

POLICY AND PROCEDURE

1. Policy Statement

St Nicholas is committed to providing a child environment, acknowledging both the physical and online environment. Digital technology will be utilised by St Nicholas staff, educators, children and families in a manner which protects children from harm, and provides a child safe environment, while enabling learning opportunities, documentation of children's learning and communication between the home and service.

St Nicholas recognises the increasing presence of digital technology in the lives of children and is committed to ensuring appropriate engagement with technology.

The use of digital technology can enhance the educational program, providing children with opportunities to be creative and active within their learning, while learning about and exploring technology. The Early Years Learning Framework and My Time, Our Place curriculum frameworks state that '*children and young people are to use digital technologies and media to access information, investigate and express ideas, and represent their thinking (2022)*'. Supporting the integration of technologies within the curriculum assists in developing children's skills, knowledge and understanding of how they are used and will equip children to engage safely and appropriately.

In addition to using technology with children, St Nicholas staff will utilise technology to document children's education and care. Capturing learning with technology provides the ability for children, families and St Nicholas team members to revisit learning experiences. In St Nicholas Early Education, recording children's routine times provides families with ready access to aspects of their child's day, which will strengthen the continuity of care between the home and service.

2. Purpose

The purpose of this Policy and Procedure is to ensure:

- All requirements under the Education and Care Services National Regulations and in relation to the safe use of digital technologies and online environments are maintained including:
 - The taking, use, storage and destruction of images and videos of children in the service
 - Obtaining authorisation from parents to take, use and store images and videos of children
 - The use of all St Nicholas devices used in services
 - The use of all personal devices of staff while working with children in services
 - The use of any digital devices used by children attending OOSH, including BYO devices used at school.
 - The timely and effective identification of and response to children who may be a risk or are experiencing abuse through the use of digital technology and online environments
- Continuing advances in the use of technology including software, applications, information sharing and devices are monitored, and St Nicholas team members must seek advice and clarification from the Head of Early Education or the Head of OOSH prior to engaging with new or unfamiliar technology.

3. Procedure Direction

Step	Detail
Use of personal electronic devices in services	<p>St Nicholas staff and educators must:</p> <ul style="list-style-type: none"> • Adopt the National Model Code for Early Childhood Education and Care and Taking Images or Videos of Children While Providing Early Childhood Education and Care Guidelines. • Not be in possession of personal electronic devices (such as tablets, phones, digital cameras, and smart watches) and personal storage and file transfer media (such as SD cards, USB drives, hard drives and cloud storage) while working with children, unless for authorised essential purposes such as emergencies, health and family needs. • Not use their personal electronic devices or technology to record, photograph or video children at the service. • Store their personal electronic devices and personal storage and file transfer media in their locker or other suitable location that is not accessible when working with children • Not wear a smart watch of any kind when responsible for supervising children. Any wearable technology that is deemed by the St Nicholas Nominated Supervisor or Responsible Person as a regular distraction to the supervision and care of children, will be performance managed, if required. • Not communicate with parent/guardians through personal devices or via personal social media accounts in relation to matters regarding children’s care and education, unless in an emergency. • Not use earbuds when working directly with children.
Use of St Nicholas supplied electronic devices in services	<ul style="list-style-type: none"> • St Nicholas will restrict access to specific sites or types of sites on the internet unless a legitimate business need for such access can be identified. • All St Nicholas devices used by the service must be password protected and not accessible to children. • All St Nicholas devices must stay onsite at the service. If there is an emergency or a situation which requires the device (service phone or laptop) to be taken offsite, the ASM or a senior manager must be notified prior to or as soon as possible. • Only services devices can be used to take photos or videos of children for the purposes of documentation of learning. • If children are using a service device for learning purposes, they must be seated with a staff member and actively supervised for the duration the device is being used. As soon as the device is no longer required, it must be closed down and placed back to the office, or other location where children are unable to access.

