

# TECHNOLOGY AND CYBER SECURITY POLICY

Updated: November 2025



## What are we talking about in this document?

The policy sets expectations for device use, social media conduct, and cyber security, and establishes protocols to protect children’s privacy and dignity in all digital interactions. It describes how digital technologies are managed, including images and videos, the use of parent consent, CCTV practices, and the secure storage and deletion of digital content.



## Who is this for?

This policy applies to children, families, staff, management, students, and visitors of the service.



## Why do we need this policy?

This policy reflects our values of transparency, accountability, and respect for children’s dignity. It ensures that all digital content, including photographs and videos, is handled with care and in accordance with family consent and privacy legislation. It also sets clear expectations for staff, families, students, and visitors regarding the use of personal and service-issued devices, social media, and CCTV.

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Key Terms		
Term	Meaning	Source
<b>Personal device</b>	Any privately owned device (e.g., mobile phone, tablet, smartwatch, smart glasses, USB, SD Card, external hard drive, personal cloud storage) not issued or owned by Keiki Early Learning, capable of capturing, storing, or transmitting data.	
<b>Keiki Issued Device</b>	A device provided and managed by Keiki Early Learning for authorised educational and operational use.	
<b>Digital Learning</b>	The integration of digital technologies into play-based and inquiry-driven educational experiences, guided by educators.	
<b>Cyber Security</b>	Measures and protocols implemented to protect digital systems, data, and devices from unauthorised access, breaches, or misuse.	
<b>Consent</b>	Written authorisation from a parent/guardian for the use of a child's image or video in specific contexts (e.g., social media, newsletters, internal documentation).	
<b>CCTV</b>	Closed-Circuit Television used to monitor and secure service premises; not intended for general viewing or child supervision.	
<b>OneDrive</b>	A secure cloud-based platform used by Keiki for storing and sharing authorised images and videos.	
<b>Smart Device (including Smart Watches)</b>	A digital device with computing capabilities, sensors, and connectivity features that allow it to take photos or videos and/or perform one or more of the following tasks: tracking health metrics (e.g. heart rate, steps, sleep), send and receive calls and messages, display notifications (e.g. calls, messages, emails), and syncs with other devices like smartphones or tablets.	
<b>Working Hours</b>	Working hours refer to the agreed period during which an employee is required to perform their duties for the employer – as per the staff Roster. This typically excludes breaks and is subject to limits set by legislation, awards, or employment agreements (e.g., maximum weekly hours under the National Employment Standards).	Keiki Leave Policy
<b>Xplor Platform</b>	A secure, Australian-hosted platform used for learning documentation and internal communication.	



## The Important Stuff

Keiki Early Learning's Technology and Cyber Security Policy outlines how digital technologies are used safely and responsibly across its services. It supports the Keiki philosophy by promoting secure, respectful, and purposeful digital engagement that enhances children's learning and protects their privacy. The policy covers device management, image and video use, consent protocols, cyber security infrastructure, CCTV practices, and digital learning. It sets clear expectations for staff, families, and visitors, ensuring compliance with privacy legislation and child safety standards while fostering a culture of ethical digital practice.

## Device Management

### Keiki Issued Devices

Only Keiki-issued devices may be used to take or store photographs or videos of children. All Keiki iPads and iPhones have Airdrop disabled to prevent unauthorized sharing. Educator Keiki email accounts configured on Keiki-issued devices are restricted to sending messages only within the Keiki domain.

Keiki-issued devices are managed through a central device management system that:

- Monitors and controls app downloads
- Enforces automatic software updates
- Secures all accounts with appropriate access controls
- Maintains a device and software inventory

Images and videos of children who have authorised consent for use in newsletters or social media are shared with Keiki Marketing via Keiki OneDrive, in accordance with privacy and consent protocols.

All Keiki-issued devices must be used exclusively for authorised purposes, and in strict compliance with Keiki's privacy, safety, and operational guidelines.

### Security, Privacy and Confidentiality

Keiki employees who have been issued Keiki Early Learning logins for emails, Xplor, Playground, or other software must keep their login details, including passwords, secure and confidential. These details must not be shared with anyone or used by others.

Do not use these credentials to log into systems away from the service unless you have explicit written authorisation from the Approved Provider.

When using Keiki-issued devices such as a laptop, always sign out and/or close the laptop before leaving it unattended to prevent unauthorised access.

