



BEFORE, AFTER & VACATION CARE

# MOBILE PHONE USE POLICY

TeamKids, February 2026



FUN

GENUINE

INNOVATIVE

INVOLVED

REMARKABLE

## POLICY RATIONALE

At Team Holiday Pty Ltd and its associated entities, including TeamKids, Kids Unlimited and Stand-Up Project (“the Company”) recognises that child safety is the responsibility of everyone, including the Company, and all Managers, Educators, and Volunteers who come into contact with children or child-related information. This policy ensures that clear standards are adhered to when it comes to the safety, wellbeing, and privacy of all children in attendance at Company operated services.

This policy will outline how the Company will maintain the use of personal mobile phones while educators are working directly with children at the company. These expectations will be in line with the National Model Code, Principle 8 of the National Principles for Child Safe Organisations, and all state Child Safe Standards to ensure best practice in accordance with the facilitation of a child safe environment.

In addition to the above codes, principles and standards, this policy will be used in partnership with the Risk Assessment – National Model Code – Use of electronic equipment and storage of images/videos of children. This Risk Assessment will include the appropriate use of service issued electronic devices, creation of a child safe culture, and the use of personal electronic devices when working or volunteering with the Company.

The Company acknowledges that while images of children may be taken for genuine reasons such as program development, documentation of child engagement within a program, and for approved marketing purposes, there may be a risk of images or recordings of children being used inappropriately. This policy ensures that children are protected from having those images used inappropriately, in particular, that they are protected from the taking or sharing of inappropriate or illegal images.

These restrictions apply to any person who is providing education and care and working directly with children. This includes:

- Educators and Agency workers
- Students attending the service as part of a practicum and representatives of tertiary providers who attend the service to assess students.
- Volunteers, including parent volunteers.
- Any third parties delivering programs or incursion activities to children in a service, whether paid or unpaid
- Allied health and inclusion professionals attending a service to observe, assess or work with a child at the service.
- Mentors or Management attending the service to support educators working with children or providing education and care.
- School teachers when children are being cared for by TeamKids.

### **Exempt from this policy are.**

- Parents and carers attending the service to drop off or pick up their child.
- Regulatory Authority Authorised Officers
- Police
- Officers of other regulators, such as environmental health officers, child protection/safety officers
- Third parties who are attending the service but are not working with children or providing education or care (for example, maintenance contractors, cleaners, tradespeople).

## THE COMPANY WILL:

- Ensure that management conducts regular checks at each service to monitor personal phone use and confirm that all educators are complying with the requirements of this policy. This includes checking that all educators have stored their personal devices securely in the designated location and that personal devices are not being used for images, videos and recordings.
- Encourage all educators to report any misuse of personal devices to management immediately.
- Investigate reports related to alleged breaches of this policy or misuse of personal or TeamKids-issued electronic devices.
- Provide training and refreshers to ensure educators are complying with this policy and the TeamKids – Multimedia and storage policy.
- Ensure that if a third-party professional attending a service and working directly with children (such as an allied health or inclusion professional) needs to use a device (for example, to undertake an assessment or take notes) they can use a device that their business or institution issues and use only for work purposes (and not personal use). Where third parties are required to take photos (for example, to undertake an assessment) written permission from the child's guardian will be provided directly to TeamKids prior to the visit. Photos are only to be taken on the business issued device.
- Ensure that if incursion providers are required to use a personal device (for example, playing music during an educational incursion) that prior approval is gained from TeamKids in writing and documented and tracked.
- Maintain a record of authorisations of all times educators have approval to carry personal devices. Services must ensure this is available to be viewed by authorised officers.
- The record of authorised exemptions will include, as required by law.
  - The name and address of the primary service where the authorisation applies.
  - The name, address and date of birth of the person being provided with exemption.
  - The reason for the exemption
  - The approval date and the period of time the authorisation applies for.
  - Confirmation that the authorisation of approved use of a personal device cannot impede active supervision or be used for taking photos/videos of children.
- Review any authorisation which remains in effect for 3 months, and where there is no valid reason to continue the authorisation, it will be revoked in writing.