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<p>Authorised use of personal electronic devices</p>	<ul style="list-style-type: none"> • Staff and educators must not have a personal device in their possession or under their control while they are working directly with children as part of the service unless written authorisation has been granted for the following: <ul style="list-style-type: none"> ○ providing support or assistance with the staff member or educator’s disability or health needs; or ○ communication with the staff member or educator's family member; or ○ safety or the provision of education and care to the children if a Service Supplied Device ceases working; or ○ for use in an emergency; or ○ work health and safety. • Must be recorded on the service device register which includes: <ul style="list-style-type: none"> ○ the name and address of the education and care service to which the authorisation relates; ○ the full name, address and date of birth of the person to whom the authorisation is given; ○ the reason for which the authorisation is given; and ○ the period of time for which the authorisation is given. • Authorisation must be reviewed every 3 months • If there is no valid reason to continue the authorisation, the approved provider must, within 48 hours of becoming aware that there is no valid reason to continue the authorisation, revoke the authorisation in writing. • Register will be kept in a safe and secure location for a minimum of 3 years from when the record was made • For each authorisation a Risk Assessment will be required. This Risk Assessment must include: <ul style="list-style-type: none"> ○ Evidence from a medical practitioner that the device is required, stating exactly what the device is required for ○ Other approved evidence to demonstrate why the device is required ○ How and when the device will be used by the staff member ○ Risk mitigation strategies to address ensuring no child can access the device ○ A start and end date for the Risk Assessment, including any review dates • Risk Assessments will be developed only after approval from the Head of Early Education or the Head of OOSH, and they may be declined. • Risk Assessments can be revoked at any time.
<p>Record keeping for service supplied devices – Device Register</p>	<ul style="list-style-type: none"> • Each service will maintain a register to record the following information for each service supplied electronic device: <ul style="list-style-type: none"> ○ date of supply of the device ○ the type of device supplied

	<ul style="list-style-type: none"> ○ if available, the make, model and serial number of the device ○ declaration the device is configured to operate in accordance with the service’s policies and procedures that relate to child safety or security of devices ○ name and signature of the person supplying the device ○ the date, name and signature of person revoking device if applicable ○ dates of device use review to ensure devices are used appropriately ● Register will be kept in a safe and secure location for a minimum of 3 years from when the record was made
<p>Taking, use, storage and destruction of children’s images and videos</p>	<ul style="list-style-type: none"> ● The identity of a child will not be published on any platform. ● If images or videos of children are taken on the service phone, they must be removed and stored on the service laptop. Once images are used, they should be deleted. ● Children will be actively involved in decision making about their image being taken and shared. Staff should ask children for consent to take and share their photographs and video. ● Staff should photograph and video children purposefully, focusing on capturing moments that highlight learning and development. ● Staff are encouraged to focus the camera angle on the learning that is taking place, which may just focus on parts of their body, such as their hands. ● Photography and videos of children’s learning should be utilised to share pedagogical stories by capturing children’s learning and identify progress in their skills and development. ● evidence of children’s learning and participation in the program should be stored digitally in the OWNA App ● All images and videos will be stored securely and confidentially
<p>Children’s use of digital technology as part of the educational program</p>	<ul style="list-style-type: none"> ● educators are to intentionally plan for the use of digital technologies to enhance the educational program, referencing the Early Years Learning Framework and My Time, Our Place frameworks. ● Children are expected to engage creatively, actively, purposely with digital technologies, whilst maintaining care and respect for devices. ● Staff are to ensure the use of technology aligns with the National Model Code for Early Childhood Education and Care and Taking Images or Videos of Children While Providing Early Childhood Education and Care Guidelines. ● Staff are to ensure the use of technology aligns with the <i>Statement on Young Children and Digital Technologies (ECA, 2018)</i>. ● Viewing of programs must be carefully selected and suitable to the needs and developmental levels of each child ● Popular culture programs are only to be included to extend on the educational program.

