

2-P33: Safe use of digital technologies and online environments– electronic devices policy and procedure



Responsible	Legal		
Accountable 1	Nominated Supervisor	Accountable 2	All Staff
Consulted	Legal, Compliance, Quality, Policy, Executive		
Informed	All staff		

Policy Statement

The objective of this DTOE Policy is to articulate Affinity's compliance with the Regulations relating to the safe use of digital technologies and online environments and the steps Affinity takes to protect children from harm and hazards.¹

Affinity is committed to protecting rights to privacy and safety when using digital technologies and online environments. Affinity utilises digital technologies in a way that upholds the values of respect, inclusion and child protection. This includes the responsible capturing, use and handling of images and videos, secure data storage, and safe online engagement in line with the National Model Code for Taking Images or Videos of Children.

This DTOE Policy:

- outlines the processes for capturing, storing, using, sharing and destroying digital media (images and videos) involving children; and
- ensures Affinity Employees, families and visitors are using digital technologies and online environments safely and responsibly in accordance with Laws and the Regulations.

Definitions and terms used within this procedure

Affinity means Affinity Education Group Pty Limited ABN 37 163 864 195;

Approved Devices means electronic devices issued Affinity to Employees to be used in centres which may include desktop computers, laptops, tablets and iPads, interactive Smartboards and mobile phones;

centre and Affinity centre means a child care centre owned and operated by Affinity;

Centre Manager means the centre manager of the relevant Affinity centre who has day to day operational management of the relevant centre.

DTOE Policy means this '*Safe use of digital technologies and online environments – electronic devices policy and procedure*' as amended from time to time which is made available on the Affinity website and in physical copy at centres and on request;

Employees means educators, volunteers and others employed or engaged by Affinity to provide childcare and education services at Affinity centres;

ICT in learning refers to the use of Approved Devices as tools to support, enhance or document children's learning experiences in developmentally appropriate, relational and play-based ways.

Laws means all legislation, regulations, common law, rules, regulatory codes and guidelines, standards and industry requirements whether at commonwealth, federal, state, territory, local or municipal level and relevant to the subject matter of this DTOE Policy, including Privacy Laws;

Personal Information has the meaning given to it in the Privacy Laws;

Privacy Laws means the *Privacy Act 1988* (Cth) and the Australian Privacy Principles as amended from time to time;

Regulations means the Education and Care Services National Regulations, as amended from time to time; and

Sedentary screen time refers to screen based digital media used whilst seated or inactive.

Procedure Strategies

1. Service issued devices

- Only Approved Devices can be used when taking images or videos of children within Affinity centres. These will be identified through AEG tech logos.

¹ Section 167 of the *Education and Care Services National Law*; Regulations 168 and 170 of the *Education and Care Services National Regulations* (**Regulations**).

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- Employees must not use, or have on their person:
 - any personal electronic devices that can take images or videos (such as tablets, laptops, phones, digital cameras and smart watches);
 - personal storage and file transfer media devices (such as USBs or hard drives); or
 - cloud-based applications that have the ability to store images or videos, when working directly with children unless for authorised essential purposes such as emergencies or health and family needs and provided such access does not adversely affect the active supervision of children.
- Affinity will consider requests to use personal devices when working directly with children on a case-by-case basis, and will make a determination as to their use in accordance with this DTOE Policy, Laws and the Regulations, and industry standards having regard to the Employee's specific needs. Even when an Employee is granted written permission to use a personal device, under no circumstance is an Employee permitted to use such device to take images or videos of children. To do so may result in immediate termination of employment.
- Employees may use personal devices on breaks in the staff room or with prior written permission by the Centre Manager for permitted and lawful purposes. At all other times, personal devices must be placed in secure storage, such as lockers located in the centre.
- All Approved Devices remain the property of Affinity and are subject to routine monitoring in accordance with Laws and the Regulations.
- Only Approved Devices are to be connected to the Affinity Wi-Fi network. Employee personal electronic devices must not be connected to the Affinity Wi-Fi network.
- Approved Devices must:
 - be password or PIN protected, where possible. Passwords are required to be changed regularly;
 - must remain at the centre at all times, unless prior arrangement and permission has been granted by Line Manager;
 - must have geo location software installed so that if the device is removed from its allocated centre, it automatically locks; and
 - not be linked to social media, personal email, messaging accounts, as otherwise determined by Affinity, with the exception of an Approved Device as determined by Affinity and used by the Centre Manager and/or administration staff for maintaining emails and centre Facebook accounts.
- The downloading, uploading, sending, accessing or distribution of any inappropriate material from the internet or use of inappropriate apps on Approved Devices will result in disciplinary action which may include termination of employment. Inappropriate material or apps may include, but are not limited to:
 - Offensive, threatening or obscene content;
 - Pornographic or sexual content;
 - Gaming or gambling apps;
 - Adult sites or dating apps; and
 - Music or e-book downloads (except for educational or professional development use with prior written approval).
- Affinity Education centre iPads do not require an Apple ID, and no personal accounts, personal Apple IDs are to be added to the device. Approved applications are available on the iPad in an application called "Self-Service". If an application is not available, and is required to run the centre, a support ticket should be raised with the Affinity Tech Team requesting the application to be added. Approvals for new applications are assessed on a case-by-case basis.
- Approved Devices will be repaired or replaced as and when needed to ensure they are safe and well maintained.² The Centre Manager must inform the Affinity IT Team of any issues (external or internal) with Approved Devices and the IT Team will organise for the repair or replacement of the relevant device.

