

Child Safe Environments and Digital Technologies Policy

1. PURPOSE

YMCA Victoria is committed to providing an environment that ensures the health, safety and wellbeing of all children, educators, families and visitors to the service. This policy outlines the requirements necessary to ensure the premises and equipment are well maintained, children are supervised effectively and precautions are taken to protect children from any harm, hazards and injury, which includes online environments and the usage of digital devices/technologies within services.

We ensure that all children and families, including Aboriginal and Torres Strait Islander children and families, children with additional needs, LGBTIQA+ children, and children from diverse backgrounds are respected and valued at all times.

The Child Safe Environments and Digital Technologies Policy includes Procedure steps, which have been developed to support staff and meet the requirements of the Education and Care Services National Law Act and Regulations (regulation 168 and 170) and the National Model Code, please refer to section: '4.1 Procedure – Children's Programs Sector Requirements' below.

2. SCOPE

This Policy applies to The Young Men's Christian Association of Victorian Inc and related entities including Kingswim and The Victorian YMCA Youth and Community Services Inc. For the purposes of this document we refer to these entities as the YMCA. All Policies and Procedures must conform to this Policy.

3. AUDIENCE

- ☒ Staff/Volunteers
 ☒ Managers
 ☒ Senior Managers/Executive
 ☐ Board Members
☒ Customers/Patrons
 ☐ Contractors

4. POLICY – YMCA VICTORIA REQUIREMENTS

YMCA Children's Programs will ensure that service facilities and activities provided as part of the educational program are in keeping with ensuring we maintain a safe, healthy and stimulating environment which is accessible to all children and allows for their physical and psychological comfort. As a Child Safe organisation, YMCA Victoria will ensure that all programs and services adhere to the 11 Victorian Child Safe Standards and 10 National Child Safe Principles.

4.1 PROCEDURE – CHILDREN'S PROGRAMS SECTOR SPECIFIC REQUIREMENTS:

Providing Child Safe Physical and Online Environments

Our organisational culture prioritises children's safety throughout individual service operations, with our policies and procedures available and accessible at each service for all staff, families, children and visitors.

All services are required to complete regular checks and assessments to monitor any potential hazards so these can be addressed to ensure a safe environment for children.

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4.1.1 Children's Personal Information

Children's personal information (including photos, videos and audio recordings) is managed and stored in accordance with *HSE938-O YMCA Victoria Privacy Policy*.

Children's Programs utilises an online Child Care Management System (CCMS) to manage child enrolment records, family accounts and reporting attendance for Child Care Subsidy (CCS) purposes.

Photos, videos and audio recordings will not be featured on parent/family online communication platforms for children who:

- Are/have been subject to child protection, family court or criminal proceeding, or other legal matters where their identity must be protected (following legal instructions)
- Are experiencing family violence and need to stay anonymous
- Have parents who are concerned about their child's digital footprint and request limited or no online photos

4.1.2 Staff Induction and Training

All Children's Programs staff are required to:

- Complete a mandatory YMCA induction
- Complete the YMCA Child Safe Online Course, which covers current child protection legislation, including for mandatory reporting requirements and obligations
- Meet ACECQA requirements relating to education and care qualifications and first aid qualifications
- Complete YMCA online training courses covering supervision, interactions with children, sun and heat protection, medical conditions, safe sleep and rest, excursions, transportation of children and cybersecurity
- Participate in ongoing professional learning and development on topics covering online safety and use of digital technologies in education and care environments, which supports the implementation of these areas into the education program for children. This includes considerations for when it is appropriate to take a photo or video of a child and the purpose for why it is being taken. Educators will use the reflective questions in the *ACECQA National Model Code* to consider how often and when to take relevant images of a child.

4.1.3 Staffing and Supervision

Required ratios are maintained and each service has a supervision plan and risk assessment, which supports the setup and routines of the service to consider, ensuring the developmental needs and safety of children are met at all times.

Supervision plans and practices take into consideration the use of online technologies and digital devices within the service to ensure active supervision. Educators undertake the following actions:

- Regularly checking the environment to ensure safe device use and adjust positioning as needed
- Looking for areas where children might use devices outside of the designated area

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- Communicating with children about what they are using devices for, their favourite apps and why they enjoy playing with them
- Communicating with children about how to use devices safely and what security settings are enabled

Refer to HSE935-O (PR) YMCA Victoria Child Safety Procedure (formerly SCYP) and CP218-O (PR) Supervision of Children Procedure for legislative ratios and organisational child safety protocols

4.1.4 Our Education and Care Services Physical Environments

Service indoor and outdoor environments are monitored on an ongoing basis to ensure premises are safe, clean and hygienic. All staff are responsible for ensuring the service is:

- Free from tobacco, drugs, alcohol, vaping substances and vaping devices (for example, e-cigarettes). All staff, families and visitors must follow this requirement as a condition of entry to the premises
- Storing chemicals and cleaning equipment out of reach of children with MSDS available
- Completing general cleaning of the environment daily
- Completing general safety checks of the environment via the *Daily Operations and Safety Checklist*
- Ensuring tripping and slipping hazards are removed as soon as they are identified

Daily Operations and Safety Checklist* and *Monthly Facility Hazard Inspections

- The *Daily Operations and Safety Checklist* must be completed daily by educators as follows:
 - In preparation for the service opening
 - In preparation for the service closing
 - At the specified times to check and record heat retention of outdoor equipment
- Completed checklists are filed onsite for auditing purposes and any identified hazards must be reported to service management as soon as possible
- Any identified hazards and corrective actions taken must be included in the *Monthly Facility Hazard Inspection*, which must be logged on the organisation's event management system

Monitoring Weather Conditions and UV Index

Educators are required to be aware of daily weather conditions and encouraged to access the local sun protection times and UV information via the free SunSmart Global UV app or website as well as the Bureau of Meteorology and ARPANSA (Australian Radiation Protection and Nuclear Safety Agency) websites.