### Personal Devices

#### General Restrictions

- Personal devices are strictly prohibited to be used, worn or carried (including on the person, in pockets or in the clothing) of any staff member, student or volunteer during working hours, unless specifically authorised in writing by the Approved Provider or Compliance and Quality Manager.
  - Personal devices include but are not limited to mobile phones, tablets, laptops, smart glasses and other smart devices, USB drives, SD cards, external hard drives and personal cloud storage
  - Personal devices can only be used before work, after work and during approved breaks (not including toilet breaks). They must never be used in spaces where children are present (exceptions may apply).
    - During Vacation Care if educators are taking an approved break in the same space as the children, personal devices cannot be used.
- Smartwatches may be worn only if they do not receive notifications and do not have the capability to take images or videos.
- Educators are encouraged to report any colleague observed taking or sharing photos using personal devices, in line with Keiki's privacy and safety protocols.
- Breaches of this policy may result in disciplinary action or termination of employment, in accordance with Keiki's Code of Conduct and operational guidelines.
- Personal device use is monitored and reviewed periodically to ensure ongoing compliance and safety.

#### Exemptions (Medical, Disability or Family Circumstances)

- Educators with medical conditions (e.g. insulin monitoring) may use personal devices only with formal approval and under strict conditions documented by the service.

- Any exception to the prohibition on personal device or storage media use must be authorised by the Approved Provider or Compliance and Quality Manager, and only for essential purposes. Such use must not impede active supervision of children.
  - Other exemptions may be considered if determined 'essential'. These may include emergency, health, disability, family necessity, technology failure and local emergency.

#### **Coordinator and Hub Staff Use**

- Centre Coordinators and Assistant Coordinators may use personal devices only after signing an exemption form outlining permitted use and responsibilities.
- Keiki Hub staff must also sign declarations regarding personal device use and accessing Keiki software (e.g. Xplor) on personal or Keiki-issued devices.
- All staff must complete device safety training during induction and participate in ongoing professional development related to secure technology use.

### **Images and Videos**

At Keiki Early Learning, images and videos of children are used to document learning, celebrate play, and support educational programming. Express authorisation is obtained from each child's parent or guardian at the time of enrolment and re-enrolment.

Consent is collected via the enrolment form and includes three distinct declarations:

- **Social Media** – for sharing images on Keiki's official platforms.
- **Newsletters** – for inclusion in internal and external communications.
- **Internal Documentation** – including use on the Xplor platform, learning displays, and educational materials such as posters and project evidence.

These consents ensure that the use of images and videos is transparent, purposeful, and aligned with family expectations and privacy requirements.

### **Storage**

- **Device Use and Security**

Only Keiki-issued devices may be used to take or store photographs and videos of children. These devices are logged into secure, password-protected Apple ID accounts and managed through a central device management system that:

- Monitors and controls app downloads
- Enforces automatic updates
- Secures all accounts with appropriate access controls

Photographs and videos cannot be stored or file transferred to personal or non-Keiki issued SD cards, USB drives, external hard drives and personal cloud storage.

- **Sharing and Consent Management**

If a parent or guardian has provided consent for their child's images to be used in newsletters or on social media, those images are uploaded to the Keiki domain OneDrive. This secure, password-protected platform is accessible only to the Keiki Marketing Team.

The Nominated Supervisor, Educational Leader, and Room Leader are responsible for ensuring that only images of children with appropriate authorisation are uploaded and shared. Images in OneDrive are deleted after use.

- **Learning Documentation**

Photographs and videos used to document and support children's learning are stored within the Xplor platform or displayed internally within the service.

- **Marketing and Editing Platforms**

The Keiki Hub Marketing Team uses images shared via OneDrive to create branded content for newsletters and social media.

- **Canva** is used for editing and branding. Keiki Early Learning has a private account that is secured, and images and graphics cannot be accessed without

passwords. Images are stored in Canva for no longer than 12 months before being permanently deleted. Canva graphics containing images are stored until no longer in use before being permanently deleted. Canva is ISO27001 certified and SOC 2 Type II compliant, confirming its robust information security management system. Data is hosted in Australia and protected by SSL/TLS encryption, ensuring compliance with the Privacy Act 1988 and the Australian Privacy Principles (APPs).

- **Mailchimp** is used for newsletter distribution. Images are stored for no longer than 12 months before deletion. While Mailchimp's data centres are located in the United States and not subject to Australian privacy laws, the platform implements strong security measures including TLS encryption, two-factor authentication, penetration testing, and 24/7 physical security.
- **Cloud Data Residency**
  - The **Xplor platform** stores all cloud data exclusively in Australia, ensuring compliance with Australian privacy laws and regulations.
  - **Microsoft 365 services**, including Keiki domain emails, OneDrive, and the Sharing Platform, are hosted in Australian data centres. These services are governed by Australian privacy laws and benefit from enhanced security and data protection through Microsoft's local hosting infrastructure.

