ECH014 – SAFE USE OF DIGITAL TECHNOLOGIES AND ONLINE ENVIRONMENTS POLICY

POLICY CONTEXT

Willunga Waldorf School is a co-educational and -inclusive school. The school's mission is to provide Steiner education from early childhood to year 12, based on the work of Rudolf Steiner. This education is driven by a deep understanding and respect for the developing and unfolding human being.

The School seeks to be a safe, just, compassionate, responsive and inclusive place for all.

BACKGROUND

The Education and Care Services National Regulations (the Regulations) require approved providers to ensure that their services have policies and procedures in place in relation to the safe use of digital technologies and online environments (regulation 168) and to take reasonable steps to ensure that those policies and procedures are followed (regulation 170).

All South Australian early childhood education and care services are required to implement a policy and procedure addressing the use of personal devices and provide a clear set of guidelines that address the safe use of digital technologies and online environments to meet the changes to regulation 168 of the Regulations, including:

- The taking, use, storage and destruction of images and videos of children
- Obtaining authorisation from parents to take, use and store images and videos of children
- The use of any optical surveillance device (e.g. CCTV)
- The use of any digital device issued by the service
- The use of digital devices by children.

PURPOSE AND SCOPE

The purpose of this policy is to outline Willunga Waldorf School's procedures and expectations regarding:

- The use of personal and service-issued digital devices
- Capture, use, storage, and destruction of images and videos of children in our care
- Parental authorisation requirements
- Use of optical surveillance devices (e.g. CCTV)
- Use of digital devices by children

This policy applies to all Early Childhood (Kindergarten and Reception) staff, children and their families, volunteers, students on placement and visitors, at all times.

DEFINITIONS

Digital Devices
Includes electronic devices that are capable of recording, storing, or sharing digital content, for example smartphones, smartwatches, tablets, cameras, and laptops.

Personal Digital Device
A privately owned digital device not issued by the School.

Personal Storage Media
A privately owned electronic device or application that enables the storage of digital media, such as USBs, SD Cards and external drives, or cloud services.

School Device
A digital device provided by Willunga Waldorf School for work-related use.

Optical Surveillance Device
Any device used to monitor activities, such as CCTV visually.

POLICY STATEMENT

At Willunga Waldorf School, our early childhood program is rooted in the principles of Steiner education, driven by a deep understanding and respect for the developing and unfolding human being.

We value the sanctity of early childhood as a time for creative play, meaningful relationships, and sensory-rich experiences. We believe that young children learn best through direct engagement with the natural world and human interaction; therefore, we approach the use of digital technologies with great care and intention.

While we recognise the need to comply with current legislative requirements, including Regulation 168 of the Education and Care Services National Regulations 2011, our approach to personal and digital device use is grounded in the following core values:

- Protecting the young child's imagination and sense of wonder by limiting digital exposure and prioritising real-world experiences.
- Upholding the dignity and privacy of the child, especially in relation to capturing and handling digital images or video.
- Fostering trust and transparency in our relationships with families, ensuring that all digital practices are clearly communicated and consent-based.
- Creating a safe and respectful learning environment, where technology is used only when necessary and in alignment with pedagogical goals.

This policy sets out how we use, limit, and manage digital devices in a way that honours our educational philosophy while ensuring the safety, wellbeing, and rights of all children in our care.

PRINCIPLES OF PRACTICE

USE OF PERSONAL DIGITAL DEVICES AND STORAGE MEDIA

- Staff, volunteers, students on placement and visitors are **not permitted** to carry or use personal digital devices or personal storage media to take, store or share photos or videos of children on the premises. (Cf Definitions)
- Families are **not permitted** to use personal digital devices or personal storage media to take, store or share photos or videos of children on the premises. (Cf Definitions)
- Personal digital devices or storage media may be used only in staff break areas during staff break times; they must never be used to take photos or videos of children for any purpose, including to document children's learning.
- Breaches may result in disciplinary action or exclusion from the premises.

USE OF SCHOOL-ISSUED DEVICES

Only authorised staff may use school-issued devices to:

- Document children's learning
- Communicate with families
- Manage administrative or educational duties

Authorised staff are determined by the Head of School and will be advised in writing.

Devices must:

- Be password-protected
- Remain on-site unless authorised in writing by the Head of School to take off-site
- Not be used for personal purposes

TAKING OF IMAGES AND VIDEOS

Images and videos may only be taken on School-Issued Devices with written parental/guardian consent.

STORAGE OF AND ACCESS TO IMAGES AND VIDEOS

Once images and videos have been downloaded from school-owned devices by the School Office Supervisor, they are:

- Stored in a non-identified way on secure, encrypted platforms (e.g. Microsoft365) or school-owned devices (i.e. special folder(s) on file tree on school server)
- Removed from the temporary storage device (e.g. SD card of school-owned camera)

Only authorised staff have access to images and videos of children, e.g. the School Office Supervisor and reception staff, Registrar & Marketing Officer.

