

P-8.38 ECTARC CHILD SAFETY AND TECHNOLOGY USE POLICY

ECTARC Training Services Policy

Purpose

ECTARC prioritises the safety, wellbeing, and protection of children. As an approved provider of 10 early childhood services, ECTARC understands and commits to providing child-safe environments across all operations. This policy outlines the standards and expectations for the use of online technology during training and assessment activities conducted by ECTARC Training Services Training (ETS) Training and Development Officers (TDOs) and students, ensuring that all practices uphold the highest standards of child safety.

Scope

This policy applies to:

- All ETS TDOs.
- Students enrolled in qualifications delivered by ETS.
- Education and care services visited by ETS for training and assessment purposes.
- Use of technology, including but not limited to, students digitally recording or taking photos of children for the purposes of their assessments.
- Any use of technology, inclusive of, but not limited to devices and online platforms, cameras and phones, used for observation and training and assessment activities.

Several units within ECEC qualifications require students to demonstrate their skills and knowledge in regulated ECEC Services or workplaces in Australia. These qualifications include the:

- CHC30121 Certificate III in Early Childhood Education and Care
- CHC50121 Diploma of Early Childhood Education and Care
- CHC50221 Diploma of School Aged Education and Care
- 10983NAT Certificate III in Outside School Hours Care.

Policy Statement

ETS is committed to ensuring that all training and assessment practices involving children are conducted in a manner that safeguards their safety, privacy, and dignity. This includes strict guidelines around the use of technology and the handling of images and personal information.

Deployment and Guidelines

Use of Online Technology

- Online platforms may be used for training and assessment purposes where deemed by both ETS and the relevant service as appropriate and safe.
- Written consent must be sought from the ECEC service prior to conducting any assessment via live streaming.
- Written consent must be sought from parents or carers (where prior permission has been provided by the parents directly to the service) for the live streaming of children for the purpose of assessment.
- All use of technology must be approved prior by the employer or director of the service at the commencement of the program. This must then be reviewed every 6 months. Permissions will be sought via a template set up in the ECTARC Student Management System and reminders will be set using the Student Management Task list.
- Where a service does not allow any form of online observation or use of technology in the service, these requests must be adhered to, and an appropriate alternative must be agreed on. Where observation must occur by an ETS TDO in person, this will be organised in advance.

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- Observations required for the unit CHCECE032 Nurture babies and toddlers and all other observations of care, hygiene, sleep and rest routines across all other units will not be conducted online under any circumstances. All such observations must occur in person during scheduled face-to-face visits.

Service Delivery Planning

- TDOs must speak with the employer/director/nominated supervisor or relevant manager of each service/organisation at the commencement of the training program to confirm their policy on use of technology by ETS.
- Service delivery plans will be structured at the commencement of the training program to ensure that observations of care, hygiene, sleep and rest routines are conducted during face-to-face visits.
- TDOs will work closely with students and employers to organise practicum placements (where applicable) in advance. This planning ensures that sufficient time is allocated for in-person observation by an ECTARC TDO.
- Due to the geographic locations of ETS students, and to ensure the availability of a TDO, where changes to these planned dates are necessary, students must provide a minimum of four (4) weeks' notice to allow for rescheduling to ensure compliance with these observation requirements.
- Notifications made in less than 4 weeks may mean the placement cannot go ahead, or observation cannot occur in the workplace and a new date must be scheduled. Where no notification, or last-minute notification is provided, the placement hours may not be recognised if the observation requirements cannot be fulfilled. Additional work placement hours will need to be completed at a mutually agreeable time to allow for observation in the workplace.
- Late notification of work placement/practicum undertaken towards the end of the enrolment period may risk non-completion of a unit, or non-completion of the qualification by the enrolment end date.

Device Usage

- TDOs are provided with access to company devices for work purposes and conducting observations, training and assessment and for supporting students. These devices are not used for personal use.
- Personal devices must not be used for any training and assessment activities involving children, including taking notes, photos, or accessing student or child information.
- Personal devices must not be used when visiting services. Individual service/organisational policies must be adhered to for storage of personal devices while in a service.
- TDOs must ensure that company devices are used securely and in accordance with ETS's data protection and privacy policies.
- All use of technology must be approved prior by the employer or director of the service.

