



Evanston Gardens
Primary School

EVANSTON GARDENS PRIMARY SCHOOL OSHC

Safe Use of Digital Technologies and Online Environments Policy



Government of South Australia
Department for Education

Safe Use of Digital Technologies and Online Environments Policy

Purpose

Our Out of School Hours (OSHC) Service is committed to fostering a culture that creates and maintains a safe online environment with support and collaboration from staff, families and community. As a child safe organisation, our OSHC 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 technology in a child safe environment.

Children's safety and wellbeing is paramount and our OSHC Service 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 our OSHC Service philosophy, and privacy and legislative requirements to ensure the safety of enrolled children, educators and families. We believe that children's safety, rights, and best interests are the paramount consideration for all Service operations, decisions and functions.

Scope

This policy applies to children, families, staff, educators, management, approved provider, nominated supervisor, students, volunteers and visitors of the OSHC Service.

Terminology

Explanation of Key Terms Used Within This Policy	
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
Harmful content	Harmful content includes sexually explicit material; false or misleading information; violence; extremism or terrorism; hateful or offensive material
ICT	Information and Communication Technologies
Illegal content	<i>Includes:</i> images and videos of child sexual abuse Content that advocates terrorist acts Content that promotes, incites or instructs in crim 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

Our OSHC Service 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. 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

Our Service adopts and aligns with the National Model Code 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 used to take, store or transfer images or videos of children who are being educated and cared for at the OSHC Service is strictly prohibited. This includes items such as tablets, mobile phones, computers/laptops, digital cameras, smart watches, META sunglasses (wearables) and personal storage and file transfer media (such as SD/memory cards, USB drives, hard drives and cloud storage) and other new and emerging technologies. These devices should not be in the possession of staff, educators or visitors (e.g. ECIP or NDIS professionals) while working directly with children, including during excursions or when children are being transported.

Staff and educators are advised that electronic devices supplied or issued by and registered with to the OSHC Service 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.

Exemptions

The approved provider will inform staff, educators and visitors of exemptions or prescribed circumstances 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 while working directly with 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)

Written prescribed circumstance authorisations must include Service details, person's details, reasons for the authorisation and duration of the authorisation.

Service-Supplied or Issued Electronic Devices

Our OSHC Service will develop and maintain a register of all electronic devices purchased for and used within the Service. Each device purchased for and used at the centre will be clearly marked with an identification code and marked to state it is property of the Service. This register will include details such as the identification code, 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, baby monitors and any other internet-connected or data-enabled devices used within the Service. Electronic devices issued by and registered with the OSHC Service will be stored in a locked cabinet at the end of the day. Records relating to the supply or issue of electronic devices, including registers of use Service-supplied or issued device is to be stored securely for a period of 3 years from the date the record was made.

Children enrolled at our OSHC Service are not permitted to bring electronic devices to the OSHC 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 the OSHC Service, 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 OSHC Service-supplied or 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 OSHC Service policies, and careful consideration 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.

Our OSHC Service 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 regularly. Digital data stored at the OSHC Service 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 OSHC Service issued devices to personal devices, unauthorised transferring of digital data may result in disciplinary action.

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

Our OSHC Service uses a range of secure software programs and apps on Service-supplied or issued devices to support the educational program and administration of the OSHC Service. 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. In addition, our OSHC Service may use accounting and payroll software such as MYOB or Xero, HR systems, and compliance tools. These platforms assist in managing the Service’s financial, staffing, and operational requirements.

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. The Department for Education AI service 'EdChat' is the only permitted AI interface at the service.

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. Our OSHC Service 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 the OSHC Service 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 or inappropriate conduct to the approved provider or nominated supervisor.

Identification and Reporting of Online Abuse and Safety Concerns

Our OSHC Service 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
- ensure all educators, staff, students and families are advised of the *Protected Disclosure (Whistleblower) Policy*, whistleblower protections and processes
- 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.

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
- 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
- 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
- processes are in place to ensure families who speak languages other than English understand the requirements of this policy, including providing authorisation for images and videos
- 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

- professional learning is provided to educators and staff relating to the safe use of digital technologies and online environments
- an *Electronic Device Register* is developed and monitored for all electronic devices purchased and used at the OSHC Service, including which staff have access or are allocated to the device
- a record of revocation is documented for any electronic devices no longer used at the Service
- appropriate ratios and adequate supervision are maintained for children at all times including when using digital technology and accessing online environments
- students, volunteers and/or visitors are never left alone with a child whilst at the OSHC Service under any circumstances
- all staff, educators, volunteers and students are aware of the National Model Code and strictly adhere to these guidelines for taking images or video of children including
 - personal electronic devices or personal storage devices, that can take images or videos, are not used by educators, staff, visitors or volunteers when working directly with children
 - staff and educators only use electronic devices supplied or issued and registered with the OSHC Service for taking images or videos of children enrolled at the OSHC Service
 - OSHC Service issued devices are securely configured, monitored and maintained to prevent unauthorised access
 - exemptions or prescribed circumstances are authorised, in writing, for staff to possess or control a personal device while working directly with children
 - visitors who are supporting children at the OSHC Service (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 our OSHC Service'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*)
- the OSHC Service *Privacy and Confidentiality Policy* is adhered to at all times by staff, educators, families, visitors, volunteers and students
- parents/guardians are informed of how the OSHC Service will take, use, store and destroy images and videos of children enrolled at the Service during enrolment and orientation
- 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
- **a record of all children who are NOT to be photographed or captured on video is to be developed, maintained and shared with educators and staff. This record will remain private and confidential.**

