

### Background

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This is intended to complement the emergent style of the educational program, whilst considering child safe risks of documentation of children's learning using digital technology.

Documentaries are viewed at some Services as an educational tool to enhance the Sunkids Curriculum. Opportunities may arise where documentary presentations can add to the understanding of a child or support a project.

### Policy statement

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To ensure that electrical and other equipment provided to Services is used safely and in accordance with Sunkids philosophy and policies. The use of digital photos and videos can be used to enhance the documentation of children's learning, ensuring using these digital tools to document children's learning and engagement does not pose as a safety risk to the children. Sunkids Children's Centres use an online programming platform, OWNA, for families to view images allowing them to view their child's participation in early learning experiences. This type of communication can and does play a role in engaging families and carers in a child's education and care experiences, particularly where there may be low levels of literacy or English is not the first language.

### Strategies and practices

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- Sunkids will take reasonable steps to protect personal information it holds from misuse, interference and loss, and from unauthorised access, modification or disclosure.
- The approved provider will inform staff, educators, visitors, volunteers and family members that the use of personal electronic devices that are capable of capturing, storing or transmitting images are strictly prohibited. This includes items such as tablets, phones, digital cameras, smart watches, META sunglasses and personal storage and file transfer media (such as SD cards, USB drives, hard drives and cloud storage). These devices should not be in the possession of staff, educators or visitors (e.g. ECIP professionals) while working directly with children.
- The approved provider will inform staff, educators and visitors of exemptions that may warrant a person to use or be in possession of a personal electronic device that can be used to take images or videos. Staff, educators or visitors with an exemption must not use the personal device to take images or videos of children. Exemptions need to be provided for in writing by the approved provider and may include:
  - Emergency communication during incidents such as a lost child, injury, lockdown, or evacuation
  - Personal health needs requiring device use (e.g. heart or blood sugar monitoring)
  - Disability related communication needs
  - Urgent family matters (e.g. critically ill or dying family member)
  - Local emergency event to receive alerts (e.g. government bushfire or evacuation notifications)

- Children enrolled at our Service are not permitted to bring electronic devices to the Service, unless an exception has been discussed with the approved provider or nominated supervisor where the device may be required to support a diagnosed medical condition or disability. If a child brings an electronic device to the Service, it will be switched off and stored in a locked cupboard.
- Staff and educators are advised that electronic devices belonging to the 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.
- Sunkids is committed to ensuring that digital documentation methods do not expose children to online harm, grooming risks, or misuse of digital content. Staff must not use any personal digital devices for photographing, filming, or storing children's images. All devices used must be secure, service-issued, and monitored.
- Educators must engage with children about the use of digital documentation, explaining in age-appropriate ways how images or videos may be used, and seek verbal consent where appropriate. Children must have the option to opt out of being photographed or filmed.
- Educators must not use service-issued devices in ways that detract from active supervision. Taking images must never override direct engagement with children.
- Digital content may only be uploaded via secured Wi-Fi or platforms with encrypted connections (e.g., OWNA).
- A second educator should be present or notified when prolonged video documentation or child interviews are conducted to ensure transparency and safety.
- When selecting documentaries or video content, educators must ensure materials reflect cultural safety, inclusiveness, and diversity. Media with stereotypes or exclusionary messages must not be shown.
- Children from diverse cultural, linguistic, or family backgrounds must see their identity respected in all media used.
- This policy will be reviewed annually and updated to reflect the latest child safety regulations, including online risk prevention strategies. The review process will include consultation with children (where appropriate), staff, and families.
- All staff will complete mandatory annual training on child protection in line with the Child Safe Standards and National Principles.
- Sunkids has obligations to take reasonable steps to destroy or de-identify personal information when no longer needed for the purpose it was collected.
- Sunkids Nominated Supervisors must keep a "laptop and tablet register" documenting who has been granted access to an electronic device that is issued for use at the service.
- Sunkids Nominated Supervisors have been provided with one electronic device per room, this device is labelled and added to Sunkids Management register as to who it has been assigned to. This is documented through our onboarding and offboarding internal process.

## Use of Electrical Devices and Other Equipment Considering Child Safe Risks

- The device assigned to the designated room is the only device to be used to capture images used for planning and programming.
- A Sunkids Lanyard will be placed on the designated room device to differentiate this is a Sunkids Planning and Programming device.
- A Centre specific risk assessment is completed and updated at least annually for use of service-issued electronic devices.
- Our 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 each month. Digital data stored at the Service will be destroyed in accordance with the Privacy and Confidentiality Policy. The approved provider will ensure staff, educators, visitors and volunteers do not transfer images or videos from Service issued devices to personal devices, unauthorised transferring of digital data may result in disciplinary action.
- Through thorough inductions the Nominated Supervisor trains all staff on using service-issued electronic devices to capture children's learning to also ensure adequate supervision of children.
- Sunkids Educational Leaders will support educators to ensure child-centered images taken are purposeful and support quality educational practice and reflection, as well as family connection.
- Sunkids Nominated Supervisors and Educational Leaders will monitor who is using service-issued devices to take images or videos of children.
- Nominated Supervisors will ensure engagement with children is not compromised by the use of electronic devices, supervision is paramount and comes above trying to capture an image.