Photography and Media

- TDOs are strictly prohibited from taking photos and videos of children in the service unless for the purposes of development work and written permission has been sought from the employer/nominated supervisor/director. Parental permission must have also been received prior by the service or the ECTARC TDO.
- Students will not be asked to submit photographs or video recordings of young children for assessment purposes.
- All photos and videos of children and young people retained, for the development of learning resources, assessment tools and training must be stored securely and used solely for the intended educational purpose.

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Third-Party Observation and Verification

- Any third-party observation and verification conducted for the purposes of completing a Third-Party Report must be carried out by a qualified supervisor who is a permanent employee of the service.
- The supervisor must have appropriate qualifications and experience to verify the student's competency in alignment with training package requirements.

Child Safety Assurance

- ETS has a Child Safe and Wellbeing Officer – this person is the General Manager – Training Services.
- All ETS TDOs must complete child safety training prior to engaging in any observation or training and assessment activities. This training includes an accredited Statement of Attainment and non-accredited training as part of their Annual Professional Development Plan.
- Any concerns regarding child safety must be reported immediately in accordance with ECTARC's and ETS's child safe policies and procedures.
- ETS will regularly review and audit training and assessment practices to ensure compliance with child safety standards.
- Child safe practices will be ensured during the development of training and assessment resources.

Legal, Ethical and Privacy Considerations

All ETS staff and students will be informed of the legal, ethical and child safety obligations that relate to digitally recording children for assessment purposes, as well as best practice recommendations and requirements developed to safeguard children's privacy and safety, related to the delivery of training and assessment, including those set out in the:

- United Nations Convention on the Rights of the Child
- Education and Care Services National Law Act 2011 and Regulations and National Quality Standards
- National Model Code and Guidelines for Taking Images or Videos of Children
- National Principles for Child Safe Organisations and state and territory Child Safe Standards
- Commonwealth, state and territory child protection legislation
- Privacy Act 1988 and Australian Privacy Principles and relevant state and territory privacy legislation
- ECEC Services' policies and procedures regarding taking images of children when at the service, including during transportation and excursions
- ECEC Services Code of Conduct (which provides guidelines for how staff and volunteers should behave, both with other adults and with children)
- National Vocational Education and Training regulator Act 2011
- National Vocational Education and Training Regulator (Outcome Standards for NVR Registered Training Organisations) Instrument 2025
- National Vocational Education and Training Regulator (Compliance Standards for NVR Registered Training organisations and Fit and proper Person Requirements) Instrument 2025.

Review and Monitoring

This policy will be reviewed annually or as required to reflect changes in legislation, technology, or organisational practices. Feedback from staff, students, and service providers will be considered in the review process.

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Appendix 1: Recommended practices from the National Model Code for taking images or videos of children.

Table 1: Recommended practices from the National Model Code for Taking Images or Videos of Children

