

Intereach Children’s Services

Safe use of Digital Technologies and Online Environments Procedure



Applies to	Intereach Out of School Hours (OOSH) and Preschool Services for children aged 3-5 years				
Policy	NQS Two: Children’s Services Health and Safety Policy				
Version	2.1	Date approved	27/02/2026	Next review date	18/12/2028

Objective

To ensure the safe, ethical, and developmentally appropriate use of digital technologies and online environments in early childhood and OOSH settings, protecting children’s rights, privacy, and wellbeing in line with national regulations and child safe standards.

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.

Key Principles

- **Child Safety First:** Digital technology use must prioritise children’s safety, dignity, and developmental needs.
- **Transparency and Consent:** Families are informed and provide consent for digital media use.
- **Data Protection:** Secure handling of digital content and personal information.
- **Developmentally Appropriate Use:** Technology is used to enhance learning, not replace human interaction.
- **Compliance:** Adherence to all relevant legislation, regulations, and standards.

Definitions

Digital Technologies: Devices and platforms including tablets, computers, cameras, smartboards, and internet-based applications.

Online Environments: Any digital platform or service accessed via the internet, including educational apps, websites, and communication tools.

Service-Issued Devices: Devices provided by the service for educational or administrative use.

Personal Devices: Privately owned devices such as mobile phones, smartwatches, or USB drives.

Paramount Consideration: The safety, rights and best interests of children must become the paramount consideration in the operation of an education and care service

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 Supervisor

- Implement and regularly review a Safe Use of Digital Technologies and Online Environments Policy in line with:
 - Education and Care Services National Regulations (Regs 168, 169, 170)
 - National Quality Standard (NQS) – especially Quality Areas 2 (Children’s Health and Safety) and 7 (Governance and Leadership)
 - National Model Code for taking images/videos of children
- Ensure media consent is obtained, documented, and reviewed annually via enrolment forms
- Ban personal devices for children, families, visitors, and staff unless for essential, authorised purposes
- Conduct risk assessments before introducing or using any digital technologies or online platforms
- Maintain a register of service-issued digital devices; personal devices must not be used as substitutes.
- Provide training and guidance to staff on safe digital practices.
- Ensure compliance with the Education and Care Services National Law and National Regulations.
- Approve and monitor the use of digital technologies and online platforms within the service.
- Prohibit staff, visitors, and others from carrying personal electronic devices capable of capturing images or video (e.g., phones, tablets, smartwatches) while in the presence of children.
- Ensure children’s personal digital devices (e.g., smartwatches, smart toys) are securely stored during their time at the service.
- Only allow the use of service-issued devices for capturing images or videos of children for documentation purposes.
- Provide initial and ongoing training to staff on safe digital practices and child safe standards related to online safety.

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- Ensure staff understand and implement active supervision strategies when children are using digital technologies.
- Support staff in upholding a culture of child safety and wellbeing, including in digital and online environments.
- Take reasonable steps to ensure all staff and educators follow the service's procedures for safe use of digital technologies and online environments.
- Monitor the use of digital technologies to ensure they are used appropriately and safely.
- Maintain ongoing communication with staff about their responsibilities and any updates to policies, procedures, or legislation.
- Provide families with information and resources on the safe use of digital technologies and online environments.
- 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

Responsible Person

- Oversee daily implementation of the procedure.
- Ensure staff and educators follow the approved practices.
- Report any breaches or concerns to the Nominated Supervisor.

Staff and Educators

- Use only service-issued devices for capturing or storing children's images or videos.
- Personal electronic devices will be restricted while working directly with children unless for authorised essential purposes.
- Use their own devices during breaks, as long as the break is off the floor and they are not responsible for supervising children during that time.
- Smart watches must not be used if they have the capability to take photos or record images.
- Supervise children's use of digital technologies.
- Complete child safety training before starting work and refresh annually.
- Report any inappropriate conduct immediately.
- Model safe, respectful, and responsible digital behaviour.
- Complete training on digital safety and data protection.
- Complete eSafety Professional Learning Modules via [Early Childhood Australia & eSafety Commissioner](https://www.esafety.gov.au) [esafety.gov.au]
- Stay up to date with online safety practices, policies, and emerging risks
- Ensure active supervision when children are using digital technologies
- Monitor for signs of online grooming, inappropriate contact, or unsafe digital behaviour