- 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 XAP)
- that the Service seeks written authorisation from parents/guardians for their child to be photographed when an outside photographer/agency is contracted to take photographs for marketing purposes or to take individual and group photos. Only children who have written authorisation from their parent/guardian will be included in any photography. [See *Media Authorisation Form*]
- that the children of parents/guardians who do not wish their child to be photographed or videoed are provided with other activities when an external photographer/agency is engaged
- Early Childhood Professionals (ECIP) or NDIS workers visiting the Service must obtain authorisation from the approved provider and parent/guardian prior to taking images or videos of children whilst at the Service. Images and videos must NOT be taken on personal devices.
- 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*, images and videos used for documenting children's learning and development must be held for 3 years after the child's last day of attendance
- every child in our care is protected from any exploitation of photographic and video images of themselves whilst they attend the Service
- images or videos of children must be appropriate in nature and must not show children in distress, in a position that may be perceived as sexualised or in a state of undress, including where genitalia may be exposed
- 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.
- the use of TV/iPad and watching DVD's is kept to a minimum, with programs are chosen that are engaging and age appropriate to children. When used, the following conditions apply:
 - only 'G' rated television programs and movies will be viewed at the Service
 - 'PG' rated television programs may be viewed if written consent is provided
 - programs depicting violence and/or inappropriate content (including graphic news reports) will not be shown
 - TV programs or videos will only be shown that have positive messages about relationships, family and life
 - information about educational programs to be viewed will be shared with families beforehand to ensure that they approve of the content. Information may include title, synopsis, rating, length of program
 - all content will be socially and culturally considerate and appropriate
- they share information to families about recommended screen time limits based on *Australia's Physical Activity and Sedentary Behaviour Guidelines*
- all documentation and records relating to safe use of digital technologies are kept safe and secure for a period of 3 years following the child's last day of attendance

- a review of practices is conducted following an incident involving digital technologies and online environments, including an assessment of areas for improvement.

Educators Will:

- adhere to the *Safe Use of Digital Technologies and Online Environments Policy* and associated procedure
- ensure they 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
- ensure they promote and support a child safe environment, including adherence to the *Child Safe Environment* and *Child Protection* policies and mandatory reporting obligations
- participate in practical training related to digital safety, privacy protection and responsible use of technology
- 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 our OSHC Service's operations, including when accessing digital technologies and online learning environments
- develop an understanding of the National Model Code and strictly adhere to these guidelines for taking images or video of children
- not use, or have access to, any personal electronic devices, including mobile phones or smart watches used to take images or video of children at the OSHC Service, access social media (Facebook, Instagram or other) whilst working directly with children, unless an exemption has been authorised
- not breach children and families' privacy
- 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 the OSHC Service
- provide written authorisation indicating whether or not the Service may take, use, store or destroy images or videos of their child
- provide written notification if they wish to withdraw the authorisation for the Service to take, use, store or destroy images and videos of their child
- be requested to provide written authorisation/consent for individuals visiting the Service to take photographs of their child/ren (e.g., ECIP professionals, professional photography for marketing, school photos etc.)
- be able to withdraw authorisation for the Service to take, use, store or destroy images or videos of children at any time in writing
- be provided with clear information about how to make a complaint and our complaints handling processes
- be aware that sometimes other children in the OSHC Service 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 the OSHC Service
- 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 the OSHC Service
- 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 and the approved provider to capture images or video of a child for observation/documentation purposes only. This applies to visitors who are supporting children at the OSHC Service (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 which may lead to notification to the regulatory authority and child protection. 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 the OSHC Service.

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 or earlier if there are changes to legislation or ACECQA guidance or any incident related to our policy.

Feedback will be requested from children, families, staff, educators and management and notification of any change to policies will be made to families within 14 days.

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](#)

Australian Children's Education & Care Quality Authority. (2024). [Taking Images and Video of Children While Providing Early Childhood Education and Care. Guidelines For The National Model Code.](#)

Australian Government eSafety Commission (2020) www.esafety.gov.au

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 2025)

[Education and Care Services National Regulations](#). (Amended 2025)

Office of the Australian Information Commissioner (OAIC)

Privacy Act 1988.

Review

Policy Reviewed By	Nikki Priestman	Principal	09/03/2026
Policy Reviewed	January 2026	Next Review Date	August 2026
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Policy Reviewed	Previous Modifications		Next Review Date
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