

# Early Years Services – QA2.18 The safe use of digital technologies and online environments

TRIM Reference: D16/36657 Due for Review: 1 March 2027  
Responsible Officer: Coordinator Early Years

## Purpose

To ensure the safe use of digital technologies and online environments at the service. It's important to keep children safe when using digital technologies and online environments as part of the educational program. Children have the right to quality education and care in a safe environment, including when using digital technologies and online.

This policy outlines Surf Coast Shire Council's commitment in:

- The taking, use, storage and destruction of images and videos of children being educated and cared for by the service.
- Obtaining authorisation from parents to take, use and store images and videos of children being educated and cared for by the service.
- The use of any optical surveillance device at the service (eg. closed-circuit television).
- The use of any digital device issued by the service.
- The use of digital devices by children being educated and cared for by the service.
- Providing guidelines so that educators, families, volunteers and early years students are aware of their responsibilities in regard to maintaining appropriate use of digital technologies and online environments as part of the educational program within Early Years services.
- Ensuring that staff and families are informed of the expectations and guidelines when using digital technologies and online environments as part of the educational program.
- Ensuring volunteer, students and contractors are informed of the expectations and guidelines when using digital technologies and online environments within the Early Years service.

## Policy Principles

National Quality Standards 1.1.1, 1.1.3, 2.1.2, 2.2.3, 3.1.1, 3.1.2, 5.1.1, 5.2.2, 6.1.2, 6.2.1, 7.1.1, 7.1.2  
Education & Care Services National Regulations: 76, 81, 84, 115, 122, 123, 124, 165, 166, 167, 168, 170, 171, 172, 175, 176

Education and Care Services National Law 2010: 162A, 165, 167

Child Safe Standards: 2, 3, 4, 8, 9, 11

ACECQA - National Model Code – Taking images in early childhood education and care 2024

All children attending our early years services 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 environments.

Children's wellbeing is paramount and children will be actively involved in decision-making about the safe use of digital technologies and online environments at the services, including taking, using and sharing an image or video of them on a digital device, whether by adult or child.

Management, educators, and staff are aware of their roles and responsibilities to identify and respond to every child at risk of child abuse or maltreatment, including abuse or maltreatment that may occur through digital technologies and online environments.

Approved providers, nominated supervisors, educators, volunteers and students, take reasonable precautions and use adequate supervision to ensure children are protected from harm that may occur through digital technologies and online environments.

Procedures to effectively manage incidents and disclosures are in place.

In adopting the National Model Code, our early years services consider the purpose and use of electronic and digital devices across each service and communicates clear expectations for educators, other staff and volunteers, to ensure child safe practices are implemented for the use of electronic and digital devices while providing early childhood education and care.

### Scope

This policy applies to all Surf Coast Shire Council Early Years Services staff, students, volunteers, contractors, children and families accessing the Early Years service.

### Policy

Digital technologies and computers have become an integral part of many children's daily lives. For this reason, it is important that our Educators are not only familiar with the use of computer technologies but are able to guide children's understanding of, and ability to use them. Electronic Devices and Media items will only be used as an extension to the daily program assisting in development of social, physical, emotional, cognitive, language and creative potential of each child. Quality TV programs can be helpful in the retelling of stories about our culture and help to celebrate diversity.

Surf Coast Shire Council is committed to ensure that Council maintains quality education and care programs that provides a safe environment when utilising electronic devices.

Adults within the kindergarten environment including staff, parents, volunteers, students, visitors and contractors must not use any personal device to record or take photos of children. Staff may only use their personal device(s) during a rostered break, and only in an area that is not used for the education and care of children. Any adult that witnesses any incidence or suspicion of inappropriate behaviour or becomes aware of the transmission of any illegal material, must report it immediately.

Surf Coast Shire as the Approved Provider will:

- Ensure strict controls are in place for appropriately storing and destroying children's images and recordings.
  - At the end of the year, staff are requested to delete all images of children off their laptop - IT perform audits of up to 5 random laptops to ensure this is upheld
  - All service provided electronic tablets and phones are labelled and collected at the end of the year for image data destruction
  - Laptops are upgraded every 4 years; IT perform data destruction on all laptops when they change over
- Meet their legislative obligations to ensure every reasonable precaution is taken to protect children from harm and hazard, including when using digital technologies and online environments
- Obtain authorisation from parents to take, use and store images and videos of children being educated and cared for by the service

