

## Rationale

All children have the right to experience quality services in environments that safeguard and promote their health, safety and wellbeing.

This policy focuses on providing safe physical and online environments for children. For any action that concerns a particular child, the safety, welfare and wellbeing of the child is the paramount consideration. For guidance regarding child protection and reporting, see SDN's *Child Protection Policy*.

## Scope

This policy, and its associated documents, applies to the entirety of SDN Children's Services and the entirety of its wholly owned subsidiaries.

This policy applies to the provision of access to safe physical and online environments for all children whilst participating in services run by SDN.

This policy must be read in conjunction with the policies listed in the Related Documents section at the end of this document.

## Policy

SDN is committed to promoting the safety, welfare and wellbeing of children. We place children's best interests at the centre of everything we do and their safety, welfare and wellbeing are always our paramount consideration. This includes creating physical and online environments that are safe and supportive.

Children will always be adequately supervised. For early learning services where parents and/or other family members are not present, children will be supervised by staff with appropriate skills and training. For programs or other services where parents and other caregivers attend alongside their children, SDN staff may provide support to parents to engage with their children and monitor the physical safety of the environment.

The physical environments of SDN services will be organised to minimise inappropriate risks to children while also promoting opportunities for learning and development and enhancing children's wellbeing.

<p><b>Minor/legislative amendment or modification history:</b> February 2025  June 2025 July 2025 December 2025</p>	<p><b>Details:</b></p> <p>Adding to risk assessment section (for example: gates, fences, doors and considers relevant risk assessments) Adding vaping as being banned within grounds and within 4 meters of entrances and any enclosed space where SDN operates</p> <p>Adding online environments to policy Added restriction for staff to only use SDN issued devices Updated in response to the recent amendment to the NSW ECEC law and regulations.</p> <ul style="list-style-type: none"> <li>• New offence - inappropriate conduct – refer to Compliance focus – offence to subject child to inappropriate conduct</li> <li>• Paramount consideration must be the protection of the rights and best interests of each child</li> <li>• Changes to definition of serious incident and requirements for notification</li> </ul>		
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Risk assessments will be conducted to determine an approach to supervision and risk management, taking into account the needs and abilities of the children, the context of the activities and the physical environment (for example: gates, fences, doors).

Hazards will be monitored and minimised in line with relevant Workplace Health and Safety legislation, Education and Care Services National Regulations 2011, and best practice.

Every reasonable and practical precaution will be taken to protect children from any hazard likely to cause injury, while also upholding the National Quality Standards (NQS) requirement for physical environments which promote competence and support exploration and play-based learning. Activities and environments with elements of appropriate and manageable risk will be provided so that children can explore their environment, learn to take and manage appropriate risks, develop skills and make decisions.

All property (for example: gates, fences, doors), equipment and materials used at an SDN service will meet relevant safety standards and consider the relevant risk assessment.

Worn and damaged equipment that may provide a safety risk for children will be repaired or replaced in a timely manner.

Learning environments will be established to provide appropriate child groupings and sufficient, accessible spaces, and will include carefully chosen and well-maintained resources and equipment.

Smoking and vaping will be banned within the grounds of, and within four metres of, any entrances.

- Optical Surveillance

Where optical surveillance (i.e CCTV) is in use at an SDN service families and staff are informed that this is in place and signage highlights the use of CCTV. Recordings are stored securely and access to any recordings is restricted to relevant senior leaders and Executive at SDN, or to authorities where required eg police request for footage. Refer to the Privacy and Protection of Information policy for further detail.

### **Child safe online environments**

All staff must uphold SDN Code of Conduct and other policies and procedures in online environments. This includes not engaging in any form of misconduct or inappropriate conduct towards children, respecting professional boundaries and not communicating or spending time with children, young people or families engaged with SDN outside of work without notifying relevant manager and following SDN requirements (refer to Relationships with SDN Families outside of Work policy and procedure).

