



# SAFE USE OF DIGITAL TECHNOLOGIES AND ONLINE ENVIRONMENTS POLICY

Clubhouse Bootcamp Service is committed to fostering a culture that creates and maintains a safe online environment with support and collaboration from staff, families and the community. As a child safe organisation, our Service embeds the [National Principles for Child Safe Organisations](#) and continuously addresses risks to ensure children are safe in physical and online environments. Digital technologies 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 digital technologies, but are able to guide children's understanding of, and ability to interact, engage, access and use a range of digital technologies in a child safe environment.

The Education and Care Services National Regulations require Approved Providers to ensure their services have policies and procedures in place for the safe use of digital technologies and online environments at the service.

## PURPOSE

Children's safety and wellbeing is paramount, and Clubhouse Bootcamp has the responsibility to provide and maintain a safe and secure working and learning environment for staff, children, visitors and contractors, including online environments. We aim to create and maintain a positive digital safe culture that works in conjunction with Clubhouse Bootcamp philosophy, privacy and legislative requirements to ensure the safety of enrolled children, educators and families by the safe use of digital technologies and online environments, including for children's learning and development and maintaining records.

The use of Closed-Circuit Television (CCTV) installed at St Paul's Anglican Grammar School (**SPAGS**), where Clubhouse Bootcamp operates from, aims to address crime prevention strategies to reduce concerns, deal with complaints and support investigations.

## SCOPE

This policy applies to children, families, staff, educators, management, Approved Provider, nominated supervisor, students, volunteers and visitors of Clubhouse Bootcamp.



## NATIONAL QUALITY STANDARD (NQS)

QUALITY AREA 2: CHILDREN'S HEALTH AND SAFETY		
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.
2.2.3	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
QUALITY AREA 7: GOVERNANCE AND LEADERSHIP		
7.1.2	Management System	Systems are in place to manage risk and enable the effective management and operation of a quality service that is child safe.
EDUCATION AND CARE SERVICES NATIONAL LAW AND NATIONAL REGULATIONS		
S. 162A	Child protection training	
S. 165	Offence to inadequately supervise children	
S. 167	Offence relating to the protection of children from harm and hazards	
12	Meaning of serious incident	
73	Educational Program	
76	Information about the educational program to be given to parents	
84	Awareness of child protection law	
115	Premises designed to facilitate supervision	
122	Educators must be working directly with children to be included in ratios	
123	Educator to child ratios – centre-based services	
149	Volunteers and students	
155	Interactions with children	
156	Relationships in groups	
168	Education and care services must have policies and procedures	
170	Policies and procedures to be followed	
171	Policies and procedures to be kept available	
172	Notification of change to policies or procedures	
175	Prescribed information to be notified to the Regulatory Authority	



176	Time to notify certain information to Regulatory Authority
181	Confidentiality of records kept by the Approved Provider
183	Storage of records and other documents
184	Storage of records after service approval is transferred

## RELATED LEGISLATION

Child Care Subsidy Secretary's Rules 2017	Family Law Act 1975
A New Tax System (Family Assistance) Act 1999	<i>Privacy Act 1988</i> (the Act)
Family Assistance Law – Incorporating all related legislation as identified within the <a href="#">Child Care Provider Handbook</a>	

## RELATED POLICIES

Behaviour Guidance: Bullying Policy CCS Data Security Policy CCS Personnel Policy CCS Governance Policy Child Safe Environment Policy	Fraud Prevention Policy Incident, Injury, Trauma, and Illness Policy Interactions with Children, Families and Staff Policy Photography Policy
Child Protection Policy Code of Conduct Policy Dealing with Complaints Policy ECIP Management Policy Educational Program Policy Enrolment Policy Family Communication Policy Governance and Leadership Policy	Privacy and Confidentiality Policy Programming Policy Record Keeping and Retention Policy Staffing Arrangements Policy Student, Volunteer and Visitor Policy Supervision Policy Social Media Policy



