

Social Media Policy

1. PURPOSE AND BACKGROUND

- (1) To set out the guidelines for the use of social media by staff and families at our service
- (2) It aims to protect the safety, privacy, and rights of all children, families and staff members
- (3) This policy helps us to comply with the *Education and Care Services National Regulations*, which requires our service to have policies and procedures in place for providing a child safe environment, including matters relating to the safe use of online environments
It complies with the *Privacy Act 1988 (Cth)*, the National Model Code for Taking Images or Videos of Children while Providing Early Childhood Education and Care (National Model Code), and the Victorian Child Safe Standards

2. SCOPE

- (4) This policy applies to:
 - The approved provider, paid workers, volunteers and work placement students, **referred to as 'staff' throughout this policy**
 - Third parties who carry out child-related work at our service, including contractors, subcontractors, self-employed persons, employees of a labour hire company, **referred to as 'staff' throughout this policy**
 - Children who are in our care, their parents, families and care providers
 - Visitors to our service who carry out child-related work, including allied health support workers
 - <Board/committee members> [delete if not applicable]
- (5) It covers both personal and professional use of social media, particularly when referencing our service or our service's activities, staff, children and families

3. DEFINITIONS

- (6) The following definitions apply to this policy and related procedures:
 - 'Social media' refers to websites and applications that enable users to create, share, and engage with content or participate in social networking (e.g., Facebook, WhatsApp, X, TikTok, Pinterest, Snapchat, YouTube, Instagram, Twitter, LinkedIn)

- 'Personal information' is defined in the *Privacy Act 1988* and includes any information about an identified individual such as their home address, email address, telephone number, date of birth, medical records, bank account details, and tax file number. It also includes photographs and recordings
- 'Parents' includes guardians and persons who have parental responsibilities for the child under a decision or order of court
- 'Staff' refers to paid employees, volunteers, students, and third parties who are covered in the scope of this policy

4. POLICY STATEMENT

Work related social media accounts

Consent and authorisations

- (7) Consent and authorisations for photos/videos are obtained and managed according to our Photography and Video Policy
- (8) We will not post photos or videos of, or information about, or children, families, visitors unless we have the relevant and specific written consent of the person involved – or, in the case of a child, their parents
- (9) Where parents or other adults have put limits on their consent (e.g., for learning and development purposes, or, not for marketing purposes), we will only post photos, videos or information according to the specific consent we have been granted
- (10) The nominated supervisor is responsible for maintaining a list with the consent details of each child. Staff who are posting on social media must check the list before posting children's photos or videos to ensure they are following restrictions specified by parents
- (11) We will agree to any request from a parent to remove/de-identify photos/videos/information of their child from our social media, even if we have prior consent
- (12) We get the relevant permission to share photo/videos owned by other people (e.g., parents, professional photographers, and always credit the sources

Appropriate content

- (13) We use social media to promote our service, share information and engage with families and the community, including:
 - Stories about children's learning and development activities, explaining learning outcomes and our education program
 - Posts about past and future events at the service, such as excursions, concerts, special days, parent-educator interviews, workshops

- Sharing health and safety information, such as tips on nutrition, hygiene practices, sun safety, infectious diseases, updates on our service's protocols
 - Promoting child safety and wellbeing
 - Promoting cultural diversity and inclusion, celebrating cultural festivals/special days or weeks (e.g., NAIDOC, Harmony Day) and giving information about our inclusive practices
 - Sharing information about child development, such as tips on early literacy, social-emotional learning, developmental milestones, resources for learning at home
 - Giving updates on our operations, staffing, policies and procedures
 - Celebrating achievements of staff and children
 - Communicating service and community announcements, such as extreme weather, emergency plans, road closures
 - Getting feedback and input from families and the community through surveys, questionnaires, polls
 - Sharing relevant information about local organisations, charities, community groups
 - To market and promote our service, e.g., advertise open days, our philosophy, how to enrol
- (14) Content is directly relevant to our service and our activities, and includes a balanced representation of children and activities
- (15) All images and videos we share depict children, staff and the service in a dignified, respectful and safe manner
- (16) Posts, comments and interactions by staff on work-related social media accounts must:
- Represent our service in a positive way
 - Align with our values, mission and vision
 - Be professional in presentation, tone and language
 - Be consistent with our codes of conduct
 - Be consistent with our service's policies and procedures
 - Be accurate and truthful
- (17) Where we are sharing images or videos that involve cultural or religious practices, we consult with the relevant community to make sure we are being respectful in our posts
- (18) Image resolution and video/sound should be high quality
- (19)

