

NQS2 Children's Health & Safety Procedure Safe Management of Personal Electronic Devices at Centres

Background

C&K is committed to protecting the safety and wellbeing of every child. This commitment extends to the safe and responsible use of personal electronic devices at our centres. This procedure outlines the expectations and responsibilities of centre staff regarding their use of personal electronic devices and aligns with the *National Model Code for Taking Images or Videos of Children while Providing Early Childhood Education and Care (National Model Code)*.

Personal electronic devices are never used to record, share and store children's images

Students, volunteers, external contractors, centre visitors and parents/guardians are not in scope of this procedure. For direction on their access and use of personal electronic devices, refer to associated policies and procedures (page 4 of this procedure).

For the purposes of this procedure:

- **Images:** Still photos and video recordings. Images of children are classified as personal information and are recorded, used and stored in strict compliance with the *Privacy Policy* and this procedure.
- **Electronic device:** Any device capable of recording, storing, sharing or transmitting images, including but not limited to smartphones, wearable technology including smartwatches and smart glasses, tablets, cameras and computers.
- **Personal Electronic Device:** Any electronic device capable of recording, storing, sharing or transmitting images, that is the property of a C&K or Affiliated centre employee, student, volunteer or contractor that works with children. Examples include, but are not limited to, to smartphones, wearable technology including smartwatches and smart glasses, tablets, cameras and computers.
- **C&K-Issued Electronic Device:** A tablet or camera capable of recording, storing, sharing or transmitting images, that is the property of C&K or Affiliated Centre.
- **Electronic Storage Device:** USBs, portable hard drives and memory cards able to store and transport files and images.
- **C&K-Approved Online Platform:** Any online or cloud-based platform /application endorsed by C&K (via the IT Steering Committee or Executive Management Committee) or Affiliated Centre Executive Management Committee.
- **Personal Online Platform:** Any online or cloud-based platform not approved by C&K or the Affiliate Centre Management Committee, that can store, share or transmit images, that a C&K or affiliated centre employee, student, volunteer, or contractor who works with children has a registered account. Including but not limited to, personal email account, any type of social media account or web-based graphic design platform.
- **Essential Purpose:** As outlined on page 4 of this procedure.
- **Non-Licensed Area:** An area of a centre not accessed or used by children e.g. staff-only centre administrative, staff meal/break or program/documentation rooms.
- **Licensed Area:** An area of a centre accessed or used by children e.g. indoor and outdoor learning environments, children's bathrooms, nappy change, kitchenettes/bottle prep areas and equipment storage areas.

Centre staff are **NEVER** permitted to:

- ✗ Record, use, share, transmit, upload and store images of children on a personal electronic device, personal online platform or personal electronic storage device.
- ✗ Use or have on their possession a personal electronic device while working directly with children, unless prior authorisation has been obtained for an essential purpose, as outlined on page 4 of this procedure.
- ✗ Use or have on their possession a personal electronic storage device while working directly with children.
- ✗ Store a personal electronic device in any location of a *licensed area* when children are present at centre; unless prior authorisation has been obtained for an essential purpose, as outlined on page 4 of this procedure.
- ✗ Store a personal electronic storage device in any location of a *licensed area* when children are present at centre.
- ✗ Use or access a personal online platform while working with directly with children.
- ✗ Permit a child to access or use a personal electronic device or personal online platform.
- ✗ Compromise the active supervision of children or delivery of education and care program when authorised to use a personal electronic device for an essential purpose, as outlined on page 4 of this procedure.

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Responsibilities

All centre staff will:

- When children are present at the centre, store personal electronic devices and personal electronic storage devices securely in a *non-licensed area* e.g. a locked office, locker, cupboard or drawer in a staff-only office, staff meal/break or program room.
- When not working directly with children, use a personal electronic device in a *non-licensed area* to complete multi-factor authentication to access a C&K-approved platform.
- When required, seek written authorisation if you must use a personal electronic device for an essential purpose while working directly with children. Essential purposes:
 - Essential communication during a temporary outage of centre telephone.
 - Essential communication during a localised emergency including lockdown, evacuation, unaccounted or missing child or medical emergency.
 - Essential communication during a localised natural emergency, including but not limited to, an extreme weather event or bush fire.
 - Essential communication on an excursion for an emergency, including lockdown, evacuation, unaccounted or missing child or medical emergency.
 - Receive urgent communication regarding a critically ill or dying family member.
 - (For centre staff or child) Electronic device used to manage a diagnosed medical condition e.g. blood glucose meter/glucometer or heart monitor.
 - (For centre staff or child) Electronic device to assist hearing loss/impairment and/or speech/language impairment/disorder e.g. Augmentative and Alternative Communication Device and/or hearing device.
 - (For child) Electronic device essential to support inclusion and participation in the education and care program of a child with a diagnosed disability, learning or developmental disorder, impairment or delay.
 - (School-Aged Child) Tablet or laptop used to complete homework; in the designated centre location; under the direct and active supervision of educators, when written authorisation has been obtained.