Services also monitor weather conditions via the Vic Emergencies App (Vic services) or the Sydney Pollen Count & Forecast App (NSW services) to ensure the service is notified of high-risk pollen days and/or thunderstorm asthma alerts.

4.1.5 Online Environments, Digital Devices and Technologies

Our services ensure online and digital technologies are incorporated into learning environments in age appropriate ways, to support children's development and understanding of engaging in these technologies safely.

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Risk Assessment: Digital Devices and Online Environments

- All services complete a 'Digital Devices and Online Environments Risk Assessment' for their site for the use of devices featuring online technology and/or used to take images/video footage of children. This risk assessment outlines:
 - All online tools and platforms, digital devices and technologies are assessed prior to children's use
 - How the use of technology is monitored
 - Devices are child-safe and have age appropriate features enabled (what technologies and devices are in the service and which ones are connected to the internet)
 - Device settings are at a level of privacy that reflects data protection laws
 - Devices are password protected and stored safely to prevent unauthorised access to data and information
 - Children using YMCA digital devices
 - Digital tablets for signing children in and out and recording activity events to parents
 - Digital tablets and images for recording a child's learning experience
 - Interactive screen for children's learning and development
 - Optical surveillance devices (CCTV) used within centres
 - Personal devices for Y Vic staff
 - Stem & digital/smart toys/equipment
 - 3rd party Contractor & Visitor devices
 - Apps and content accessible to children
 - Children bringing their devices to OSHC
 - Image capture and storage of children's recorded events for a learning experience
 - Optical surveillance devices (CCTV) image capture
 - Image use in the advertising and marketing process
 - 3rd party Contractor & Visitor system management
 - Data and Privacy data transfer between devices and systems
 - Artificial Intelligence (AI) systems and processes
- Risk assessments are reviewed annually and logged on the Risk Management System for organisation oversight
- Services complete an annual audit to confirm what digital devices are in the service and which ones are connected to the internet as part of the 'Digital Devices and Online Environments Risk Assessment' review. This information is provided to the IT Department to inform the YMCA Digital Devices Register

Digital Devices, Central Register and Cybersecurity

The YMCA's IT Department provides organisational oversight of digital device assets and internal online security management, which includes:

- Maintaining a YMCA Digital Devices Register of assets used within our education and care services
- Setting up digital devices for our services to ensure appropriate security settings
- Remote access to monitor digital device usage and online content accessed

On YMCA Digital Devices, we install and update:

- Safety, security and monitoring software, and monitor downloads
- Internet and spam filters and a pop-up blocker
- Filtering software and age-appropriate settings

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- We enable internet browser security and regularly check internet usage history on all service issued devices/each device that will be used by children
- We regularly check privacy settings and recommended age restrictions on all service issued devices/each device that will be used by children
- We turn off chat functions on apps and games
- We select appropriate app settings, which could include turning off location settings and enabling privacy controls on each device that will be used by children
- Parental controls, privacy and safety protections are setup on digital devices
- Tools are available to control access to appropriate content based on children's age and development. They can be used to block, filter, monitor, and limit online content on service devices, alongside supervision and other safety strategies
- To keep children safe, it is important to limit access to functionalities such as location, camera, photos and videos already stored on the device, and the ability of the device to listen to its surroundings

Digital Devices and Online Environments in Education and Care Services

All educators and Children's Programs staff are required to:

1. Maintain and promote a positive culture that ensures safe, responsible and respectful use of digital devices and online technologies
2. Uphold children's rights to provision, participation and protection in digital environments, including explaining to children that they can revoke their consent for their photo, video or audio to be captured at any time
3. Complete training, which provides professional development to enhance knowledge about identifying and mitigating the risks associated with being safe online and engaging with digital devices and technologies in education and care services
 - Utilise only YMCA devices for taking photos, video or audio recordings of children in line with the *HSE935-O (PR) Child Safety Procedure (formerly SCYP)* and *IT001-O (PO) YMCA Victoria IT Acceptable Use Policy*. YMCA digital devices are labelled for identification purposes.
4. Follow the steps for capturing, storing, accessing, retaining and destruction of images, video and audio recordings of children. *YMCA digital devices automatically imports data (including photos, videos or audio recordings securely on the organisation's internal OneDrive to minimise data transfer.*
5. Ensure steps for capturing, storing, accessing, retaining and destroying images of children are followed as outlined below:
 - Ensure written parental permission (which can be revoked at any time in writing by emailing the service) has been granted for photographing, video or audio recording children which sets out conditions and intended use
 - Direct families to complete a new permission form if they have revoked consent to maintain accurate child enrolment information. Staff to complete a Customer Engagement Support Request (Asana form located on YNet) informing the Customer Engagement Team if revoked consent will impact promotional photography previously taken of the child
 - Photos, videos or audio recordings will not be taken of children in inappropriate situations (for example, when they are upset, in bathrooms or during nappy changes)
 - Seek to obtain consent from children of all ages prior to taking photos, video or audio recordings of them and explain what the content would be used for (i.e. photograph to be included in child's individual portfolio to document their learning)