	<ul style="list-style-type: none"> • Programs depicting violence eg. graphic news reports, must not be shown. • Children in Early Education are to view 'G' rated programs only. Children in OOSH services can view 'PG' rated programs, with parental permission. • All content will be socially and culturally considerate and appropriate. • St Nicholas team members are required to actively supervise technology use and ensure they are positioned where they can view screens.
Children's use of personal devices - EE	<ul style="list-style-type: none"> • Children are not permitted to bring personal devices or technology to St Nicholas services.
Children's use of personal devices - OOSH	<ul style="list-style-type: none"> • Parents/guardians and children are required to sign a technology agreement, stating personal devices are only used for homework or approved games. Children will be able to use personal devices once the agreement has been signed. • Children are not permitted to use their personal digital devices or technology to record, photograph, video or make a call during the operational hours of the service. • Children are able to use their personal laptops for research, to complete schoolwork and/or to play games for a maximum of 30 minutes per session. • Personal devices are to be stored in the office space, locker or school bag when not in use.
Reporting online child abuse	<ul style="list-style-type: none"> • Any child at risk of or who is experiencing abuse through digital technologies and online environments must be notified to the relevant authorities where required and within 24 hours
CCTV	<p>Currently, St Nicholas Early Education and OOSH services do not utilise CCTV.</p> <p>Some services have CCTV in the service carpark for security purposes only.</p>
Visitors to St Nicholas services	<ul style="list-style-type: none"> • Visitors to St Nicholas sites must sign in the Visitors Register on arrival and sign out when leaving • Parents/guardians, must not use their personal devices to take photos or videos of children when on the St Nicholas site. • Non parental visitors must not use their personal devices to take photos or videos of children when on a St Nicholas site. This includes Contractors. • No visitor or Contractor must be left alone with children while on site. • Other St Nicholas staff including support office staff, must take off any smart watches when entering a service and only use a St Nicholas device if required (phone, Ipad or Laptop)

Recommended Screen Time	<ul style="list-style-type: none"> • children younger than 2 years: no sedentary screen time • children aged 2–5 years: no more than one hour per day; less is better • children and young people aged 5–17 years: no more than 2 hours of sedentary recreational screen time per day. This does not include required schoolwork. Less is better.
Use of AI (Artificial Intelligence) for Programming and Planning	<ul style="list-style-type: none"> • Services are permitted to use Artificial Intelligence (AI) only with approval from the Head of Early Education or Head of OOSH. • Use of AI technologies will supplement, not replace, human intuition, engagement, and creativity. • AI will be used to enhance educational experiences for children, promote their individual learning, development and well-being, and to assist St Nicholas educators in observational recording without compromising the privacy, inclusivity, and safety of children. • AI applications will only be used by qualified staff who have received training on privacy, data use, and ethical use of technology in ECEC contexts. • Any use of AI programs or applications will undergo rigorous testing process to validate their accuracy and reliability in the ECEC context. • Data usage from the AI application will be used only for educational purposes and only when consent is obtained from parents/carers on collection in accordance, treated as a personal and sensitive document under the Australian Privacy Principles and Privacy Policy. • Any information collected through AI technology will be stored on secure platforms and will not be disclosed to any outside third-party without proper prior approval. • Ethical concerns regarding access to data, discrimination, and child privacy will be thoroughly addressed in accordance with the Framework. • St Nicholas will communicate and explain the AI application facilities to families and engage educators in professional development and training to ensure AI use is effectively monitored and applied in line with the aims and goals of St Nicholas. • AI will not be used to complete St Nicholas documentation or the service’s Self Assessment Tool
Parent / Guardian Authorisation	<ul style="list-style-type: none"> • Written authorisation is requested as part of the enrolment process for children: <ul style="list-style-type: none"> ○ to use the St Nicholas computers/tablets for learning purposes; ○ have their photo taken and published as part of promotional marketing or on the OWNA app program used by the service. • Parents / Guardians have the right to not allow their child to be photographed or videoed • Parents Guardians have the right to withdraw their consent for photos and videos any time <p>Authorisation for photography and video for the purposes of St Nicholas Marketing</p> <ul style="list-style-type: none"> • Prior to any images or video being taken for the purposes of St Nicholas

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- marketing, parents will be requested to complete specific permission form.
- Parents have the right to decline their child being photographed or videoed.