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- Understand and follow the [National Model Code](#) and service expectations around device use
- Seek guidance from the Nominated Supervisor or Team Leader when unsure
- Embed digital safety education into the program using age-appropriate resources (e.g., eSafety classroom resources)
- Facilitate conversations that empower children to:
 - Make safe choices online
 - Express their preferences about technology use
 - Understand the importance of privacy and consent
- Implement strict storage controls for children's digital data
- Ensure secure handling, storage, and destruction of images, videos, and digital records
- Do not share group photos where children are identifiable without explicit consent
- Communicate that personal devices are banned at the service unless essential
- Provide resources and information to families on digital safety and online environments
- Encourage families to:
 - Read and understand the service's digital safety procedures
 - Keep media consent up to date
 - Support and reinforce digital safety practices at home
 - Avoid taking photos/videos at the service or during excursions
 - Ensure children hand in personal devices upon arrival at the service
 - Must refrain visitors, contractors, students or volunteers from using personal devices around children;
 - Visitors, contractors, students or volunteers must be supervised at all times and follow the service's digital safety protocols

Parents/Guardians

- Read and understand the procedure for safe use of digital technologies and online environments.
- Provide written consent for the use of their child's images or videos.
- Understand that they can withdraw or change consent at any time.
- Engage with the service about digital safety practices.
- Report any concerns regarding digital technology use.
- Participate in digital literacy education offered by the service.
- Check that media consent forms for children are current and up to date.
- Support and follow digital safety practices within the service.
- Ensure children hand in digital devices to staff upon arrival for secure storage until pickup.
- Do not take photos or videos of children at the service or during outings/excursions.
- Talk to children and educate them about the procedure and their responsibilities to follow it.
- Ensure not to take photos or videos of children while on the education and care service premises, during regular outings, or on excursions. Parents and guardians must also

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refrain from sharing any images on social media where other children may be visible in the background.

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.

- **Use of Devices:** Only service-issued devices may be used for educational or documentation purposes. Personal devices must be stored securely and not used in child-accessible areas.
- **Image and Video Capture:** Written parental consent is required before capturing or using any child's image or video. Images/videos must be stored securely and deleted when no longer needed.
- **Online Safety:** Children's access to online environments must be supervised and age appropriate. Educators must assess digital content for suitability and safety.
- **Data Security:** All digital records must be stored on secure, encrypted platforms. Access to digital content is restricted to authorised personnel only.
- **Incident Management:** Any breach of this procedure must be reported immediately to the Nominated Supervisor. Incidents involving child safety must be reported to the Regulatory Authority within 24 hours.
- **Training and Review:** All educators, staff, students, and volunteers must complete approved child safety and child protection training before commencing duties, and participate in annual refreshers.

Risk Assessments and Action Plans

- Services must complete risk assessments and develop action plans to:
 - Minimise risks to children's health, safety, and wellbeing.
 - Promote a culture of child safety across all service operations, including online environments without compromising a child's right to privacy, access to information, social connections and learning opportunities.
- Risk management must be ongoing, documented, and responsive to feedback from staff, children, and families in line with NQS Quality Area 2.2.1 and Child Safety Standards NSW 8.

Management of Image and Videos of children

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.

- Strict controls must be in place for the storage, retention, and destruction of children's images and videos.
 - Aligns with Regulation 168 and ACECQA's Safe Use of Digital Technologies Guidelines. [acecqa.gov.au]
- Only service-issued devices are permitted for capturing images/videos.
- Personal devices must be stored away when working directly with children.
- Written parental consent is required before capturing or using any image or video.
- Consent must specify purpose, duration, and right to withdraw.

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- Images/videos must be stored on secure, encrypted platforms with restricted access.
- No personal cloud storage, USBs, or external drives allowed.
- Images/videos must be securely deleted when no longer needed or when consent is withdrawn.
- Staff are not permitted to use personal digital devices (such as smartphones or tablets) for work-related purposes including programming, communication, or capturing images of children.:
- Written consent has been obtained from parents/guardians for any images or videos.
- 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.
- Visitors, contractors, students and volunteers are strictly prohibited from using their personal devices to take photos, videos, or access digital content related to children in care.
- Any child support services that visit the service are only permitted to use business/employer issued devices (i.e. laptops and tablets) where it is required to perform their professional functions (i.e. taking notes/observations, filling in forms, part of a child's therapeutic treatment such as speech therapy applications etc.) where it would impede their ability to carry out their professional function without it. No photos are to be taken unless parent authorisation is sought.

Use of Digital Technology

The service may utilise secure online platforms (e.g., Harmony, Authorised Educational Programming Apps) 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;
- understand where and how information is stored and the terms and conditions of the online platforms being used;
- 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.
- When images are taken for the purpose of social media, parent consents are in place, and images are shared securely with our Communications and Marketing teams who will adhere to security and privacy obligations before posting.

