

# CHILD SAFE PRACTICE

FOR THE USE OF  
PERSONAL DEVICES IN  
FAMILY DAY CARE

Part 2: Educator Resource



## Introduction

The safety of children has always been a top priority for the early education and care sector.

Family Day Care Australia (FDCA) has a strong commitment to child safety and *the National Principles for Child Safe Organisations*, and recognise the importance of managing risks, especially those associated with the safety of a child.

In response to recent high-profile cases of child sexual abuse and grooming in education and care, ACECQA, in consultation with all Australian governments and regulatory bodies have released recommended changes regarding the use of personal devices by educators in centre-based education and care environments.

You can read more information about these changes in the National Model Code for Early Childhood Education and Care titled: *Taking Images or Videos of Children while Providing Early Childhood Education and Care (2024)*.

FDCA understands that, following the development of the National Model Code, there may be regulatory changes made applicable in centre-based care environments. However, these do not or cannot apply to family day care settings due to their unique nature.

As a result, FDCA has developed a guidance note for approved family day care services. This Educator Resource has also been developed to provide prompts to support discussion and critical reflection among educators around the safe use of devices in family day care settings.



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## Use of devices: Educators

All children have the right to be safe and feel safe. This includes the right to have information about them, including photos and videos, only taken with their parents' or guardians' consent, and stored securely where it cannot be used for harm or exploitation in any way.

This principle is supported by the *Review of Child Safety Arrangements under the National Quality Framework*, which led to the development of the National Model Code. It also aligns with the Convention on the Rights of the Child, the National Quality Framework and the National Principles for Child Safe Organisations.

### DEVICE USE OPTIONS

1. Sourcing a separate device (phone, tablet) specifically for the purpose of providing family day care.
2. Using your own device (phone, tablet) with additional security protections applied, for the purpose of providing family day care.

### PROS & CONS

#### *Option 1: Sourcing a separate device*

##### Pros:

- Enables educators to separate professional from personal.
- Ensures all family day care related material and content is stored securely in one place that is not accessible to others (e.g. no family sharing functions or shared PIN access).
- The cost can be claimed as a business tax deduction.

##### Cons:

- Additional upfront costs for the device and/or data.
- Switching between devices may be inconvenient, leading educators to default to their personal device out of familiarity and habit.

#### *Option 2: Own device with additional protections*

##### Pros:

- Educators are already familiar with the device.
- It is accessible for educators to take urgent personal calls (school, family emergencies).
- No additional cost.

##### Cons:

- May have other functions, such as family sharing and cloud storage, that could give family members access to family day care content
- May be used by other family members (i.e. children know the PIN) compromising the security of family day care content.

### TIPS FOR USING YOUR OWN DEVICE

#### Security:

- Ensure your device is protected by a password and/or Face ID.
- Keep the device physically and digitally inaccessible to family members (e.g. Ensuring family members can't access content via family sharing and/or cloud storage access).
- Create a folder or album on the device specifically for family day care content (photos and videos) that is not accessible by others.

#### Using the cloud:

- Storing content in the cloud can help remove it from the device, reducing the risk of unauthorised access. However, ensure the content is stored in a secure file within the cloud to prevent family members from accessing it.

### COMMUNICATION PLATFORM OPTIONS

1. Use purpose built, sector endorsed / approved online platforms and apps for collecting, storing and sharing family day care content with families and/or service providers.
2. Use generic social media platforms and apps with additional protections for collecting, storing and sharing family day care content with families and/or service providers.

#### *Option 1: Purpose built platforms*

##### Pros:

- Designed specifically for education and care settings so should meet the requirements and needs of educators but will also have the necessary security settings built in.
- Can be locked down and are less likely to be accessed by family members or other unauthorised people.

**Cons:**

- Purpose built platforms are more likely to incur a cost, especially if additional functions and security protections are needed.
- The variety of options available can be overwhelming and a deterrent.

**Option 2: Generic platforms with protections**

**Pros:**

- Familiar, already available, and free for both educators and families.

**Cons:**

- Used for both personal and professional purposes, making it easy for boundaries to be blurred.
- Requires educators to connect with families' personal pages.