National Model Code and Guidelines	Implications for Training Providers and ECEC Students
Only service-issued electronic devices should be used when taking images or videos of children while providing education and care.	<p>Students should not use personal electronic devices or a device issued by their Training Provider for assessment purposes.</p> <p>Training Providers should liaise with the ECEC Service to seek permission to use the ECEC Service's device if required as part of an assessment task.</p> <p>Training Providers should ensure ECEC Students work with the ECEC Service to ensure parents/carers are aware and have provided consent if any images of their child are to be used for assessment purposes.</p>
Personal electronic devices that can take images or videos (such as tablets, phones, digital cameras, smart watches) and personal storage and file transfer media (such as SD cards, USB drives, hard drives and cloud storage) should not be in the possession of any person while providing education and care and working directly with children unless authorised for essential purposes.	<p>As per above.</p> <p>Any exceptions to an ECEC Student not being in possession of such a personal electronic device while providing education and care should be for limited, essential purposes that are authorised by the approved ECEC provider at the service, and where that access does not impede the active supervision of children.</p>
<p>ECEC Services should have strict controls in place for the appropriate storage and retention of images and videos of children.</p> <p>Additionally, under the Australian Privacy Principles:</p> <ul style="list-style-type: none"> organisations must take reasonable steps to protect personal information it holds from misuse, interference and loss, and from unauthorised access, modification or disclosure. an organisation has obligations to take reasonable steps to destroy or de-identify personal information when no longer needed for the purpose it was collected. 	<p>Images, films, videos, or recordings of activities involving a child, taken for any purpose, should not be stored or retained on any personal devices or personal cloud accounts.</p> <p>For the purpose of assessment, students should only use the ECEC Service's device to live stream activities involving children.</p>
<p>Images or videos of children that are not directly relevant to the child's participation in the ECEC Service's activities should not be taken. Examples of inappropriate, and potentially illegal, images or videos that are never to be taken or recorded include where a child is:</p> <ul style="list-style-type: none"> not appropriately dressed, for example, in their underwear, in a state of undress, completely undressed or with their genitalia exposed in a position that could be perceived as sexualised in nature in distress or anxious / experiencing or demonstrating distress or dysregulation. 	<p>At no point should a Training Provider require a student to record, store or share images of a child when they are in a state of undress.</p> <p>Where possible, images should promote the view of children as capable and competent and recognise their dignity and rights. Choosing angles, such as above shots that capture children's hands, heads or profiles (rather than their faces), can be equally effective in depicting their active involvement in an activity or experience.</p>

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Appendix 2: Units of competency requiring workplace assessment - Early Childhood Education and Care.

Units that specify that 'Skills must be demonstrated in a regulated education and care service in Australia' (with no simulation option) and performance evidence must be directly observed by the Training Provider assessor on one occasion:

- CHCECE030 Support inclusion and diversity
- CHCECE031 Support children's health, safety and wellbeing
- CHCECE032 Nurture babies and toddlers
- CHCECE033 Develop positive and respectful relationships with children
- CHCECE036 Provide experiences to support children's play and learning
- CHCECE037 Support children to connect with the natural environment
- CHCECE042 Foster holistic early childhood learning, development and wellbeing
- CHCECE043 Nurture creativity in children
- CHCECE048 Plan and implement children's education and care curriculum.

Units that specify that 'Skills must be demonstrated in a regulated education and care service in Australia' (no simulation option):

- CHCECE034 Use an approved learning framework to guide practice
- CHCECE035 Support the holistic learning and development of children
- CHCECE038 Observe children to inform practice
- CHCECE054 Encourage understanding of Aboriginal and/or Torres Strait Islander Peoples cultures.
- CHCECE056 Work effectively in children's education and care
- CHCECE044 Facilitate compliance in an education and care service
- CHCECE045 Foster positive and respectful interactions and behaviour in children
- CHCECE046 Implement strategies for the inclusion of all children
- CHCECE047 Analyse information to inform learning
- CHCECE049 Embed environmental responsibility in service operations
- CHCECE050 Work in partnership with children's families
- CHCECE041 Maintain a safe and healthy environment for children.

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Appendix 3: Units of competency requiring workplace assessment - School Aged Education and Care.

Units that specify that 'Skills must be demonstrated in a regulated children's education and care service in Australia' and specific performance evidence must be directly observed by the Training Provider assessor:

- CHCSAC007 Develop and implement play and leisure experiences in school age care
- CHCSAC009 Support the holistic development of children in school age care
- CHCSAC010 Foster holistic learning, development and wellbeing for school age children.

Units that specify that 'Skills must be demonstrated in a regulated children's education and care service in Australia':

- CHCSAC006 Support children to participate in school age care
- CHCSAC008 Work collaboratively and respectfully with school age children. Units that specify that 'Skills must be demonstrated in the workplace':
- CHCPRT001 Identify and respond to children and young people at risk
- HLTWHS003 Maintain work health and safety
- HLTWHS001 Participate in workplace health and safety.

VERSION CONTROL	DATE RELEASED	NEXT REVIEW	APPROVED BY	AMENDMENT
Version 1	July 2025	July 2026	ECTARC Leadership	New Policy