### Retention and Deletion

- **Social Media**  
Photographs and videos used on social media platforms are stored securely by Keiki and retained internally for no longer than 12 months. However, once published, they may remain publicly accessible on social media platforms indefinitely.
- **Newsletters**  
Images used in newsletters are stored securely by Keiki and retained internally for no longer than 12 months. Once distributed, newsletters may remain accessible indefinitely via email or online archives.
- **Learning Documentation**  
Images and videos used to document and support children's learning and development are:
  - Stored on Keiki-issued devices for no longer than 3 months before being permanently deleted.
  - Stored on the Keiki Apple iCloud and Keiki OneDrive for no longer than 3 months before being permanently deleted.
  - If displayed within the service or stored on the Xplor platform, they are retained in accordance with record-keeping requirements: 3 years after the child's last day of attendance, after which they are permanently deleted.

### Photo and Video Applications and Restrictions

- Only approved applications may be used for editing images and videos. For example, Canva is permitted due to its secure infrastructure and compliance with ISO27001 standards. Applications such as PicCollage are restricted due to known data and security vulnerabilities. See below for more information.
- Location services must be disabled on all devices when capturing images or videos to prevent the exposure of children's whereabouts.
- Images of children in a state of undress, or those depicting injuries, marks, rashes, or bruises, must not be taken under any circumstances unless explicitly directed by an authorised officer from the Department of Communities, the Police Department, or another relevant authority.

### Use of Canva

Educators and staff may use Canva to create and share information with families.

However, its use must be controlled and limited to the following conditions:

- Personal Canva accounts must not be used by educators or staff.
- Only the Nominated Supervisor is authorised to set up a free Canva account using a Keiki-owned email address, which may then be shared with educators and staff.
- Images and photos must not be uploaded to Canva unless a Keiki account has been created.
- All photos, images, and videos used in Canva must be deleted from both the created materials and the platform in accordance with this policy.
- Any written communication intended for families, or the community (excluding day-to-day learning and care documentation) is considered Keiki property and must be created or approved by Keiki Marketing prior to distribution.

For assistance with posters or marketing materials, please contact the Marketing Team via email at [marketing@keikiearlylearning.com.au](mailto:marketing@keikiearlylearning.com.au) or by phone on 08 9300 1330.

### Closed-Circuit Television (CCTV) Use

Keiki Early Learning uses CCTV systems at its Early Learning services, and CCTV may also be installed at school sites where Outside School Hours Care (OSHC) programs are delivered.

- **Purpose:** CCTV is used to support the security of buildings and external areas. While children, families, and staff may be incidentally captured in recordings, this is not the primary purpose of the system. Footage may be used in investigations conducted by Keiki Early Learning and governing bodies, including but not limited to the Education and Care Regulatory Unit (ECRU), the Reportable Conduct Scheme, Child Protection authorities, or the Police.
- **Access:** CCTV footage is not available for general viewing by families, staff, or visitors. While some staff may have incidental visibility of live footage during recording in certain service areas, recorded footage cannot be accessed or replayed without express permission from the Nominated Supervisor or Approved Provider.
- **Storage and Retention:** CCTV footage is stored securely, retained only for as long as necessary, and deleted in accordance with applicable privacy laws and data retention policies.

### Cyber Security Infrastructure

Keiki Early Learning partners with **Solutions IT**, a Western Australia-based IT company with over 25 years of experience supporting the education sector. Solutions IT provides Keiki Early Learning with managed IT services, cyber security support, procurement, and device management.

In collaboration with Solutions IT, Keiki Early Learning has implemented the following cyber security infrastructure to safeguard children, families, and staff:

- Use of encrypted platforms including OneDrive, SharePoint, and iCloud
- Role-based access controls and two-factor authentication
- Phishing protection and automatic software updates
- Airdrop functionality disabled on Keiki-issued iPads
- Email functionality on Keiki-issued iPads restricted to the Keiki domain only
- Antivirus software is automatically downloaded and run on all Keiki issued devices and Keiki employees cannot delete or deactivate the software at anytime without being in breach of this policy

## Remote Access

Staff must not access Keiki Early Learning software or data from personal devices—whether on-site or remotely—unless formal authorisation has been granted and the appropriate consent and declaration forms have been signed.

Authorised personnel, including Coordinators, Assistant Coordinators, and Keiki Hub employees, may access Keiki domains and software from personal devices under strict conditions. These conditions include:

- **No copying, downloading, or replication** of personal information related to children, families, or staff—including photographs and videos.
- **Signed declarations** outlining permitted use of personal devices during working hours and for accessing Keiki systems such as Xplor outside of operating hours or from offsite.
- **Monitoring and control:** All Keiki-issued devices are managed through a central device management system that monitors app installations and enforces security protocols.
- **Passwords are kept confidential** and not shared with anyone or any other Keiki employee other than the Compliance and Quality Manager or Solutions IT technicians.

These measures are in place to ensure the privacy, safety, and integrity of sensitive data and to comply with Keiki Early Learning’s broader cyber security and risk management framework.

