



Bacchus Marsh
Grammar

ELC POLICY

Early Learning Centre Photography and Video Policy

Approved by the Approved Provider: 29 March 2026

Bacchus Marsh Grammar PO Box 214 Bacchus Marsh VIC 3340 **E** school@bmg.vic.edu.au
Maddingley Campus South Maddingley Road, Bacchus Marsh VIC 3340 **P** 03 5366 4800
Woodlea Campus and ELC 111 Frontier Avenue, Aintree VIC 3336 **P** 03 5366 4900

An Independent Ecumenical School
for Girls and Boys
Reg. No. 1919
ABN: 24 128 531 078

www.bmg.vic.edu.au



Photography and Video Policy

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1 Quick reference:

photography | video recording | digital images | parental consent | child consent | authorisations | service- supplied devices | personal devices | child safety | privacy | data security | online safety | inappropriate content | image sharing | secure storage | image deletion | respectful use | child dignity | social media | documentation | authorised access

Version	Date of release	Summary of changes
3.0	February 2025	<ul style="list-style-type: none"> Revised to comply with the Early Childhood Legislation Amendment (Child Safety) Bill 2025 (that is: amendments to the National Laws,) and the Victorian Statement of Regulatory Expectations – National Model Code (SRE-NMC) Some sections are re-written in response to clearer government advice on device rules and restrictions. Some sections have been deleted where there is unnecessary duplication with the Technology and Device Use Policy Previous policy used the National Code term ‘service-issued devices’. The new law uses the term ‘service-supplied devices’. All references to ‘service-issued’ has been changed to ‘service-supplied’ to be consistent with the law’s term Makes the rules about families taking photos more flexible, noting that best practice currently is that parents do not take any photos at the service
2.0	August 2025	Revised twice to incorporate NQF regulatory changes regarding digital technologies and mandatory restrictions on personal devices
1.0	September 2024	Full review, rewrite and restructure and replaces former ‘Photography Policy’ Revised and added content to align with the National Model Code + new consent form

2 Purpose and Background

- 2.1.1 To set out guidelines for the safe and appropriate use of photography and video
- 2.1.2 It aims to protect the safety, privacy, and rights of all children, families and staff members
- 2.1.3 This policy helps us to comply with the Education and Care Services National Law and Regulations, which requires our service to have:
 - Restrictions and controls in place for capturing, storing or transmitting images of children (National Law s 175), and
 - Policies and procedures in place for providing a child safe environment, and the safe use of digital technologies and online environments, including specific requirements relating to images and videos of children (reg 168(2)(ha))
- 2.1.4 It complies with the Privacy Act 1988 (Cth), and aligns with the National Model Code for Taking Images or Videos of Children while Providing Early Childhood Education and Care (National Model Code), the ECEC Code of Ethics, and the Child Safe Standards/National Principles for Child Safe Organisations
- 2.1.5 It complies with the Victorian Statement of Regulatory Expectations – National Model Code

3 Scope

- 3.1.1 This policy applies to:
 - ‘Staff’: the approved provider, persons with management or control, nominated supervisor, paid workers, volunteers and work placement students, third parties who carry out work at our service that is relevant to this policy, including contractors, subcontractors, self-employed persons, employees of a labour hire company
 - Children who are in our care, their parents, families and care providers
 - Visitors to our service, including paid or unpaid third parties delivering programs or activities to children and allied health support workers
 - Tertiary provider representatives assessing students on practicum at our service
- 3.1.2 It covers all activities carried out at or by our service that involve capturing, storing or transmitting images of children, including at special events, excursions, travel and transport

- 3.1.3 This policy should be read in conjunction with our Social Media Policy, Technology and Device Use Policy, AI Policy and CCTV Policy.