TERMINOLOGY	
Artificial intelligence (AI)	An engineered system that generates predictive outputs such as content, forecasts, recommendations, or decisions for a given set of human defined objectives or parameters without explicit programming.
Cyberbullying	When someone uses the internet to be mean to a child or young person so they feel bad or upset
Cyber safety	Safe and responsible use of the internet and equipment/devices, including mobile phones and devices.
Disclosure	Process by which a child conveys or attempts to convey that they are being or have been sexually abused, or by which an adult conveys or attempts to convey that they were sexually abused as a child
Generative artificial intelligence (AI)	A branch of AI that develops generative models with the capability of learning to generate novel content such as images, text and other media with similar properties as their training data
ICT	Information and Communication Technologies
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
Optical Surveillance Device	Has the same meaning as in section 6(1) of the Surveillance Devices Act 2004 of the Commonwealth
Online hate	Any hateful posts about a person or group based on their race, religion, ethnicity, sexual orientation, disability or gender
Smart toys	Smart toys generally require an internet connection to operate as the computing task is on a central server
Sexting	Sending a sexual message or text, with or without a photo or video. It can be done using a phone service or any platform that allows people to connect via an online message or chat function
Unwanted contact	Any type of online communication that makes you feel uncomfortable, unsafe or harassed.

Source: Glossary to NQF Child Safe Culture and Online Safety Guides- ACECQA 2025



## IMPLEMENTATION

Clubhouse Bootcamp uses digital technology and electronic devices as a tool for learning with children, documenting their 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 and CCTV monitoring. Our educators are diligent in ensuring children are only able to access age-appropriate technology on a Service issued device.

### DIGITAL TECHNOLOGY AND ELECTRONIC DEVICES USED AT THE SERVICE

Clubhouse Bootcamp follows the National Model Code for Taking Images or Videos of Children while Providing Early Childhood Education and Care ([National Model Code](#)) and Guidelines for taking images or videos of children.

The Approved Provider will inform staff, educators, visitors, volunteers and family members that the use of personal electronic devices to take photos, record audio or capture video of children who are being educated and cared for at Clubhouse Bootcamp is strictly prohibited. This includes items such as tablets, phones, digital cameras, smart watches, META sunglasses and personal storage and file transfer media (such as SD cards, USB drives, hard drives and cloud storage). These devices should not be in the possession of staff, educators or visitors (e.g. ECIP professionals) while working directly with children. Staff and educators are advised that electronic devices belonging to Clubhouse Bootcamp must not be removed from the premises as they may contain personal details of staff or children, including photos or videos. Except where required for operational activities, for example, excursions or transportation.

The Approved Provider will inform staff, educators and visitors of exemptions that may warrant a person to use or be in possession of a personal electronic device that can be used to take images or videos. Staff, educators or visitors with an exemption must not use the personal device to take images or videos of children. Exemptions need to be provided for in writing by the Approved Provider and may include:

- Emergency communication during incidents such as a lost child, injury, lockdown, or evacuation
- Personal health needs requiring device use (e.g. heart or blood sugar monitoring)
- Disability related communication needs
- Urgent family matters (e.g. critically ill or dying family member)
- Local emergency event to receive alerts (e.g. government bushfire or evacuation notifications)
- Vacation care - excursion longer than 3 hours.

- Any staff member who wishes their personal phone to go on an excursion longer than 3



hours will surrender their phone to the co-ordinator, who will securely store the phone in a bag that they carry with them. If a staff member needs to use their phone to either receive or make a personal call, it will be with the express permission of the co-ordinator and the call will be made away from children, provided no child is put at risk due to insufficient supervision. After the call, the phone will be returned to the coordinator to be stored securely. Upon returning to Club House, the phones will be returned to the designated lockable container.

Clubhouse Bootcamp will **develop and maintain a register of all electronic devices purchased for and used within the Service**. This register will include details such as the device type, date of purchase, intended use, assigned user (if applicable), security settings, and any features related to connectivity, data storage, or recording capabilities. Devices recorded in the register may include, but are not limited to, computers, tablets, mobile phones, cameras, CCTV systems, audio recorders, smart toys, and any other internet-connected or data-enabled devices used within the Service.

Children enrolled at Clubhouse Bootcamp are not permitted to bring electronic devices to the Service, unless an exception has been discussed with the Approved Provider or nominated supervisor, where the device may be required to support a diagnosed medical condition or disability. If a child brings an electronic device to Clubhouse Bootcamp, it will be switched off and stored in a locked cupboard.

## IMAGES AND VIDEOS

The Approved Provider is responsible for determining who is authorised to take, use, store and destroy images and videos of children using Clubhouse Bootcamp issued digital devices. Images and videos will be stored securely with password protection, with access limited to authorised personnel only. Images and videos of children must only be taken and used in accordance with Clubhouse Bootcamp policies, and careful consideration must be given to the purpose of the image or video. Educators will engage in discussions that consider the intent, appropriateness, context and consent involved in capturing and using the images and videos, ensuring the process aligns with children's learning, wellbeing and right to privacy.

