

Intereach Family Day Care

Safe use of Digital Technologies and

Online environments Procedure



Applies to	Intereach Family Day Care (FDC)				
Policy	NQS Two – Children’s Health and Safety Policy				
Version	2.0	Date approved	01/12/2025	Next review date	01/12/2028

Objective

Intereach as the approved provider is committed to create an environment where children are not only physically safe but also digitally secure while ensuring their safety, health and wellbeing.

This procedure aims to ensure that all digital interactions within the service are safe, age-appropriate, and comply with relevant legislation and best practices. It supports educators, staff, and families in fostering a secure digital environment that promotes responsible use of technology and protects sensitive information.

Background

In an increasingly digital world, online and digital technologies are becoming essential tools in Early Childhood Education and Care (ECEC) environments for learning, communication, and administration. While these technologies offer significant benefits, they also present potential risks to the safety, privacy, and wellbeing of children, families, and educators. Young children are particularly vulnerable due to their limited understanding of online safety and the long-term impact of digital exposure.

Under the Education and Care Services National Regulation 168, 169 and 170 and the National Principles for Child Safe Organisation Principle 8 Children are safe online; an approved provider must ensure that policies and procedures are in place for the safe use of digital technologies and online environments at the service, which guides the safe use of digital devices, protect children's personal information and digital identities, and ensure all online practices reflect a child-safe culture.

Definitions

Relevant Person- means a person involved in the provision of an approved education and care service as any of the following:

Service authorised device (NSW) - for use in a family day care service, means a device that is

- Authorised by an approved provider of a family day care service, and
- To be used by the relevant person for the purpose of capturing or transmitting an image of a child while that child is being educated and cared for by the service, and
- Is configured to operate in accordance with any policies or procedures of the family day care service that relate to child safety or the security of devices

Service issued Device (VIC) - Family Day Care educators can take images or videos using a device if:

- that device is only used for providing education and care (and not personal use), and,
- it is registered with the approved provider.

- **Service-Supplied Device (NSW)**, for use in an education and care service, means a device that is: Supplied by an approved provider of an education and care service; and
 - To be used by a relevant person exclusively for the purposes of providing education and care to children as part of that service; and,
 - Configured to operate in accordance with any policies or procedures of the education and care service that relate to child safety or the security of devices.
- **Inappropriate Conduct:** Any behaviour by an educator, staff member, volunteer, or visitor that compromises child safety or wellbeing, as defined under the amended National Law (effective 2026).

Responsibilities

Nominated Supervisors / Coordination Unit Staff

It is the responsibility of the Nominated Supervisors and Coordination Unit staff to:

- Ensure that obligations under the Education and Care Services National Law and National Regulations are met.
- Take reasonable steps to ensure all staff and educators follow the safe use of digital technologies and online environments procedure.
- Authorise a device in writing to the used by relevant person (Family Day Care educator) for the purposes of capturing or transmitting an image or video of a child while that child is being educated and cared for by the service.
- Keep written records of the authorisation, including:
 - Date of authorisation
 - Device type (e.g. iPhone, iPad)
 - Make/Model/Serial number (if available)
 - Provider's declaration that the device meets safety and security requirements
 - Signature of the approved provider or authorised delegate
 - Date of any revocation if authorisation is withdrawn
 - securely keep records for a minimum of three years.
- Take reasonable steps to ensure the safe use of digital technologies, including smart toys, and online environments at the service.
- Ensure educators are aware of the child safe standards in relation to online safety.
- Ensure staff and educators understand how to actively supervise children while using digital technologies.
- Support educators and staff to uphold the service's culture of child safety and wellbeing, including when accessing digital technologies and online learning environments.
- Provide resources and opportunities for ongoing training.
- Regularly and spontaneously review service authorised devices of family day care educators to ensure the authorised devices are being used appropriately for the purposes of, or in connection with, the provision of education and care to children have ongoing communication with educators and staff about their responsibilities and any changes to policies, procedures and legislation, particularly as digital technologies evolve quickly.
- Communicate and provide information and resources to families on safe use of digital technologies and online environments.
- Have a register for family day care educator service authorised devices.