- Ensure staff do not use their personal mobile phone or electronic device that can record or take images when working with children
- Provide timely and effective identification of, and response to, children who may be at risk of or are experiencing abuse or maltreatment through digital technologies and online environments. This includes appropriate notification to the relevant regulatory authorities, where required.
- Monitor for any data transfers between devices issued by the service and any other devices, ensuring device use is authorised and/or for approved purposes as per the National Model Code
- In adopting the National Model Code, our service considers the purpose and use of electronic and digital devices across the service and communicates clear expectations for educators, other staff and volunteers, to ensure child safe practices are implemented for the use of electronic and digital devices while providing early childhood education and care
- Take reasonable steps to ensure that all staff, volunteers, contractors, families and children follow the *safe use of digital technologies and online environments policy*
- Ensure that copies of the policy and procedures are readily accessible to nominated supervisors, coordinators, educators, staff, families and are available for inspection.
- Ensure that CCTV is not used within the licensed spaces without parental permission.
- Ensure that CCTV that is used in common areas of services have signs displayed to acknowledge use

### **Nominated supervisors will:**

- Ensure staff understand how to actively supervise children while using technologies at their services and child ratios are met to ensure adequate supervision
- Ensure all staff know where to access the *safe use of digital technologies and online environments policy*.
- Have ongoing communication with educators and staff about their responsibilities and any changes to policies, procedures and legislation, particularly as digital technologies evolve quickly.
- Support educators and staff to uphold the Surf Coast Shires culture of child safety and wellbeing, including when accessing digital technologies and online learning environments.
- Support educators and staff to understand the National Model Code and manage the use of electronic and digital devices at the service, including the service's expectations around the use of personal and service issued devices.
- When required, utilise the National Quality Framework Online Safety Self – Assessment & Risk Assessment Tool with their service staff annually

### **Educators will:**

- Not use 'personal electronic devices', this includes any device that can take images or videos, such as mobile phones, digital cameras, tablets, smart watches and other new and emerging technologies, where those technologies have image taking or video recording capability, while providing education and care and working directly with children.
- Not use or have possession of unapproved / personal storage media devices, for example, an SD card, USB drive, hard drive or use of a cloud-based application which can store images or video recordings.

- Ensure all SCS electronic devices (excluding laptops) remain at the services at all times and are only taken off site on regular outings, excursions and emergencies (SCS mobile phones and iPads are not to be taken home).
- Adhere to the SCS confidentiality policy, all SCS electronic devices are locked away at end of educational and care sessions.
- Ensure all images or videos captured on mobile phones, iPads, laptops and other storage devices are deleted at the end of each year or when the child leaves the service.
- Ensure all images or videos captured are directly relevant to the educational program and kept to a minimum.
- Ensure at the end of the year all mobile phones and iPads are clearly named and handed in for servicing / and data destruction of all images/videos.
- Seek approval to use their personal mobile phone for essential purposes only by completing the Request to Use Personal Mobile Phone – D25/14977
- Ensure they do not take images or videos of children with their electronic device if they have an authorised exemption allowing them to use their personal electronic device.
- Have read the Early Years Safe use of digital technologies and online environments policy and have a thorough understanding of their obligations under the Childrens Services Regulations 2020 and Education and Care Services National Law Act 2010.
- Notify the Team Leader, immediately if they see other staff inappropriately using personal or SCS issued electronic devices within the service.
- Inform all relevant parties (such as their family and friends and their children’s school or childcare centre) how to contact them through the service phone in case of an emergency.
- Accept and Sign requirements outlined in the electronic device agreement annually.
- Only use service-issued electronic devices when taking images or videos of children while providing education and care.
- Obtaining parental authorisation to take, use and store images and videos of children.
- Not share any digital images of children and families without parent permission.
- Know which children are not to be filmed or photographed.
- Ensure COMMS are involved with any media releases.
- Implement the Surf Coast Shires culture of child safety and wellbeing, including when accessing digital technologies and online learning environments.
- Actively supervise children when they are using digital technologies, including by monitoring and maintaining staff to child ratios.
- Ensure children participate in decision-making in matters affecting them regarding the safe use of digital technologies and online environments at the service.
- Have access to the National Model Code and the services expectations around the use of personal and service issued devices while at the service and seek guidance when needed from the nominated supervisor or approved provider.

## Programming and Planning

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.

When using digital technology for programming and planning purposes, educators will:

- Only use approved platforms to document children's learning, for example Kinderloop and Xplor.
- Ensure families have approved use of this platform on their child's enrolment form.
- Obtain parent consent to film or photograph their child for use in the educational program on the child's enrolment form.
- Know which children are not to be filmed or photographed.
- Not share any digital images of children and families without parent permission.