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- Immediately delete photos, videos and audio recordings of children at the time of capture that will not be used to document the child's learning (for example, used in a learning story)
 - Images, video and audio recordings selected to document a child's learning are:
 - For ELC services: Saved and published on online parent communication platform (where parental consent has been obtained) or stored securely on YMCA OneDrive
 - For OSHC and Occasional Care services: Stored securely on YMCA OneDrive or printed for hardcopy portfolios/journals
 - Photographs, video and audio recordings of children are retained in line with Education and Care National Law and Regulation timeframes and stored securely on YMCA OneDrive, online parent communication platform (ELC services) or archived securely onsite (hardcopy documents)
 - Only persons authorised by the Approved Provider are granted access to this data, which the IT Department monitor
 - At the conclusion of these timeframe's photographs, video and audio recordings of children are permanently destroyed and hardcopy archives are shredded and disposed of securely to ensure personal information is not compromised
- Refer to pages 7 and 8 for promotional photography requirements*
6. Consider the developmental stages of children when utilising technology as part of the educational program and limit the amount of screen time in line with the guidelines:
 - Under 2 years of age no screen time
 - Children 2 to 4 years of age, limited to less than 1 hour per day
 - Children 5 to 12 years of age, limited to 2 hours per day
 7. Ensure active supervision of children when online and using digital devices
 8. Ensure quality and developmentally appropriate access to technology and content for educational purposes, ensuring quality sources (for example, eSafety Commissioner) are utilised for curriculum planning
 9. Educational programs incorporate opportunities for:
 - Discussing online safety within children
 - Exploring their world through access to imagery and information
 - Engaging in digital play through creating, communicating and consuming digital content in an age appropriate and safe manner
 - Discussing the concepts of 'being online' or 'the internet' with children so that they continue to develop their understanding
 - Implementing the use of technologies in everyday life and use real or imaginary technologies as prop's in children's play
 - Supporting the development of self-regulation for using digital devices and technologies
 - Educating children about what to do if they encounter inappropriate online material
 - Educating children about the importance of strong privacy settings and not accepting unknown friend or follower requests
 - Teaching children from a young age that not everyone online is who they say they are
 - Teaching children that if they receive a sexual image, they should tell a trusted adult, delete it and not share or save it
 - Teaching children how AI works and the risks of AI systems. Engage children in play-based, meaningful activities to help them understand AI concepts

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- Discussing the importance of privacy with children, including posting on social media and how AI can collect and store personal information and why this can lead to safety risks
- 10. Ensure online content or programs are viewed and assessed prior to introducing to children and have a General classification (G rating) or for OSHC a Parental Guidance (PG) recommended classification maybe considered if deemed appropriate and approved by OSHC Regional Manager (for example, excursion to cinema in school holiday program)
- 11. Limit experiences utilising screen usage to those which are educational or include movement for gross motor activity
- 12. Ensure digital devices and technologies are not used as a reward or to manage challenging behaviours

YMCA Promotional Photography, Video and Audio Recordings

Photography, Video and Audio recordings captured for promotional purposes must following the requirements outlined below:

- Written permission must be obtained for children prior to capture via the *Children's Programs Talent Release Form* which specifies conditions and intended use
- Permission must be renewed if an image is to be reused for purposes beyond those originally agreed upon. This consent can be revoked anytime by emailing brand@ymca.org.au Images which have their consent revoked will follow the guidelines detailed below
- The YMCA Marketing and Communications Department arrange for promotional photoshoots at our services, with advance notice provided to staff and families (only children with parental permission may partake in the photoshoot)
- Promotional photography/videography suppliers are bound by contract with YMCA, which stipulates that all footage taken remains the property of YMCA and cannot be used or sold for any other purpose
- Promotional photography, video and audio recordings are:
 - Stored securely in YMCA managed centralised digital repositories, and accessible only to authorised staff through password protected applications
 - Labelled accurately and include details such as date, event, and subject (if applicable)
 - Images cannot be captured or stored on personal devices or unsecured non-YMCA managed platforms
 - Retained for a use period of three (3) years from capture. After, images are archived but no effort is required to be made to retroactively remove content from previous use/circulation
 - Permanently destroyed after seven (7) years. Images that are no longer needed to ensure compliance with privacy laws and to limit unnecessary data retention may be destroyed sooner
 - YMCA Victoria will make every effort to delete any images of deceased Indigenous and elderly clients or staff to ensure cultural respect and sensitivity is maintained as and when informed
- Promotional photography, video and audio recordings intended for use on YMCA official Social Media channels must strictly adhere to the *EF810-O (PO) Social Media Policy – Official Use*

Third Party External Professional Photographers (not YMCA Promotional Photography)

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- When engaging an external professional photographer for the purpose of photographs for parents/guardians (for example, kinder portraits), which they opt into we undertake the following:
 - Specifying to the photographer that their agreement with the parent/guardian must include how photos of children are stored, retained and deleted and whether child can be included in group photography (if applicable) so parents/guardians are clear about the handling of their child's photographs/data by the photographer and sharing with other parents/guardians. Photographer to ensure no other children are present in the background of individual children's photos
 - Only children whose parents/guardians have provided written consent may be photographed
 - YMCA staff will verify which children are to be photographed as per photographers list
 - In the event a group photo will be taken, only children whose parents/guardians have provided written consent may be photographed
 - Photographers will be supervised at all times by YMCA staff during their visit
 - Photographers are only permitted to photograph children in appropriate environments. No photography is permitted in bathrooms or during nappy changes

Optical Surveillance Devices (including Closed Circuit Television (CCTV))

Services using CCTV must adhere to the *YMCA Victoria's HSE937-O (PO) CCTV Policy*

Conditions of Entry for Contractors, Visitors and Families

The engagement of external suppliers or contractors must be done so in line with the *OHS021-O (PR) Contractor Management Procedure* and *HSE935-O (PR) YMCA Victoria Child Safety Procedure (formerly SCYP)*. This includes the completion of onsite safety inductions, confirmation of a valid and verified Working with Children Check (Victoria and NSW) and relevant insurance requirements. External contractors must not have unsupervised or individual access to children.