Inappropriate content

- (20) Content, including photos and videos, that could be perceived as inappropriate, embarrassing, exploitative, intrusive, harmful or compromising to the children, families or staff involved are not allowed
- (21) Posts, comments and interactions by staff on work-related social media accounts must not:
- Be discriminatory, stereotyping, biased or inflammatory
 - Be defamatory
 - Break any laws, including privacy or child protection laws

- Infringe intellectual property (e.g., copyrighted material)
 - Disclose confidential or sensitive material about our service, our operations or anyone associated with us
 - Be misleading or giving false information
- (22) Staff must not alter images or videos or caption in a way that misrepresents the people or activities depicted. Basic editing is acceptable, but not editing in such a way that significantly changes the original image or video is not

Privacy and confidentiality

- (23) Our social media accounts privacy settings are set so that parents and families/staff members/approved users have access
- (24) Staff must log out of social media accounts after use
- (25) The approved provider/nominated supervisor is responsible for ensuring that our privacy settings are regularly reviewed, passwords regularly changed and we are abreast of changes to social media companies' policies and privacy regulations. See our Technology and Device Use Policy for more details about how we manage IT security and privacy
- (26) We will not share content or make posts that identify children or adults by their full name or disclose personal information, unless there is a need to do so, and we have the relevant permission
- (27) Where possible, we use photos and videos that are taken from angles that protect children's identities, such as side or back view
- (28) Private internal social media groups (e.g., WhatsApp, private Facebook groups for staff) must be secure and membership restricted to authorised staff. Within these groups, personal and confidential information must be handled according to our usual practices, and in line with our policies, including our Privacy and Confidentiality Policy

Management and oversight

- (29) The nominated supervisor is responsible for:
- Administering our social media accounts and maintaining strict control of their contents
 - Regularly scanning and responding in a timely manner to social media content related to our service
 - Deleting and reporting inappropriate content, including unauthorised or inappropriate photos/videos, comments or information
 - Removing outdated content and updating profiles
 - Ensuring that staff understand how to represent our service on social media
 - Restricting access to our social media accounts to authorised staff who know how to implement our confidentiality and privacy protocols
- (30) Content on social media that might have legal implications or the potential to cause damage to our service or staff should be reported promptly to the approved provider to manage.

Staff should not share or post/comment or share this type of content without the approved provider's permission

Personal social media accounts

- (31) Staff use of personal media accounts must be in line with our Child Safe Code of Conduct
- (32) Staff must not 'friend' or 'follow' or otherwise connect with parents, families or children from our service through personal accounts (unless there is a pre-existing relationship that predates the staff member's employment)
- (33) Staff must follow our Technology and Device Use Policy regarding the use of personal devices at work
- (34) Staff must not use personal social media accounts to conduct official service business
- (35) Staff must not post on personal media accounts any:
 - Information, photos or videos of children or their families on their personal social media accounts
 - Information, photos or videos of other staff members that relates to their role or activities at our service on their personal media accounts, unless the other staff member/s have consented, and the photos/videos are appropriate and do not compromise the reputation of our service
 - Information about what happens at our service or other work-related matters
 - Photos/videos taken at our service or on an excursion or during travel with, or transporting, children
 - Negative, disparaging or defamatory comments about our service, staff, families or children
 - Material that could bring their professional standing into disrepute
 - Material that could damage the employment relationship, the service's reputation or commercial interests, or bring our service into disrepute
 - Material relating to our service, staff, children, families or visitors that is offensive, threatening, harassing, bullying, discriminatory, or otherwise unlawful
 - Material that discloses confidential, private or sensitive information about our staff, children, families, or visitors
 - Material that publicises workplace disputes
 - Material that uses the service's logos or contact details without permission
 - Material that appears to be from our service or expresses views on behalf of our service

Guidelines for parents and families

- (36) Parents and families should not share any photos or videos that include identifiable characteristics of other children, staff, visitors or families without getting the relevant consent first
- (37) Note, our service does not take responsibility for the sharing or use of photos or videos that are shared by people other than our staff

- (38) Concerns or complaints about staff or our service should be made by following our Complaint Handling Policy and Procedure. Parents and families should not bring up issues via social media

Breaches and complaints

- (39) Anyone can raise concerns or complaints regarding social media use by staff according to our Complaint Handling Policy and Procedure
- (40) Staff must follow our Child Protection Policy and Procedures if they have concerns for a child's safety or well-being
- (41) Any breaches of this policy are treated seriously
- (42) Depending on the nature of the breach, staff members may be subject to disciplinary action, referred to the police/child protection authority, and/or have their employment terminated