## Social Media and Public Sharing

Keiki Early Learning maintains official social media pages to promote our services and share updates with families about children’s learning experiences and upcoming events. At enrolment and re-enrolment, parents/guardians are asked to provide written authorisation for photographs and videos of their child to be taken during regular activities and excursions for use on social media platforms and in newsletters.

Once shared, these images enter the public domain and are no longer under the control of Keiki Early Learning. Parents/guardians may withdraw their consent at any time by notifying the service in writing. However, previously published images will not be removed unless uploaded in error. Newsletters are distributed to current families and, in some cases, to those on the waitlist. As with social media, once distributed, Keiki Early Learning cannot control further sharing or use of these materials.

To protect the privacy of all children:

- Families are asked not to save, share, or repost images of other children from the Xplor platform, Keiki social media pages, or newsletters.
- Staff must not take or share images or videos of children using personal devices.
- Staff must not download images or videos of children using personal storage media such as, but not limited to, SD cards, USB drives, external hard drives and personal cloud storage
- Only Keiki-issued devices may be used for capturing and storing images or videos of children.

### Staff Conduct and Social Media Expectations

All employees and associated parties are reminded that the internet is not anonymous. Anything posted online—whether from home or work devices—can reflect on Keiki Early Learning and be traced back to the individual.

When engaging with social media, staff must uphold the same professional standards expected in the workplace. The following guidelines apply:

- **Access Restrictions:** Social networking sites must not be accessed from Keiki computers or mobile devices unless authorised by the General Manager for work-related purposes.
- **Confidentiality:** Do not publish confidential, sensitive, or proprietary information about Keiki Early Learning, its children, families, staff, or operations.
- **Respect and Professionalism:** Avoid offensive, discriminatory, or disparaging remarks about colleagues, families, or the organisation. This includes private messaging apps and any content where children appear in the background.
- **Brand Protection:** Do not use Keiki logos, trademarks, or intellectual property in personal posts.
- **Media Engagement:** If contacted by media, refer them to the appropriate Keiki representative. Do not make unauthorised public statements.
- **Workplace Boundaries:** Online activities must not interfere with job responsibilities. Staff are not authorised to use work email addresses to register for external social media platforms.
- **Social Connections:** Staff are strongly discouraged from accepting or sending friend requests to families of enrolled children.

If posting content related to Keiki Early Learning, staff must include a disclaimer such as: *“The postings on this site are my own and do not necessarily represent the views, positions or strategies of Keiki Early Learning.”*

#### Responsible Social Networking Tips

- Be personally accountable for all content you publish.
- Assume anything posted may remain public indefinitely.
- Use privacy settings but understand that nothing online is truly private.
- Avoid inflammatory or inappropriate content.
- Correct any misinformation you post as soon as possible.

If you are unsure about posting something, seek guidance from your Coordinator. It is always safer to pause and reflect before publishing.

### Student, Volunteer and Visitor Protocols

To ensure the safety of and respect the privacy of children protocols for image use and taking and device use have been implemented for visitors to the service.

#### Students and Volunteers

Students and volunteers are strictly prohibited from using or wearing personal devices while working directly with children or within licensed spaces. This includes, but is not limited to, mobile phones, tablets, smart watches, smart devices, laptops, and any other device capable of capturing or storing data such as images or videos. Students and Volunteers are also strictly prohibited from accessing Keiki systems including, but not limited to, Xplor, the Sharing Platform (Microsoft) and 1Place.

Prior to documenting any information about a child, students and volunteers must obtain explicit authorisation from the child’s parent or guardian.

Observations and documentation must be completed without the use of photographs or videos unless written authorisation has been granted by the Nominated Supervisor. This authorisation applies only to capturing images of activities or environmental setups, not of children.

Use of Keiki-issued devices is not permitted unless under the direct supervision of a Keiki Educator and solely for the purpose of photographing an activity or experience setup. Photos that include children or show children in the background will not be shared with the student

or volunteer. Videos must not be taken by or for students or volunteers under any circumstances.

Even when authorisation is granted:

- Documentation must not include photos or videos of children or identifiable features such as names or dates of birth.
- Personal devices or RTO-issued devices must not be used to capture images or videos.
- Images and videos of children must not be taken or shared via email or any external platform.
- Images and videos of children must not be downloaded or stored using personal storage media such as SD cards, USB drives, external hard drives and personal cloud storage.
- All documentation must exclude identifying features to protect the child's privacy and comply with Keiki's technology, cyber security, and child safety policies.

These protocols are in place to uphold the safety, dignity, and privacy of children and families, and reflect Keiki Early Learning's commitment to child-safe practices and responsible digital conduct.