Personal devices that can take images or videos and personal storage and file transfer media are not permitted for contractors or visitors who are working directly with children or in child facing areas. This includes the following:

- Agency staff
- Students attending the service as part of a practicum and representatives of tertiary providers who attend the service to assess students
- Volunteers, including parent volunteers
- Any third parties delivering programs or incursion activities to children in a service, whether paid or unpaid
- Allied health and inclusion professionals attending a service to observe, assess or work with a child at the service
- Mentors or coaches attending the service to support teachers or educators working with children or providing education and care
- Preschool field officers
- Primary school teachers attending a service as part of a school transition program
- If a third-party professional attending a service and working directly with children (such as an allied health or inclusion professional) needs to use a device (for example, to undertake an assessment or take notes) they can use a device that is:
 - issued by their business or institution; and

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- used only for work purposes (and not personal use)

External contractors for the purposes of premises maintenance are permitted to use personal digital devices in areas where children are present only for the purpose of completing the maintenance task (for example, photographing an inspected fire extinguisher).

These contractors must declare the requirement to use their personal device at the time of sign in at the service and will be under the supervision of educators present within the service, in line with the HSE935-O (PR) YMCA Victoria Child Safety Procedure (*formerly SCYP*).

In instances where a photo must be captured for the completion of contract works a YMCA staff member will either capture the photo or verify that the photo does not feature children (for example, contractor takes a photo of work completed on the roof and YMCA staff member will view the imagery to verify that no children are featured).

Parents/guardians and family visitors are not permitted to use personal digital devices while in our services premises. Where an event is held at a service (for example, kindergarten graduation), YMCA staff will capture images/videos and make these available to families.

YMCA requests that parents/guardians and family visitors not share any images or videos taken by YMCA staff on social media platforms which feature other people's children without first obtaining parental/guardian consent.

The restrictions outlined above do not apply to the following:

- Victorian Regulatory Authority Authorised Officers
- Police
- Officers of other regulators, such as environmental health officers

For personal device requirements for YMCA staff, please refer to the *HSE935-O (PR) YMCA Victoria Child Safety Procedure (formerly SCYP)* and *IT001-O (PO) YMCA Victoria IT Acceptable Use Policy*

Engaging with Children and Families

Services provide information for families on:

- Support agencies and where to go for help for online safety resources, including the eSafety Commissioner (eSafety), Kids Helpline, Headspace and Parentline (refer to Section 9 'Supporting Documents' for links to resources)
- Online safety and risks in the online environment, such as cyber bullying, online grooming and sexting
- Organisations for advice and resources on selecting digital content and platforms, apps and games that are appropriate for children's use
- Screen time guidelines

Children, parents/guardians and families are encouraged to raise any concerns or provide feedback on this policy at any time

Online Parent Communication Platform

Our Early Learning Centre's utilise an online parent communication tool for the purpose of sharing children's learning journey with families. The platform requires signed parent/guardian consent to collect and display images and video of children. This is completed via the child's enrolment record (please refer to the *Enrolment and Orientation Procedure*) and also when gaining access to the

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platform to provide authorisation of how information is used. Users must agree and adhere to the terms and conditions of use, including not sharing images or video recordings featuring other children to online platforms or accounts without obtaining permission from the children's parents/guardians.

The platform complies with the Privacy Act 1988 (Cth) by ensuring information stored within the system is protected by storing it in secure data centres with off-site backups and encrypting communication between users and servers via industry-standard secure sockets layer (SSL). The platform is password protected and no personal information is shared with third parties.

Nominated Supervisors and Centre Managers oversee the user management of the platform to ensure YMCA personal and parents/guardians/families are added or removed when joining or leaving the service. Children's Programs staff ensure the protection of children's identity for circumstances including family violence, child protection orders.

ELC and Occasional Care Services Only: Children's Personal Electronic Devices

Children's personal electronic devices in our early learning and occasional care services are only permitted if required for medical or health reasons. An exception may be approved by an ELC Area Manager if a device has been prescribed by a medical practitioner in accordance with a medical management plan or wellbeing plan. Exceptions must be documented in the child's individual Risk Minimisation and Communication Plan or Guidance and Wellbeing Plan

OSHC Services Only: Children's Personal Electronic Devices in OSHC

This section provides guidance to ensure all children in OSHC services are using Personal Electronic Devices (PED's) in a safe and meaningful way.

We discourage the practice of children bringing valuables to the program, including digital devices. YMCA will not be responsible or held liable should items be lost or damaged while attending our services.

If a child brings a mobile phone to OSHC it will stored in either a locked cupboard until collection by parents/guardians upon sign out or turned off and stored in the child's school bag. Personal Electronic Devices will be used for limited amounts of time during the service.