4 Definitions

4.1.1 The following definitions apply to this policy and related procedures:

- a) 'Audio' means a sound recording of children, including voices and other sounds made by children
- b) 'Capture', in relation to an image of a child, includes to film, record or take an image of the child
- c) 'Consent' refers to the voluntary and informed agreement to allow something to happen or someone else to do something. It is used interchangeably with authorisation in this policy
- d) 'Device' means any device capable of capturing, storing or transmitting images or videos. Examples include (but are not limited to): mobile phones, tablets, computers, cameras, smartwatches that can capture or store or transmit images, wearables (such as smart/camera glasses), smart toys, USB drives, memory cards, hard drives
- e) 'Parents' includes guardians and persons who have parental responsibilities for the child under a decision or order of court
- f) 'Personal devices' are owned or controlled devices capable of capturing, storing or transmitting images. For the purposes of this policy, personal devices also includes any devices issued to students by their training provider
- g) 'Photo/Photograph/Video' means any visual recording of children, either still or moving
- h) 'Service-supplied devices' are devices supplied by the approved provider to be used by an authorised person exclusively for the purposes of providing education and care to children as part of our service. Service-supplied devices are configured to operate in accordance with this policy and procedure and other policies and procedures related to child safety or the security of devices
- i) 'Staff', unless otherwise indicated, refers to the approved provider, persons with management or control, nominated supervisor, paid workers, volunteers, students, and third parties who are covered in the scope of this policy. Note: 'staff', 'employees' and 'workers' etc. may have their own different definitions in legislation covered in this policy

5 Policy Statement

5.1 Child safe environment

- 5.1.1 We must have child safe systems in place for the taking, use, storage and destruction of images and videos of children in our care (National Regulations s 168(2)(ha)(i)).
- 5.1.2 Our practices comply with the *National Law and Regulations* and the Victorian Statement of Regulatory Expectations National Model Code, which sets out how to implement child safe practices for capturing, storing and transmitting images and videos of children, and device use in education and care services.
- 5.1.3 When we are photographing or videoing children, our number one priority is the safety, dignity, best interests, and rights of the child. We avoid any action that might cause harm or discomfort.
- 5.1.4 We always get the informed consent of parents before we photograph or video their child.
- 5.1.5 If a child is capable of understanding, we will ask their permission before we take a photo or video, and will explain to them how we intend to use it. Where a child is very young or developmentally not capable of understanding, we will check for non-verbal signs of consent before taking their photo or video.
- 5.1.6 Staff will respect a child's right to decline and will never force a child to be photographed or recorded.
- 5.1.7 We support staff to ensure their use of photography/video is purposeful, supports quality educational practice, and does not interfere with active supervision or child-educator engagement
- 5.1.8 We support staff to maintain a culture of child safety, and encourage them to speak up if they see personal or service-supplied devices being used inappropriately.
- 5.1.9 We store photographs and videos of children on secure platforms and take steps to ensure access to them is restricted.

- 5.1.10 Staff must not use devices to take photos or videos if doing so jeopardising their capacity to supervise, interact or engage with children

5.2 Parental Consent/Authorisation

- 5.2.1 We must have child safe systems in place for obtaining authorisation from parents to take, use and store images and videos of children in our care (National Regulations s 168(2)(ha)(ii))
- 5.2.2 We discuss this policy with parents at the time of their child's enrolment
- 5.2.3 We get written consent from parents to take, use and share photographs or videos of their child
- 5.2.4 Our consent form is specific. We state why the photos or videos are being taken, how they will be used, stored, and shared, and who is authorised to take them
- 5.2.5 Parents may choose not to consent to their child being photographed or videoed in any circumstances, or they may choose to give consent for a limited number of situations
- 5.2.6 We notify parents in advance of any school photographers who intend to take photographs/videos of their children, and give parents the opportunity to withdraw their consent
- 5.2.7 We only engage professional photographers who agree to follow this Photography and Video Policy
- 5.2.8 External/third-party professionals (e.g., NDIS providers, allied health workers) who are supporting children while they are at our service, must not capture, store or transmit images or videos of children unless they have the written authorisation of the child's parent, and they are supervised by a staff member while taking the image or recording (note, third parties who are conducting child-related work at our service must comply with this policy, our [Technology and Device Use Policy](#) and our [Child Safe Code of Conduct](#))
- 5.2.9 Refusing/withdrawing consent
- 5.2.10 Parents may refuse to authorise our service's capture, use or storage of images or videos of their child
- 5.2.11 We maintain a list of children whose parents have withheld consent or given limited consent. Staff are responsible for checking the list and, where applicable:
- 5.2.12 Not photographing or videoing these children, and ensuring they are removed from any group photos/videos situations; or
- 5.2.13 Only using and sharing photographs/videos of these children according to their parents' authorisation
- 5.2.14 Parents may withdraw prior authorisation at any time by notifying the nominated supervisor in writing