Clubhouse Bootcamp will regularly review how digital data, including images and videos of children, is stored. Back-ups of all digital data, whether offline or online (such as a cloud-based service), will be performed each month. Digital data stored at Clubhouse Bootcamp will be destroyed in accordance with the *Record Keeping and Retention Policy* and procedure. The Approved Provider will ensure staff, educators, visitors, and volunteers do not transfer images or videos from Clubhouse Bootcamp issued devices to personal devices; unauthorised transfer of digital data may result in disciplinary action.



## RECORD KEEPING AND RETENTION OF PHOTOS

### Who is responsible, and when will this be done?

- **The Delegated Administration Officer** is responsible for record keeping and retention of photos.
- This process will be performed **weekly (every Monday)** for each individual service.

### Procedure to be followed

#### Review Photos

- Sort through all photos taken during the previous week.
- Select only suitable and appropriate photos for documentation and service records.

#### Create Weekly Collage

- Insert chosen photos into a digital collage that reflects the week's activities.
- Ensure the collage provides a balanced representation of learning and engagement.

#### Save Collage File

- Save the collage into the designated **Google Drive folder** for the specific service.
- Follow the agreed **folder and filename protocol**:
  - Folder: *[Service Name] → Weekly Collages → [Year]*
  - Filename: *[ServiceName]\_WeeklyCollage\_YYYYMMDD*

#### Delete Unused Photos

- Delete all unused or unselected photos from devices and storage locations (e.g., cameras, tablets, phones, temporary folders).
  - **The Delegated Administration Officer** will delete all cloud based images and videos each Monday.
  - **Room Leader** will delete all photos and images from the service devices each Wednesday.
- Ensure no residual copies remain outside the secured service file system.

#### Retention Period

- Collage files are to be retained for a **minimum of 3 years** to support Quality Assurance (QA) and reporting requirements.

#### Monthly Review & Disposal

- On a monthly basis, check all collage files in the storage folder.
- Delete any files that are older than **3 years** to maintain compliance and manage storage capacity.



## DRUG AND ALCOHOL . See Policy Manual for full policy.

### Purpose

To provide a safe and healthy environment for all children, families, staff, and visitors by preventing the presence or influence of drugs, alcohol, and other prohibited substances within the service.

### Policy Statement

- The **possession, use, distribution, or sale of illegal drugs, alcohol, or any prohibited substances** is strictly forbidden on all service premises, including buildings, outdoor play areas, parking areas, and during any service-related activities (on or off-site).
- **The possession and use of Vaping Devices (e-cigarettes) is strictly prohibited** at all Childcare Services. This applies to staff, families, visitors, and contractors, regardless of whether the device contains nicotine.
- Staff members must not attend work under the influence of alcohol or illegal drugs.

#### 1. Staff Responsibilities

- All staff are required to arrive fit for duty and remain free from the effects of alcohol or illicit drugs while on shift.
- Any staff member found in breach of this policy will be subject to disciplinary action, up to and including termination of employment.

#### 2. Visitors and Families

- Families, visitors, and contractors are required to comply with this policy while on the premises or attending service-related events.
- Anyone found in possession of drugs, alcohol, or vaping devices will be asked to leave immediately.

#### 3. Reporting

- Any suspected breaches must be reported to the Service Manager/Director promptly and confidentially.
- Incidents will be documented and managed in accordance with workplace health and safety requirements.





## PHYSICAL ENVIRONMENT AND ACTIVE SUPERVISION

The Approved Provider, nominated supervisor, management and educators will:

- ensure children are always supervised and never left unattended whilst an electronic device is connected to the internet
- provide a child safe environment to children- reminding them if they encounter anything unexpected that makes them feel uncomfortable, scared or upset, they can seek support from staff
- reflect on our Service's physical environment, layout and design to ensure it supports child safe practices when children are engaged in using technology
  - perform regular audits to identify risks to children's safety and changes in room set-ups that can indicate areas of higher-risk and become supervision 'blind spots'
  - ensure location of digital technology/equipment allows educators to remain in line-of-sight of other staff members when working with children
  - only permit children to use devices in open areas where educators can monitor children's use
  - be aware of high-risk behaviours for children online, including uploading private information or images, engaging with inappropriate content (inadvertently or purposefully), making in-app purchases, and interacting with unsafe individuals
  - ensure all visitors and volunteers are supervised at all times ensure all devices are password protected with access for staff only
- where digital devices are used during transportation and excursions, they must be used in accordance with practices outlined within this policy and associated procedure.

