



Use of Electronic Devices and Images

Occasional Care

Adopted August 2025

Acknowledgment of Country

Council acknowledges the Bunurong People of the Kulin Nation as the Traditional Owners of these municipal lands and waterways, and pay our respects to Elders past and present.

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Purpose

1. Hobsons Bay City Council is a child safe organisation that creates a culture, adopts strategies and takes action to promote child wellbeing and prevent harm to children and young people. Council is strongly committed to protecting and preserving an individual's right to privacy and to the responsible and fair handling of their personal information.
2. The Early Years Department complies with privacy legislation (*Children's Services Regulations 2020*) in relation to confidentiality and storage of records. All images taken involve practices that are respectful and provide security for children.

Background

3. When used intentionally as part of implementing an educational program, electronic devices can be effectively utilised when providing education and care, including to assist in documenting a child's learning.
4. Images and recordings may be used as discussion points for children and families or used in displays both at the service and internally within Hobsons Bay City Council to show the quality of the service provided.
5. To minimise risks to children, child safe practices are clearly set, understood and implemented when taking images or recording videos of children in the service.

Scope

6. This policy applies to the Approved Provider, Nominated Supervisor, educators, students/volunteers, visitors, parents/guardians and children within the program.

Definitions

Approved provider	An approved provider of a children's service under the <i>Children's Services Act 1996</i> .
Nominated supervisor	A person responsible for the day-to-day management of an approved service.
Educator	A person with an extensive and specific set of abilities, skills, knowledge, training or experience in a particular discipline with the necessary qualifications to provide dedicated valuable learning experiences to others.
Recording device	Any device that can take images or videos, such as a mobile phone, digital camera, tablet, smart watch or glasses with camera ability, including any new and emerging technologies.
Service-issued electronic device	An electronic device owned by Council and issued to the service.

Personal electronic device	An electronic device owned or used by a person that has not been issued by the service.
Privacy legislation	Children's Services Regulations 2020 Part 7, Division 3, Subdivision 4— Confidentiality and storage of records

Policy and principles

Service-issued devices

- Only service-issued iPads and/or tablet may be used in the service to take/record images or videos of children while providing education and care. These must be password protected and only used by service-employed educators or under the direction of the approved provider. Service-issued mobile phones must not be used to take images or videos of children.

Personal devices

- Anyone who is working or engaged in the service in any capacity is prohibited from having personal electronic devices that can take images or video on their person while with children.

Oversight, control and access to images

- The approved provider needs to be vigilant and have oversight and control over who has access to images of children.

Taking images and recording videos

- Images that include those where children are not appropriately dressed, are in a position that could be perceived as being sexualised in nature or are demonstrating signs of distress or dysregulation.

Sharing of images and videos

- Images and videos of children are only to be shared on platforms intended for the educational purpose of that image or video. Parent/guardian permission is requested for their child to be photographed as part of the service for internal display or service display upon enrolment.
- Parents/guardians will be asked to provide additional written consent for purposes such as promotion, Council marketing, newspaper/media or external publications, where their child will be photographed.

Storage of images and videos:

- Images and videos taken by educators will be stored securely on service-issued devices and the approved provider will have strict controls in place to ensure appropriate storage and retention.

Procedural guidelines

14. The Occasional Care electronic enrolment form contains a statement requesting parent/guardian permission for their child to be photographed as part of the program for internal display, service display, promotion and Council marketing.
15. The electronic enrolment form and consents are kept on the child's electronic file and can be amended or withdrawn by the parent/guardian at any time.
16. Only service-employed educators are approved of taking images or videos of children on the service-issued iPad for educational purposes. This excludes agency staff members.
17. The service issued iPad or tablet and mobile phone must always remain on site at the service.
18. All images and videos on service-issued electronic devices will be reviewed at the end of each term and deleted if no longer needed.
19. Images and video may only be shared with parents/guardians through the program reflection book or Xplor.
20. Educators must not have any personal devices on their person while with children.
21. Personal devices must be put away in the storage cupboard and only be accessible when staff are on breaks and not with children.
22. Educators may make or receive required personal phone calls through the room landline phone, or an alternate plan can be put in place in the case of a family emergency.
23. Visitors and parents must not use their personal devices while at the service and must keep devices always secured in a bag or pocket unless they are signing their child in or out.
24. Educators can alert the approved provider by telephone if they observe staff using personal devices while with children, or inappropriate use of service-issued devices and can complete a child safety incident report through Elumina.

For the use of images outside the children's service:

25. A professional photographer must have the permission of the Nominated Supervisor and parents before photographs can be taken.
26. An educator / council representative will always be present while the photographer takes the photos.
27. Children's surnames will not be published, and first names will only be published with parent's consent.
28. In accordance with Council's Using corporate images and logos policy, the communications team will keep copies of images and consent forms taken of children in the service. Appropriate images will be added to Council's photo library.

Roles and Responsibilities

Approved Provider

- 29. The approved provider will be vigilant and:
 - 29.1. Have oversight over the accessing of images and videos within the service and the posting of images, videos and other content online.
 - 29.2. Ensure that images, videos or content are not inappropriately posted online or shared through other applications, including those not for the purpose of sharing with a child's family or carer.
 - 29.3. Monitor use of devices at the service, including ensuring that educators do not use personal electronic devices.
 - 29.4. Monitor devices for taking images or recording videos and communicating with families and carers.

Nominated Supervisor

- 30. The Nominated Supervisor will:
 - 30.1. ensure staff know where to access and follow policies and procedures relating to the use of electronic devices and images in the service.
 - 30.2. ensure that the children's safety and security is paramount in any decisions made regarding the taking and use of their image or video.
 - 30.3. ensure service-issued devices are always kept on site at the service.

Educators

- 31. Educators will:
 - 31.1. ensure they are familiar with and abide by Council's policies and procedures.
 - 31.2. correctly store their personal device while at the service and communicate with the nominated supervisor if they are required to use their personal device for a family necessity such as an ill or dying family member, so an appropriate and safe plan can be put in place.

Families

- 32. Families will:
 - 32.1. complete electronic consent on enrolment and update the service by email if they wish to make any changes.

Council Communications Team

- 33. Hobsons Bay City Council Communications Team will:
 - 33.1. in accordance with the Using corporate images and logos policy, keep copies of images and consent forms taken of children in the service.
 - 33.2. add appropriate images to Council's photo library.

Related documents

34. Guidelines for the National Model Code <https://www.acecqa.gov.au/media/41206>
35. Hobsons Bay City Council Privacy Policy
36. Hobsons Bay City Council Using Corporate Images and Logos Policy
37. Altona Meadows Occasional Care Enrolment Form
38. National Quality Standards

Related legislation

39. Children's Services Regulations 2020

Review date

40. This policy will be reviewed three years from the date of endorsement by Council unless it is required to be updated sooner.

Further information

41. For further information concerning this policy please contact occasionalcare@hobsonsbay.vic.gov.au

Document control

Policy Name	Use of Electronic Devices and Images
Responsible Directorate	Sustainable Communities
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V001	26 August 2025	Council