

Safe Use of Digital Devices (Child Safe Model Code)

Issue Date: July 2025

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EDUCATION AND CARE SERVICES NATIONAL REGULATIONS

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QUALITY AREA 2

2.2	Safety	Each child is protected
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 (effective Jan 2026)	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
QUALITY AREA 7		
7.1.2	Management System	Systems are in place to manage risk and enable the effective management and operation of a service that is child safe.

CHILD SAFE STANDARDS	
1	Child safety and wellbeing is embedded in organisational leadership, governance and culture.
3	Families and communities are informed and involved in promoting child safety and wellbeing.
4	Equity is upheld and diverse needs respected in policy and practice.
8	Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.
10	Policies and procedures document how the organisation is safe for children and young people.

Policy Statement

Our Service uses digital technology and electronic devices as a tool for supporting safety and wellbeing, teaching and learning with children, meeting children's individual needs, documenting children's learning and development, communicating with families and the wider community, supporting program planning and administration tasks and enhancing safety and security through systems such as sign in/out platforms. Lipscombe is committed to the ACECQA National Model Code for Taking Images or Videos of Children while Providing Early Childhood Education and Care (National Model Code) in relation to use of electronic devices in child occupied spaces.

Purpose

Children's safety and wellbeing is paramount. Our Service has the responsibility to provide and maintain a safe and secure working and learning environment for children, as well as families, staff, visitors and contractors, including online environments. We aim to create and maintain a positive digital safe culture that works in conjunction with our Service philosophy, privacy and legislative requirements, our community and values.

Target Audience: All participants engaged with Lipscombe Child Care Services

Responsibilities

Role	Responsibilities
Approved provider (Lipscombe Child Care Services Board)	<ul style="list-style-type: none"> ensure that obligations under the Education and Care Services National Law and National Regulations are met ensure that the Safe use of digital technologies and online environments policy and procedures are implemented, the appropriate risk assessments and action plans are completed, and all identified actions are taken to minimise the risks to children's health and safety

	<ul style="list-style-type: none"> • 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) • ensure the safe use of digital technologies, including smart toys, and online environments at the service • ensure nominated supervisors, educators and staff implement practices that align with the National Model Code and the service's child safe practices for the use of electronic and digital devices for taking images or videos of children • ensure policies and procedures promote equity and respect diversity for the safety and wellbeing of children and young people • take reasonable steps to ensure that nominated supervisors, educators and staff follow the Safe use of digital technologies and online environments policy and procedures • ensure that copies of the policy and procedures are readily accessible to nominated supervisors, coordinators, educators, staff, families, and are available for inspection
Nominated supervisor (Service Director)	<ul style="list-style-type: none"> • implement the Safe use of digital technologies and online environments policy and procedures and ensure that any plans developed from risk assessments are in place for individual children and are carried out • ensure staff understand how to actively supervise children while using digital technologies • meeting staff to child ratios to ensure adequate supervision • ensure all educators and staff know where to access the Safe use of digital technologies and online environments policy and procedures • 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 service's 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, work collaboratively with appropriate services and/or professionals to support children's access, inclusion and participation in the program, including their safe access to online learning environments.
Educators	<ul style="list-style-type: none"> • implement the Safe use of digital technologies and online environments policy and procedures and ensure that any action plans for individual children are carried out • implement the service's culture of child safety and wellbeing, including when accessing digital technologies and online learning environments • know the individual needs and action plans for the children in your care, and understand how they relate to the safe use of digital technologies and online environments • ensure active supervision of children when they are using digital technologies, including by monitoring and maintaining staff to child ratios • recognise and respond effectively to children and young people when discussing the use of digital technologies and online environments, considering diverse needs and interests • 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

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| | <ul style="list-style-type: none"> • ensure you understand the National Model Code and the service's 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. |
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The National Model Code

The National Model Code addresses child safe practices for the use of electronic devices while providing early childhood education and care (ECEC). The National Model Code aims to:

- support providers and their services to implement child safe practices regarding the use of electronic devices for taking images or videos of children while providing education and care.
- increase awareness of staff, volunteers and families regarding child safety risks and considerations in using electronic devices for taking images or videos of children while providing education and care.
- encourage approved providers of centre-based early childhood services to commit to adopting and implementing child safe practices regarding use of electronic devices across their services. , ahead of possible introduction of regulatory changes under the Education and Care Services National Law 2010 (National Law).
- offer best practice advice and information to support approved providers to adopt these practices.