Safe Use Guidelines

1. Parents/guardians must fill out an *OSHC and School Holiday Program Child Personal Electronic Device Permission Form* agreeing that the device has appropriate parental controls enabled and children access age-appropriate content and Apps only. The form must be signed by the child and their parent/guardian
2. Children must hold a completed '*Be Secure Online*' certificate from the eSafety Commissioner (*refer to Section 9 'Supporting' Documents for website link*)
3. Children can only use devices in a designated area
 - Personal Electronic Devices are to be used for homework purposes only (unless exception is granted i.e. for medical reasons*)
4. Cameras and microphones in devices are not to be used while attending the service, including while on excursions and regular outings. Electronic devices with a camera must not be used in any place where a camera would normally be considered inappropriate. This includes in change rooms and toilets or any situation which may cause embarrassment or discomfort to others.

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5. Devices that have cellular internet access capabilities or wireless communication capabilities (including mobile phones and wearable devices) may not be used at any time (unless exception is granted i.e. for medical reasons*)
6. Charging cables must be in good condition, damaged or frayed cords will not be permitted. The cables must be positioned in a way to avoid a tripping hazard.
7. Devices must be clearly named or otherwise identifiable.
8. Children must not use devices to threaten, bully, intimidate or otherwise harass other people through email, chat function, photographic, video or other data transfer system available on the device or for any illegal activity.
9. Any child who is using a portable electronic device inappropriately and/or not in accordance with these guidelines will have the device removed and returned at the end of the session. Parents/guardians will be informed of any misuse.
10. Devices are for personal use only and the sharing of screens or the device with other children is not permitted. This includes setting an appropriate volume so as not to interrupt the play and leisure of other children.
11. If the device is connected to a school network, the school's internet use agreement/policy must be followed.

***Exception** - An exception may be approved by an OSHC Regional Manager if a device has been prescribed by a medical practitioner in accordance with a medical management plan or wellbeing plan. Exemptions must be documented in the child's individual Risk Minimisation and Communication Plan or Guidance and Wellbeing Plan

4.1.6 Reporting

Children are supported to report cyberbullying to the platform and the eSafety Commissioner (refer to Section 9 'Supporting Documents').

If a data breach is suspected, Children's Programs staff must follow the requirements of the policy and procedure listed below, which outlines internal and external reporting requirements:

- Incident Management Procedure
- IT007-O IT Incident Response Policy

4.2 PROCEDURE – RECREATION SECTOR REQUIREMENTS

Recreation Children's Programs Services licensed under the Department of Education; including Limited Hours and Occasional Care Services, OSHC Services and Vacation Care Programs requirements are included in the Children's Programs Sector Requirements listed above.

5. LEGISLATIVE AND INDUSTRY REQUIREMENTS

- Education and Care Services National Law Act 2010
- Education and Care Services National Regulations 2011
- Children's Services Act 1996
- Children's Services Regulations 2020
- Reportable Conduct Scheme
- Child Wellbeing and Safety Act 2005
- Children, Youth and Families act 2005 (Vic)
- Child Safe Standards 2022

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- Privacy Act 1988 (Cth)
- Information Privacy Act 2000 (Vic)
- Occupational Health and Safety Act 2004 (Vic)
- Online Safety Act 2021
- United Nations Convention on the Rights of the Child

6. DEFINITIONS

Term	Definition
Artificial Intelligence (AI)	An engineered system that generates predictive outputs such as content, forecasts, recommendations, or decisions for a given set of human-defined objectives or parameters without explicit programming. AI systems are designed to operate with varying levels of automation.
Child Abuse	The physical or psychological/emotional mistreatment of children. There are four main categories of child abuse neglect, physical abuse, psychological/emotional abuse, and sexual abuse
Cyberbullying	When someone uses the internet to be mean to a child or young person so they feel bad or upset.
Disclosure	A process by which a child conveys or attempts to convey that they are being or have been sexually abused, or by which an adult conveys or attempts to convey that they were sexually abused as a child. This may take many forms, and might be verbal or non-verbal. Non-verbal disclosures using painting or drawing, gesticulating, or through behavioural changes, are more common among young children and children with cognitive or communication impairments. Children, in particular, may also seek to disclose sexual abuse through emotional or behavioural cues, such as heightened anxiety, withdrawal or aggression.
Duty of Care	A common law concept that refers to the responsibilities of organisations to provide people with an adequate level of protection against harm and all reasonably foreseeable risk of injury.
Commission for Children and Young People	The Commission for Children and Young People is an independent statutory body that promotes improvement in policies and practices affecting the safety and wellbeing of Victorian children and young people. They have a particular focus on vulnerable children and young people.
11 Child Safe Standards	State regulated Child Safe Standards (Victoria) The Child Safe Standards (the Standards) are compulsory minimum standards for all organisations that provide services to children. The aim of the Standards is to ensure organisations are well prepared to protect children from abuse and neglect. The eleven standards are as follows: Standard 1: Culturally safe environments – Establish a culturally safe environment in which the diverse and unique identities and experiences of Aboriginal children and young people are respected and valued. Standard 2: Leadership, governance and culture – Ensure that child safety and wellbeing are embedded in school leadership, governance and culture. Standard 3: Child and student empowerment – Children and young people are empowered about their rights, participate in decisions affecting them and are taken seriously.