## SOFTWARE PROGRAMS AND APPS

Clubhouse Bootcamp uses a range of secure software programs and apps on Service-issued devices to support the educational program and administration of Clubhouse Bootcamp. All apps used by staff, educators, visitors and children are carefully selected, regularly checked and kept up to date with the latest available system updates. Access to software programs and apps are password protected to ensure the privacy of children, families and staff. Each user is required to create their own user account and ensure log in, and password information is not shared.

The Approved Provider will ensure programs which require additional background checks, such as CCS Software, are only accessed by authorised staff who have completed necessary screening processes in accordance with Family Assistance Law. Our educational program software is used by educators to share observations, photos, videos, daily reports, and learning portfolios with families in a secure, closed platform.



## ARTIFICIAL INTELLIGENCE (AI) INTERACTIONS AND GUIDELINES

Educators or staff using AI are to be aware of limitations, privacy risks, and the potential for errors in the information it provides. AI can support and assist staff as a documentation tool; however, it is their responsibility to ensure the information's accuracy and not rely upon it as an authoritative source. Staff and educators should ensure they enter original work into the AI program and are required to monitor, verify, and check information obtained from AI to ensure specific details are contextually relevant. Data and privacy concerns must be addressed, and staff should not enter details which may identify individual children, such as names and date of birth.

## CONFIDENTIAL AND PRIVACY GUIDELINES

Our *Privacy and Confidentiality Policy* applies to all use of digital technology and online environments. All staff, educators, and visitors must ensure that any information, images, or digital content related to children, families, and the Service is collected, stored, used, and shared in accordance with privacy legislation and Service procedures, to maintain confidentiality and protect the safety and wellbeing of children. The nominated supervisor will advise the Approved Provider as soon as possible regarding any potential threat to security information and access to data sensitive information. Clubhouse Bootcamp will follow practices outlined within the *Safe Use of Digital Technologies and Online Environments Procedure* to protect personal and sensitive digital data.

The Approved Provider will notify the Office of the Australian Information Commissioner (OAIC) in the event of a possible data breach by using the online [Notifiable Data Breach Form](#). This could include:

- a device containing personal information about children and/or families is lost or stolen (parent names and phone numbers, dates of birth, allergies, parent phone numbers)
- a data base with personal information about children and/or families is hacked
- personal information about a child is mistakenly given to the wrong person (portfolios, child developmental report)
- this applies to any possible breach within Clubhouse Bootcamp or if the device is left behind whilst on an excursion
- ensure educators are aware of their mandatory reporting requirements and report any concerns related to child safety including inappropriate use of digital technology to the Approved Provider or nominated supervisor.



## IDENTIFICATION AND REPORTING OF ONLINE ABUSE AND SAFETY CONCERNS

Clubhouse Bootcamp will implement measures to keep children safe whilst using digital technology and accessing online environments.

The Approved Provider, nominated supervisor and management will:

- ensure all staff, educators, students and volunteers are aware of their mandatory reporting obligations and promptly report any concerns related to child safety, including inappropriate use of digital technology, to the Approved Provider or nominated supervisor [See *Child Protection Policy*]
- support educators to:
  - encourage children to seek support if they encounter anything unexpected that makes them feel uncomfortable, scared or upset
  - listen sensitively and respond appropriately to any disclosures children may make relating to unsafe online interactions or exposure to inappropriate content, adhering to the *Child Protection Policy, Behaviour Guidance: Bullying Policy* and reporting procedures
  - respond to and report any breaches and incidents of inappropriate use of digital devices and online services to management
- ensure all concerns are documented and responded to promptly and appropriately, with support provided to the child and their family as required report any suspected cases of online abuse to the relevant authorities, including the eSafety Commissioner and Police, in accordance with legal requirements and child protection procedures
- notify the regulatory authority within 24 hours, via NQAITS, if a child is involved in a serious incident, including any unsafe online interactions, exposure to inappropriate content, or suspected online abuse.