4. Roles and Responsibilities

Role	Responsibility
Approved Provider	<ul style="list-style-type: none"> • Ensure that the obligations under the Children (Education and Care Services National Law Application) Act 2010 and Education and Care Services National Regulations 2011 are met. • Take reasonable steps to ensure that Nominated Supervisors, employees and visitors follow the <i>Safe Use of Digital Technologies and Online Environments Policy and Procedure</i>. • Promote a culture of child safety and wellbeing that underpins all aspects of service operations, to reduce risk to children (including the risks of online abuse). • Ensure St Nicholas Nominated Supervisors and employees implement practices aligned with the National Model Code for Early Childhood Education and Care and Taking Images or Videos of Children While Providing Early Childhood Education and Care Guidelines, NSW Child Safe Standards and the services child safe practices for the use of electronic and digital devices for taking images or videos of children. • Provide secure digital technology devices to each service for the use and storage of images and videos of children • Ensure copies of this policy and procedure are readily accessible to all St Nicholas staff and educators. • Provide all St Nicholas services with appropriate information for the storage, use, retention and destruction of photos and videos, including the <i>Information and Records Management Policy and Procedure</i> and associated guidelines.
Nominated Supervisor Responsible Person	<ul style="list-style-type: none"> • Ensure the service is adhering to the St Nicholas <i>Safe Use of Digital Technologies and Online Environments Policy and Procedure</i> and National Model Code for Early Childhood Education and Care and Taking Images or Videos of Children While Providing Early Childhood Education and Care Guidelines. • Ensure only St Nicholas issued devices are to be used to take, use and store images and videos of children being educated and cared for by the service. • Ensure reasonable precautions are taken to protect children from harm and hazard when using digital technologies and engaging in online environments. • Maintain any issued digital technologies in working order at the service. • Ensure service devices only have applications deployed by CDMN Technology Services. • Maintain currency in complying with any relevant changes in legislation and practices in relation to this procedure.

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	<ul style="list-style-type: none"> • Lodge a Service@MN ticket as soon as practically possible if technology is broken or needs repair. • Report any misuse of technology in mnResponse and to any relevant agencies or authorities. • Ensure any child disclosure of unwanted or inappropriate contact online is reported in mnResponse and to any relevant agencies or authorities within 24 hours. • Ensure accurate records are maintained of parent/guardian authority to take, use and store images and videos of children. • Ensure children whose parents/guardians do not give written authority will be excluded from having their photograph shared. • Ensure children who are not to be photographed or videoed remain participating in all aspects of the educational program. • Ensure St Nicholas and Diocesan staff, educators, volunteers and students seek written permission from families/guardians if they are requested to take photographs or videos for purposes such as educational studies, media or marketing • Ensure St Nicholas staff and educators are aware of risks to children when including use of technology and the internet in learning. • Ensure there is active supervision of children when they are using digital technologies. • Advocate the importance of a child safe online environment. • Maintain currency in understanding of digital citizenship and promote responsible and ethical online use for children and St Nicholas team members. • Engage St Nicholas staff and educators in training on the safe use of digital technologies and online environments. • Ensure any subcontractors visiting the site do not use any form of digital technology to capture images of children. • Limit the deployment of applications for use to the approved list. • Only communicate with families (except for face-to-face) using the service phone or St Nicholas email address.
Educators / Staff	<ul style="list-style-type: none"> • Make thoughtful pedagogical decisions around the use of technology within the educational program and teach children how to use technology safely. • Reflect upon the use of technology within the educational program. • Implement the services culture of child safety and wellbeing, including when accessing digital technologies and online environments. • Ensure reasonable precautions are taken to protect children from harm and hazard when using technologies and engaging in online environments. Be aware of and minimise risks to children when including use of technology and the internet in the program • Ensure any applications used with children have been deployed by CDMN Technology Services. • Ensure an understanding and alignment of practices with the National