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	Standard 4: Family engagement – Families and communities are informed and involved in promoting child safety and wellbeing. Standard 5: Diversity and equity – Equity is upheld and diverse needs are respected in policy and practice. Standard 6: Suitable staff and volunteers – People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice. Standard 7: Child-focused complaints processes – Ensure that processes for complaints and concerns are child focused. Standard 8: Child safety knowledge, skills and awareness – Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training. Standard 9: Physical and online environments – Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed. Standard 10: Review of child safety practices - Implementation of the Child Safe Standards is regularly reviewed and improved. Standard 11: Implementation of child safety practices – Policies and procedures that document how schools are safe for children, young people and students.
10 National Child Safe Principles	National child safe standards (all states and territories)
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.
Harmful content	Harmful content includes: - sexually explicit material - false or misleading information - violence - extremism or terrorism - hateful or offensive material.
Illegal content	Illegal content includes: - images and videos of child sexual abuse - content that advocates terrorist acts - content that promotes, incites or instructs in crime or violence - footage of real violence, cruelty and criminal activity.
Online hate	Any hateful posts about a person or group based on their race, religion, ethnicity, sexual orientation, disability or gender
Personal Electronic Devices (PED's)	A piece of electronic equipment, such as a laptop computer, smart watch, toy, media player, or a mobile phone, that is small and easy to carry.
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.
Smart toys	Smart toys generally require an internet connection to operate as the computing task is on a central server.
Unwanted Contact	Any type of online communication that makes you feel uncomfortable, unsafe or harassed. It can be with a stranger or someone you/the child knows.

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7. ROLES AND RESPONSIBILITIES

Department / Role	Responsibilities
The Approved Provider	The Approved Provider is responsible for: • Meeting obligations under the Education and Care Services National Law and National Regulations for Early Learning Centre and OSHC and obligations under the Children's Services Act 1996 and Children's Services Regulations 2020 for limited hours and occasional care services in Recreation • Ensuring the <i>CP008-O (PO) Child Safe Environments and Digital Technologies Policy</i> is implemented in the service and accessible to all educators • Ensuring all educators are aware of and follow the <i>CP008-O (PO) Child Safe Environments and Digital Technologies Policy</i> and accompanying risk assessments • Providing an environment that is free from the use of tobacco, illicit drugs, vaping substances and vaping devices and alcohol and ensure no educators or staff are affected by alcohol or drugs (including prescription medication) so as to impair their capacity to supervise or provide education and care to children in the service • Promote a culture of child safety and wellbeing that underpins all aspects of the service's operations (including online learning environments), to reduce risk to children (including the risk of abuse) • Ensure the safe use of digital technologies, including smart toys, and online environments at the service • Ensure policies and procedures promote equity and respect diversity for the safety and wellbeing of children and young people • Ensure that copies of the policy and procedures are readily accessible to nominated supervisors, coordinators, educators, staff, families, and are available for inspection • Ensuring the nominated supervisor and all educators are aware of their responsibilities in regards to child protection and mandatory reporting requirements • Ensuring all educators have completed YMCA Child Safety (<i>formerly SCYP</i>) online training and are aware of the policy and procedure. • Ensuring services are compliant with the Eleven Child Safe Standards (<i>refer to Section 6 'Definitions' for detailed descriptions of the Child Safe Standards</i>) • Notify families at least 14 days before changing the policy or procedures if the changes will: ○ significantly impact the service's education and care of children or ○ significantly impact the family's ability to utilise the service.
The Nominated Supervisor	The Nominated Supervisor is responsible for - • Ensuring all educators are aware of the <i>CP008-O (PO) Child Safe Environments and Digital Technologies Policy</i> and are implementing it. • Ensuring the recruitment process follows the YMCA Victoria Recruitment and Selection policy and procedure. • Ensuring all educators have completed YMCA's Child Safety Training (formerly SCYP) • Ensuring the service complies with the Child Safe Standards • Ensuring educators are aware of and follow the Early Childhood Australia Code of Ethics and YMCA Victoria's code of conduct policy and procedure. • Ensuring all educators are aware of their obligations in regards to Child Protection and have completed Mandatory Reporting training. • Notifying Department of Education within 24 hours of a serious incident or complaint.

