POLICY

Safe Use of Digital Technology and Online Environments

NT CHRISTIAN SCHOOLS

DOCUMENT INFORMATION

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Policy Feedback

AMENDMENT HISTORY

Version	Date	Changes Made
1.0	03/2026	Developed to support operations and compliance after Education and Care (Strengthening Regulations of Early Education) Bill 2025. Policy developed using resources from ELC Desktop. Approved by CEO.

1 Preamble

NT Christian Schools is an organisation that exists to advance the Christian religion through the provision of high-quality education and training services and religious instruction. A holistic and relational approach to learning for each individual student, underpinned by a biblical world view provides an education for the whole person, for the whole of life.

We believe that the Christian faith is a life-transforming faith that will be authentically evidenced in a believer's actions. The bible exhorts us to purse godliness and to model biblical standards of behaviour. Everything we do, our practices, our conduct, our use and stewardship of resources is an act of worship to God and a witness to those around us.

All members of the NT Christian Schools community are to be committed to ensuring a safe and caring environment for students, staff and the whole community in a manner that is consistent with the Christian ethos and beliefs of NT Christian Schools.

Employees and those a policy applies to are fully supported by NT Christian Schools to meet compliance with this policy.

NT Christian Schools is committed to achieving and maintaining workable solutions for our organisation.

We may make changes to this policy from time to time to improve the effectiveness of organisational operation or to meet legislative requirements. Notification of changes will be communicated to those a policy applies to, and it is their responsibility to read updated policies and relevant related documents as soon as reasonably practical. Any NT Christian Schools stakeholder who wishes to provide feedback about this policy may forward their suggestions to the policy monitor or policy@ntchristianschools.com.au.

2 Purpose

Children's safety and wellbeing is paramount, and our 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 Service philosophy, and privacy and legislative requirements to ensure the safety of enrolled children, educators and families.

3 Policy applies to

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

The policy is available to all parents, carers, students, staff, volunteers and contractor via the NT Christian Schools website and on request in hard copy from any campus office or the NT Christian Schools Business Services Office as required.

The policy is available to all staff and Board of Directors via the NT Christian Schools Canvas *Policy and Advisory Library*.

4 Policy

4.1 Guiding Principles

Our 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 Service embeds the National Principles for Child Safe Organisations and addresses risks to ensure children are safe in physical and online environments. Digital technologies are an integral part of many children's daily lives. For this reason, it is important that our educators are familiar with the use of digital technologies, and 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.

4.2 Implementation

Our 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.

4.3 Digital Technology and Electronic Devices Used at the Service

Our Service follows the National Model Code and Guidelines 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 photos, record audio or capture video of children who are being educated and cared for at the Service is 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.

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. In exception, devices required for operational activities, for example excursions or transportation, may be carried off premises.

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)

Our Service will develop and maintain a register of all electronic devices purchased for and used within the Service. This register will include details such as the 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, audio recorders, smart toys, and any other internet-connected or data-enabled devices used within the Service.

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.

4.4 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 Service 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 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 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 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 Service issued devices to personal devices. Unauthorised transferring of digital data may result in disciplinary action.

4.5 Physical Environment and Active Supervision

The approved provider, nominated supervisor, management and educators will:

- ensure children are supervised and never 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.

4.6 Software Programs and Apps

Our Service uses a range of secure software programs and apps on Service-issued devices to support the educational program and administration of the 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 Services use accounting and payroll software, HR systems, and compliance tools. These platforms assist in managing the Service's financial, staffing, and operational requirements.

4.7 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.

4.8 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 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)
- ensure educators are aware of their mandatory reporting requirements and report any concerns
- related to child safety including inappropriate use of digital technology to the approved provider or nominated supervisor.

4.9 Identification and Reporting of Online Abuse and Safety Concerns

Our 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
- 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.

4.10 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. 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 member's access to the Service.

5 Roles and Responsibilities

5.1 The Approved Provider / Nominated Supervisor / Management

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 know of and adhere to this policy and associated procedure
- new employees, students and volunteers are provided with online access to the Safe Use of Digital Technologies and Online Environments Policy and procedure as part of their induction
- 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
- they promote and support a child safe environment, ensuring adherence to the Child Safe

Environment and Child Protection Policies, including mandatory reporting obligations

- 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
- 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 Service under any circumstances
- all staff, educators, volunteers and students are aware of the National Model Code and Guidelines and adhere to these recommendations 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 issued by the Service for taking images or videos of children enrolled at the Service
    - Service issued devices are securely configured, monitored and maintained to prevent unauthorised access
    - visitors who are supporting children at the 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.
- children, educators and parents are aware of our 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 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 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
- 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)
- families are informed that a written request is required to withdraw authorisation

- images and videos for individual children are deleted or destroyed and removed from storage when authorisation has been revoked from the parent/guardian
- processes for the storage of images and videos are reviewed on a regular basis, ensuring 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 data is archived regularly
- 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
- external agencies or specialists are consulted to see 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 birth to one year should not spend any time in front of a screen
    - children 2 to 5 years of age should be limited to less than one hour per day
    - children 5-12 years of age should limit screen time for entertainment to no more

than 2 hours a day.