## Viewing of Films/Movies

*Many Early Learning services regularly use films and television programs as part of their programming—whether for educational purposes, group activities, or quiet-time entertainment. While these screenings are common, it's important to note that showing films in any setting outside the private home—including Early Years services—constitutes a “public performance” and therefore requires a Public Performance Licence (PPL).*

## Surf Coast Shire Council's Obligations

*Under Australian copyright law, the public performance of copyrighted films without permission or an appropriate licence may infringe the rights of the copyright holder. As the governing body responsible for the operation or oversight of Early Years services, councils have a duty to ensure that all sites under their management are operating within the law and not inadvertently breaching copyright through unlicensed film use.*

*Therefore, the educational exemption will apply where:*

- *The audience is limited to the people who are receiving or giving the educational instruction; and*
- *The film is being shown “in the course of education” and not for profit.*

*If a film is being shown for reasons other than direct educational instruction (e.g. rainy-day activity, good behaviour reward etc) it is considered a non-educational purpose, and a specific copy-right licence is required to avoid infringement.*

*As we do not have a specific copy-right licence **ALL** film/movies are **NOT** to be screened at any of Surf Coast Shire operated Early Years Services, unless it is for educational instruction, and this is written into your direct educational program.*

**Educators must adhere to the following guidelines for use of digital technologies and online environments as part of the educational program within our services:**

- Programs must be carefully selected and be suitable to the needs and development levels of each child using various types of technology or media.
- Any films, videos or any other digital programs being used as part of the educational program is to be viewed prior to showing and be documented into the educational program.
- Digital Technology is used to assist in expanding the content of the daily program and build on children's learning and inspire the ongoing and enthusiastic acquisition of knowledge through technology.
- Provide children with access to technology to help develop their computer literacy skills.
- Endeavour to limit experiences involving screen use to those which have an educational component – including movement.
- Electronic devices accessible to children throughout the program must have a password login system managed by educators.
- Programs are chosen that are engaging and age appropriate to children, that support children's natural curiosity for technology within the service.
- The use of Electronic Devices will be kept to a minimum, respecting service, children and families input.
- Discuss with children the role of screen time in their lives and support them in making healthy choices about their use of screen time for both education and recreation.
- Programs depicting violence eg. graphic news reports will not be shown.
- Children are to view 'G' rated programs only as per the Office of Film and Literature Classification or equivalent body.
- TV programs or videos will only be shown that have positive messages about relationships, family, and life.
- All media will be previewed prior to using any streaming media such as music or videos prior to using it in the classroom.
- All content will be socially and culturally considerate and appropriate.
- Model appropriate screen behaviours to the children.
- Encourage the promotion of productive sedentary experiences for rest and relaxation.
- Ensure that an appropriate balance between inactive and active time is maintained each day.
- Not use a screen as a reward or to manage challenging behaviours.

**Artificial Intelligence (AI)**

Using AI for everyday practice

AI can be used to support practice without sacrificing professional autonomy or the genuine relationships educators build everyday with children and families.

While AI can be a valuable tool for tasks such as translating a story or refining an observation, it should never replace the core professional responsibilities of an educator.

The foundation of effective pedagogy remains an educator's ability to draw upon research, deep content knowledge, and evidence-based practices. After all, it is through nuanced observation and thoughtful reflection that an educator truly gains a profound understanding of a child's unique identity and learning journey.

Warnings and considerations when using AI:

- AI can make up information, so always fact-check.
- AI may reflect bias from its training data.
- AI can miss important context or nuance.
- Entering sensitive data into AI can risk privacy.
- You are responsible for the final output, not the AI.
- You must not upload photos of children.

While AI can be a big time-saver, continuous critical reflection is paramount. While an AI model might write a piece of documentation, it is important to question: "Is that accurate? Is that fair? Is that appropriate? An educator's role is not to simply accept AI output but to use it as a starting point."

Fact-checking is imperative because AI systems are known to 'hallucinate' or produce inaccurate, nonsensical or false results, despite presenting them in a plausible way.

Bias is another key concern as AI systems may have been trained on wrongful information and may perpetuate and amplify stereotypes or lead to discrimination. This is particularly worrying for children and families experiencing vulnerability, who are more susceptible to discrimination, or simply may not be considered in planning, due to algorithmic bias if they are not properly represented in datasets.

### **Use of personal devices**

**If use of personal device is required, staff are required to complete a request for approval.**

Essential purposes for which use and / or possession of a personal electronic device may be authorised for purposes other than taking images or recording videos of children include:

- communication in an emergency situation involving a lost child, injury to child or staff member, or other serious incident, or in the case of a lockdown or evacuation of the service premises, and or local emergency event occurring ie. bush fire
- personal health requirements, eg. heart or blood sugar level monitoring or disability
- family necessity, eg. a worker with an ill or dying family member
- technology failure, eg. when a temporary outage of service-issued electronic devices has occurred

**Staff should never use a personal electronic device to photograph children, or record audio or visual images of children for any purpose, including to document children's learning**

### **Families will ensure that:**

- They do not use personal electronic devices that can take images or video, such as tablets, phones and smart watches, whilst in the early childhood program (all devices are to remain in their bags, pockets).
- They do not take any photos of their child or other children while visiting the service
- Children are not to bring their own personal cameras, phones, or electronic devices to the service.
- Photos and video recordings of children in Kinderloop or Xplor are not downloaded and posted to personal social media platforms.