## USE OF CLOSED-CIRCUIT TELEVISION (CCTV) MONITORING

The SPAGS campuses that Clubhouse Bootcamp operates from uses Closed-Circuit Television (CCTV) to monitor the physical environment. The school will regularly review guidance on the use of surveillance devices, including information provided by the Office of the Australian Information Commissioner.

Access to the monitor is restricted through a password-protected system to ensure security and prevent unauthorised viewing. Families are informed the Clubhouse Bootcamp uses CCTV as a surveillance method during enrolment and orientation to Clubhouse Bootcamp. Signs are visible at the school entrances informing anyone entering the school grounds that CCTV is installed and monitored.



## CAMERA LOCATIONS

- The entrance and exit points of SPAGS
- Throughout the SPAGS school grounds
- Inside SPAGS Gymsnasiums and facilities

Cameras are not installed in private areas such as bathrooms or shower areas (for adults or children). All cameras are clearly visible.

The CCTV recording system operates in real mode, monitoring the site continuously 24 hours a day. Footage and information collected via the recording system will be governed by [Australian Privacy Principles](#) and all relevant staff will be kept up to date with requirements under Australia's privacy law. CCTV footage is kept in a secure location, only accessible by the SPAGS Principal Team and Business Manager.

Access to CCTV footage at Clubhouse Bootcamp is strictly controlled by the school and protected by secure, password-protected systems. Only authorised personnel are permitted to access the footage, in accordance with privacy laws and Service policies. The school is responsible for determining who is authorised to access CCTV footage. CCTV footage will not be accessible to external parties (e.g., staff members or families) without appropriate authorisation. Any requests to view CCTV footage will be managed in accordance with Australian Law.

## THE APPROVED PROVIDER/NOMINATED SUPERVISOR/MANAGEMENT WILL ENSURE:

- that obligations under the *Education and Care Services National Law and National Regulations* are met
- educators, staff, students, visitors and volunteers have knowledge of and adhere to this policy and associated procedure
- new employees, students and volunteers are provided with a copy of the *Safe Use of Digital Technologies and Online Environments Policy* and procedure as part of their induction and are advised on how and where the policy can be accessed
- families are aware of this *Safe Use of Digital Technologies and Online Environments Policy* and procedure and are advised on how and where the policy can be accessed
- they promote and support a child safe environment, ensuring adherence to the *Child Safe Environment and Child Protection Policies*
- the National Principles for Child Safe Organisations is embedded into the organisational structure and operations [or state specific Child Safe Standards]
- all staff, educators, volunteers and students are aware of current child protection law, National



Principles for Child Safe Organisations and their duty of care to ensure that reasonable steps are taken to prevent harm to children. Develop and monitor an *Electronic Device Register* for all electronic devices purchased and used at Clubhouse Bootcamp

- appropriate ratios and adequate supervision are maintained for children at all times including when using digital technology and accessing online environments
- students (work experience), volunteers and/or visitors are never left alone with a child whilst at Clubhouse Bootcamp under any circumstances
- all staff, educators, volunteers and students are aware of the National Model Code and [Guidelines](#) and adhere to these steps for taking images or video of children including:
  - Educators, staff, visitors or volunteers are not to be in possession of personal electronic devices or personal storage devices that can take images or videos when working directly with children
  - staff and educators only use electronic devices issued by Clubhouse Bootcamp for taking images or videos of children enrolled at the Service
  - Clubhouse Bootcamp issued devices are securely configured, monitored and maintained to prevent unauthorised access
  - visitors who are supporting children at Clubhouse Bootcamp (NDIS funded support professionals, Inclusion Support Professionals) obtain written authorisation from parents/guardians to capture images or video of a child for observation/documentation purposes only. (See *ECIP Confidentiality Agreement*)
- children, educators and parents are aware of Clubhouse Bootcamp's complaints handling process to raise any concerns they may have about the use of digital technologies or any other matter (see: *Dealing with Complaints Policy*)
- Clubhouse Bootcamp *Privacy and Confidentiality Policy* is adhered to at all times by staff, educators, families, visitors, volunteers and students
- parents/guardians are informed of how Clubhouse Bootcamp will take, use, store and destroy images and videos of children enrolled at the Service during enrolment and orientation. Policies are available on Club House website
- written authorisation is requested from families to take, use, store and destroy digital documentation including images and videos of children
- images or videos of children are not taken, used or stored without prior parent/guardian authorisation
- written authorisation is obtained from parents/guardians for children to use electronic devices (See: *Cyber Safety Authorisation*)
- written authorisation is obtained from parents/guardians to collect and share personal information,



images or videos of their children online (Website, Facebook, Instagram or Owna)