5.3 Purpose and use

- 5.3.1 Capturing, storing or transmitting images and videos of a child in our care must only be for the purposes of, or in connection with, the provision of education and care services (*National Law s 175*) (i.e., not for outside of work use) and only with parental consent.
- 5.3.2 For example, to:
- Document and support children's learning and development
 - Engage families by sharing children's progress and daily activities
 - Communicate events/activities and share relevant information with families and communities
 - Promote/market the service
 - Support educational research and professional development
- 5.3.3 Photographs and videos are only used for the purposes we set out in our consent form. Any additional use requires further written consent from parents
- 5.3.4 Note, our service may need to take photos, videos or audio recordings of a child for their safety or wellbeing, e.g., to document injuries or if we are instructed to do so by the police/child protection authority. If the relevant authority allows for it, the child's parents have the right to access them



Access and use

- 5.3.5 Only staff who have a clear need to do so as part of their job, and who are authorised by the approved provider/nominated supervisor, can access, use or share the photos/videos we take of children at our service
- 5.3.6 Photos and videos must only be shared in line with the conditions set out in our consent form. They must not be accessed or shared beyond their intended purpose or context
- 5.3.7 We will only share a child's photos or videos publicly - e.g. on social media, on our website, in newsletters, by email, brochures, on digital learning apps – if we have written parental consent
- 5.3.8 We will only use children's photos to market or publicise our service, or to support any research projects or study placements, if we have written parental consent
- 5.3.9 Staff must also comply with our Social Media Policy if they are posting photographs or videos on social media platforms
- 5.3.10 Photographs/videos used publicly will refer to the child by their first name and surname initial unless parents have authorised the use of the child's full name
- 5.3.11 Staff must never download photographs or videos of a child at our service to a personal device or take steps that would allow them to access this type of content from their own personal device
- 5.3.12 Note, in some situations, such as where a child is at risk of harm, we may be legally obliged to share photos or videos with the police or another authority

5.4 The use of devices for photography and videos

- 5.4.1 The approved provider, persons with management or control, nominated supervisor, staff, students, and volunteers must only use service-supplied devices to capture, store or transmit an image or video of a child in our care (National Law s 175F)
- 5.4.2 The approved provider, nominated supervisor, permanent and temporary staff, independent contractors, volunteers, students, tertiary providers assessing students, paid or unpaid third parties, and anyone else involved in delivering our services must not use personal devices to capture, transmit or store of a child in our care
- 5.4.3 Third-party professionals who are appropriately authorised to capture, store or transmit images of children must only use a device issued by their business/institution (and not a personal device) (or, the approved provider may give them written authorisation to use a service-supplied device)
- 5.4.4 Third party contractors not working directly with children (e.g., maintenance and cleaning staff, gardeners, IT technicians etc) must never capture, store or transmit images or videos of any child at our service on any device
- 5.4.5 If a personal device is used to capture, transmit or store images of a child in in an emergency, these images or videos must be transferred as soon as practicable to a service-supplied device or platform, and the relevant content must be deleted from the personal device
- 5.4.6 Staff must report any accidental or necessary use of a personal device for photography or recording to the nominated supervisor immediately
- 5.4.7 Capturing, storing or transmitting an image or video of a child in our care with a personal device, in circumstances that are not permitted, is an offence and a serious breach of this Policy. Doing so may result in disciplinary action and may be deemed as subjecting a child to inappropriate conduct, which is an offence under the National Law
- 5.4.8 Refer to our Technology and Device Use Policy for more details