- Ensure all staff complete mandatory child safety and child protection training prior to commencing duties.
- With the Human Resources (HR) team, verify and maintain records of valid Working with Children Checks (WWCC) and notify regulators of any changes.
- Comply with requirements for the National Early Childhood Educator Register.
- Ensure that children's safety, rights, and best interests are the paramount consideration in all decisions and operations. Comply with regulatory information-sharing requirements and maintain workforce data in the National Early Childhood Educator Register
- Only use service issued devices from interreach to capture, store and transmit photos of children while being educated and care for by the service in all circumstances except when authorised in writing by the approved provider to have a personal device in their possession is necessary for the purposes of:
 - Providing support or assistance with the relevant persons disability or health needs.
 - Communication with the relevant persons family member.
 - Safety or the provision of education and care to the children if a service supplied device ceases working for use in an emergency, or Work health and safety.

Educators

It is the responsibility of Educators to:

- Implement the safe use of digital technologies and online environments policy and procedures;
- Ensure only authorised or service issued devices are used for the purposes of capturing or transmitting an image or video of a child while that child is being educated and cared for by the service
- Ensure they do not engage in any inappropriate conduct using technology or online environments.
- Remain vigilant that children may be subjected to inappropriate conduct electronically.
- Report any suspected or witnessed inappropriate contact immediately to the Nominated Supervisor participate in eSafety Training: e Safety Professional Learning Modules - ECA and the eSafety Commissioner (earlychildhoodaustralia.org.au), and to ensure up to date knowledge in safe practice.
- Have programs in place to educate children to be promoting safe, responsible and discerning in the use of digital technologies; for example, but not limited to, resources accessed via e-safety Commissioner website
<https://www.esafety.gov.au/educators/classroom-resources>
- Ensure use of online sites and digital technologies are learning centred.
- Ensure a risk assessment is carried out for using electronic devices,
- Ensure active supervision of children when they are using digital technologies.
- Understand and monitor for signs of online grooming or inappropriate contact through messaging, chat functions, or game platforms.
- Facilitate age-appropriate conversations that empower children to make safe decisions online and express their preferences regarding the use of technology.
- Be familiar with the [National Model Code](#) (particularly 1 and 4)

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- Recognise and respond effectively to children and young people when discussing the use of digital technologies and online environments, considering diverse needs and interests.
- Implement strict storage controls for children's digital data. Consider the security of the digital data and the privacy of children and families when using digital platforms,
- Ensure children and young people participate in decision-making in matters affecting them regarding the safe use of digital technologies and online environments at the service.
- Ensure all media consent arrangements are adhered to.
- Have regular conversations with families regarding consent.
- Ensure visitors/ household members, students and contractor refrain from using their personal devices around children.
- Provide information and resources to families on safe use of digital technologies and online environments.
- Not share group photos where children are identifiable

NB: Family Day Care educators are permitted to keep personal phones with them while providing education and care to children; however, they **must not** be used to take, store or send images of children (unless in NSW they are an authorised device)

Parents / Guardians

It is the responsibility of Parents/Guardians to:

- Read and understand the FDC Safe Use of Digital Technologies and Online Environments Procedure.
- Engage in opportunities for digital literacy education offered by the service.
- Ensure media consent is up to date.
- Support digital safety practices.
- Ensure children do not bring personal devices when attending FDC services. and,
- Not take images or videos of children within the education and care service or at events such as regular outings and excursions

Procedure

All children attending the service are provided with a safe environment through the creation and maintenance of a child safe culture, and this extends to the safe use of digital technologies and online environment.

Conducting Risk Assessments

Educators must have strict controls in place for the appropriate taking, storage and retention of images and videos of children.