2. Capturing of Images/Videos

- The collection, usage, storage, and disclosure of images and videos will be in compliance with this all Laws (including Privacy Law), the Regulations, this DTOE Policy, and Affinity's Privacy Policy which also deals with the handling of Personal Information.
- Parents/guardians must provide written consent upon enrolment for taking photos and videos of their child for internal platforms that document children's learning and engagement such as Storypark and newsletters, which is the primary purpose for taking images and videos of children at the centre. If a parent/guardian does not consent, Affinity will be unable to share photos and videos of their child on internal platforms.

² Quality Area 3.1 of the *National Quality Standards (NQS)*.

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- In addition, parents/guardians must provide written consent upon enrolment to Affinity using images and/or videos of their child for ancillary purposes, such as marketing material to be displayed at centres, on social media and other external publications. If a parent/guardian does not consent, Affinity will not use any image or video of the child for such purposes.
- All written consents must be retained in the enrolment file.
- A parent/guardian may revoke consent at any time by written notice to the Centre Manager after which time, no images or videos will be taken of the child(ren). The Centre Manager is responsible for ensuring the revocation of consent is documented and all relevant platforms are updated accordingly including removing images and videos of the child(ren) the subject of the revocation.
- Images and videos of children will only be captured on Approved Devices.
- All images and videos taken of child(ren) on Approved Devices and shared (for example on StoryPark) are for personal viewing only and are not for distribution. Affinity owns these images and videos including the copyright subsisting in them. Unless Affinity otherwise states in writing, parents/guardians must not share, publish, or distribute any images or videos taken by Affinity publicly including on any social media platforms.
- No photos or videos will be taken in bathrooms or nappy change facilities or other areas where a person would reasonably expect privacy. Children's rights will be upheld at all times during personal care routines and transitions.
- Images and videos taken must be directly related to a child's participation in the daily activities at the centre. Employees must never take, store or use any images or videos of children that is inappropriate (e.g. where a child is not fully clothed, is in a position that could reasonably be seen as sexualised or is exhibiting unsettling behaviours such as hysteria)
- Any Employee who takes, stores or uses an inappropriate image or video of a child will be subject to disciplinary action which may include termination of employment and may be subject to other adverse action including criminal proceedings being commenced against them personally.
- The Centre Manager must regularly review the Approved Devices to monitor the use of such devices including the images and videos stored on them. Any identification of inappropriate use of an Approved Device, including the discovery of inappropriate images or videos, must be immediately reported in writing to Affinity's Incident Support Team. A failure to report may result in disciplinary action being taken including termination of employment.
- Notwithstanding the requirements of this DTOE Policy, Affinity may disclose images or videos captured on Approved Devices to regulatory and/or enforcement authorities with competent jurisdiction over Affinity or as required by Laws.

3. Storage and retention of images and videos

- In compliance with Privacy Laws, Affinity takes all reasonable steps to protect Personal Information from misuse, unauthorised access, loss and disclosure. Further information about the use, collection and handling of Personal Information is contained in Affinity's Privacy Policy, available on Affinity's website and in physical copy on request.
- All digital files of images and videos must be stored on password protected and secure Affinity owned devices or servers.
- Affinity will only retain images and videos of a child for the duration of the child's enrolment or a longer period of time permitted by Law, including if the parent consents to the use of images and/or videos in Affinity's marketing material, or if required to be retained by regulatory and/or enforcement authorities as part of an investigation or legal proceedings. After such time, the images and videos will be permanently deleted from all servers, systems and Approved Devices.
- Affinity will take all reasonable steps to protect images and videos of children from unauthorised access and cyber-attacks. The Affinity IT Team will keep cyber security procedures up to date as considered necessary and in accordance with Laws.
- In the event of an actual or suspected security incident relating to the images and videos, Affinity will promptly investigate the incident and determine if there has been a data breach involving Personal Information, and if so, Affinity may notify all relevant persons in accordance with Privacy Laws.

4. Use of IT Resources with Children

- Approved Devices that children can use, such as iPads, will be managed to ensure children are not accessing any unapproved content including by restricting the ability to access certain websites and mobile application.
- Children will not be permitted to bring their own devices to the centre unless required by Law or otherwise permitted by Affinity in writing in special circumstances.
- Online safety will be promoted with children and families (e.g. through policies and procedures published on Affinity's website and other resources from time to time).
- For all age groups, sedentary periods, including times of rest, relaxation and soothing, should provide meaningful interactions such as reading, singing, storytelling and puzzles with a responsive educator, rather than passive screen use.