5. PRINCIPLES

- (43) All practices related to social media at our service are conducted with children's safety, wellbeing, privacy and dignity as our number one priority
- (44) We only share content that is appropriate and for which we have the relevant consent
- (45) We comply with all relevant legislation, regulations and standards at all times
- (46) We act in line with our *Statement of Commitment to Child Safety and Wellbeing*, Child Safe Code of Conduct, National Model Code and the ECEC Code of Ethics
- (47) We treat all individuals in social media content with dignity and respect, and recognise that there are cultural differences and sensitivities related to social media content
- (48) We give staff the training, resources and support that they need to implement this policy

6. POLICY COMMUNICATION, TRAINING AND MONITORING

- (49) This policy and related documents can be found on our website and in our front office.
- (50) The approved provider and nominated supervisor provide information, training and other resources and support regarding the Photography and Video Policy and related documents
- (51) All staff (including volunteers and students) are formally inducted. They are given access to review, understand and formally acknowledge this Photography and Video Policy and related documents
- (52) The Nominated supervisor runs a professional development program for each staff member, which covers this policy
- (53) Roles and responsibilities are clearly defined in this policy and in individual position descriptions. They are communicated during staff inductions and in ongoing training
- (54) The approved provider and nominated supervisor monitor and audit staff practices through supervision and regular performance appraisal and address non-compliance. Breaches to this policy are taken seriously and may result in disciplinary action against a staff member

- (55) At enrolment, families are given access to our Photography and Video Policy and related documents
- (56) Families are notified in line with our obligations under the *National Regulations* when changes are made to our policies and procedures

7. ROLES AND RESPONSIBILITIES

Approved provider responsibilities (not limited to)

Ensure our service meets its obligations under the *Education and Care Services National Law and Regulations*, including to take every reasonable precaution to protect children from harm and hazards likely to cause injury and ensure that children in our care are adequately supervised at all times

Ensure that our service's governance, management, operations, policies, plans, (including risk management/action plans), systems, practices and procedures for social media are up-to-date, appropriate in practice, best practice, align with the principles/standards for child safe organisations and comply with all relevant legislation

Take reasonable steps to ensure this Social Media Policy is followed (e.g. through clear and accessible communication, and systemised inductions, resourcing, training and monitoring of all staff – including volunteers, students)

Ensure that social media use is effectively managed and overseen, including consents, staff authorisations, content management, privacy and security, and complaints and breaches

Ensure this policy and related documents are reviewed regularly, and notify families of reviews and changes according to legislation and our policies and procedures

Nominated supervisor / persons in day-to-day charge responsibilities (not limited to)

Ensure our service meets its obligations under the *Education and Care Services National Law and Regulations*, including to take every reasonable precaution to protect children from harm and hazards likely to cause injury and ensure that children in our care are adequately supervised at all times

Support the approved provider to ensure that our service's governance, management, operations, policies, plans, (including risk management/action plans), systems, practices and procedures for social media are appropriate in practice, best practice, align with the principles/standards for child safe organisations and comply with all relevant legislation

Implement this Social Media Policy and support the approved provider to ensure that is followed by staff and families (e.g. through clear and accessible communication, and systemised enrolments/orientations, inductions, training and monitoring of all staff – including volunteers, students)

Ensure that parents are giving informed consent, including by discussing this policy at the time a child is enrolled. Ensure that all consent forms are completed, stored securely and regularly reviewed. Maintain a list of children whose parents have not provided consent or who have provided limited consent, and make sure that educators have access to this list

Support the approved provider to ensure that: our social media content is professional, appropriate and represents our service in a positive way; and inappropriate or unauthorised

content is removed and reported to the approved provider and, where necessary, the police or child protection authority

Contribute to policies and procedure reviews and risk assessments and plans in consultation with children, families, communities and staff. Support the approved provider to notify families of reviews and changes according to legislation and our policies and procedures

Educator / other staff responsibilities (not limited to)

Follow this [Social Media Policy](#) and other related policies

Do not post or share any content, including photos and videos, on our work social media accounts without the proper authorisation from the approved provider/nominated supervisor and the necessary consent from the people involved (and, in the case of a child, parental consent)

Use social media in a way that upholds our [Child Safe Code of Conduct](#) and our service's reputation

Do not breach the privacy or confidentiality on social media of anyone at our service

Undertake all necessary training and professional development activities related to this policy

Follow our complaint management system to respond properly to any complaints or concerns about children's safety or wellbeing