USE OF IMAGES AND VIDEOS

Images and videos of children may only be used by authorised staff for approved uses. These uses include:

- Learning documentation
- Newsletters or service displays
- Marketing, e.g. via the School's Instagram site

Authorised staff are determined by the Head of School and will be advised in writing.

Under no circumstances may images or videos be shared on personal social media or non-approved platforms.

RETENTION AND DESTRUCTION OF IMAGES AND VIDEOS

Images and videos are currently being retained indefinitely as students move from early childhood into our primary and high school.

In as much as it is practicable, images and videos will be deleted by the School Office Supervisor once no longer required (e.g. after the child leaves the school, or upon withdrawal of consent).

PARENTAL AUTHORISATION

- Families must complete a Digital Media Consent Form on consent2go.
- The form outlines:
    - The types of media will be taken
    - How they may be used
    - The right to opt in or out of specific uses
- Consent may be withdrawn at any time in writing. Staff will comply with the request promptly and, where possible delete relevant materials.

USE OF OPTICAL SURVEILLANCE DEVICES (CCTV)
- No CCTV is installed in or around the kindergarten premises.
- Families and staff will be notified of any installation of CCTV systems.

CHILDREN'S USE OF DIGITAL DEVICES
- Children will not have access to digital devices.
- Children are not permitted to bring in digital devices from home.
- Families are strongly encouraged to support the School's ethos and educational principles and limit their children's access to and use of digital devices in the home.

APPROPRIATE SUPERVISION
The implementation of this policy is supported by the appropriate ratios for supervision of children by qualified staff. To this purpose:
- Children will not be left alone with volunteers, visitors, or students on placements or work experience.
- The kindergarten and reception rooms have been designed to facilitate appropriate supervision of children by qualified staff.
- Volunteers, visitors and students on placements or work experience are required to sign in and out at the Front Office each time they attend the Kindergarten/Reception classes

EXEMPTIONS

Staff may be allowed to carry and/or use personal digital devices under certain circumstances and for purposes other than taking images or recording videos of children. These include:
- To communicate in an emergency situation involving a lost child, injury to child or staff member, or other serious incident, or in the case of a lockdown or evacuation of the service premises
- For personal health requirements, e.g. heart or blood sugar level monitoring
- For disability, e.g. where a personal electronic device is an essential means of communication for an educator or other staff member
- If a family necessity, e.g. a worker with an ill or dying family member
- In the event of a technology failure, e.g. when a temporary outage of school-issued electronic devices has occurred
- During local emergency events occurring, to receive emergency notifications through government warning systems, for example, bushfire evacuation text notification

Exemptions may be granted by the Head of School or ECH Faculty Leader and will be communicated to relevant staff and families (as necessary) in writing. Authorisation may be given verbally where written communication is not possible initially (e.g. due to time constraints/level of urgency). However, any verbal authorisation must be followed up with a written communication to document it appropriately.

Any exemptions granted will be monitored and reviewed by the ECH Faculty Leader to ensure the use of personal devices is consistent with what is permitted and the authorisation remains current.

TECHNOLOGY FAILURES

In the event that school-issued devices fail, the following applies until such time that the failure has been resolved:
- Reporting and documenting will be done manually, on paper, and digitised one school-issued devices are up and running again.
- Staff will forego taking photos or videos.
- Under no circumstances must they use personal devices to take photos or videos.

ROLES AND RESPONSIBILITIES

Role	Responsibilities
Head of School	• Ensure this policy and procedures are fully implemented and followed at all times • Uphold the School's culture of child-safety • Ensure appropriate resources are provided by the School with regard to the purchase and upkeep of school-based devices and secure data storage • Ensure appropriate resources are provided to meet staff to child ratios to ensure adequate supervision • Ensure compliance with obligations under the Australian Privacy Principles • Ensure appropriate training is provided to relevant staff in the use of school-issued devices and safe data transfer and storage • Ensure regular review of this policy and associated procedures
Early Childhood (ECH) Faculty Leader	• Implement this policy and procedures and ensure it is upheld at all times • Uphold the School's culture of child-safety • Ensure staff, families, volunteers, students on placement and visitors follow this policy at all times and know where and how to access it • Induct new ECH staff, volunteers and students on placements in this policy and procedures • Ensure staff to child ratios are consistently met to ensure adequate supervision • Report any breaches of this policy to the Head of School • Engage in required training in the use of school-issued devices and safe data transfer and storage • Regularly review this policy and associated procedures • Monitor and review any exemptions granted to staff for use of personal devices
School Office Supervisor	• Download images and videos of children from school-issued devices onto the school server • Ensure images and videos are stored securely on encrypted platforms (e.g. Microsoft365) or school-owned devices (i.e. special folder(s) on file tree on school server) • Promptly comply with parents' withdrawal of consent and, in as much as is practicable and possible, delete any relevant images and videos
ECH staff, volunteers and students on placements	• Implement and follow this policy and procedure at all times • Uphold the School's culture of child-safety • Report any breaches to the ECH Faculty Leader (or the Head of School if the breach concerns the Faculty Leader)

	• Engage in required training in the use of school-issued devices and safe data transfer and storage • Ensure they understand the National Model Code and the School's expectations around the use of personal and school-issued devices while at work and seek guidance when needed from the ECH Faculty Leader or Head of School.
Families	• Understand and support this policy • Provide or withdraw consent as needed • Report any breaches of this policy to the ECH Faculty Leader (or Head of School if the breach concerns the Faculty Leader)

BREACH OF THIS POLICY

Breaches of this policy must be reported to the Early Childhood (ECH) Faculty Leader or the Head of School if the breach concerns the ECH Faculty Leader. See *Roles and Responsibilities* above.