Appropriate risk assessments are completed, and all identified actions are taken to minimise the risks to children's health and safety and to promote a culture of child safety and wellbeing that underpins all aspects of the service's operations (including online learning environments), to reduce risk to children (including the risk of abuse).

Educators identify and mitigate risks in the online and physical environments without compromising a child's right to privacy, access to information, social connections and learning opportunities (refer to Child Safety Standard Vic 9.1 and NSW 8).

Management of images and videos of children: Capture, use, storage and disposal

It is important to safeguard children's privacy and dignity in all digital practices and comply with the relevant legislation, child protection standards and the National principles for Child Safe Organisations when capturing, using, storing, and securely disposing of images and videos of children.

Capturing images

- Educators must use service-authorised (NSW) or service issued devices (Vic) when taking, storing or transmitting images or videos of children being educated and cared for at their service and only when written consent has been obtained from parents/guardians.
- Inappropriate images or videos are strictly prohibited from being taken, inappropriate images or videos are any that are not relevant to the child's learning and development, examples include:
 - where a child is not appropriately dressed, i.e. in their underwear;
 - in a position that could be perceived as sexualised in nature; and,
 - in a distressed or anxious state;
- Household members, visitors, students and contractors are strictly prohibited from using their personal devices to take photos, videos, or access digital content related to children in care.
- Coordination Unit will only use their service issued devices when capturing images and videos of children in care for the purposes of documenting children learning and development and educators' pedagogical practices.

Use of Digital Technology

The service may utilise secure online platforms (e.g., Harmony, Facebook, Storypark, Seesaw) to share updates and communicate with families and the broader community. When engaging in such communication, the service will ensure that:

- all content shared respects the privacy and dignity of children and families.
- appropriate consent has been obtained prior to sharing any images, videos, or personal information.
- platforms are used in accordance with the service's digital safety and child protection policies and procedures.
- communication remains professional, respectful, and aligned with the service's values and educational objectives.
- online platforms are password protected and use multifactor authentication.
- They understand where and how information is stored and the terms and conditions of the online platforms being used.
- They avoid identifying images of children where possible. and,
- all social media posts are professionally composed and accompanied by appropriate, consented photographs that reflect the values and standards of the service.

Where an educator maintains a public Facebook or Instagram business page, the coordination unit must be informed to ensure that all content shared is professional and appropriately represents the values and standards of the service.

Where sharing information or images on digital platforms, be up to date with security and privacy policies of those platforms.

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- Educators will not share images or videos of FDC children on any personal platforms under any circumstances
- Educators must not share images or videos online of children who:
 - are/have been subject to child protection, family court or criminal proceeding, or other legal matters where their identity must be protected (following legal instructions).
 - are experiencing family violence and need to stay anonymous
 - have parents who are concerned about their child's digital footprint and request limited or no online photos.

Storage of Digital documents or photos

- Where photos of children are stored, the device must be password-protected and regular security updates completed.
- Where folders can be created with additional passwords, this practice is recommended.
 - Under regulation 183, the NQF requires all records relating to a child enrolled at the service to be kept for 3 years from the last day they were educated and cared for by the service, unless the record:
 - relates to an incident, illness, injury or trauma suffered by a child while being educated and cared for by the service or may have occurred following an incident whilst being educated and cared for by the service, in which case the record must be kept until the child is age 25, or
 - is in relation to the death of a child while being educated and cared for by the service, in which case the record must be kept until 7 years after the death.
 - Relates to child sexual abuse which should be retained for at least 45 years as recommended by the Royal Commission
- All images and videos must be deleted once they have served their intended purpose and regulatory requirements. For example, images of children should not be retained on personal devices for personal keepsakes or mementos by educators.

Disposal of electronic documents

All electronic data must be kept for the timeframes stated under "Storage of Digital Documents or Photos" and then destroyed properly.

- Australian Privacy Principles 11.1 and 11.2 require personal information to be protected then destroyed or de-identified when it's no longer needed. Make sure electronic records are completely removed, not just deleted.