Any breach of this policy will result in immediate termination of the student or volunteer's placement and notification to their Registered Training Organisation. Where appropriate, reports will also be made to relevant authorities such as the Police, Mandatory Reporting Scheme, or Reportable Conduct Scheme.

### Visitors

Visitors are strictly prohibited from using personal devices to access Keiki systems or capture images or videos while on-site. This includes incursion providers, contractors, and guests attending the service.

If a visitor is required to take photographs or videos as part of their authorised purpose at the service, they must first obtain written authorisation from the Approved Provider, Person of Management of Control (PMC) or Nominated Supervisor. Once authorised:

- The Nominated Supervisor must accompany the visitor during all image or video capture activities.
- The Nominated Supervisor will support educators in temporarily removing children from the environment to ensure no unauthorised images are taken.
- Visitors must not be left unsupervised with children under any circumstances.
- Visitors are asked to not use their personal devices while visiting the service, this includes answering calls.

These protocols are designed to uphold the safety, dignity, and privacy of children and families, and are enforced as part of Keiki Early Learning's commitment to child-safe practices and responsible digital conduct.

### Education and Care Regulatory Unit (ECRU)

When attending services, it is standard practice for ECRU authorised officers to bring department-issued devices to ensure they have the necessary tools for documentation of evidence and reporting.

Authorised officers may use their department-issued devices for:

- Completing electronic checklists
- Taking photos for evidence purposes
- Accessing resources
- Communication with other department staff

Authorised officers are not permitted to use their personal devices while onsite.

### Childcare Experts (CCE)

When attending services, it is standard practice for Childcare Experts staff to bring CCE-issued devices. These devices will be used for the following purposes:

- Completing electronic checklists
- Taking photos for evidence purposes without capturing children
- Accessing resources
- Communication with other CCE staff

CCE staff are not permitted to use their personal devices while onsite.

### **Keiki Early Learning Hub Staff**

When attending services, it is standard practice for Keiki Hub staff to bring Keiki-issued devices with them. They may also use mobile phones to ensure they have the necessary tools for auditing, communication and to fulfil their job role.

Keiki Hub Staff are not permitted to use their personal devices to take photos or videos of children.

### **Families**

Families are requested not to use personal devices while on the floor or near children during orientation sessions. This expectation is clearly communicated at enrolment to maintain a safe, distraction-free environment.

Families are also prohibited from wearing wearable cameras within the service, including but not limited to smart glasses or body cameras.

For events held at the service, families are reminded:

- Do not take photographs or videos using personal devices such as mobile phones, tablets, smartwatches, smart glasses, or other smart devices.
- When children participate in group activities or performances, Keiki will make every effort to capture photos and videos, which will be shared with families via Xplor Playground.

These protocols are in place to safeguard the privacy and dignity of all children and families and to ensure Keiki Early Learning complies with child safety legislation and privacy requirements in Western Australia.

### **Digital Learning and Child Participation**

Keiki Early Learning recognises that children are growing up in digital contexts and supports their right to participate safely and meaningfully in digital learning experiences. In alignment with *Early Childhood Australia's Digital Policy Statement* and the *eSafety Early Years* program, educators provide opportunities for children to explore, experiment, and collaborate using digital technologies in ways that promote social interaction, creativity, and problem-solving.

Digital learning is integrated through play-based and inquiry-driven experiences, with adult modelling and supervision to ensure safe and developmentally appropriate use. Educators actively seek children's perspectives and encourage participation in shaping how technology is used in their learning.

Educators make informed decisions about when and how digital technologies are used, ensuring a balance of digital and non-digital experiences that support wellbeing, relationships, and citizenship in digital contexts. Technology use must be purposeful, planned, and led by intentional educator engagement.

Keiki Early Learning fosters digital citizenship by promoting respectful, responsible, and safe behaviours. Child agency is encouraged through age-appropriate discussions about technology use and digital content creation.

To extend learning, educators may use Keiki-issued devices (e.g., iPads) for research with children. Parents/guardians provide consent during enrolment or re-enrolment, which can be withdrawn at any time in writing. Children are never left alone with devices, and privacy protocols apply to all image or video capture.

Educators also discuss age-appropriate protective behaviours around cyber and device safety. Professional learning modules support educators in guiding children toward safe and respectful online behaviours.

Keiki complies with all relevant laws and legislation regarding digital content. Following the *Online Safety Act 2021* and the age restriction of 16 years for YouTube (effective 30 July 2025), Keiki has removed YouTube links from resources. YouTube Kids and reputable websites will be used instead.

### Outside School Hours Care

In School Aged Programs, children may bring personal devices as part of their curriculum. All devices must be handed to the Nominated Supervisor or Responsible Person for safekeeping to prevent unauthorised use. Families are asked to keep smart devices at home.