	<p>Model Code for Early Childhood Education and Care , Taking Images or Videos of Children While Providing Early</p> <ul style="list-style-type: none"> • Childhood Education and Care Guidelines and the service’s expectations around the use of personal and service issued devices and seek guidance when needed from the Nominated Supervisor or Responsible Person. • Understand only service issued devices are to be used to take, use and store images and videos of children being educated and cared for by the service. • Ensure children whose parents/guardians do not give written authority will be excluded from having their photograph taken. • Maintain full participation in the educational program for children who are not permitted to be photographed or videoed. • Ensure written permission is sought from parents/guardians if they are requested to take photographs or videos for purposes such as their studies. • Maintain appropriate, active supervision of children when 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. • Understand 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. • Report the misuse of digital devices or technology and unacceptable online behaviours to the Nominated Supervisor, Responsible Person or a senior manager. • Report any disclosures of unwanted or inappropriate contact whether known or unknown to the child. • Maintain currency in understanding of digital citizenship and promote responsible and ethical online use for children and St Nicholas team members. • Only communicate with families (except for face-to-face) using the service phone or St Nicholas email address.
<p>Parents / Guardians</p>	<ul style="list-style-type: none"> • Indicate consent regarding the authority granted to St Nicholas and Diocesan employees to photograph or video your child on enrolment. • Update St Nicholas of any changes to photograph/video consent for their child, in writing. • Connect to the OWNA App to obtain visibility over the documentation of children’s routines and learning. • Use the OWNA App to sign children in and out of the service. • Maintain responsibility for any digital devices or technology provided to children from home in services (OOSH only). • Refrain from taking photographs or videos of children other than your own, unless consent has been received.

	<ul style="list-style-type: none"> • Support children to develop their digital citizenship to understand how to use technology effectively, ethically and safely. • Communicate with St Nicholas staff and educators (except for face-to-face) using the service phone or St Nicholas email address.
Children	<ul style="list-style-type: none"> • Personal use of digital technology is not permitted in St Nicholas EE services. • School age (OOSH) children when using any personal device must do so in a safe, responsible and respectful manner, provided this is supported by a St Nicholas team member. • Seek support from St Nicholas team members when using digital technologies. • Engage with the service-issued devices with respect.

5. Related Documents

Policies and Procedures

- Enrolment and Orientation Policy and Procedure
- Acceptance and Refusal of Authorisation Policy and Procedure
- Provide a Child Safe Environment Policy and Procedure
- Supervision Policy and Procedure
- Interactions with Children Policy and Procedure
- Incident, Injury, Trauma and Illness Policy and Procedure
- Record Management Policy and Procedure
- BYOD Parent and Child Agreement

Legislation

- [Children \(Education and Care Services\) National Law \(NSW\) No 104a of 2010 - NSW Legislation](#)
Regulations: 84, 155, 176, 181, 183
- [Education and Care Services National Regulations \(2011 SI 653\) - NSW Legislation](#)
Section: 5AA, 165, 167

Other References

[National Model Code for Early Childhood Education and Care](#)
[Taking Images or Videos of Children While Providing Early Childhood Education and Care Guidelines](#)
[Education and Care Services \(Supply, Authorisation and Use of Devices\) Order 2025](#)
[acecqa safe use of digital - Google Search](#)
[Providing a child safe environment](#)
[eSafety checklist for early learning services | eSafety Commissioner](#)
[New child safety requirements](#)