5.5 Inappropriate photography and videos

- 5.5.1 Any photographs or videos with inappropriate content is strictly prohibited
- 5.5.2 Inappropriate content includes any depictions of a child that be considered exploitative, intrusive, or harmful – for example, where a child is undressed, in distress, in a state of dysregulation or depicted in a manner that could be considered sexualised or exploitative



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- 5.5.3 Any staff member who captures or shares inappropriate content will be reported to the relevant authority, following our Child Protection Policy
- 5.5.4 Photography and videos (including live streaming) are not permitted of children engaged in private activities or in areas we designate as ‘no photography’ zones, including bathrooms, nappy change rooms, and areas where there is not a clear line of sight by other staff members
- 5.5.5 Staff must make sure that children are clothed and positioned appropriately before they take their photo or video
- 5.5.6 Images and videos must be used in a way that is dignified and respectful, and not in a way that is discriminatory, stereotyping or biased
- 5.6 **Guidelines for parents and families**
- 5.6.1 Families are not permitted to take photographs or videos at our service, except in some limited instances and only when authorised by the approved provider or nominated supervisor
- 5.6.2 In determining whether photography or filming by families is appropriate, including for special events or non-routine activities (e.g., end of year concerts), the approved provider or nominated supervisor will consider the child safety risks involved and our obligations in relation to privacy and parental consent. The safety, rights and best interests of all children in our care must be placed above all else
- 5.6.3 Families should not share any photos or videos that include identifiable characteristics of children or families (other than their own), staff, staff or, visitors at our service without getting the relevant consent first. This includes sharing images on social media, websites, or any other platform
- 5.7 **Student assessments**
- 5.7.1 Students are not permitted to photograph, video or live stream assessment tasks involving children at our service, unless they:
- Have prior permission from the approved provider (or an authorised delegate)
 - Have specific written parental authorisation, and
 - Use service-supplied devices, not personal devices or devices issued by their training provider
- 5.7.2 Direct observation is our preferred method for assessments; however, where this is not possible, the observation may occur remotely via live streaming if the nominated supervisor has given prior approval
- 5.7.3 Live streaming may only be conducted by the training provider assessor, and not a third party or workplace supervisor
- 5.7.4 Live streams must not be recorded, stored or shared
- 5.7.5 Live streaming must avoid focussing the camera on children, be directly relevant to the assessment activity, and must never be done while a child is in a state of undress, in distress or in any other inappropriate circumstances
- 5.8 **Privacy and security**
- 5.8.1 Images, videos or recordings of children, taken for any purpose, must not be stored or retained on any personal devices or personal cloud accounts
- 5.8.2 Digital photos and videos of children are stored on secure platforms and/or digital devices that are password protected
- 5.8.3 Printed, hard copy photos of children are stored securely, away from public access
- 5.8.4 Access to stored photos and videos is limited to authorised staff members only
- 5.8.5 We regularly update our systems to ensure they remain secure and protected from unauthorised access
- 5.8.6 Staff are not allowed to transfer photographs and recordings to personal devices or unauthorised platforms
- 5.8.7 Any sharing of photographs and recordings outside our service is done securely and only with written authorisation from the child’s parents
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- 5.8.8 Staff are trained to follow our privacy and security protocols
- 5.8.9 The approved provider and nominated supervisor are responsible for the oversight monitoring, review and control of a device use and photography at our service. They must take every reasonable precaution to ensure that the relevant persons named in this policy only use service-supplied devices (not personal devices) to capture, store or transmit images or videos of children in our care (National Law ss 175D)

5.9 Retention and destruction

- 5.9.1 Photos and videos are only kept for as long as necessary to fulfil their intended purpose, unless we need to keep them longer for legal or regulatory reasons
- 5.9.2 We may keep photos and videos that have historical value indefinitely
Photos or videos that relate to a child protection matter will be managed according to our Child Protection Policy
- 5.9.3 When they are no longer needed, photos and videos are securely deleted or destroyed to ensure they cannot be accessed or recovered (e.g., digital photos and videos are either overwritten by data wiping software, or we physically destroy storage devices; physical photos are destroyed in a secure manner)
- 5.9.4 We will agree to requests to delete/destroy images and videos where it is appropriate and lawful to do so