Images and videos captured as part of the learning program may be uploaded into Storypark. These images and videos will be deleted from the SDN device when no longer required. Images or videos uploaded into Storypark will be stored on a child's profile which is controlled by the child's parent/guardian. The parent/guardian can delete any images or video, or the profile itself. SDN will retain the Storypark profiles of children who have left for three years, after which time it will be deleted.

Authorisation to take, use and store images and videos of children is collected from parents/guardians through the enrolment process. Families can choose to provide full or partial consent or choose not to give consent.

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## Access to online environments in early learning

SDN will prevent children in early learning services from accessing online environments unless this is part of an educational program and in line with the requirements below.

Staff may utilise online resources in development or delivery of education programs for children, including researching activities and programming. Staff may also utilise online resources when delivering the educational program to complement or extend learning, for example, showing short videos to children.

Staff will only use service-issued devices when taking images or videos, or when working with children. In order to prevent children using devices to access online environments and manage any risk to child safety:

- Only staff can use SDN provided devices which can access the internet and online environments
- Children will not be given access to electronic devices whilst the device is connected to the internet
- Devices will be closely supervised when in use
- Devices will be stored securely when not in use.

If staff plan to show children online videos then the following is required:

- View the whole video first to ensure that it does not contain inappropriate content
- Prevent children from seeing advertising where possible
- Use reputable sources for online videos

## Exceptions for children requiring communication assistance

In some cases, an individual child may use electronic devices for communication due to disability or additional needs. In this case SDN will be guided by the child's family and any therapeutic or medical advice. SDN will work with the child's family and any relevant services to reduce the risk of access to online environments. In this scenario the following risk measures will apply:

- Only the child who requires the specific device will be allowed to use the device
- The device will only be used for the approved purpose
- The device will not be connected to the online environment or will be restricted in what can be accessed. This may require working with the child's family to adjust device settings
- Devices will be closely supervised when in use
- Devices will be stored securely when not in use to prevent access by children.

## Related SDN Documents

### Policies

- GI-HLP-1.06: Risk Management
- GI-HLP-1.08: Critical Incidents
- GI-HLP-1.09: Privacy and Protection of Information

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- GI-HLP-1.10: Code of Conduct
- GI-HLP-1.33 Child Protection
- SD-OP-2.05: Supervision of Children
- SD-OP-2.11: Nutrition
- SD-OP-2.14: Children with Medical Conditions and Illness
- SD-OP-2.15: Child Incident, Injury, Trauma, and Illness
- SD-OP-2.16: UV (Sun) Protection
- SD-OP-2.17: Water Safety
- SD-OP-2.18: Excursions, Incursions and Regular Outings
- SD-OP-2.22 Relationships with SDN Families outside of Work
- SD-OP-2.24: Interactions with Children
- WHS-HLP-4.01: Work Health and Safety
- WHS-OP-4.03: Infectious Diseases
- WHS-OP-4.05: First Aid
- WHS-OP-4.06: Emergency Preparedness

### Procedure

- GI-PRO-1.07-01: Providing access to Child Safe Physical and Online Environments
- SD-PRO-2.22-01 Relationships with SDN children, young people and families outside of work

### Forms

- GI-FRM-1.33-01: Exception Form to Use Personal Devices
- SD-FRM-2.09-01-02: Daily Arrival Check Centres Form
- SD-FRM-2.09-01-03: Daily Departure Check Centres Form
- SD-FRM-2.04-01 Behaviours of Concern Assessment Tool

### Relevant Legislation/Regulations

- Education and Care Services National Law Act 2010, sections 165, 166 and 167
- Education and Care Services National Regulations 2011, regulations 99, 158-159, 168(f), 168 (h), 176
  - Schedule 1: National Quality Standards
- Work Health and Safety Act 2011
- National Principles for Child Safe Organisations
- NSW Child Safe Standards

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- ACT Child Safe Standards
- ACECQA, The National Model Code for Taking Images or Videos of Children while Providing Early Childhood Education and Care (National Model Code), 2024.
- ACECQA, National Guidelines – Taking images or videos of children while providing early childhood education and care. 2024.

## Related documents/references

- <https://www.kidsafensw.org/>
- [Compliance focus – offence to subject child to inappropriate conduct](#)

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