The National Model Code consists of four parts.

Part 1: Only service-issued electronic devices should be used when taking images or videos of children while providing education and care. The appropriate use of service-issued electronic devices for taking, sending and storing images or videos of children should be clearly outlined in policies and procedures.

Part 2: Personal electronic devices that can take images or videos (such as tablets, phones, digital cameras, smart watches) and personal storage and file transfer media (such as SD cards, USB drives, hard drives and cloud storage) should not be in the possession of any person while providing education and care and working directly with children. Any exceptions to this should be for limited, essential purposes that are authorised in writing (or through another means if written authorisation is not reasonably practicable) by the approved provider at the service, and where that access does not impede the active supervision of children.

Part 3: 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.
- personal health requirements, e.g. heart or blood sugar level monitoring.
- disability, e.g. where a personal electronic device is an essential means of communication for an educator or other staff member.
- family necessity, e.g. a worker with an ill or dying family member.
- technology failure, e.g. when a temporary outage of service-issued electronic devices has occurred.
- local emergency event occurring, to receive emergency notifications through government warning systems, for example, bushfire evacuation text notification.

Part 4: Approved providers and their services should have strict controls in place for the appropriate storage and retention of images and videos of children.

Service Procedures:

Devices:

'Electronic devices', include any device that can take images or videos, such as tablets/iPads, phones, digital cameras, smart watches, and other new or emerging technology such as META sunglasses. It also includes personal storage and file transfer media (such as SD cards, USB drives, hard drives and cloud storage).

Personal Devices:

Anyone who is working or engaged in a Service based activity in any capacity is prohibited from having personal electronic devices that can take images or video, such as tablets, phones and smart watches, on their person whilst with children.

Smart watches without capacity for recording images or video, may be worn in child occupied environments, to meet personal health needs or for basic purposes such as telling the time or counting steps. Smart watches must be in flight mode, disabling their capacity to send and receive messages. This is to ensure supervision is not compromised by distraction, in the same way as mobile phones are not permitted to be used while educators are working with children.

Personal devices will not be approved as a service issued device.

Teachers, educators and other staff can access personal electronic devices while taking a scheduled break from work, such as a lunch break or a rest pause, which is taken outside the child occupied space. The number of breaks or pauses should not increase beyond entitlement, to facilitate use of a personal device.

Personal devices may also be used during planning time for work purposes, for example to research information to inform a program or for ease of communication by relief educators working directly with children, when planning for regular team members is held off site and away from children.

Personal communication during work time

Educators and staff of the Service are welcome and encouraged to provide the main Service contact number to family or others, to enable them to be contacted during work time. The Service administration staff will ensure that calls are forwarded through to the relevant person or arrange for a call back if appropriate to the situation. The Service will support educators working with children to be relieved to accept a call, such as maintaining ratio or supervision while the educator takes the call, if required.

Personal Devices authorized for essential purposes

There are limited circumstances that a personal device is considered authorized by the approved provider or Nominated Supervisor, for use while working with children. This is only when there is an extreme circumstance such as a natural disaster, or emergency situation such as lockdown or when there is a lost child and educators are searching independently in various locations, and use of an accessible personal electronic device contributes to safety and wellbeing of those present.

For any other use of a personal electronic device, the educator or staff member must apply to the Nominated Supervisor for authorization to use that device. Authorisation will be considered for limited circumstances, which may include:

- health issues such as heart or blood sugar monitoring.
- a limited time situation such as a family member of the staff member being ill.
- a period of local emergency related to the educator/staff member's home.
- Technology failure at the Service (for example a temporary outage of service issued devices)
- Disability, where the device is an essential means of communication.
- Communication during an excursion such as when educators are separated into groups and there are insufficient service-issued devices to maintain communication for safety and wellbeing. This situation is expected to be identified as a part of risk assessment prior to the excursion and approval for access to a personal device identified as a risk minimization strategy.