5.10 Breaches and complaints

- 5.10.1 Anyone can raise concerns or complaints regarding the handling of photographs, videos, or devices, according to our Complaint Handling Policy
- 5.10.2 Staff must follow our Child Protection Policy and Procedures if they have concerns for a child's safety or well-being
- 5.10.3 Any inappropriate conduct by staff or any breaches of this policy, including the improper use of devices, or unauthorised capturing, storing or transmission of photos or videos, are treated seriously
- 5.10.4 Subjecting a child to inappropriate conduct is a breach of our Child Safe Code of Conduct and an offence under the National Law (s 166A)
- 5.10.5 Depending on the nature of the breach, staff members may be subject to disciplinary action (by our service and by the regulatory authority), referred to the police/child protection authority, and/or have their employment terminated

6 Principles

- 6.1.1 All practices related to photography/video are conducted with children's safety, wellbeing, best interests, rights, privacy and dignity as our number one priority
- 6.1.2 We only capture, use, share and store photos/videos according to their intended purpose and with the written consent of parents
- 6.1.3 We store photos/videos securely and have systems that prevent them from being accessed or shared improperly, or without authorisation. We only retain photos/videos for as long as is necessary and we destroy/delete them securely
- 6.1.4 We comply with all relevant legislation, regulations and standards at all times
- 6.1.5 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
- 6.1.6 We treat all individuals in photographs/videos with dignity and respect, and recognise that there are cultural differences and sensitivities related to photography
- 6.1.7 We give staff the training, resources and support that they need to implement this policy

7 Policy, Communication, Training and Monitoring

- 7.1.1 This policy and related documents can be found in our Policy Folder, BMG web site and OneDrive Policy folder
- 7.1.2 The approved provider and nominated supervisor provide information, training and other resources and support regarding the Photography and Video Policy and related documents
- 7.1.3 All staff (including volunteers and students) are formally inducted. They are given copies of/access to, review, understand and formally acknowledge this Photography and Video Policy and related documents
- 7.1.4 The approved provider/nominated supervisor runs a professional development program for each staff member, which covers this policy
- 7.1.5 Roles and responsibilities are clearly defined in this policy and in individual position descriptions. They are communicated during staff inductions and in ongoing training
- 7.1.6 The approved provider and nominated supervisor monitor and audit staff practices e.g. through spot checks, performance reviews, supervision sessions, compliance visits from operations managers, spot checks from area managers, regular performance appraisal) and address non-compliance. Breaches to this policy are taken seriously and may result in disciplinary action against a staff member
- 7.1.7 At enrolment, families are given copies of/given access to our Photography and Video Policy and related documents
- 7.1.8 Families are notified in line with our obligations under the National Regulations when changes are made to our policies and procedures

8 Legislation Overview

8.1 Education and Care Services National Law and Regulations

Law	Description
s 2A	Paramount consideration – safety, rights and best interests of children
s 165	Offence to inadequately supervise children
s 166A	Offence to subject a child to inappropriate conduct
s 167	Offence relating to protection of children from harm and hazards
s 175	Devices in education and care services
Regulations	
s 73	Educational program
s 74	Documenting of child assessments or evaluations for delivery of educational program
s 168(2)(h)	Education and care services must have policies and procedures in relation to providing a child-safe environment
s 170	Policies and procedures to be followed
s 171	Policies and procedures to be kept available
s 177(1)(a)	Prescribed enrolment and other documents to be kept by approved provider
ss 181,183 - 184	Confidentiality and storage of records

8.2 Other Applicable Laws and Regulations

Act / Regulation	Description
Australian Human Rights Commission Act 1986 (Cth)	Provides guidance on how to uphold the principles in the Convention on the Rights of the Child