- Recorded video materials, including any brought by children from home, will be viewed by educators before it is shown to children. This will permit careful selection of relevant segments and planning for effective use of this resource.
- When live documentaries or un-viewed recorded materials are screened, an educator will be present as an engaged viewer. This person shall be present throughout the broadcast to monitor and discuss with the children any materials they see/have seen, and to plan for effective use of the ideas conveyed by the broadcast.
- Educators will supervise all documentary viewing sessions and ensure that all children always have the choice of alternative concurrent experiences.
- In selecting video material and documentaries to show to children, educators will use the *Levin and Carlsson-Paige Framework* as a guide. See below.

<b>FRAMEWORK FOR ASSESSING DOCUMENTARIES</b>		
<b>Issues</b>	<b>What children should NOT see</b>	<b>What children should see</b>
To establish a sense of trust and safety	The world is dangerous; enemies are everywhere; weapons are needed to feel safe.	A world where people can be trusted and help each other; where safety and predictability can be achieved; where fears can be overcome.
To develop a sense of autonomy with connectedness	Autonomy is equated with fighting and weapons. Connectedness is equated with helplessness, weakness, and altruism.	A wide range of models on independence within meaningful relationships and of autonomous people helping each other.
To develop a sense of empowerment and efficacy	Physical strength and violence equals power and efficacy. Bad guys always return and a range of ways to have an impact are not shown.	Many examples of people having a positive effect on their world without violence.
To establish gender identity	Exaggerated, rigid gender divisions – boys are strong, violent and save the world, girls are helpless, victimised and irrelevant to world events.	Complex characters with wide-ranging behaviours, interests, and skills; commonalities between sexes overlapping in what both can do.
To develop an appreciation for diversity among people	Racial and ethnic stereotyping. Dehumanising enemies. Diversity is dangerous. Violence against those who are different is justified.	Diverse people with varied talents, skills and needs, who treat each other with respect, work out problems non-violently, and enrich each other's lives.

<p>To construct the foundations of morality and social responsibility</p>	<p>One-dimensional characters who are all good or bad. Violence is the solution to interpersonal problems. Winning is the only acceptable outcome. Bad guys deserve to be hurt.</p>	<p>Complex characters who act responsibly and morally towards others, showing kindness and respect, working out moral problems, taking other people's point of view.</p>
<p>To have opportunities for meaningful play</p>	<p>Curriculum content is far removed from children's experience or level of understanding. Toys are linked to curriculums promoting imitative not creative play.</p>	<p>Meaningful content to use in play, which reflects children's experience and level of understanding. Shows not linked to realistic toys so that children can create their own unique play.</p>

*From Levin, D. & Carlsson-Paige, N. (1994) 'Developmentally Appropriate Television: Putting Children First', Young Children, vol.49, no.5, pp. 38-44.*

- Educators will help children to develop visual literacy skills and to become thoughtful and critical viewers.
- Screened segments typically will be kept brief, 5 to 10 minutes in duration, and may include relevant extracts from feature-length movies.
- The use of visual equipment must be recorded as part of the curriculum and parents are to be informed.
- Children of different age groups must not be combined to view a presentation unless space is adequate, circumstances are safe and legislative requirements are being met.

**INAPPROPRIATE USE OF VISUAL EQUIPMENT: -**

- To “baby sit” children
- If above standards have not been met
- In educator’s areas for educators’ entertainment during a break
- When viewing arrangements are unsafe – consider adequate supervision at all times
  
- The Service computers, iPads and tablets are for work purposes only. This includes the administration of the Service and for the development of the children’s curriculums. Personal use to access websites is not permitted. Internet and email usage is monitored by Sunkids Management.
  
- Applications uploaded to any iPad or tablet must have approval from the Approved Provider and will be remotely installed by IT personnel. iPads and tablets will be checked regularly for unauthorised applications.
  
- Services are provided with digital phones/tablets to use as part of the children’s curriculums and developmental portfolios. Phones/tablets are allocated to each room. Each Service is responsible for keeping a current record of the phones/tablet and the educators responsible for each camera/tablet. Educators must ensure the safety and security of the phones/tablet and immediately report any breakages or loss to the Nominated Supervisor.
  
- In addition to the specific items addressed in this policy, the Service will generally have an electronic smartboard.
  
- Educators must not use equipment unless they have been instructed in the correct use of the item or read the instructions manual. Educators must seek advice if they require training or assistance to use any equipment.
  
- The phone is to be used for Service business purposes. In an emergency, educators can access the phone and take personal calls. Educators answering the Service phone must follow the phone etiquette: - *‘Thank you for calling Sunkids [Centre Name], you are speaking with [Educator Name], how may I assist you?’*.
  