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	• Notifying the Child Safety Manager who will inform the Commission of Children and Young People within 3 business days of any reportable incident or allegation made against an educator. • Ensuring all educators (<i>other than in instances where an executive exemption has been approved or who are trainees who have three months to obtain these qualifications</i>) have completed training in: - First aid - CPR - Anaphylaxis - Asthma <i>And ensuring their qualifications are current</i> • Ensuring all children enrolled at the service have a completed enrolment form on file as per Enrolment and Orientation policy and procedure, listing and attaching any relevant documents for specific health or dietary needs and medical action plans. • Complete risk minimisation plans for children with medical conditions in consultation with their family. • Ensuring the building and equipment is clean, safe and in good repair. Arranging repairs and maintenance as needed. • Ensuring the <i>Daily Operations and Safety Checklist</i> are completed • Ensuring the emergency evacuation map and procedures are displayed by each exit and evacuation/lock down drills are practiced at least once every three months. • Ensuring the following risk assessments are completed and implemented: -Centre -Excursion -Supervision -Digital Devices and Online Environments • Implementing supervision plans according to the risk assessment and regularly reviewing them • Ensuring educators understand how to actively supervise children while using digital technologies • Meeting staff to child ratios to ensure adequate supervision • Ensuring that copies of the policy are readily accessible to educators, staff, families, and are available for inspection • Have ongoing communication with educators and staff about their responsibilities and any changes to policies, procedures and legislation, particularly as digital technologies evolve quickly • Support educators and staff to uphold the service's culture of child safety and wellbeing, including when accessing digital technologies and online learning environments • When required, work collaboratively with appropriate services and/or professionals to support children's access, inclusion and participation in the program, including their safe access to online learning environments • Ensuring the safety and wellbeing of children attending the service by keeping a visitors' record, including signatures and arrival/departure times • Ensuring the service is free from tobacco, drugs, alcohol, vaping substances and vaping devices (for example, e-cigarettes) • Ensuring a suitable number of fully equipped, in date, first aid kits are available
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	- Ensuring cleaning equipment and chemicals are safely stored and inaccessible to children and MSDS are available - Ensuring regular pest/vermin inspection/eradications are completed and documented.
Responsible Person in Charge and other Educators	Responsible Person in Charge and other Educators are responsible for– - Reading and signing an acknowledgement that they have read and understood the <i>CP008-O (PO) Child Safe Environments and Digital Technologies Policy</i> and any applicable supporting documents - Following the <i>CP008-O (PO) Child Safe Environments and Digital Technologies Policy</i> at all times when educating and caring for children - Acting in the best interests of the children at all times - Following Early Childhood Australia’s Code of Ethics and YMCA Victoria’s code of conduct policy - Completing YMCA’s Child Safety Training (formerly SCYP), understand their responsibilities in regards to child protection and mandatory reporting any suspected cases of child abuse - Supporting children to feel safe and secure while enhancing their learning and development - Never leaving children alone, out of sight or with a visitor, volunteer, student, contractor or a parent/guardian other than their own - Ensuring children are effectively supervised at all times, keeping in mind requirements of supervision plans - Understanding and following the Delivery and Collection of Children policy and procedure, ensuring children are only sent home with their parents/guardian or authorised contacts - Be aware of any court orders relating to children at the service - Teach and empower children to speak up about situations they are uncomfortable with, by first developing trusting relationship with children which will build their sense of attachment and trust - Adhering to the Children’s Programs Positive Guidance Procedure and ensure children are not subjected to any form and inappropriate discipline or corporal punishment - Be aware of children’s medical conditions and follow each child’s individual risk minimisation plan, as per medical condition policy - Be aware of any dietary requirements children have and ensure their meals are suitable - Attending to the first aid needs of children as soon as possible. Following the Administration of First Aid procedure and contacting the child’s parent/guarding or emergency services if necessary - Understand emergency evacuation procedures and participate in drills - Implement the service’s culture of child safety and wellbeing, including when accessing digital technologies and online learning environments - Know the individual needs and action plans for the children in your care, and understand how they relate to the safe use of digital technologies and online environments - Ensure active supervision of children when they are using digital technologies, including by monitoring and maintaining staff to child ratios - Recognise and respond effectively to children and young people when discussing the use of digital technologies and online environments, considering diverse needs and interests

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	• Ensure children and young people participate in decision-making in matters affecting them regarding the safe use of digital technologies and online environments at the service • Maintain current accredited first aid and approved CPR, asthma and anaphylaxis training • Recognise and respond effectively to children and young people, taking into account diverse needs • Ensure children and young people participate in decision making in matters affecting them, including in relation to safety issues and risk identification • Ensuring the service is free from tobacco, drugs, alcohol, vaping substances and vaping devices (for example, e-cigarettes)
Parents/Guardians or Authorised Nominees	All parents/guardians or authorised nominees are responsible for - • Providing the service with a complete enrolment form for their child, listing any specific health or dietary needs and medical action plans • Notifying the service of any court orders relating to their child and providing documentation to support this • Reporting any concerns about a child's safety to the relevant parties –centre manager/coordinator, child protection or the police if immediate intervention is required • Encouraging their child to show respect for the YMCA educators, environment and equipment and role modelling it themselves • Not using personal devices while in child facing areas while in our services premises • Not sharing any images or videos captured by YMCA educators on social media platforms featuring other people's children without first obtaining parental consent • Following the restriction requirements that our services are free from tobacco, drugs, alcohol, vaping substances and vaping devices (for example, e-cigarettes) • Abiding by the requirements of the 'Safe Use Guidelines' as outlined on pages 10 and 11 of this policy if their child brings a personal electronic device to OSHC • The decision to provide personal electronic devices to their children should be made by parents/guardians and an accompanying 'OSHC and School Holiday Program Child Personal Electronic Device Permission Form' must be completed and signed by the parent/guardian and child • OSHC parents/guardians must be aware if their child takes a personal electronic device to the service
Regional OSHC Coordinators	Regional OSHC Coordinators are responsible for ensuring: Monitoring compliance to the <i>CP008-O (PO) Child Safe Environments and Digital Technologies Policy</i> for the services they oversee
Area Managers (ELC) and Regional Managers (OSHC)	Area Managers and Regional Managers are responsible for ensuring- • The <i>CP008-O (PO) Child Safe Environments and Digital Technologies Policy</i> is implemented at the services they oversee • All YMCA personnel, including the Nominated Supervisor, receive relevant induction and training on this policy • All YMCA Personnel understand and can access the policy, and other related policies and procedures, and comply with them at all times.
Executive Managers	Executive Managers are responsible for: • Ensuring suitable resources and support systems are in place to enable service compliance with this policy.

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	Driving the consultation processes and leadership on continuous improvement with this policy.
Policy and Procedure Group	Approve the policy
General Manager, Children's Programs	Approve updates to the policy

8. QUALITY ASSURANCE ACTIVITIES

- This policy will be reviewed every two years or as required based on legislative changes.
- The ongoing monitoring and compliance to this policy will be overseen by Area Managers (Early Learning) and Regional Managers (OSHC).
- An annual assessment of this policy will be completed by the Children's Programs Quality Manager to ensure compliance with relevant legislation and alignment with best practice recommendations in the education and care sector.
- The evaluation of the policy will be facilitated by the policy owner, using stakeholder feedback to drive continuous improvement and reflect service users' comments where practical.