In any situation where a personal device is authorized for use at the Service, that device is authorized for its explicit use only, never for photos, video or audio recording of children for any purpose including documenting learning.

Arrangements for use of personal devices authorized by the Nominated Supervisor will be documented and retained at the Service. Where the arrangement is relevant to the individual staff member, the agreement will be detailed, signed by the Nominated Supervisor and the staff member, and retained on the staff member personnel file. The documentation will include a review or expiry date. Where the arrangement was for an emergency or other situation which necessitated use of the personal device in keeping with Service guidelines, use of the personal device will be recorded in the incident/ reflection form that is completed for that situation.

Service-Issued Devices

Only service-issued / approved devices may be used in the service when taking images or recording videos of children. Personal devices will not be approved as a service issued device for this purpose.

Devices which are service-issued are identified by their inclusion on the Service phone (Telstra) account; and labelling as a service-issued device to ensure it is apparent to others the device is service-issued when it is in use. Use of covers which easily identify the device as service issued, will be used wherever possible.

Service-issued devices, other than the Service roster phone, will always remain on site at the Service, unless being used during Service excursions.

Service-issued devices will only be used by educators and staff of the Service, for Service-related purposes. These may include:

- communication with colleagues or external community members.
- photograph, audio or video recording for planning, documenting and reflecting on the program.
- playing music
- accessing age and stage developmentally appropriate learning material
- supporting identified individual needs of children (for example communication or well-being related activities).
- Creating and maintaining records for individual children.
- Administrative and compliance tasks
- Accessing health and safety information such as UV ratings via the SunSmart app, which need to be monitored throughout the day.

iPads or tablets should be prioritized over mobile phones for taking images, video or audio recording. Phone use should be limited to communication unless a particular image or recording is to be shared for a specific purpose.

Service-issued devices will be allocated to programs based on needs identified through risk assessment and risk minimization planning. Current devices issued for each service are:

- Lipscombe Avenue – 1 service issued mobile phone (rosters), multiple iPads and 4 laptop PCs plus admin desktop PCs.
- Nutgrove & Sandy Bay Outside School Hours Care – 2 service issued mobile phones, multiple iPads and 1 laptop PC.
- Seagulls (LDC) – 1 service issued mobile phone, multiple iPads and 1 laptop PC.
- Waimea Outside School Hours Care – 7 service issued mobile phones, multiple iPads and 1 laptop PC.

Service-issued device controls

Access

All service issued devices will be passcode protected for staff use only.

Recommended updates will be applied as they become available, to ensure effective and safe use. The admin log in must be used to action laptop updates.

Devices will only be used when they will not 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.

Service issued devices are not shared with programs situated on different premises. For example, devices at the 568 Sandy Bay Road location will only be used for both Nutgrove and Sandy Bay Outside School Hours Care. Devices issued to Seagulls Centre will only be used for those participants of Seagulls. Waimea Outside School Hours Care devices will only be used for those participants of Waimea Outside School Hours Care and devices at Lipscombe Avenue will be used for Bumble Bee, Playhouse or administration participants.

Random checks of use of devices for messaging and internet access will be carried out from time to time by the Director or Assistant Director.

Taking images and recording audio or video

At time of enrolment, parents/guardians give or do not give authorisation for photo, video and voice recording for various purposes. Any lack of authorization or restriction to authorization for digital recording is noted on child information records provided to the room/ program the child attends.

Images created are only used as per parent/guardian authorization. For example, images or video recorded might only be used for the purpose of creating a child's record of learning or may be shared for newsletter / internal publications or external publications. The service newsletter is shared via Schoolzine app, which is accessed by use of a passcode so that content is not publicly available.

Where a child will be identified in an image, the educator will seek a child's consent to record the image or video. Where a child will not be identifiable in the image, and parent consent for recording is given, the child's consent is implied.

When creating images of children at play, for planning or other purposes, educators are encouraged to ensure the aspect of the recording is primarily focused on the activity, skill development, or learning experience. These images may identify children and are useful in connecting families to the program through sharing the child's experience and engagement.

'Portrait style' photographs of children are to be avoided unless for specific purpose. Examples of this may include an image for display as part of a medical management or risk minimization plan; or for display in the program to enhance children's sense of belonging and connection.