## SERVICES WILL:

- Use only TeamKids-issued electronic devices to capture images, videos or recordings of children. This includes mobile phones, digital cameras, tablets, iPads, and other emerging technologies.
- Ensure TeamKids-issued devices are used for communication. Documented approval must be maintained for the use of personal mobile phones in advance, unless in an emergency, where prior approval cannot be obtained.
- In the event of an emergency, services will document the reason a personal mobile device is required. This will include person's name and reason for use.

## Emergencies include:

- Incidents involving a lost child, injury to a child or staff member, or another serious incident.
- In the case of a lockdown or evacuation incident at the service premises

- Emergency communication during excursions and regular outings
- When groups of children and educators get split up during an emergency
- Technology failure, when a temporary outage of service-issued electronic devices has occurred.
- During a local emergency event to receive emergency notifications. This could include government warning systems, such as a bushfire evacuation text notification.

## **Prior Approval is required in writing for the following circumstances:**

### **Health and Disability**

- Personal medical needs (e.g., heart or blood sugar monitoring).
- Disability-related use, where a device is an essential communication aid.

### **Family and Caring Responsibilities**

- Urgent family necessity (e.g., ill or dying family member).
- Sole or emergency carer responsibilities for a vulnerable dependent (e.g., child with disability, aged parent, hospitalised child).
- Expectant parent awaiting urgent medical updates (e.g., pregnancy complications).

### **Safety and Wellbeing**

- Personal safety reasons (e.g., court orders, safety plans, urgent police or support service contact).

### **Operational Requirements**

- Technology failure (e.g., walkie talkies not functional due to distance/location, with Regional Manager approval).
- Off-site supervision of children (e.g., excursions, transport, outdoor activities) where access to a service phone is not practical.

## **EDUCATORS WILL:**

- Under no circumstances use personal electronic devices to photograph, record or film children, including for the purpose of documenting learning.
- Personal electronic devices that can take images or videos, and personal storage and file transfer media, are not in the possession of any person while providing education and care and working with children, except for limited essential purposes.
- Access personal devices only when not working directly with children, such as during scheduled breaks (e.g., lunch or tea breaks), planning time, or administrative tasks.
- Ensure electronic devices, including Phones, tablets, digital cameras, smartwatches with camera/recording functionality, Wearables (camera glasses), SD CARDS, USB drives and hard drives are stored appropriately while educators are working with children.
- Read and acknowledge this policy on their employment platform as part of their compliance responsibilities.
- Check the identity of third parties on arrival, confirm the purpose of any electronic devices they bring, and ensure prior written approval has been obtained from Management before allowing use.
- Not communicate with children via social media platforms (e.g., WhatsApp, Snapchat, Instagram, Facebook)

## APPLYING FOR AN EXEMPTION

Educators can submit applications for an exemption under this policy using the [Mobile Phone Exemption Submission](#) form.

**Please note**, in order to submit an exemption request using this form, Educators must be logged in with their TeamKids email address. Any support issues regarding TeamKids email address logins must be directed to [support@onplatinum.com.au](mailto:support@onplatinum.com.au), while a short video on how to login to your email can also be found [here](#).

All applications will be assessed upon receipt, with outcomes communicated directly once available. Until such time that an application has been assessed, this policy will continue to apply in full, and any breaches may result in disciplinary action as outlined below.

## BREACHES OF POLICY

Any breach of this policy may result in disciplinary action, up to and including termination of employment.

This includes, but is not limited to, the inappropriate use, storage, sharing or destruction of images or recordings; failure to adhere to supervision requirements; and unauthorised use of personal or service devices.

All staff are expected to uphold the standards outlined in this policy at all times, and to act in accordance with the Code of Conduct, relevant legislation, and privacy regulations.

Suspected or confirmed breaches must be reported immediately to the appropriate Company Manager, People and Culture team or [childsafety@teamkids.com.au](mailto:childsafety@teamkids.com.au).

Failure to comply with this policy may also result in legal action where breaches involve violations of child safety laws or privacy legislation.

## REFERENCES

ACECQA National Quality Framework Resource Kit (2012)  
ACECQA National Quality Framework – National Model Code (July 2024)  
Quality Area 1 – Educational Program and Practice.  
Quality Area 2 – Children’s health and safety  
Quality Area 7 – Leadership and Service Management  
Victorian Child Safe Standards  
Education and Care Services National Law Act (2010), S 165

## VERSION CONTROL

Version control Date: August 2018

Reviewed: January 2026

To be reviewed: January 2027