- they share information to families about recommended screen time limits based on *Australia's Physical Activity and Sedentary Behaviour Guidelines*.

5.2 Educators

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, ensuring adherence to the Child Safe Environment and Child Protection Policies, including 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 Service's operations, including when accessing digital technologies and online learning environments
- 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 Service, access social media (Facebook, Instagram or other) or breach children and families' privacy
- keep passwords confidential and log out of computers and software programs after each use
- 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.

5.3 Visitors and Volunteers

Visitors and Volunteers will:

- adhere to the Safe Use of Digital Technologies and Online Environments Policy and associated procedure whilst visiting the 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 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 to capture images or video of a child for observation/documentation purposes only. This applies to visitors who are supporting children at the Service (NDIS funded support professionals, Inclusion Support professionals).

6 Definitions and acronyms

The following terms used throughout this policy are defined as follows:

Term	Definition
Artificial intelligence (AI)	An engineered system that generates predictive outputs such as content, forecasts, recommendations, or decisions for a given sent 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 abuses, 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.
ICT	Information and Communication Technologies
Illegal content	Includes:

	• 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.

7 Early Learning Compliance

QUALITY AREA 2: CHILDREN'S HEALTH AND SAFETY		
2.2	Safety	Each child is protected.
2.2.1	Supervision	At all times, reasonable precautions and adequate supervision ensure children are protected from harm and hazard.
2.2.3	Child Safety and Protection	Management, educators and staff are aware of their roles and responsibilities regarding child safety, including the need to identify and respond to every child at risk of abuse or neglect.
QUALITY AREA 7: GOVERNANCE AND LEADERSHIP		
7.1.2	Management System	Systems are in place to manage risk and enable the effective management and operation of a quality service that is child safe.

EDUCATION AND CARE SERVICES NATIONAL LAW AND REGULATIONS	
S. 162A	Child protection training
S. 165	Offence to inadequately supervise children
S. 167	Offence relating to protection of children from harm and hazards
12	Meaning of serious incident
73	Educational Program

76	Information about educational program to be given to parents
84	Awareness of child protection law
115	Premises designed to facilitate supervision
122	Educators must be working directly with children to be included in ratios
123	Educator to child ratios – centre-based services
149	Volunteers and students
155	Interactions with children
156	Relationships in groups
168	Education and care services must have policies and procedures
170	Policies and procedures to be followed
171	Policies and procedures to be kept available
172	Notification of change to policies or procedures
175	Prescribed information to be notified to Regulatory Authority
176	Time to notify certain information to Regulatory Authority
181	Confidentiality of records kept by approved provider
183	Storage of records and other documents
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8 Related legislation and policy

8.1 NT Christian School policies and procedures

- Child Protection Policy
- Privacy Protection Policy
- Mandatory Reporting Policy
- Behaviour Guidance: Bullying Policy
- Staff and Board Code of Conduct Policy
- Parent, Volunteer, Visitor and Contractor Code of Conduct
- Complaints Policy
- Educational Program Policy
- Enrolment Policy
- Incident, Injury, Trauma and Illness Policy
- Interactions with Children Families and Staff Policy
- Record Management Policy

- Staffing Arrangements Policy
- Student, Volunteer and Visitor Policy

8.2 Legislation

- Privacy Act 1988 (the Act)
- National Principles for Child Safe Organisations
- Care and Protection of Children Act 2007 (NT)
- Education and Care Services National Law Act 2010
- Education and Care Services National Regulations
- Child Care Subsidy Secretary's Rules 2017
- A New Tax System (Family Assistance) Act 1999
- Family Law Act 1975
- Family Assistance Law – Incorporating all related legislation as identified within the Child Care Provider Handbook

8.3 Other relevant resources

- Online safety | eSafety Commissioner
- 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
- eSmart Alannah & Madeline foundation
- Family Tech Agreement. eSafety Early Years Online safety for under 5s
- 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)