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- For children under 2 years, sedentary screen time is not recommended. ICT in learning, such as audio devices or curated playlists may be used to play soothing music, songs, and rhymes to support language development and emotional regulation. However, best practice emphasizes that during play-based learning, routine and/or moments of distress, connection through an educator's calm, responsive presence and voice is essential, not electronic devices.
- For children aged 2 – 5 years, sedentary screen time should be limited to no more than 30 minutes per day. Appropriate use of ICT in learning for 2 – 5's are:
 - Using touchscreen devices for interactive digital learning (e.g. ELLA, Early Years Toolbox, Mathseeds and Reading Eggs);
 - Taking photos or videos to document their own learning experiences, guided and supervised by an educator;
 - Engaging in guided inquiry using digital media to explore new ideas (e.g. social stories from Positive Living Skills; culturally responsive content from Wandana Aboriginal Education);
 - Participation in interactive group experiences using smartboards or other touchscreen devices (e.g. digital drawing, charades, learning videos).
- Affinity has procedures relating to screen time which may be updated based on current industry guidance on recommended screen time for children and will use reasonable endeavours to discuss screen time with families.

5. Supervision and identification of inappropriate content

- Employees must actively supervise and monitor children at all times when using any Approved Device and comply with this DTOE Policy, including regarding notifying and reporting any actual or suspected high-risk behaviour or breaches of Laws and the Regulations.³ The use of Approved Devices must not adversely affect educator to child ratios.⁴
- The Nominated Supervisor will be responsible for ensuring all Employees are aware of, and comply with, this DTOE Policy, including receiving appropriate training.
- Only authorised Employees will be permitted to transfer files and data containing images and videos of children from Approved Devices. This may include publishing images to social media (provided prior written consent from the parent/guardian has been obtained) and saving images and videos to any cloud based server.
- Employees will receive training in protecting children relevant to this DTOE Policy.⁵

6. External Visitors

- Clear signage is displayed at all entry points of centres advising families, visitor's and external stakeholders that the use of digital devices is not permitted where children are present unless Affinity advises otherwise in writing in limited circumstances and situations, in which case the taking of images and videos by parents/guardians will be monitored by Employees.
- This will only occur during communal special events held at centres, such as orientation days or graduation, and only the child(ren) of the parent/guardian can be captured.
- All parents/guardians must comply with the directions of Employees during these events, including when the taking of images and videos is permitted and when it is not.
- Families and guardians attending centre events must not be permitted to take photos or videos of children on personal devices unless Affinity directs otherwise in accordance with this DTOE Policy. The service can facilitate the taking and distributing of photos through approved mediums. Employees must ensure children are not left alone with visitors at any time.⁶
- External service providers (e.g. Occupational Therapists, Development Coaches, incursion providers, contractors) are prohibited from taking photos or videos of children on personal devices.
- Affinity may engage a third-party provider to take images and videos of children (Approved Person) in limited circumstances (e.g. to take photographs at graduation). Affinity will ensure all relevant consents have been obtained from families and use best endeavours to ensure the Approved Person is professional, reputable, and complying with all relevant policies, procedures and Laws.

7. Information, feedback and compliance

³ Section 165 of the *Education and Care Services National Law*; Quality Areas 2.2.1 and 7.1 of the NQS.

⁴ Regulations 122 and 123 of the Regulations.

⁵ Section 162A of the *Education and Care Services National Law*; Regulation 84 of the Regulations; Quality Area 7.1 of NQS.

⁶ Regulation 166 of the Regulations.

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- All staff, volunteers and others working for (or engaged by) Affinity who will (or may be required to) attend centres will be made aware of, and must comply with, this DTOE Policy.⁷
- Non-compliance with this DTOE Policy may result in disciplinary action being taken, including termination of employment or engagement with Affinity.
- Affinity will notify enrolled families at least 14 days prior to any change made to this DTOE Policy that would have a significant impact on Affinity's ability to provide childcare services to enrolled children or any family's ability to utilise childcare services.⁸ However, Affinity may not provide prior notice of a change to this DTOE Policy where a notice period would pose a risk to the safety, health or wellbeing of any enrolled child. In those circumstances, Affinity will notify enrolled families as soon as practicable after making any change.
- Any concerns, questions of feedback relating to images and/or videos of any child at an Affinity centre, or this DTOE Policy generally, can be directed to Affinity's Family Support Team by emailing feedback@affinityeducation.com.au.

Version Control	Date	Author	Description of Change
1.0	Sept 2025	AEG	New
1.1	Nov 2025	AEG	Addition of requirements for third party providers

Responsible = those who are responsible for carrying out the task

Accountable level 1 = the owner and person accountable for the sign off or approval of a task

Accountable level 2 = the person who is accountable for the task being carried out

Consulted = the person to be consulted with and whose input, opinions and feedback are crucial to the task

Informed = the person who should be informed and made aware of the task and any updates

Policy Written by: Legal Team	Position: Legal	Date: September 2025
Approved by: Affinity Education Group	Approved Date: September 2025	Next review date: September 2026

⁷ Regulation 171 of the Regulations; Quality Area 2.2.3 of the NQS.

⁸ Regulation 172 of the Regulations.