Interactive whiteboards, if available, are used only under direct supervision for intentional, planned learning experiences.

### Screen Time and Wellbeing

Keiki Early Learning is committed to supporting children's health and wellbeing in digital contexts. Balanced use of technology is essential for physical, emotional, and social development.

Educators will:

- Provide varied digital and non-digital experiences, ensuring screen-based activities form only a small part of each child's day.
- Encourage movement, outdoor play, and hands-on learning.
- Ensure screen time is purposeful, developmentally appropriate, and always supervised.
- Promote healthy screen habits (visual breaks, minimising glare, smooth transitions).
- Work in partnership with families to support consistent, healthy approaches at home and in the service.

Our approach is guided by current research and sector guidance, including the *Early Childhood Australia Statement on Young Children and Digital Technologies*.

### Incursion Technology and Device Use

For incursions or special events where external providers supply and manage digital devices (e.g., iPads for creative workshops), Keiki Early Learning will ensure:

- **Pre-Approval and Risk Assessment:**  
All third-party devices must be pre-approved by the Compliance and Quality Manager prior to use. A risk assessment is conducted to ensure devices meet Keiki's safety, privacy, and cyber security standards.
- **Device Controls:**
  - Devices must be configured with guided access or equivalent controls to restrict internet, camera, and non-authorised apps.
  - Devices are stored in a locked cupboard when not in use, or packed away by the incursion provider and kept inaccessible to children.

- **Supervision and Use:**
  - Children are never left alone with devices; all use is directly supervised by Keiki educators.
  - No images or videos are to be taken unless
    - on Keiki issued devices and
    - explicit parental consent is obtained and all privacy protocols are followed.
- **Provider Agreement:**
  - The incursion provider must sign a technology and cyber security agreement confirming compliance with Keiki’s policy, the Education and Care Services National Law (WA), National Regulations, and ACECQA recommendations.
  - The provider must not access, store, or transmit any child’s personal information, images, or data.
- **Parent Authorisation:**
  - Parental or guardian authorisation is required for children to participate in experiences involving the use of digital devices. This authorisation must be obtained either through the enrolment or re-enrolment process, or via a specific booking or authorisation form, in accordance with service policy and relevant legislative requirements.
- **Incident Management:**
  - Any breach or incident involving third-party devices is reported immediately to the Compliance and Quality Manager and, if required, to regulatory authorities.
- **Legislative and Policy Alignment:**
  - All device use during incursions aligns with Keiki’s Technology and Cyber Security Policy, the Education and Care Services National Law (WA), National Regulations, and ACECQA’s Child Safe Culture Guide.

### Excursion Venues with Technology and Devices

Occasionally, to follow children’s interests or extend their learning, an excursion may be booked to a venue that incorporates technology and digital devices (e.g., *Nostalgia Box*).

When this occurs, Keiki Early Learning will ensure the following:

- **Pre-Approval and Risk Assessment:**

All excursions involving technology and digital devices must be pre-approved by the Compliance and Quality Manager or Approved Provider prior to booking. A risk assessment is conducted to ensure devices meet Keiki’s safety, privacy, and cyber security standards.
- **Device Controls:**
  - Devices must be configured with guided access or equivalent controls to restrict internet, camera, and non-authorized apps.
- **Supervision and Use:**
  - Children are never left alone with devices; all use is directly supervised by Keiki educators.
  - No images or videos are to be taken unless
    - on Keiki issued devices and
    - explicit parental consent is obtained and all privacy protocols are followed.
- **Provider/Venue:**
  - The provider/venue must not access, store, or transmit any child’s personal information, images, or data, excluding CCTV that is used for security purposes only.
- **Parent Authorisation:**

- Parental or guardian authorisation is required for children to participate in experiences involving the use of technology and digital devices. This authorisation must be obtained either through the enrolment or re-enrolment process, or via a specific booking or authorisation form, in accordance with service policy and relevant legislative requirements.
- **Incident Management:**
  - Any breach or incident involving third-party devices or technology is reported immediately to the Compliance and Quality Manager and, if required, to regulatory authorities.
- **Legislative and Policy Alignment:**
  - All device use during excursions aligns with Keiki's Technology and Cyber Security Policy, the Education and Care Services National Law (WA), National Regulations, and ACECQA's Child Safe Culture Guide.

## Roles and Responsibilities

### Keiki Early Learning will ensure that:

- All Keiki employees are provided with clear guidance and training on the safe use of digital devices, including their responsibilities for the use, retention, and deletion of photographs and videos of children.
  - Ongoing professional learning will be provided to educators and staff on digital safety, privacy and pedagogical use of technology, drawing on sector resources such as the Early Childhood Australia Statement on Young Children and Digital Technologies.
- Any breaches of child protection legislation are reported immediately to the relevant authorities, including the police, the mandatory reporting service, and the Education and Care Regulatory Unit (ECRU).
- All concerns regarding the conduct of staff and educators are thoroughly investigated, and the reportable conduct process is followed in accordance with regulatory requirements.
- Notify the Office of the Australian Information Commissioner (OAIC) in the event of a data breach, using the Notifiable Data Breach Form.