Refer to page 4 of this procedure for authorisation requirements.

- When written authorisation has been obtained, use personal electronic device in a manner that does not interfere with the active supervision of children or delivery of the program.
- Inform family members and other relevant contacts (e.g. child's school or childcare providers), of centre's contact details for personal emergencies.
- Immediately report inappropriate use of a personal electronic device, a personal online platform or electronic storage device to the Centre Director/Nominated Supervisor, Responsible Person in Charge (RPIC) or Early Childhood Education Manager (ECEM)/Management Committee.

Wearable technology

Centre staff:

- May wear a smartwatch or fitness/health tracker when working directly with children, only if the device does not have the capability to record images, and its use does not interfere with the active supervision of children or delivery of the education and care program.
- Will when working directly with children, place their smartwatch or fitness/health tracker in airplane mode or disable notifications to avoid distractions.

School-age children's use of personal electronic devices

School-age children:

- May wear a smartwatch or fitness/health tracker, only if the device does not have the capability to record images.
- Will upon arrival, place personal electronic devices in the designated secure storage area in the administrative office (or other non-licensed area), where they will remain for the duration of their time at the centre.
- May access and use their personal tablet or computer to complete school-assigned homework only when the following conditions are met:
 - Authorisation to Use of Personal Electronic Device to Complete Homework Form has been completed.
 - An educator has provided verbal authorisation to access and use.
 - An educator can directly and actively supervise the activity – an educator is able to view tablet/computer screen.
 - The device is used only in the designated homework area.
- Will never:
 - Use a personal electronic device to record, store or share images.
 - Use a personal electronic device for any other purpose other than completing school-assigned homework.
 - Share personal electronic device password with peers.
 - Allow peers to use their personal electronic device.
- Understand that the Centre Director/RPIC may withdraw their authorisation at any time if the use of the personal tablet or computer is deemed to pose a risk to the safety or wellbeing of children or centre staff.

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Centre Director/Nominated Supervisor and Responsible Person in Charge will:

- Include this procedure in the induction process for all teachers and educators, including casual staff.
- Treat any use of personal electronic devices, personal online platforms or electronic storage devices inconsistent with this procedure as serious misconduct.
- Immediately report procedural non-compliance to the ECEM/Management Committee and, if required and where there is risk to children's health and safety, notify the regulatory authority in line with the *Child Centre Incident Reporting Procedure* (Branch/Affiliate).
- Never conduct physical searches of a centre staff member's personal belongings or person to monitor or enforce compliance with this procedure.
- Refer to the *Approved Essential Purposes* table (page 4 of this procedure) when considering and authorisation centre staff requests to use a personal electronic device while working directly with children.
- Without breaching privacy, inform relevant centre staff when an individual has been authorised to use their personal electronic device for an essential purpose.
- Maintain a folder containing completed *Authorisation to Use a Personal Electronic Device for an Essential Purpose Form*.
- Withdraw authorisation to use a personal electronic device for an essential purpose if it is determined its use does not comply with this procedure or poses a risk to the safety and wellbeing of children or centre staff.
- Ensure centre staff, students, volunteers and external contractors (that work with children) have access to secure storage in a non-licensed area for storing personal electronic devices.
- Establish and implement clear centre-based protocols for recording and relaying telephone messages via the centre telephone to centre staff.

Early Childhood Education Managers, Early Childhood Pedagogy Advisors and C&K Management Personal/Affiliated Centre Management Committee will:

- Include this procedure as part of the induction process for Centre Directors/Nominated Supervisors.
- Monitor centre compliance with this procedure. Treat any use of personal electronic devices, personal online products/platforms or personal electronic storage devices that is inconsistent with this procedure as serious misconduct.
- Never conduct physical searches of a staff member's personal belongings or person to monitor or enforce compliance with this procedure.
- When conducting centre monitoring visits, when children are present, store personal electronic devices securely in a non-licensed area.
- Withdraw authorisation to use a personal electronic device for an essential purpose if it is determined its use does not comply with this procedure or poses a risk to the safety and wellbeing of children or centre staff.