Use of Artificial Intelligence (AI)

Intereach FDC, including educators, may engage the use of Artificial Intelligence tools. AI can complement an educator's skills, however, must always be used in a manner that prioritises the safety and wellbeing of children.

- Never share personal information about children or others when using AI tools. For example, if using an AI tool to summarise a child's learning experiences, always remove any identifying details before entering them into the tool. Use random initials and birthdates.
- Do not include images or videos into AI tools.
- Any content created by AI will be checked by an educator to make sure it is accurate and appropriate.

- Assume any information being input into generative AI tools could become public and think about what is appropriate to include.
- Communicate to families that AI is being used.
- Only used paid and verified AI tools to ensure the highest standards of data protection and privacy such as Copilot.

Consent for digital content

Parental/guardian consent is required before capturing or sharing any digital content involving children. Parents have the right to withdraw consent at any time.

Permission will be sought from children before taking their image or video and explained how the image or video will be used in age-appropriate ways with their responses respected. Children will not be forced or manipulated into having their photo taken.

Use of Optical Surveillance (E.g. CCTV)

Surveillance equipment is permitted to be installed however must be positioned to respect privacy. The Coordination unit and Families must be informed about the surveillance and where it is located if surveillance records people:

- individuals, must be informed before they're recorded, that their personal information may be captured.
- clear signage, that is easy to understand, must be available to indicate the presence of surveillance equipment. and,
- ensure only authorised people have access to recorded data, these people include educators, service staff and department of education staff and where necessary police.

Cameras and devices connected to the internet can be hacked, so it's important to keep them secure. For example, the connection of webcams and baby monitors to wireless networks add extra privacy risks because of the increased possibility of data being intercepted by people using electronic hacking devices.

The use of digital devices by children

Educators will ensure active supervision of children when using devices.

- Check privacy settings and age restrictions regularly.
- Check the risks of smart toys and, where possible, disconnect them from the internet to avoid hacking.
- Turn off chat functions on apps and games.
- Choose app settings that turn off location sharing and enable privacy controls.
- Children will be supported to develop age-appropriate understanding of:
 - Online safety and respectful technology use.
 - How to seek help if they feel unsafe or unsure online.
- Children will have a voice in decisions involving their digital presence.
- Use the eSafety Commissioner's play-based resources based on the Mighty Heroes bush characters (animations and activities) to explore digital concepts like protecting personal information, respectful relationships and being a good digital citizen.
- Communicate with children and families about online risks (in an age and developmentally appropriate way), using conversation starters from the eSafety Commissioner: Talking about child sexual abuse online with 0- to 12-year-olds. Inform

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families about how the service communicates with children about these issues, ahead of time, to build a shared understanding of child safety.

- Children will not be permitted to use personal devices from home when attending FDC.

Use of screen time

The Australian Department of Health provides research-based recommendations for physical activity, sedentary behaviour, and sleep for children and young people. Educators will be encouraged to implement these guidelines in their daily practice, including the following: Across a 24-hour period, it is recommended:

- infants younger than 2 have no screen time;
- children aged 2-5 have no more than one hour of screen time per day; and,
- children and young people aged between 5-17 years have less than 2 hours a day of sedentary recreational screen time.

These time limits do not include the screen time spent on educational activities. (Refer to *Physical activity and Small Screen Time Procedure*).

Visit the Australian Department of Health's [Physical Activity and Sedentary Behaviour Guidelines](#)

Engaging family

Families will be informed about the service's digital safety procedures, including:

- platforms and tools in use at FDC;
- their child's access to digital devices (if any); and,
- how media consent is managed and upheld.

Families are encouraged to raise any concerns or questions about digital safety practices.