**TIPS FOR USING GENERIC PLATFORMS**

Take the time to set it up properly!

Ideally, you will have the following:

1. A public page for business promotion activities
  - Use stock photos or de-identified photos only.
  - Avoid using names or referencing specific children or families.
  - Share important information, promote good practices and market or 'sell' your business to others.
  - Manage any comments appropriately.
2. A private group for current families only
  - Ensure privacy settings are configured to prevent posts from being made public and to block unauthorised people from joining. You should not need to 'add' a parent as a friend to invite them to the group.
  - Share important information including updates, notifications or special requirements.
  - Seek consent from all families to share photos and videos that document their child's day in the group. Recognise that some may decline consent and you

will need to manage their child's documentation separately.

- Actively manage membership based on enrolment changes and movements.
  - Actively manage any existing conflicts between families, including monitoring comments, if required.
  - Consider reviewing and approving posts before they are shared in the group.
  - Provide a list of user expectations, including general respectful behaviour, and pin to the page. Include a strict rule that prohibits saving or sharing any photos that depict another child other than their own in any way.
3. A personal page
    - Keep it personal and separate from your professional role.
    - Avoid adding parents of children in your care.
    - Do not share any photos, videos or identifiable information about the children in your care.

**TIP FOR USING GENERIC OR PURPOSE-BUILT PLATFORMS**

Regardless of the device or platform used, always ensure that any photo or video taken:

- Shows the child fully dressed or appropriately dressed for the activity.
- Does not capture the child in a vulnerable state (e.g. distressed, upset or frustrated).
- Is relevant and appropriate to the delivery of education and care.

Adopting safe practices such as using separate devices, purpose-built platforms and managing public / private pages demonstrates to children and their families that their safety, and their rights to privacy are prioritised by you and the service provider.

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## Use of devices: Family, household members and other visitors

There are many ways to implement and promote child safe practices regarding the use of devices by family members, household members and visitors to the home.

Your service provider should have a clear policy on device use, which you are required to follow. The service provider will share this policy with you, assisting and supporting you in its implementation.

It is important to communicate this policy to household members and visitors during operational hours, ensuring everyone understands and adheres to the guidelines. This may include family members under the age of 18 (such as teenage children), adults in the home and any visitors. Following these guidelines will help to maintain a safe and secure environment for the children in your care.

### IMPLEMENTING THE SERVICE PROVIDER'S POLICY

Here are some key points that may align with the service provider's policy to help you communicate it and enforce it effectively:

- a) The taking of images or videos of children in care by any family member or visitor is *strictly prohibited* at any time.
- b) The use of personal devices by family members or visitors in areas where children may be present, such as bedrooms or bathrooms within the approved premises, is *strictly prohibited*.
- c) The use of personal devices in 'common / open spaces' (such as the living room, kitchen, or outside area) where children may be present is *prohibited* wherever reasonably practical.

Family members and visitors should limit the use of personal devices to their own bedrooms or spaces where children are not present during hours of care provision.

- ▶ **Note:** Exceptions to this rule, such as a family member using a computer or device for homework or work purposes in a supervised area, should be discussed with the service provider. The service provider will assess any associated risks and determine if such exceptions can be safely managed or documented.

### SAFE PRACTICE STRATEGIES

- Educate your family and household members about safety, and the importance of device rules.
- Promote strong professional boundaries and encourage healthy boundaries in others.
- Ensure any rules are reasonable, and where possible, involve the relevant people (e.g. your children) in the conversation and rule setting process.
- Remind everyone of the rules regularly, both in conversation and through visual displays.
- Maintain supervision of the children in your care at all times. Rules do not eliminate the need for supervision.