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- Staff will not share images or videos of OOSH or Preschool children on any personal platforms under any circumstances.
- Staff must not share images or videos of children for social media purposes 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 are 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. 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 above under 4.2. 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)

OOSH staff and educators may be permitted to use Artificial Intelligence tools (AI) if done responsibly and without compromising the safety and wellbeing of children.

- AI tools can support educators in tasks like:
 - Documentation and observations
 - Planning learning experiences
 - Compliance reporting
 - Communication with families
- AI must not replace educator judgment or relationships with children and families.
 - Educators must remain the authors of documentation and decision-making.

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- AI use must reflect actual practice in the service.
 - Information generated by AI (e.g., for Quality Improvement Plans) must be accurate and based on real service operations.
- 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.

Authorisation for sharing 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 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 to wireless networks adds 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.

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- 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 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: For example "Talking about child sexual abuse online with 4 to 12-year-olds". Inform 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 including iPads, laptops, smart watches and smart toys from home (or school issued) when attending OOSH. Devices are stored securely until collection of child at the end of service

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. Staff are encouraged to implement these guidelines in their daily practice, including the following: Across a 24-hour period, it is recommended:

- Screen time is not recommended for children younger than 2 years; and,
- for children 2 to 5 years, screen time should be no more than one hour in total throughout the 24-hour period.
- Children and young people aged between 5-17 years have less than 2 hours a day of sedentary recreational screen time.

The amount of time spent on screens will be limited;

- to experiences involving screen that have an educational component – including movement;
- to encourage the promotion of productive sedentary experiences for rest and relaxation; and,
- to ensure that an appropriate balance between inactive and active time is maintained each day.
- The role of screen time in their lives is discussed with children and they are supported in making healthy choices about their use of screen time for both education and recreation.
- Appropriate screen behaviours are modelled to the children.
- Under no circumstances is the screen to be used as a reward or to manage challenging behaviours.
- 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 OOSH;
 - their child's access to digital devices (if any); and,

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- 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.
- 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. PG programs will require parent consent before implementation.
- 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.

Reporting concerns or breaches

- All breaches or concerns about digital or online safety must be reported to the Nominated Supervisor or Team Leader immediately.
- If child safety is compromised, appropriate child protection procedures will be followed.
- 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 occurs, staff will:

- take action immediately - If the incident involves a device staff will disconnect the device and report it as an incident;
- determine 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 Illness, incident, Injury, Trauma, infectious disease and immunisation 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, staff, volunteers and students or when there is a legislative change.

Governance processes will prioritise child safety and compliance with regulatory obligations, including workforce data reporting and information-sharing requirements.

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.
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, 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.

Element	Concept	Description
7.2.3	Development of professionals	Educators, 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 and Regulations – Amendments effective 1 January 2026 (Child Safety Enhancements)</p> <p>National Early Childhood Educator Register requirements</p> <p>Increased penalties and enforcement provisions under NQF</p> <p>Early Childhood Australia Code of Ethics</p> <p>National Quality Standard, Quality Area 2: Children Health and Safety and Quality Area 7: Governance and Leadership</p> <p>National Principals of Child Safe Organisations – Principal 8 national-principles-for-child-safe-organisations.PDF (childsafety.gov.au)</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>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>External Documents</p>	<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>My Time Our Place Frameworks for School Age Children: My Time Our Place Framework</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 BELONGING, BEING & BECOMING - THE EARLY YEARS LEARNING FRAMEWORK ACECQA MY TIME, OUR PLACE - FRAMEWORK FOR SCHOOL AGE CARE IN AUSTRALIA ACECQA</p>
<p>Internal documents</p>	<p>Intereach Privacy Policy Intereach Social Media Policy Intereach Data Security and Retention Policy Intereach Child Safe Policy Intereach Code of Conduct Policy Intereach Risk Management Policy Intereach Incident Management Policy Illness, Incident, Injury, Trauma, Infectious Disease and immunisation procedure Authorisation for Device Use form</p>

Document control			
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1.0	02/09/2025	J Farrow - Manager Education and Care	03/09/2028
1.1	31/10/2025	Procedure updated to include requirements for Preschool children and approved by: N Brown, Compliance, Safety and Risk Manager	03/09/2028
2.0	18/12/2025	Includes new governance obligations under the Education and Care Services National Law amendments effective 1 January 2026. Approved by: K Hyde – General Manager, Operations	18/12/2028
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