Responsible use of technology

- The use of Television, watching DVD's, streaming educational programs, accessing online based educational games and online research activities will be kept to a minimum. (Refer to *Physical Activity and Screen Time Procedure*).
 - Programs/games depicting violence and/or inappropriate content (including graphic news reports) will not be shown.
 - TV programs, DVD or streamed programs will only be shown that have positive educational messages about relationships, family and life and must be classified G (General) under the Australian Classification rating.
 - Information about programs to be viewed will be shared with families beforehand to ensure that they approve of the content.
 - All content will be socially and culturally considerate and appropriate.

Inappropriate Conduct

- Educators must not engage in any inappropriate conduct toward children through the use of technology or online environments. This includes, but is not limited to:
 - Sending, posting, or sharing messages, images, or videos that are disrespectful, harmful, or exploitative.
 - Using digital platforms for personal communication with children outside approved service channels.
 - Engaging in grooming, bullying, or any behaviour that compromises a child's safety or wellbeing.

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- Educators must remain vigilant that children may be subjected to inappropriate conduct either directly or indirectly, including as a witness to conduct captured electronically. Examples include:
 - - Exposure to inappropriate language, gestures, or actions in photos or videos.
 - - Viewing or overhearing harmful interactions during video calls or recordings.

Reporting concerns or breaches

All breaches or concerns about digital or online safety must be reported to the Family Day Care Coordinator or approved provider immediately.

If child safety is compromised, appropriate child protection procedures will be followed in responding to online incidents. (Refer to: [Quick reference guides for responding to online safety incidents.pdf](#))

All incidents will be recorded, reviewed, and addressed in a timely manner.

Responding to online incidents

Responding to online incidents effectively is crucial to minimize harm and ensure safety. Refer to the quick reference guide for responding to online safety incidents. Refer to [Quick Reference guide for responding to online safety incident](#) (eSafety.gov.au) for steps to follow when an incident is identified.

If an incident occur, educators and staff will:

- take action immediately - If the incident involves a device will disconnect the device and report it as an incident.
- determined the nature and the scope of the incident and evaluate impacts to service.
- take steps to contain such incident and to prevent it from happening again; and,
- communicate the incident and the actions taken to families and other relevant parties (Refer to Intereach Risk Management Policy, Incident Management Policy and Incident, Injury, Trauma and Illness Procedure)

Evaluating measures

The incidents, complaints and feedback from children and families will be tracked for evaluating purposes and assessing staff confidence and training uptake annually.

Children's voices will be gathered through age-appropriate methods (e.g., drawings, discussions, storytelling) to shape digital learning environments.

Breach Consequences

Breaches of child safety obligations, including inappropriate conduct, may result in regulatory action, penalties, or criminal charges under the amended National Law.

Monitoring, evaluation and review

This procedure will be reviewed every three years and incorporate feedback and suggestions from children, families, educators, coordinators, volunteers, and students.

National Quality Framework

Element	Concept	Description
2.1.2	Health practices and procedures	Effective illness and injury management and hygiene practices are promoted and implemented.

Element	Concept	Description
2.2.1	Supervision	At all times, reasonable precautions and adequate supervision ensure children are protected from harm and hazard
2.2.2	Incident and emergency management	Plans to effectively manage incidents and emergencies are developed in consultation with relevant authorities, practiced and implemented
2.2.3	Child Safety and protection	Management, educators and staff are aware of their roles and responsibilities regarding child safety, including the need to identify and respond to every child at risk of abuse or neglect
3.1.1	Fit for purpose	Outdoor and indoor spaces, buildings, fixtures and fittings are suitable for their purpose, including supporting the access of every child.
3.1.2	Upkeep	Premises, furniture and equipment are safe, clean and well maintained.
3.2.1	Inclusive environment	Outdoor and indoor spaces are organised and adapted to support every child's participation and to engage every child in quality experiences in both built and natural environments.
4.1.1	Organisation of educators	The organisation of educators across the service supports children's learning and development.
7.1.1	Service philosophy and purpose	A statement of philosophy guides all aspects of the service's operations.
7.1.2	Management Systems	Systems are in place to manage risk and enable the effective management and operation of a quality service that is child safe.
7.1.3	Roles and responsibilities	Roles and responsibilities are clearly defined, and understood, and support effective decision making and operation of the service.
7.2.1	Continuous improvement	There is an effective self-assessment and quality improvement process in place.
7.2.3	Development of professionals	Educators, coordinators and staff members' performance is regularly evaluated, and individual plans are in place to support learning and development.