Photographs, video or voice recordings will not be made in bathrooms or nappy change spaces, during personal care routines, or if children are partially or fully undressed for any reason. The only exception is when an image is created explicitly for immediate sharing with parents, to support communication and decision making related to children's wellbeing. For example, a rash or mark which is unusual for the child, or unexplained, may by agreement, be shared with a parent electronically to support best care and outcomes for the child.

Other situations where images, video or voice recording is inappropriate, include:

- When a child is distressed or anxious
- If a child is in a position which could be perceived as sexualized in nature
- If a child is dysregulated
- If a child indicates they do not want to be photographed or recorded, whether expressed verbally or non-verbally through expression or actions.

Sharing of photographs, video or audio recording

It is inappropriate for an image or video of a child to be shared to platforms beyond the intended educational purpose of the image or video. Any image or video recording of a child can become inappropriate if shared in the wrong context or for an unintended purpose. This includes if an individual transfers images to their own account or device either directly or via the cloud, for example, to post images or videos on social media or other applications / software platforms.

Photos, video or voice records are shared outside the Service only:

- To the parent or guardian at their request (noting images of other children must be deleted from the image or video unless permission is given by that child's parents for the image to be shared externally).
- When permission is given by the parent in the enrolment record for photos or recordings to be included in Service publications such as a newsletter.
- When a parent/guardian gives explicit permission for a photograph or video to be used externally, such as for the Service website.

The Service does not operate any social media pages or spaces, or share images or recordings via any electronic platform other than Schoolzine for the purpose of sharing newsletters or other Service communication.

Appropriate storage, retention and destruction of images

Electronic storage of photographs, video or audio recording is limited to the time the child is enrolled at the service. Storage may be on service issued device only, in the program the child attends or in administration. Images included in records of children's experiences and learning are either deleted once they have served their purpose, or if stored for later use, deleted when the child ceases attendance at the service.

Service issued devices will be checked as part of the quarterly safety audit process for any images that have served their purpose or are of children who have left the service. Where a child who has left the service appears in a group photo which is required for further use, and the image may only be stored until the end of that calendar year.

Procedure for lost devices

Service-issued devices will stay on site in the program to which they are allocated, unless taken on excursion. The number of devices taken on an excursion will be considered as part of the excursion plan and risk minimisation process. Devices excess to required use should remain at the program.

Devices taken on excursions will be passcode protected.

If a service issued device is identified as missing, this will be reported to the Nominated Supervisor as soon as possible. The Nominated Supervisor will contact families of children attending the service to advise, and direct efforts to locate and retrieve the misplaced device.

Children's use of personal devices

In Outside School Hours Care, digital devices have potential to enhance, extend and enrich experiences offered for and with children. In a leisure- based environment digital devices can promote interaction, collaboration and shared learning.

However, use of devices in Outside School Hours Care programs must be service-issued devices only.

In keeping with the DECYP device policy, the Service requires that children's personal devices are 'off and away all day'. Any child wearing a smart watch or other similar device must have it switched to 'flight mode', and it must not be capable of taking photographs, video or voice recording.

Direct access for parent communication with their children will always be made available by the Service, removing the need for a child to have a personal device when in attendance.

Service-issued devices used for online access will have controls set to limit access to child safe online spaces only. For further details, see the Service Child Safe online environments policy.

Parent use of personal devices

Parent personal devices are commonly used for accessing the Xplor QR code for signing children in and out of the Service and provide efficiency with this process.

Parents will not use personal devices to photograph, video or voice record children in attendance at the Service. Parents will also refrain from engaging in facetime or other video calls while in the presence of children at the Service.

The Service discourages the use of personal devices by parents / guardians for calls or other use on Service premises, to prioritise attention to children, child safety, and connection with educators or staff.

Visitor devices in child occupied space

If a third-party professional attending a service and working directly with a child (such as an allied health or inclusion professional) needs to use a device (for example, to undertake an assessment or take notes) they can use a device that is:

- issued by their business or institution
- used only for work purposes (and not personal use).
- not used to photograph, voice or video record any other child present (without explicit parent/guardian permission)

Students and other visitors

Students on placement and other visitors, must not have personal devices in child occupied spaces.