## Nominated Supervisor

### The Nominated Supervisor will ensure:

- Professional development and training needs of educators are identified and actioned, specifically in relation to technology use, privacy, confidentiality, and image-taking practices.
- Any concerns or breaches are reported to the Approved Provider and the Compliance and Quality Manager within 24 hours.
- A positive culture is maintained and promoted, encouraging the safe, responsible, and respectful use of Keiki-issued devices.
- The use of personal devices is monitored, and further training or performance improvement plans are implemented for educators or staff who use personal devices outside of approved times.
- The Privacy and Confidentiality Policy is adhered to at all times.
- There is no unauthorised access to Keiki-issued devices or platforms.
- All educators and staff have appropriate access to Keiki-issued devices and platforms, and passwords are kept secure.
- Families are provided with information on technology use and cyber security practices within Keiki and the service.
- Consents and authorisations are kept up to date, and educators are informed of any changes regarding the use of photographs and videos of children.

- Ensure all staff are aware of and follow the Code of Conduct and Privacy and Confidentiality Policies, especially when using digital platforms.

### Educators and Staff

#### Educators and staff will ensure:

- Personal devices are not used on the floor, including smartwatches that can take photographs or videos of children or if notifications cannot be turned off.
- Photographs or videos of children are never taken using personal devices.
- Keiki-issued devices and platforms are logged out of after use, where possible.
- Passwords and login details for Keiki devices, platforms, and programs are kept confidential and not shared.
- Files and data are only accessed or modified when authorised to do so.
- Any breaches or inappropriate use of digital devices or platforms are immediately reported to the Nominated Supervisor.
- Photographs, videos of children, or documents that are the property of Keiki Early Learning are not copied, downloaded, photographed, videoed, or stolen.
- The developmental level of children is considered when planning intentional teaching experiences using digital devices.
- Children are supervised directly by educators sitting with them when using technology.
- Educators are aware of which children have authorisation for their photograph or video to be used on social media or in newsletters.
  - Educators can use [Photo Authorisation Sign](#) for reference, keeping it stored in a private space within the room. Use this [document](#) to support using the sign.
- Use child-safe search engines (e.g., Kiddle) when researching with children, to prevent exposure to inappropriate content.

### Consequences of Failing to Comply with this Policy

A failure to comply with the rules in this Policy may be treated as serious misconduct and result in the termination of the employee's employment with Keiki and reporting to regulatory authorities.

Voluntary self-reporting by any employee of their failure to comply with this Policy will be taken into account, along with the severity of the failure in deciding whether the conduct justifies termination.

### Review of this Policy

This policy will be reviewed annually, and more frequently if required, to ensure alignment with the National Model Code, legislative changes, and sector guidance. Reviews will also address emerging issues in digital technology, including the use of generative AI and children's rights to digital identity, informed by current research.



### Supporting Documents

#### Policies

[Child Safety Policy](#)

[Code of Conduct](#)

[Educational Program and Curriculum Policy](#)

[Positive Guidance and Interactions with Children Policy](#)

[Supervision of Children Policy](#)

[Volunteers, Relief Staff and Students Policy](#)

**Resources**

- [Education and Care Services National Law \(WA\) Act 2012](#)
- [Education and Care Services National Regulations 2012](#)
- [Statement on young children and digital technologies - ECA](#)
- [eSafety Early Years Program – Professional Learning Modules developed by the eSafety Commissioner and ECA](#)
- [NQF Child Safe Culture Guide](#)
- [Developing Digital Technology Policy for Early Childhood Education and Care – Digitalchild.org.au](#)
- [Statement on Young Children and Digital Technologies - ECA](#)
- [The National Model Code](#)



**Sources**

- ACECQA – Australian Children’s Education and Care Quality Authority.
- Education and Care Services National Law (WA) Act 2012. (2024).
- Education and Care Services National Regulations 2012. (2024).
- Guide to the National Quality Framework. (2024).
- NQF Child Safe Culture Guide
- [National Model Code](#)