<i>Privacy Act 1988</i>	Principal act protecting the handling of personal information, including photos and videos
<i>Victorian Statement of Regulatory Expectations – National Model Code (SRE-NMC)</i>	Guidelines for implementing the National Model Code in Victoria

8.3 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 regarding child safety, including the need 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
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 that is child safe
7.1.2	Management systems	Systems are in place to manage risk and enable the effective management and operation of a quality service that is child safe
7.1.3	Roles and responsibilities	Roles and responsibilities are clearly defined, and understood, and support effective decision-making and operation of the service

8.4 Early Years Learning Framework (EYLF) v2.0 / Victorian Early Years Learning and Development

EYLF Outcome	Key Component
3: CHILDREN HAVE A STRONG SENSE OF WELLBEING	<ul style="list-style-type: none"> • Children become strong in their social, emotional and mental wellbeing • Children become strong in their physical learning and wellbeing



	<ul style="list-style-type: none"> Children are aware of and develop strategies to support their own mental and physical health and personal safety
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8.5 National Principles for Child 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

9.1 Key Policies

Child Protection Policy | Child Safe Code of Conduct | Child Safe Risk Management Plan | Complaint Handling Policy | ECEC Code of Ethics | Social Media Policy | Technology and Device Use Policy | Relationships with Children Policy | Orientation for Children Policy | Parental Interaction and Involvement Policy | Governance Policy | Privacy and Confidentiality Policy | Enrolment Policy | CCTV Policy

9.2 Procedures

Child Safe Environment Procedures (in Child Safe Environment Policy) | Child Protection Procedures (in Child Protection Policy) | Complaint Handling Procedures (in Complaint Handling Policy)

9.3 Resources

Photography and Video Consent Form template (attached at Appendix A)
[Active Supervision Guidelines \(ACECQA\)](#)
[Centre Support resources available on Karla Resources at centresupport.com.au]

10 Sources

Education and Care Services National Law and Regulations | National Quality Standard | Victorian Statement of Regulatory Expectations – National Model Code (SRE-NMC) | National Principles for Child Safe Organisations | Child Safe Standards | National Model Code for Taking Images or Videos of Children while Providing Early Childhood Education and Care | Australian Privacy Principles (Privacy Act 1988) | eSafety Commissioner Resources | Early Childhood Australia Code of Ethics | ACECQA’s NQF Online Safety Guide | ACECQA’s NQF Child Safe Culture Guide | Australian Human Rights Commission guidance on children’s rights and privacy | Australian Government’s Australian Skills Quality Authority - Guidance for Assessing ECEC Students in the Workplace | ACECQA’s Safe Use of Digital Technologies and Online Environments Policy and Procedure Guidelines | VECRA guidelines for digital technologies and online environments



11 Authorisation

ELC Document Name	Photography and Video Policy	
Name of Reviewer: Approved Provider	Andrew Neal	Signature:
Name of Reviewer: Nominated Supervisor	Kerry Osborn	Signature:
Date Revised	March 2026 Reviewed annually and when there are changes that may affect child safety, including after any responses to incidents, disclosures or suspicions of harm or risk of harm. The review will include checks to ensure the document reflects current legislation, continues to be effective, or whether any changes and additional training are required	

12 History

Date	Amendment
September 2024	1. New policy to replace the Photography Policy
April 2025	2. Reviewed with no changes.
August 2025	3. Policy update in response to the amended National Regulations commencing 1 st September 2025 and 1 st January 2026
October 2025	4. Revised Policy update in response to the amended National Regulations commencing 1 st September 2025 and 1 st January 2026
March 2026	<ol style="list-style-type: none"> 1. Revised to comply with the Early Childhood Legislation Amendment (Child Safety) Bill 2025 (that is: amendments to the National Laws,) and the Victorian Statement of Regulatory Expectations – National Model Code (SRE-NMC) 2. Some sections are re-written in response to clearer government advice on device rules and restrictions. Some sections have been deleted where there is unnecessary duplication with the Technology and Device Use Policy 3. Previous policy used the National Code term ‘service-issued devices’. The new law uses the term ‘service-supplied devices’. All references to ‘service-issued’ has been changed to ‘service-supplied’ to be consistent with the law’s term 4. Makes the rules about families taking photos more flexible, noting that best practice currently is that parents do not take any photos at the service