If a student is required to include images to support provision of their training or learning, the images will be:

- captured on a service-issued device
- only be of children whose parent/guardian has given explicit permission for a student to observe and record information and images related to their child
- appropriate and relevant to the experience being recorded
- be shown to the program coordinator before being included in any documentation

Incursions and Excursions

Incursion or excursion facilitators or presenters may want to have photo or video record of the experience for their own purposes. If a presenter or facilitator requests an image, they will request this from the educators present so the image can be taken on a service issued device. Only children whose parent / guardian has given permission for images to be shared externally will be included in such an image. Incursion or excursion facilitators are not permitted to photograph or video children in attendance on their personal or business devices.

Regulatory visitors

Photos and recordings made by authorized officers of the regulatory authority will not include children.

If the Service is asked or instructed to take an image of a child by the Police or a Child Protection Agency, the image will be taken on a service-issued device in a way that respects the rights and dignity of the child and could not be considered inappropriate.

Storage of devices

Service issued devices will be stored in nominated storage spaces. At Lipscombe Avenue and Seagulls in rooms which are inaccessible out of hours. At Nutgrove/ Sandy Bay Outside School Hours Care or Waimea Outside School Hours Care in a locked cupboard, so devices cannot be accessed by people from outside the Service in a shared space.

Communication of this policy

This policy will be shared by:

- being included in the Service 'Key Policy' folder provided to each family at time of enrolment, then annual re-enrolment
- being available in hard copy at each program
- being published in the service newsletter or via the Schoolzine platform when changes or updates are made
- being shared with educators and staff via 'Staff notes'.
- Being included in the onboarding process for new educators and staff in the Employment Hero platform.
- Being provided to students at time of induction

Failure to comply

Failure to comply with Education and Care Services regulations regarding safe use of devices can result in serious consequences, including fines or the suspension or cancellation of service approval.

Any breach of this Policy may result in disciplinary action in accordance with the Disciplinary Policy for employees and contractors. It may also result in the Service reconsidering a contractual relationship with any party including the enrolment of a Child. Any employee, contractor, volunteer or family member who becomes aware of a breach of this Policy must disclose this breach either to their program co-ordinator, the Assistant Director or the Director (as is applicable). In extreme circumstances an individual may be concerned that a serious breach of this Policy has occurred but considers that it would be personally damaging to report it through normal channels, in such a case they should report it under the Speak Up Policy.

Links to other Policies:

Out of Hours Contact Policy	Family Code of Conduct
Speak Up Policy	Staff Code of Conduct
Child Safet Code of Conduct	Cyber Security and Technology usage Policy
Child Safety and Wellbeing Policy	Excursion Policy
Privacy and Records Policy	Student and Volunteer Policy
Risk Management Policy	

References and Resources:

ACECQA National Model Code – Images in ECEC

Care for Kids. Digital Devices in outside school hours care. 2021. <https://www.careforkids.com.au/blog/digital-devices-in-outside-school-hours-care>

National Principles for Child Safe Organisations

Victoria's Child Safety Standards

NSW Child Safety Standards

SNAICC- Keeping Our Kids Safe

eSafety Commissioner including eSafety checklist for early learning services

Privacy Act 1988 (Cth)

National Privacy Principles

ECA Code of Ethics

Child Safe Organisations

Securing customer personal data | Australian Cyber Security Centre

Guide to securing personal information | Office of the Australian Information Commissioner
Active Supervision: Ensuring safety and promoting learning (ACECQA sector resource)
Providing a Child Safe Environment – NQF Policy Guidelines (ACECQA sector resource)
National Office for Child Safety

Policy Review:

Lipscombe Early Years Education & Care will review this policy and related documents, annually, or more often as required when new information becomes available. Families are encouraged to collaborate with the Service to review the policy and procedures.

It is essential for all staff to be involved in the policy review process and familiarise and acknowledge in writing any changes to policy made at review.

Changes made at review:

July 2025 – New policy

Code of Conduct Declaration

I,have read, understand and agree to abide by the Lipscombe Child Care Services Child Safe Use of Devices Policy, and understand adherence is a condition of my employment or volunteer work.

I understand that a breach of the policy may result in disciplinary action including termination of volunteer work or employment.

Date..... Signed.....

Received by:..... Date.....