For more information and resources on online safety visit: <https://www.esafety.gov.au/parents>

### TIPS FOR SAFE DEVICE USE BY FAMILY AND HOUSEHOLD MEMBERS AND VISITORS

- **Professional boundaries:** Maintaining strong professional boundaries is vital.
- **Friendly, not a friend:** this approach is particularly helpful when setting clear boundaries with parents and families. It is important to draw a line between personal and professional relationships.
- **Follow / unfollow:** it is good practice to avoid connecting or following families on social media. Managing boundaries on social media platforms can be challenging, and it is easy for educators to unintentionally share photos, or comment on posts unrelated to their professional role. Additionally, the children in your home are learning safe strategies for online use and will look to you as a role model for what is appropriate to share online, including images or information about the children in your care.

## EDUCATION FOR FAMILY AND HOUSEHOLD MEMBERS

It is your responsibility as the educator to set clear and specific expectations regarding how family and household members should interact and behave with the children in your care, especially in relation to the use of devices. This includes:

- Exposure to inappropriate material via the TV, computer or phone.
- Taking photos, recordings or videos of the children.
- Taking photos, recordings and videos around, or in the presence of the children.

For more information on the risks of harmful sexual behaviours in a family day care environment, log into FDCA's Member Zone to access the *Safeguarding Children: Harmful Sexual Behaviours* Educators and Services resource by clicking on the "Resources and Factsheets" tab on the sidebar menu and access the online course through the "Learning Hub" tab.

It is recommended that you use a variety of methods to deliver this information to the children in your home and regularly revisit these expectations with them. This allows the children to ask questions and clarify specific information to ensure they understand the expectations.

This can include:

- An individual conversation.
- A household / group conversation.
- Creating a rules or expectations list together that can be displayed, including 'Ok' and 'Not Ok' practices.
- Having family and household members sign an acknowledgement or agreement of these expectations.
- Encouraging each person to speak up if they are unsure about a certain situation, have found

themselves in a predicament or are concerned about the actions or behaviours of another person in the home.

There are some excellent resources for discussing online safety with young people available here: <https://www.esafety.gov.au/young-people>

## EDUCATION FOR VISITORS

If you have one-off visitors (e.g. tradesperson) entering your home, they may need to keep their phone on them. You should ensure strengthened supervision of the children to mitigate any risks.

For other visits, such as family members of the children in your care or personal visitors who are non-household members (e.g. neighbours), the service provider's policy on device use should be clearly communicated. You may wish to display signage that articulates the policy on the use of personal devices in the home.

## REMEMBER THE "3 PS"

- **Prioritise:** The safety of the children in your care must be a priority.
- **Protect:** Increase the security and protective functions on all devices and platforms to limit unauthorised access.
- **Promote:** Ensure the rules are clear to all relevant people, including the children in your care and their families.

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## Scenarios to prompt critical reflections

### SCENARIO 1:

An educator frequently takes photos of children engaging in educational activities in their family day care environment. They share these photos on a business page on Facebook to showcase what the children are doing at the service each day – the page is only open to families within the service. This business page is linked to their personal Facebook account.

### INCIDENT

One morning, the educator discovers that their personal Facebook account has been hacked. The hacker gains control of both their personal and business pages and now has access to private photos of the children. The educator immediately reports the incident to Meta/Facebook, providing all necessary documentation and proof of ownership to regain control of these pages. Despite their efforts, Meta is unable to recover the accounts.

*Which of the suggested strategies discussed above could be used to avoid / prevent this incident?*

### SCENARIO 2:

An educator is 'friends' with the mother of a child in their care on Facebook. She comments on a photo of the child that his mum shared from a recent photo shoot. "What a lovely shot of Jack!"

The 14-yr old son of the educator sees that she has commented on the photo and adds their own comment "Cute pic Jack".

The educator posts a photo of Jack eating spaghetti and pouring it on his head on Facebook and tags Jack's mum, "Messy boy today! Watching him do this was hilarious."

### INCIDENT

The educator's 1-yr old son was home from school that day, so also watched Jack make a mess of his spaghetti. While the educator was preparing a cloth to clean him up, her son took some video footage of Jack rubbing spaghetti into his hair. He uploads the video onto TikTok with a filter and a song in the background.

The TikTok video gets quite a few hits, so a few days later the educator's son decides to get some more footage from Jack, including a video with him running down the hallway with no pants on.

*Which of the suggested strategies discussed above could be used to avoid / prevent this incident?*

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