**Links to Regulations**

National Quality Standard		
<b>Quality Area 1: Educational program and practice</b>		
1.1	Program	The educational program enhances each child’s learning and development
1.2	Practice	Educators facilitate and extend each child’s learning and development.
1.2.1	Intentional teaching	Educators are deliberate, purposeful, and thoughtful in their decisions and actions.
1.2.2	Responsive teaching and scaffolding	Educators respond to children’s ideas and play and extend children’s learning through open-ended questions, interactions and feedback.
1.2.3	Child directed learning	Each child’s agency is promoted, enabling them to make choices and decisions that influence events and their world.
<b>Quality Area 2: Children’s Health and Safety</b>		
2.1	Health	Each child’s health and physical activity is supported and promoted.
2.1.3	Healthy lifestyle	Healthy eating and physical activity are promoted and appropriate for each child.
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.
2.2.2	Incident and emergency management	Plans to effectively manage incidents and emergencies are developed in consultation with relevant authorities, practised and implemented.
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.
<b>Quality Area 3: Physical Environment</b>		
3.1.1	Fit for purpose	Outdoor and indoor spaces, buildings, fixtures and fittings are suitable for their purpose, including supporting the access of every child.
3.1.2	Upkeep	Premises, furniture and equipment are safe, clean and well maintained.
3.2.1	Inclusive Environment	Outdoor and indoor spaces are organised and adapted to support every child’s participation and to engage every child in quality experiences in both built and natural environments.
3.2	Use	The service environment is inclusive, promotes competence and supports exploration and play-based learning.

3.2.1	Inclusive environment	Outdoor and indoor spaces are organised and adapted to support every child’s participation and to engage every child in quality experiences in both built and natural environments.
3.2.2	Resources support play-based learning	Resources, materials and equipment allow for multiple uses, are sufficient in number, and enable every child to engage in play-based learning.
3.2.3	Environmentally responsible	The service cares for the environment and supports children to become environmentally responsible.
<b>Quality Area 4: Staffing Arrangements</b>		
4.1	Staffing arrangements	Staffing arrangements enhance children’s learning and development.
4.2.1	Professional collaboration	Management, educators and staff work with mutual respect and collaboratively, and challenge and learn from each other, recognising each other’s strengths and skills.
4.2.2	Professional standards	Professional standards guide practice, interactions and relationships.
<b>Quality Area 5: Relationships with children</b>		
5.1	Relationships between educators and children	Respectful and equitable relationships are maintained with each child.
5.1.1	Positive educator to child interactions	Responsive and meaningful interactions build trusting relationships which engage and support each child to feel secure, confident and included.
5.1.2	Dignity and rights of the child	The dignity and rights of every child are maintained.
5.2.1	Collaborative learning	Children are supported to collaborate, learn from and help each other.
5.2.2	Self-regulation	Each child is supported to regulate their own behaviour, respond appropriately to the behaviour of others and communicate effectively to resolve conflicts.
<b>Quality Area 6: Collaborative partnerships with families and communities</b>		
6.1	Supportive relationships with families	Respectful relationships with families are developed and maintained and families are supported in their parenting role.
6.2	Collaborative partnerships	Collaborative partnerships enhance children’s inclusion, learning and wellbeing.
6.2.3	Community engagement	The service builds relationships and engages with its community.
<b>Quality Area 7: Governance and Leadership</b>		
7.1.1	Service philosophy and purpose	A statement of philosophy guides all aspects of the service’s operations.
7.1.2	Management systems	Systems are in place to manage risk and enable the effective management and operation of a quality service.

Education and Care Services National Regulations	
55	Quality Improvement Plans
56	Review and revision of quality improvement plans
73	Educational program
77	Health, hygiene and safe food practices
81	Sleep and rest
82	Tobacco, drug and alcohol-free environment
83	Staff members and family day care educators not to be affected by alcohol or drugs
97	Emergency and evacuation procedures
99	Children leaving the education and care premises
103	Premises, furniture and equipment to be safe, clean and in good repair
104	Fencing
105	Furniture, materials and equipment
106	Laundry and hygiene facilities
107	Space requirements – indoor space
108	Space requirements – outdoor space
109	Toilet and hygiene facilities
110	Ventilation and natural light
113	Outdoor space — natural environment
114	Outdoor space - shade
115	Premises designed to facilitate supervision
136	First aid qualifications
155	Interactions with children
156	Relationships in groups
168	Education and care service must have policies and procedures

170	Policies and procedures to be followed
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Education and Care Services National Law	
165	Offence to inadequately supervise children
167	Offence relating to protection of children from harm and hazards



Review & Document Control	
Policy Reviewed	Modifications
July 2025	Creation of Policy from Sustainability Policy and Providing a Child Safe Environment Policy. Ensured the changes to regulations 1/9/25 have been covered. Covered device safety, online safety.
October 2025	Clarity around the use of Canva added
November 2025	Clarity around the use of personal devices during breaks added

### Disclaimer

It is each employee, family and visitor to the service’s responsibility to read, understand, follow and address any concerns with management about this policy.

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You can find it at: <https://keikiearlylearning.com.au/policies-and-procedures/>

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