Any breach of this policy by staff, families, volunteers, students on placements or visitors will result in:
• Investigation by the Head of School or ECH Faculty Leader
• Possible disciplinary action, which may include termination of employment (staff), enrolment (students) or legal action (volunteers, students on placement, visitors)

Serious breaches may be reported to the Department for Education, the police, or other relevant government or regulatory authorities.

STAFF INDUCTION AND ONGOING TRAINING

All new Early Childhood staff as well as volunteers, visitors and students on placement or work experience are provided with an induction to the use of personal devices and this policy.

Procedures are reviewed regularly, for example, during Faculty meetings, to ensure they remain relevant, compliant with current legislation, and they are Front of mind for all staff.

POLICY ACCESS

Hard copies of policies are available to staff in the kindy office. Electronic copies of policies are available on the SchoolStream parent and staff apps as well as on our website. Hard copies of policies can be made available to parents upon request.

Families will be notified by email at least 14 days beforehand of any of the changes:
• affect the fees charged or the way they are collected, or
• significantly impact the service's education and care of children, or
• significantly impact the family's ability to utilise the service.

RELATED POLICIES, PROCEDURES, DOCUMENTS AND LEGISLATION

Related School Policies, Procedures and Guidelines	• STU001 – Child Safe Environment Policy • STU012 – Photography Policy • GOV005 – Privacy Policy • SF001 – Professional Code of Conduct • Enrolment Policy

Related Legislation and Regulatory Requirements	National Quality Standards (NQS):
	    • QA2: Children's health and safety
	      2.2 Safety:
	      2.2.1. Supervision - At all times, reasonable precautions and adequate supervision ensure children are protected from harm and hazard.
	      2.2.3. Child Protection - Management, educators and staff are aware of their roles and responsibilities to identify and respond to every child at risk of abuse or neglect
	    • QA7: Governance and Leadership
	      7.1. Governance:
	      7.1.2. Management systems: Systems are in place to manage risk and enable the effective management and operation of a quality service.
	      7.21.3 Roles and responsibilities: Roles and responsibilities are clearly defined, and understood, and support effective decision-making and operation of the service.
	Education and Early Childhood Services (Registrations and Standards) Act 2011 (as amended):
	    • Section 162A: Child Protection Training
	    • Section 165: Offence to inadequately supervise children
	    • Section 167: Offence relating to protection of children from harm and hazards
	Education and Care Services National Regulations (2011) (as amended):
	    • Regulation 84: Awareness of child protection law
	    • Regulation 115: Premises designed to facilitate supervision
	    • Regulation 122: Educators must be working directly with children to be included in ratios
	    • Regulation 123: Educator to child ratios – centre-based services
	    • Regulation 165: Record of visitors
	    • Regulation 166: Children not to be alone with visitors
	    • Regulation 168: Education and care services must have policies and procedures
	    • Regulation 170: Policies and procedures to be followed
	    • Regulation 171: Policies and procedures to be kept available
	    • Regulation 172: Notification of change to policies or procedures
	    • Regulation 175: Prescribed information to be notified to Regulatory Authority
	    • Regulation 176: Time to notify certain information to Regulatory Authority
	National Model Code for Managing Digital Devices in Early Childhood and Care Settings (2024)
	Australian Privacy Act 1988
	Privacy Amendment (Enhancing Privacy Protection) Act 2012 (as amended)

Cross sector Guidelines (SA)	• DHS – National Principles for Child Safe Organisations • Protective Practices for staff in their interactions with children and young people

VARIATION AND REVIEW

The School reserves the right to vary, replace or terminate this policy from time to time.
Unless altered earlier, this policy will be reviewed every two (2) years.

Responsible Person	Early Childhood Faculty Leader
Policy Approver	Head of School
Version	1.1

Publication Date	Sep 2025
Last Review Date	Feb 2026
Next Review Date	Sep 2027

Revision Record	February 2026:
	- Policy Context section: removed the word "gender"
	- Definitions section:
	    o clarified definition of digital devices to include smartwatches
	    o Changed "personal device" to "personal digital device"
	    o Included definition of Personal Storage Media
	- Clarified Principles of Practice to make it clearer what is and isn't allowed, and how the school stores, accesses/uses and retains digital media of children and/or their work
	- Added Exemptions section
	- Added Technology Failures section
	- Roles and Responsibilities section:
	    o Clarified responsibilities for Head of School and ECH Faculty Leader
	    o Added School Office Supervisor role and responsibilities
	- Added reference to National Model Code to Related Legislation section