- families are informed to withdraw authorisation, a written request is required images and videos for individual children are deleted or destroyed and removed from storage when authorisation has been revoked from the parent/guardian
- they review how images and videos are stored on a regular basis and ensure new educators and staff have access to relevant folders and files, if required, in accordance with their role
- digital data is stored securely, whether offline or online, using a cloud-based service, and that data is archived regularly (monthly is recommended)
- images and videos are deleted or destroyed and removed from storage devices in accordance with the *Record Keeping and Retention Policy*. Only images and videos used for documenting children's learning and development may be held for 3 years after the child's last day of attendance in accordance with the *Record Keeping and Retention Policy*
- external agencies or specialists are consulted if concerns are identified relating to online abuse, cyberbullying or digital safety risks
- policies and procedures reflect a commitment to equity and diversity, protect children's privacy, and empower children to be independent
- collaboration with relevant professionals, as required, to support equitable access to digital technologies for all children
- they remain informed of privacy legislation through monitoring of updated from relevant government authorities such as the Office of the Australian Information Commissioner (OAIC)
- a risk assessment is conducted regarding the use of digital technologies by staff and children at the Service, including accessing online environments
- risk assessments for digital technology and online environments are reviewed annually or as soon as possible after becoming aware of any circumstances that may affect the safety, health or wellbeing of children
- policies and procedures are reviewed following an identification of risks following the review of risk assessments relating to the use of digital technologies and online environments
- staff, educators, families and children are informed of updates to policies, procedures or legislation relating to digital technologies and online environments
- a review of practices is conducted following an incident involving digital technologies or online environments, including an assessment of areas for improvement
- to install and maintain anti-virus and internet security systems including firewalls to block access to unsuitable web sites, newsgroups and chat rooms
- educators are informed of, and adhere to recommended timeframes for 'screen time' according to Australia's Physical Activity and Sedentary Behaviour Guidelines:



- children 5-12 years of age should limit screen time for entertainment to no more than 2 hours a day.
- they share information to families about recommended screen time limits based on *Australia's Physical Activity and Sedentary Behaviour Guidelines*.

#### EDUCATORS WILL:

- adhere to the *Safe Use of Digital Technologies and Online Environments Policy* and associated procedure
- understand the critical importance of implementing active supervision strategies when children are accessing online environments to keep children safe
- promote and contribute to a culture of child safety and wellbeing in all aspects of Clubhouse Bootcamp's operations, including when accessing digital technologies and online learning environments
- not use, or have access to, any personal electronic devices, including mobile phones or smart watches capable of taking images or video of children at Clubhouse Bootcamp, access social media (Facebook, Instagram or other) or breach children and families' privacy whilst in the presence of children under their supervision
- immediately place any personal electronic device they have brought into the service in the provided secure lockable container until their rostered break or the end of their shift
- only access their personal electronic devices whilst they are on a break, or after the end of their shift, **and** out of sight of any children attending the service
- understand that child safety has priority over any personal emergency or need to use a personal electronic device, and that it is the educator's responsibility to take all reasonable steps to ensure the safety of all children in their care before attending to any use of such devices
- keep passwords confidential and log out of computers and software programs after each use
- ask permission before taking photos of children on any device and explain to children how photos of them will be used and where they may be published
- ensure children's personal information where children can be identified such as name, address, age, date of birth etc. is not shared online
- ensure that screen time is NOT used as a reward or to manage challenging behaviours under any circumstances
- introduce concepts to children about online safety at age-appropriate levels
- support children's understanding of online safety by providing age-appropriate guidance, discussions and activities that help them to recognise safe and unsafe online behaviours



- consult with children about matters that impact them, including the use of digital technologies and online environments, to ensure their voices are heard and respected in a meaningful way.

#### FAMILIES WILL:

- adhere to the *Safe Use of Digital Technologies and Online Environments Policy* and associated procedure
- not use personal electronic devices, such as mobile phones, smart watches or META sunglasses, to take photos, record audio, or capture video of children being educated and cared for at Clubhouse Bootcamp
- be aware that sometimes other children in Clubhouse Bootcamp may feature in the same photos, videos, and/or observations as their children. In these cases, families are never to duplicate or upload them to the internet/social networking sites or share them with anyone other than family members.