- Educator’s mobile phones can only be used in personal time, in the allocated staff room or outside of the Service, otherwise the mobile must be secured away. Under no circumstances are educators authorised to take photos of children with their mobile phone.
  
- The use of headphones of any form, including wireless earpieces, is not permitted during an educator’s work hours. These devices limit educator’s ability to appropriately supervise Children’s interactions.
  
- **NO EQUIPMENT IS TO BE REMOVED FROM THE CENTRE**

**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.

**Additional safe practices for babies**

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- No additional practices required.

**Responsibilities of parents**

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- N/A

**Procedures and forms**

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- Services Phone/Tablet Register

**Links to other policies**

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- Child Protection and Risk Management Policy
- Child Safe Environment Policy
- Educational Program Policy
- Educator Professionalism and Ethics Policy
- Privacy and Confidentiality Policy
- Social Media and Email Policy

**Links Education and Care Services National Regulations 2011, National Quality Standard 2011**

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Regs	73	Educational program
	74	Documenting of child assessments or evaluation for delivery of education program
	105	Furniture, materials and equipment
	115	Premises designed to facilitate supervision
	168	Education and care services must have policies and procedures
	177 (1) (a)	The documentation of child assessments or evaluations for delivery of the education program as set out in regulation 74
	181	Confidentiality of records kept by approved provider
QA	1.1.1	Curriculum decision making contributes to each child’s learning and development outcomes in relation to their identity, connection with community, wellbeing, confidence as learners and effectiveness as communicators
	1.3.3	Information for families are informed about the program and their child's progress
	2.2.1	At all times, reasonable precautions and adequate supervision ensure children are protected from harm and hazard
	4.2.2	Professional standards guide practice, interactions and relationships
	5.1.1	Responsive and meaningful interactions build trusting relationships which engage and support each child to feel secure, confident and included
	5.1.2	The dignity and rights of every child are maintained
	6.1.2	The expertise, culture, values and beliefs of families are respected and families share in decision-making about their child’s learning and wellbeing
	7.1.2	Management systems are in place to manage risk and enable the effective management and operation of a quality service

**Sources**

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- Education and Care Services National Regulations 2011
- Guide to the National Quality Standard 2018
- National Mode Code and the Guidelines

**Further reading and useful websites**

- A Developmental Framework for Assessing Children’s Television From Levin, D. & Carlsson-Paige, N. (1994) *‘Developmentally Appropriate Television: Putting Children First’*, *Young Children*, vol.49, no.5, pp. 38-44  
[http://depts.washington.edu/nwmedia/sections/kitsap/docs/kitsap\\_resource\\_assessment.pdf](http://depts.washington.edu/nwmedia/sections/kitsap/docs/kitsap_resource_assessment.pdf)  
accessed 30 March 2026
- ACECQA Taking images or videos of children while providing early childhood education and care. Guidelines for the National Model Code. Accessed 30 March 2026
- NQF 2025 Child Safe Changes Summary – ACECQA Legislative Changes accessed 30 March 2026
- Office of the eSafety Commissioner – Early Childhood Resources: <https://www.esafety.gov.au/early-childhood> accessed 30 March 2026
- ACECQA – Using Digital Devices in Centre – Based Education and Care Services National Model Code accessed 30 March 2026

**Policy review**

The Service encourages staff and parents to be actively involved in the annual review of each of its policies and procedures. In addition, the Service will accommodate any new legislative changes as they occur and any issues identified as part the Service’s commitment to quality improvement. The Service consults with relevant recognised authorities as part of the annual review to ensure the policy contents are consistent with current research and contemporary views on best practice.

**Version Control**

Version	Date Reviewed	Approved By	Comments/Amendments	Next Review Date
1	8 January 2018	Kaylene Harper	Updated to changed NQF requirements 1 February 2018.	January 2019
2	13 February 2019	Kaylene Harper	Policy reviewed. Sources and further readings accessed and updated.	February 2020
3	3 February 2020	Kaylene Harper	Policy reviewed. Sources and further readings accessed and updated.	February 2021
4	14 October 2020	Kaylene Harper	Policy reviewed. Sources and further readings accessed and updated.	October 2021
5	17 June 2021	Kaylene Harper	Additional information regarding smart watches and headphones added.	June 2022
6	22 September 2021	Kaylene Harper	Policy reviewed	September 2022
7	30 September 2022	Linda Hollard	Policy reviewed	September 2023
8	23 August 2023	Grace McKinstry	Policy reviewed. Further readings accessed.	August 2024
9	9 July 2024	Tiffany Boeske	Reviewed policy Accessed sources	July 2025

Use of Electrical Devices and Other Equipment Considering Child Safe Risks

10	12 June 2025	Genevieve Mahaki	Amended Policy to include Lanyards to Sunkids Mobile Devices	June 2025
11	30 March 2026	Tiffany Boeske	Amended policy inline with National Law	March 2027