9. SUPPORTING DOCUMENTS

Internal Links:

- [OSHC and School Holiday Program Child Personal Electronic Device Permission Form](#)
- [ELC and Occasional Care Digital Devices and Online Environments Risk Assessment](#)
- [OSHC and SHP Digital Devices and Online Environments Risk Assessment](#)
- [CP Staff Exception Form Use of Personal Device for Medical and Family Circumstances and Excursions](#)
- [CP Staff Exception Form Use of Personal Device for Emergency](#)
- [Staff Declaration: Acceptable Use of Personal Devices in Children's Programs](#)
- [Daily Operations and Safety Checklist](#)
- [YNet Policy and Procedure Library](#) including;
 - Safeguarding Children and Young People Policy
 - HSE935-O (PR) YMCA Victoria Child Safety Procedure (*formerly SCYP*)
 - YMCA Victoria Responding to Child Safety Concerns Procedure (*formerly SCYP*)
 - YMCA Victoria Code of Conduct Policy
 - CP218-O (PR) Supervision of Children Procedure
 - HSE938-O YMCA Victoria Privacy Policy
 - YMCA Victoria Safe Behaviours
 - OHS039-G (PR) YMCA Victoria Incident Management Procedure
 - Interactions with Children Policy
 - Children's Programs Positive Behaviour Guidance Procedure
 - EF810-O (PO) Social Media Policy – Official Use
 - HSE937-O (PO) YMCA Victoria CCTV Policy
 - IT001-O (PO) YMCA Victoria IT Acceptable Use Policy
 - IT007-O IT Incident Response Policy

External Links:

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- [Belonging, Being and Becoming: The Early Years Learning Framework for Australia](#)
- [My Time, Our Place: Framework for School Age Care in Australia](#)
- [Victorian Early Years Learning and Development Framework](#)
- [Education and Care Services National Law Act 2010](#)
- [Education and Care Services National Regulations 2011](#)
- [Children's Services Act 1996](#)
- [Children's Services Regulations 2020](#)
- [National Quality Standard: Quality Area 5 – ACECQA](#)
- [UNICEF: United Nations Convention on the Rights of the Child](#)
- [ECA Code of Ethics - Early Childhood Australia](#)
- [Victorian Child Safe Standards](#)
- [NSW Child Safe Standards](#)
- [Reportable Conduct Scheme](#)
- [Children, Youth and Families Act 2005](#)
- [Child Wellbeing and Safety Act 2005](#)
- [Equal Opportunity Act 2010](#)
- [Child protection - Department of Families, Fairness and Housing](#)
- [Early Childhood Australia: Statement on Young Children and Digital Technologies](#)
- [Australian Government Department of Health. \(2014\). Australia's Physical Activity and Sedentary Behaviour Guidelines](#)
- [Raising Children Network - Screen time: babies and toddlers](#)
- [eSafety Commissioner](#)
- [ACECQA Policy and Procedure Guidelines for the Safe Use of Digital Technologies and Online Environments](#)
- [ACECQA Providing a Child Safe Environment Policy and Procedure Guidelines](#)
- [ACECQA NQF Online Safety Guide](#)
- [ACECQA NQF Child Safe Culture Guide](#)
- [Early Childhood Australia Statement on young children and digital technology](#)
- [National Mode Code – Taking images in early childhood education and care](#)
- [Online Safety Classroom Agreement](#)
- [eSafety Commissioner Be Secure Online Module for Children](#)
- [The eSafety Guide](#)
- [The Playing IT Safe Framework and Alignment](#)
- [Headspace National Youth Mental Health Foundation](#)
- [Kids Helpline Phone Counselling Service](#)
- [Parentline Victoria](#)
- [Parentline NSW](#)
- Storypark:
 - [How your information is kept secure](#)
 - [Technology and security specifications](#)
 - [Terms of use – Storypark](#)
- Xplor:
 - [Privacy Notice - Xplor Technologies](#)
 - [Software Terms of Use - Xplor](#)
- [Commission for Children and Young People](#)
- [Guide to the National Quality Framework](#)
- [Australian Institute of Family Studies: Screen time effects and guidelines for children and young people](#)
- [Bureau of Meteorology \(BOM\)](#)

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- [SunSmart Global UV app - SunSmart](#)
- [My UV Website](#)
- [Australian Radiation Protection and Nuclear Safety Agency \(ARPANSA\)](#)
- [VicEmergency: Incidents and Warnings](#)
- [Sydney Pollen Website](#)
- [The Academy](#)

10. APPROVAL AND REVIEW

Meeting Approved:	Approved by Executive Manager OSHC by delegation of policy owner
Meeting Approval Date:	24 September 2025
Policy Review Date:	24 September 2028
Policy Owner:	General Manager - Children's and Youth Programs
Contact Details:	katie.adams@ymca.org.au

Amendments

Version	Date	Author	Change Description
V.1	29/03/2019	Children and Families Leadership Team	National Policy introduced for all YMCA Associations
V.2	7/12/2023	Governance Manager	Updated to new policy template, updated to reflect the 11 Victorian Child Safe Standards, updated reference to children's services regulations (2020)
V.3	22/08/2025	Quality Manager, Children's Programs	Policy and procedure merged. Updated to reflect legislation changes for vaping devices and substances, safe online environments and digital technologies and the National Model Code
V.4	24/08/2025	Quality Manager, Children's Programs	Policy and accompanying risk assessments amended to include provisions for external professional photographers and personal devices for maintenance contractors permitted for the purpose of their contract works

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