**** Refer to 'Approved essential purposes to use a personal electronic device table' on the following page****

Associated policies and procedures

This procedure is implemented alongside:

- *Acceptable Use Procedure* (branch centres only)
- *Mobile Device Procedure* (branch centres only)
- *Student Procedure and Induction Checklist* (branch centres only)
- *Volunteer Procedure and Induction Checklist* (branch centres only)
- *External Contractor Working with Children Procedure and Induction Checklist* (branch centres only)
- *Visitor Procedure*
- *Parent and Community Code of Conduct*

References and resources

- *National Model Code for Taking Images or Videos of Children while Providing Early Childhood Education and Care* (National Model Code)
- *ACECQA Child Safety – NQF Online Safety Guide*
- *ACECQA Information Sheet - NQF Child Safety Changes*
- *ACECQA Policy and Procedure Guidelines – Safe use of Digital Technologies and Online Environments*

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Essential purposes to use a personal electronic device while working directly with children

Essential purpose	Who	Authorisation required	Authorised period of time
A personal electronic device can be used to arrange and coordinate phone division with C&K IT team/Management Committee and for essential communication during a temporary outage of centre telephone. In addition, Nominated Supervisor or RPIC should discuss how centre operations may be impacted during this period with their ECEM/Management Committee.	Nominated Supervisor or RPIC	C&K IT Team/Management Committee written authorisation via email 'How To' telephone diversion instructions.	Until the outage of the centre telephone has been resolved.
Essential communication during a localised emergency including lockdown, evacuation, unaccounted or missing child or medical emergency.	Centre staff	Authorised under the provision of the <i>Emergency Management and Missing and Unaccounted Child Procedures</i> .	Duration of the emergency or until the risk to children and staff has been resolved.
Essential communication during a localised natural emergency, including but not limited to, an extreme weather event or bush fire.	Centre staff	Authorised under the provision of the <i>Emergency Management Procedure</i> .	Duration of the emergency or until the risk to children and staff has been resolved.
Essential emergency communication on an excursion including lockdown, evacuation, unaccounted or missing child or medical emergency.	Centre staff attending the excursion	ECEM/Management Committee member written authorisation via the <i>Excursions Plan and Risk Assessment</i>	Throughout the excursion; until the excursion has concluded.
Receive urgent communication regarding a critically ill or dying family member.	Centre staff and students, volunteers and external contractors that work with children	Centre Director or ECEM/Management Committee member written authorisation via <i>Authorisation to Use a Personal Electronic Device for an Essential Purpose Form</i> .	To be determined in consultation with, and at the discretion of Centre Director or ECEM/Management Committee
Electronic device used to manage a diagnosed medical condition e.g. blood glucose meter/glucometer or heart monitor.	Centre staff and students, volunteers and external contractors that work with children	Centre Director or ECEM/Management Committee member written authorisation via <i>Authorisation to Use a Personal Electronic Device for an Essential Purpose Form</i> .	Throughout the person's employment or engagement at a centre.
	Centre staff for an enrolled child	Registered medical practitioner written authorisation via child's Medical Management Plan.	Throughout child's enrolment.
Electronic device to assist hearing loss/impairment and/or speech/language impairment/disorder e.g. Augmentative and Alternative Communication Device and/or hearing device.	Centre staff and students, volunteers and external contractors that work with children	Centre Director or ECEM/Management Committee member written authorisation via <i>Authorisation to Use a Personal Electronic Device for an Essential Purpose Form</i> .	Throughout the person's employment or engagement at a centre.
	Enrolled child and centre staff for an enrolled child	Registered medical practitioner or allied health written authorisation via child's Education Support Plan (or attached supporting document).	Throughout child's enrolment.
Electronic device essential to support inclusion and participation in the education and care program of a child with a diagnosed disability, learning or developmental disorder, impairment or delay.	Enrolled child and centre staff and/or allied health/external contractor that works with children for an enrolled child	Registered medical practitioner or allied health written authorisation via child's Education Support Plan (or attached supporting document).	Throughout child's enrolment.
Tablet or laptop used to complete homework; in the designated centre location; under the direct and active supervision of educators.	Enrolled school age child	Parent/guardian and Centre Director written authorisation via <i>Authorisation to Use of Personal Electronic Device to Complete Homework Form</i> .	Every 12 months