Contribute to policy and procedure reviews and risk assessments and plans

Families responsibilities (not limited to)

Follow the relevant sections of our [Photography and Video Policy](#)

Complete our consent form/s at the time of your child's enrolment and keep it updated if anything changes

Do not share photos/videos on social media if they include identifiable characteristics of another child or adult at our service, unless you have the relevant consent

Notify our service in writing if you wish to withdraw consent for sharing information about your child on social media

Raise any concerns you have about our service, or our social media use, according to our Complaint Handling Policy and Procedure. Do not raise issues through social media

8. LEGISLATION (OVERVIEW)

Education and Care Services National Law and Regulations

Law	Description
s 165	Offence to inadequately supervise children
s 167	Offence relating to protection of children from harm and hazards

Regulations	
s 168(h)	Education and care services must have policies and procedures in relation to providing a child safe environment, including matters relating to the promotion of a culture of child safety and wellbeing within the service; and the safe use of online environments at the service
s 170	Policies and procedures to be followed
s 171	Policies and procedures to be kept available
s 172	Notification of change to policies or procedures

Other applicable laws and regulations

Act/ Regulation	Description
<i>Australian Human Rights Commission Act 1986 (Cth)</i>	Provides guidance on how to uphold the principles in the <u>Convention on the Rights of the Child</u>
<i>Privacy Act 1988</i>	Principal act protecting the handling of personal information, including photos and videos

National Quality Standard

Standard	Concept	Description
1.3	Assessment and planning	Educators and co-ordinators take a planned and reflective approach to implementing the program for each child
1.3.1	Assessment and planning cycle	Each child's learning and development is assessed or evaluated as part of an ongoing cycle of observation, analysing learning, documentation, planning, implementation and reflection
1.3.3	Information for families	Families are informed about the program and their child's progress
2.2	Safety	Each child is protected
2.2.1	Supervision	At all times, reasonable precautions and adequate supervision ensure children are protected from harm and hazards
2.2.3	Child Protection	Management, educators and staff are aware of their roles and responsibilities to identify and respond to every child at risk of abuse or neglect
4.2	Professionalism	Management, educators and staff are collaborative, respectful and ethical
4.2.2	Professional standards	Professional standards guide practice, interactions and relationships
5.1	Relationships between educators and children	Respectful and equitable relationships are maintained with each child
5.1.2	Dignity and rights of the child	The dignity and rights of every child is maintained

Standard	Concept	Description
6.1	Supportive relationships with families	Respectful relationships with families are developed and maintained and families are supported in their parenting role
6.1.2	Parent views are respected	The expertise, culture, values and beliefs of families are respected and families share in decision-making about their child's learning and wellbeing
7.1	Governance	Governance supports the operation of a quality service
7.1.2	Management systems	Systems are in place to manage risk and enable the effective management and operation of a quality service
7.1.3	Roles and responsibilities	Roles and responsibilities are clearly defined, and understood, and support effective decision-making and operation of the service

My Time, Our Place (MTOP) V2.0

MTOP Outcome	Key component
3: CHILDREN AND YOUNG PEOPLE HAVE A STRONG SENSE OF WELLBEING	<ul style="list-style-type: none"> Children and young people become strong in their social, emotional and mental wellbeing Children and young people become strong in their physical learning and wellbeing Children and young people are aware of and develop strategies to support their own mental and physical health, and personal safety

National Principles for Safe Organisations

Most relevant principles

Child safety and wellbeing is embedded in organisational leadership, governance and culture.

Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.

Families and communities are informed and involved in promoting child safety and wellbeing.

Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.

9. RELATED DOCUMENTS

Key Policies Child Protection Policy | Child Safe Code of Conduct | Child Safe Risk Management Plan | Complaint Handling Policy | ECEC Code of Ethics | Photography and Video Policy | Technology

and Device Use Policy | Photography and Video Policy | Relationships with Children Policy | Orientation for Children Policy | Parental Interaction and Involvement Policy | Governance Policy | Privacy and Confidentiality Policy | Enrolment Policy

Procedures	Child Safe Environment Procedures (in Child Safe Environment Policy) Child Protection Procedures (in Child Protection Policy) Complaint Handling Procedures (in Complaint Handling Policy)
Tools	Photography and Video Consent Form template (in Photography and Video Consent Form) <u>Active Supervision Guidelines (ACECOA)</u> [Centre Support resources available on Karla Resources at centresupport.com.au]

10. POLICY INFORMATION

Approval date	4/9/24
Effective date	23/3/25
Review date	23/3/26
Approved by	Dina Kahn