#### VISITORS AND VOLUNTEERS WILL:

- adhere to the *Safe Use of Digital Technologies and Online Environments Policy* and associated procedure whilst visiting Clubhouse Bootcamp
- not use personal electronic devices, such as mobile phones smart watches or META sunglasses, to take photos, record audio, or capture video of children being educated and cared for at Clubhouse Bootcamp
- report any concerns related to child safety, including inappropriate use of digital technology, to the Approved Provider or nominated supervisor
- obtain written authorisation from parents/guardians to capture images or video of a child for observation/documentation purposes only. This applies to visitors who are supporting children at Clubhouse Bootcamp (NDIS funded support professionals, Inclusion Support professionals) (See *ECIP Confidentiality Agreement*).

#### BREACH OF POLICY

- Staff members or educators who fail to adhere to this policy may be in breach of their terms of employment and may face disciplinary action including immediate termination of employment.
- Visitors or volunteers who fail to comply to this policy may face termination of their engagement.
- Family members who do not comply with this policy may place their child's enrolment at risk and limit the family members access to Clubhouse Bootcamp.





## RESOURCES

Australian Children's Education & Care Quality Authority. [National Model for Early Childhood Education and Care.](#)

[Australian Government Office of the eSafety commission](#)

[eSafety Early Years Program for educators](#)

[eSafety Early Years Program checklist](#)

[eSafety Young People](#)

[eSmart Alannah & Madeline foundation](#)

Kiddle is a child-friendly search engine for children that filters information and websites with deceptive or explicit content: <https://www.kiddle.co/>

Office of the Australian Information Commissioner (OAIC)

## CONTINUOUS IMPROVEMENT/REFLECTION

Our *Safe Use of Digital Technologies and Online Environments Policy* will be reviewed on an annual basis in consultation with children, families, staff, educators and management. Families will be notified of changes to policies within 14 days to ensure they remain informed and can provide feedback or ask questions as needed.

## CHILDCARE CENTRE DESKTOP- RELATED RESOURCES

CCS Compliance Checklist and Audit CCTV Monitoring Letter to Families Cyber Safety Agreement Cyber Safety Authorisation Data Breach Response Record Data Security Checklist Digital Technologies Risk Assessment ECIP Confidentiality Agreement	Electronic Device Register Media Authorisation Child Media Authorisation Staff Privacy Audit Privacy and Confidentiality Procedure Safe Use of Digital Technologies and Online Environment Procedure
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## SOURCES

Australian Children's Education & Care Quality Authority. (2025). [Guide to the National Quality Framework](#)

Australian Children's Education & Care Quality Authority. (2023). [Embedding the National Child Safe Principles](#)

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Australian Government Department of Education. [Child Care Provider Handbook](#) (2025)

Australian Government. [eSafety Commissioner Early Years program for educators](#)

Australian Government, Office of the Australian Information Commissioner. (2019). Australian Privacy Principles: <https://www.oaic.gov.au/privacy/australian-privacy-principles-guidelines/>

Australian Government Department of Health and Aged Care. (2021). [Australia's Physical Activity and Sedentary Behaviour Guidelines](#)

Australian Human Rights Commission (2020). *Child Safe Organisations*. <https://childsafe.humanrights.gov.au/>

Early Childhood Australia Code of Ethics. (2016).

Education and Care Services National Law Act 2010. (Amended 2023).

[Education and Care Services National Regulations](#). (Amended 2023).

Office of the Australian Information Commissioner (OAIC)

Privacy Act 1988.

**APPENDIX** – Register of electronic devices purchased for use at each service:

WARRAGUL  
TRARALGON  
DROUIN

## REVIEW

POLICY REVIEWED BY	Catherine Stoney	Director/Approved Provider	11/09/2025
POLICY REVIEWED	Sept 2025	NEXT REVIEW DATE	Sept 2026
VERSION NUMBER	V1.0.25		
MODIFICATIONS	<ul style="list-style-type: none"><li>•New policy developed following changes to National Regulations effective from 1 September 2025</li><li>•Merger of the following policies: Technology Policy, Cyber Safety Policy, Mobile Device Usage Policy and CCTV Policy</li></ul>		
POLICY REVIEWED	PREVIOUS MODIFICATIONS		NEXT REVIEW DATE