Compliance and Reference

Legislation	<p>Relevant legislation and standards include but are not limited to:</p> <p>Education and Care Services National Law Act 2010</p> <p>Education and Care Services National Regulations 2011</p> <p>Education and Care Services National Law Amendments (VIC & NSW) effective Jan 2026.</p> <p>Early Childhood Australia Code of Ethics</p> <p>Information Privacy Act 2000 (Vic)</p> <p>National Quality Standard, Quality Area 2: Children Health and Safety and Quality Area 7: Governance and Leadership</p> <p>National Principles of Child Safe Organisations – Principal 8 national-principles-for-child-safe-organisations.PDF (childsafety.gov.au)</p> <p>Occupational Health and Safety Act 2004 (Vic)</p> <p>Privacy Act 1988 (Cth)</p> <p>United Nations Convention on the Rights of the Child</p> <p>The most current amendments to listed legislation can be found at:</p> <p>Victorian Legislation – Victorian Law Today: www.legislation.vic.gov.au</p> <p>Commonwealth Legislation – Federal Register of Legislation: www.legislation.gov.au</p>
Standards or other external requirements	<p>Australian Privacy Principles</p> <p>Information Privacy Principles (Vic)</p> <p>National Model Code</p> <p>National Quality Standards</p> <p>Child Safe Standards NSW</p> <p>Child Safe Standards VIC</p>

External Documents	<p>Early Childhood Australia Statement on young children and digital technology: http://www.earlychildhoodaustralia.org.au/wp-content/uploads/2018/10/Digital-policy-statement.pdf</p> <p>Early Year Learning and Development Framework: https://www.acecqa.gov.au/nqf/national-law-regulations/approved-learning-frameworks</p> <p>eSafety Commissioner: https://www.esafety.gov.au/</p> <p>eSafety's professional learning modules: https://www.esafety.gov.au/educators/training-for-professionals/early-years</p> <p>Online Safety Agreement: https://www.esafety.gov.au/educators/early-years-program/online-safety-agreement</p> <p>The eSafety Guide: https://www.esafety.gov.au/key-issues/esafety-guide</p> <p>Child Safe Organisations - Checklist for Online Safety</p> <p>The Playing IT Safe Framework and Alignment: https://playingitsafe.org.au/</p> <p>Approved Early Years Learning and Development Frameworks: https://www.acecqa.gov.au/nqf/national-law-regulations/approved-learning-framework</p> <p>BELONGING, BEING & BECOMING - THE EARLY YEARS LEARNING FRAMEWORK ACECQA</p> <p>MY TIME, OUR PLACE - FRAMEWORK FOR SCHOOL AGE CARE IN AUSTRALIA ACECQA</p>
Internal documents	<p>Intereach Privacy Policy</p> <p>Intereach Social Media Policy</p> <p>Intereach Data Security and Retention Policy</p> <p>Intereach Child Safe Policy</p> <p>Intereach Code of Conduct Policy</p> <p>Intereach Risk Management Policy</p> <p>Intereach Incident Management Policy</p> <p>Incident, Injury, Trauma and illness procedure</p> <p>Physical activity and screen time Procedure</p> <p>Device authorisation form</p>

Document Control

Version	Date approved	Approved by	Next review date
1.0	1 September 2025	J Farrow - Manager Education and Care	1 September 2028
2.0	1 December 2025	Procedure updated to reflect regulation changes: Approved by: K Hyde – General Manager, Operations	1 December 2028