ROLES AND RESPONSIBILITIES – Photography and video

Approved provider responsibilities (not limited to)

Ensure our service meets its obligations under the *Education and Care Services National Law and Regulations*, including as they relate to authorisations, devices and safe digital or online environments 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 photography and videos are appropriate in practice, best practice, align with the principles/standards for child safe organisations, National Model Code and comply with all relevant legislation

Ensure this Photography and Video Policy is in place and take reasonable steps to ensure that is followed (e.g. through clear and accessible communication, and systemised inductions, training and monitoring of all staff – including volunteers, students)

Authorise staff device use and determine which roles can take, access and use photos and videos of children (e.g., educators, nominated supervisor, ECT). Ensure that staff's use of devices is being monitored and reviewed and that personal devices are not being used for photographing or videoing children

Ensure that parents are giving informed consent and that photos/videos are only being used by staff for their intended purpose

Ensure families, visitors, third-party professionals are informed of, and following, our rules for photography, videos and personal device use. Assess whether photography or filming by families is appropriate, including for special events or other non-routine situations, putting above all else children's safety, best interests and rights

Ensure our systems are child safe secure and kept-up-to date, and that photos/videos are stored in a way that protects them from misuse, interference and loss, and from unauthorised access, modification or disclosure. Take reasonable steps to destroy or de-identify photos/videos when we no longer need them for purpose they were collected

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

Ensure that our service's governance, management, operations, policies, plans, (including risk management/action plans), systems, practices and procedures for photography and videos are appropriate in practice, best practice, align with the principles/standards for child safe organisations, National Model Code and comply with all relevant legislation



Implement this Photography and Video 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)

Oversee the day-to-day monitoring of device use, ensuring that staff do not have unauthorised personal devices in their possession and that only service- supplied devices are being used to photograph or video children

Ensure families, visitors, third-party professionals are informed of, and following, our rules for photography, videos and personal device use. Assess whether photography or filming by families is appropriate, including for special events or other non-routine situations, putting above all else children's safety, best interests and rights

Notify parents in advance if any professional photographers, or anyone else outside to our service will be taking and storing photos/videos

Ensure that photos/videos are only being taken, used and shared according to their purpose. Get additional written consent for anything that is not covered in the consent form

Support the approved provider to keep our IT systems child safe secure and up-to-date. Store photos/videos in a way that protects them from misuse, interference and loss, and from unauthorised access, modification or disclosure. Take reasonable steps to destroy or de-identify photos/videos when we no longer need them

Support the approved provider to regularly review this policy and related documents, and to notify families of reviews and changes according to legislation and our policies and procedures

Educator / other staff responsibilities (not limited to)

Follow this Photography and Video Policy and other related policies and procedures

Only use service- supplied devices (not personal devices) to capture, transmit or store images of children and only if you are authorised to do so and for an authorised purpose

Do not keep personal devices in your possession or control while caring for/educating children at our service. Do not capture, transmit or store images of children on a personal device

Ensure that children who do not have parental consent are excluded from any individual or group photos/videos

Only share photos/videos taken by our service (including online, on social media, on digital learning apps, or directly with families) if you **have** been authorised to do so by our service and the specific written consent we have been granted by children's parents. Always make sure you have consent from other staff members, families or visitors before sharing any photos/videos of them

Ensure families, visitors, third-party professionals are informed of, and following, our rules for photography, videos and personal device use

Ensure that all photos/videos are appropriate and maintain the privacy and dignity of the children, staff members, families and visitors at our services



Report any breaches or concerns regarding photography/videos/devices to the nominated supervisor. Follow our [Child Protection Policy](#) if there are any concerns about harm or risk of harm to a child and report to the relevant authority in line with our procedures and obligations