### **Contractors**

If a contractor requires a photograph within the Early Years space, they must first seek approval from a staff member. A staff member must be present while the photograph is taken to ensure that no children are visible.

Before leaving the premises, the contractor may be asked to present the image to a staff member for verification.

### **Allied Health and Inclusion Professionals**

Allied health and inclusion professionals working directly with children who require the use of a device (eg. to undertake an assessment or record notes) may use a device that is:

- issued by their organisation or institution; and
- used solely for work-related purposes (not for personal use).

### **Definitions**

#### **Harmful Content**

Harmful content includes:

- sexually explicit material
- false or misleading information
- violence
- extremism or terrorism
- hateful or offensive material.

#### **Illegal Content**

Includes:

- images and videos of child sexual abuse
- content that advocates terrorist acts
- content that promotes, incites or instructs in crime or violence
- footage of real violence, cruelty and criminal activity

#### **Electronic Device**

Includes but not limited to iPod, iPad, computers, cameras, mp3 players, Gameboy, Wii, Xbox, PSP, mobile phones, video players, TV's, smart watches with record function, tablets, wearables, such as camera glasses, SD cards, UBS and hard drives.

#### **Personal Electronic Devices**

Includes any device that can take images or videos, such as mobile phones, digital cameras, tablets, smart watches and other new and emerging technologies, where those technologies have image taking or video recording capability. The National Model Code and Guidelines also address use and possession of unapproved / personal storage media devices, for example, an SD card, USB drive, hard drive or use of a cloud-based application which can store images or video recordings

#### **Authorised Essential Purposes**

Includes emergencies, health and family needs.

## References

### Related Surf Coast Shire Council and Early Years Policies

MPP-052	Child Safe Organisation
MPP-057	IT Acceptable Use Policy
HR24	Code of Conduct
HR02	Working with Children & Criminal History Checks
HR40	Digital & Social Media Policy
MPR-042	Media Liaison Procedure for Council officers
D15/42585	Early Years Staff Code of Conduct Policy
MPP005	Privacy & Data Protection
D22/217989	Early Years Enrolment & Orientation of Children and their families Policy
D15/15724	Early Years Employment of Qualified/Staff and Ratios Policy
D15/33004	Early Years Supervision of Children Policy
D15/32929	Early Years Nappy Changing and Toileting Policy
D15/16337	Early Years Confidentiality, Management and Storage of Records Policy
D22/209250	Early Years Family Code of Conduct Policy

### Related Surf Coast Shire Council and Early Years Services Work Instructions and Forms

D25/140977	Early Years Personal Phone request form
D25/141004	Early Years Electronic device agreement
D17/54211	Child Safe Standards Reporting Form
D23/104577	Early Years Child Safe Code of Conduct – Child Safe Standards
D25/13226	Code of Conduct for PAG members
D17/110950	Surf Coast Shire – Child Safe Commitment Statement
D24/112060	Early Years Staff – Incident Report Form
D25/137590	Work Instruction – Early Years Research projects
D26/57797	Work Instruction - Early Years Relief Calendar - April 2026
D26/63091	Visitor registration in Early Years Services via SISO

### Other References

National Early Years Learning Framework  
Victorian Early Years Learning and Development Framework  
The Convention on the Rights of the Child  
Education and Care Services National Regulations  
National Principles for Child Safe Organisations 2018  
ACECQA - National Model Code – Taking images in early childhood education and care 2024  
ACECQA – Children’s Rights in their digital footprints 2025  
ACECQA – Using digital touch technologies to support children’s learning 2025  
ACECQA – Digital documentation for families – quality or quantity? 2025  
ACECQA – Digital technology in educational program and practice 2025  
National Quality Frameworks Child Safe Culture and Online Safety Guide 2025  
National Quality Frameworks Online Safety Self – Assessment & Risk Assessment Tool 2025  
[https://www.acecqa.gov.au/sites/default/files/2025-07/OS\\_Self-assessment%20and%20risk%20assessment%20tool\\_AttB\\_UPDATED.pdf](https://www.acecqa.gov.au/sites/default/files/2025-07/OS_Self-assessment%20and%20risk%20assessment%20tool_AttB_UPDATED.pdf)  
National Quality Standards  
Australian Government Department of Health – Australia’s Physical and Sedentary Behaviour Guidelines  
The Australian Council on Children and the Media for the Australian Research Alliance for Children and Youth  
Office of Film and Literature

### Document History

Version	Document History	Approved by – Date
1	Approved	General Manager Culture and Community 1 April 2016
2	Amended	Manager Aged and Family 21 February 2017
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