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NQF Online Safety Guide. Child Safety. ACECQA 2025

National Quality Standard

Quality Area 1

Quality Area 2 – Element 2.2.1

Quality Area 5 – Element 5.1.2

Quality Area 7 - Element 7.1.2

6. Definitions

Term	Definition
Inappropriate Conduct	<p>Meaning of "inappropriate conduct" in relation to child [NSW]</p> <p>(1) In this Law, "inappropriate conduct" in relation to a child means conduct a reasonable person would consider to be inappropriate in an education and care service.</p> <p>(2) In deciding whether a reasonable person would consider conduct inappropriate in an education and care service, the following must be considered--</p> <ul style="list-style-type: none"> (a) whether the conduct is expected practice in the provision of education and care services; (b) the child's age and stage of development; (c) whether a child is likely to suffer emotional, psychological or physical harm as a result of the conduct; (d) the purpose of the conduct, including whether the conduct, in the circumstances in which the conduct occurs, could be considered sexual or violent. <p>(3) In deciding whether conduct is inappropriate conduct in relation to a child, the following is irrelevant--</p> <ul style="list-style-type: none"> (a) whether the child consents to the conduct; (b) whether the person engaging in the conduct believes the child consents to the conduct. <p>(4) A child may be subjected to conduct that is inappropriate conduct--</p> <ul style="list-style-type: none"> (a) in person, both directly and otherwise; or Example--: conduct witnessed by a child (b) by communication, including-- <ul style="list-style-type: none"> (i) verbal communication; and (ii) electronic communication received in real or close to real time; or (c) by electronic capture, including photography and recording; or (d) through a pattern of behaviour.
Capture	An image of a child, includes film, record or take an image of the child.
Personal Electronic Device	<ul style="list-style-type: none"> (a) owned or controlled by a person; and (b) capable of: <ul style="list-style-type: none"> i. capturing an image; or

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	ii. storing or transmitting an image but does not include a Service-Supplied Device or Service-Authorised Device.
Service Supplied Device	(a) supplied by an approved provider of an education and care service; and (b) to be used by a relevant person exclusively for the purposes of providing education and care to children as part of that service; and (c) configured to operate in accordance with any policies or procedures of the education and care service that relate to child safety or the security of devices.
Working directly with children	A person who is, at a given time, physically present with a child or children and employed, engaged or appointed to provide education and care to the child or children at that time. A person is not working directly with children at a given time if the person is taking a short break from providing education or care to children in accordance with the person's employment, engagement or appointment, except if children enrolled at the service are present during the short break.
Educator	A St Nicholas team member whose primary role is working directly with children
Staff	A St Nicholas team member whose primary role is not working directly with children, including cooks, support office team members, administration team members, support workers, volunteers
Early Education	St Nicholas service providing education and care to children aged 0 – 5 years
Staff	St Nicholas service providing education and care to school aged children
Approved Provider	The legal entity with ultimate responsibility for the service under the National Law
Nominated Supervisor	A person with management or control of an education and care service, responsible for its day-to-day management.
Responsible Person	A Responsible Person is present at an education and care service to ensure compliance, safety, and wellbeing when the Approved Provider or Nominated Supervisor is not.
Person with Management Control (PMC)	An individual who forms part of the group responsible for the executive decisions of an approved provider, has significant influence over service delivery
ACECQA	Australian Children's Education & Care Quality Authority) is the independent national authority guiding the implementation of the National Quality Framework (NQF) for early childhood education and care across Australia. It works with state governments to ensure national consistent quality standards, compliance, and qualification assessments
Service	Education and care service providing, or intended to provide, education and care on a regular basis to children under 13 years of age

7. Document Review

This Policy will be reviewed when there is a legislative change, organisational change, delegations change, technology change or at least every 1 - 2 years to ensure it continues to be current and effective.

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