Contribute to policy and procedure reviews, risk assessments and plans

Families responsibilities (not limited to)

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

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

Do not take photos or videos at our service unless you have the nominated supervisor or approved provider's permission

Refrain from sharing photos/videos (e.g., on social media) websites, email, messaging apps 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 photographing/videoing your child

Raise any concerns or complaints regarding photography/videos/devices according to our [Complaint Handling Policy and Procedure](#)



13 Appendix B: Photography and Video Consent Form

I consent to the following my child being photographed/videoed by Bacchus Marsh Grammar, Early Learning Centre, Woodlea for the following purposes:

(Please tick which points you give consent for)

- To document and support learning**, including evidence of learning, individualised planning, sharing with parents, reflecting on programs and practices, training, curriculum planning, documenting achievements, demonstrating regulatory compliance. Photos/videos stay within the service’s community, on parent-educator communication platform Xplor (Incident, injury, illness, trauma and Illness form) official staff communication systems, compliance/regulatory reports, in physical photo displays/booklets on display at the service
- To communicate with families and the wider community** about the service, events, activities or other relevant information (but not for marketing purposes). Photos/videos are shared publicly on our website, newsletters, ELC and Bacchus Marsh Grammar School Yearbook and Handbook
- For external marketing/promotion** of the service, including with third party marketing/promotional platforms/agencies in public advertisements, print and online media, brochures, newsletters, social media, on our website
- Professional photography/videos**, including group/class photos and special events

I understand that:

- I can withdraw my consent at any time by advising the nominated supervisor in writing
- Bacchus Marsh Grammar, Early Learning Centre, Woodlea owns copyright of the photographs/videos it captures. This means that it can use the photos/videos in the way specified in this form without notifying, acknowledging or compensating you or your child
- Except in the case of external photographers, photos/videos will be taken and used by authorised staff only
- My child will be identified by their first name and surname initial only in photos/videos
- Photographs/videos will be handled according to the relevant privacy and Child Safety laws
- Photographs/videos will be stored securely, and access will be restricted to authorised individuals only
- Photos/videos will be retained only for as long as they are needed for their intended purpose, after which they will be destroyed/deleted in a secure manner
- I need permission to take any photos or videos at the service
- I cannot share photos/videos (e.g., on social media) if the photo/video also includes identifiable characteristics of another child or adult at the service, unless I have the relevant consent

Child’s full name:	
Parent 1 Name:	Parent 2 Name:
Parent 1 Signature:	Parent 2 Signature:
Date:	Date:



14 Appendix C

RESOURCE: Summary of Photography and Video Policy for families

How we use photos and videos at our service

Your child's safety, privacy and dignity are our top priority

When and why we take photos/videos

We may take photos, videos or audio of your child to:

- Document their learning and development
- Share learning experiences with you
- Promote the service (e.g. newsletters, displays)
- Support educator training or child development programs

We only do this with your written consent

What we never do

- We never take, use or share photos or videos without permission
- We never use personal phones or devices to capture images or videos of children
- We never take photos or videos in private areas (e.g. bathrooms or nappy change rooms)

How we keep photos/videos safe

- All photos/videos are stored securely and can only be accessed by authorised staff
- We do not allow staff to take or store images on their personal devices
- When photos/videos are no longer needed, we delete them securely

Your child's rights

- We check in with your child and respect if they say "no" to a photo or video
- We make sure photos show children in a respectful and appropriate way

Your rights as a parent

- You can say "yes" or "no" to different types of photo/video use
- You can change or withdraw your consent at any time
- You can ask us to delete an image or video of your child (where legally appropriate)

families and visitors

- Please respect our strict rules about photography at our service and don't take photos of anyone other than your own child or family at our service unless you have the approved provider or nominated supervisor's permission
- Do not share photos/videos that include identifiable characteristics of people at our service unless you have their permission or, in the case of a child, their parent's permission

Want to know more?

Ask us for a copy of our [Photography and Video Policy](#) or speak to the nominated supervisor at any time.
