

## Electronic communication with children and young people procedure

### 1. Purpose

The use of electronic communication such as phone, email, SMS, gaming accounts, social media and video calling provides different platforms for people to interact with each other. Children and young people can be especially vulnerable to harm caused by the inappropriate or unsafe use of electronic communication. Uniting is committed to working within the National Principles for Child Safe Organisations and supporting its workforce to interact with children and young people in a positive and appropriate way, ensuring the safety of children and young people is upheld.

This purpose of this procedure is to outline the expectations for Uniting representatives in electronic communication with children and young people.

This procedure should be read in conjunction with Uniting’s [Child Safety Policy](#), [Child Safety Code of Conduct](#), [Code of Conduct](#) and [Consent Guidelines](#), as part of Uniting’s response to keeping children and young people safe from all forms of abuse and harm.

Ensuring the safety and wellbeing of children and young people is an organisation wide responsibility – any breaches of the requirements outlined in this procedure are to be reported to and addressed by senior management. Any representatives found to be in breach of the requirements outlined in this procedure, may be subject to disciplinary procedures as appropriate at Uniting.

Noting that the relationship between some Uniting representatives (i.e., those living with a child or young person such as a foster carer, kinship carer, adoption/permanent carer, etc.) may differ to those in professional working relationships, the following expectations apply.

### 2. Procedure

#### 2.1 Gaining consent for electronic communication with child or young person

- Whenever possible and safe to do so, consent from the parent/carer/guardian or other authorised representative and the child/young person must be sought before communicating with a child/young person via electronic communication.

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Permission should be obtained at intake to the Uniting service as part of recording consent.

- Consent from a parent/carer/guardian or other authorised representative may not be required when a young person is deemed to be a mature minor (please refer to the Uniting’s [Code of Conduct](#) for more information).
- If you have concerns that seeking parental or guardian consent for and/or inclusion in electronic communications would compromise the safety of a child/young person, discuss these concerns with your direct line manager to determine how to best proceed with service provision (e.g., can the service be offered without the use of electronic communication).

## 2.2 General principles for electronic communication with children and young people

All Electronic communication between a Uniting representative and a child/young person should only occur via an official Uniting device and/or account/channels.

In emergency situations only, a non-official Uniting device can be used as part of service provision (e.g., a personal mobile phone device), where pre-approval for communication with the child/young person on this device has been provided by your direct line manager. Pre-approval, as well as all communication that occurs on a non-official Uniting device is to be recorded in the consumer file.

### Uniting representatives must **not**:

- Engage in closed conversations with a child/young person electronically. At least one other third-party adult (parent/another Uniting representative) is to be included, unless:
  1. The young person is a recipient of the service in their own right without parental/guardian consent required to participate (e.g., youth homelessness services, Orange Door, Young Carer services). This includes young people assessed as mature minors or;
  2. Parental/guardian consent has been attained through the [Child/Young Person Contact Authority Form](#), or;
  3. Where inclusion of a third-party for electronic communications may not be practical, safe or consented to by the child/young person. This needs to be discussed and managed with your direct line manager. See **Section 2.9** for more information.
- Communicate with a child/young person on a non-official Uniting device (unless you have received approval from your line manager to do so).
- Knowingly engage in any personal communication with a child/young person outside the scope of their work role via any communication medium.
- Provide their own personal contact details including mobile number, email address, gaming identification/account details or social media account details to child/young person.

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- Permit access by a child/young person to their personal computer, mobile phone, online gaming accounts or other personal devices and/or accounts.
- Send any electronic communication that attempts to hide the identity of the sender or represent the sender as someone else.
- Knowingly transmit, retrieve or store (except when the information is required as evidence, which must be retained) any communication that is:
  - discriminatory or harassing
  - derogatory to any individual or group
  - obscene, sexually explicit or pornographic
  - defamatory or threatening
  - in breach of an individual’s right to privacy
  - in violation of any license governing the use of software
  - could be perceived as grooming behaviour
  - for any purpose that is illegal, or in contradiction to the Uniting [Code of Conduct](#) and [Child Safety Code of Conduct](#).
- Engage in behaviour that contradicts Uniting’s [Code of Conduct](#) and **Child Safety Code of Conduct**, including:
  - Not enter into any social, sexual or intimate contact or relationship with any current or past consumers; particularly if the past consumer might re-enter the service, has been disengaged for less than 6 months, or was known to the service whilst a minor;
  - Ensure any outside of work contact with child or young person is, wherever possible, discussed beforehand with the Representatives manager to ensure the contact is transparent and managed within the spirit of the Code of Conduct;
  - Not contact children or young people outside of designated work hours (e.g., after hours, weekends, sick leave) unless required by their formal duties or approved by their direct manager;
  - Not have contact with, engage with or discuss children or young people outside of any official Uniting social media networks (e.g., Facebook, Twitter, etc.).

### 2.3 Gaming accounts

- All staff using gaming accounts with children/young people as part of service provision must use an official Uniting device and Uniting account. Under no circumstances should a Uniting representative be using a personal or private gaming account or ID to communicate with a child/young person.
- Game accounts utilised as part of service provision (e.g., Online gaming accounts, devices such as PlayStation, Xbox, Nintendo devices etc.) must be registered Uniting only accounts and able to be reviewed/accessed by direct line manager at any time.
- Electronic communication that occurs with a child/young person, via a gaming console, needs to be transparent and approved by direct line manager.

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## 2.4 Telephone

- Phone calls must be made on a Uniting phone, not the representative's personal device, unless it is a program requirement and is authorised by direct line manager and authorisation is documented in the case file. Note: This does not apply to Out of Home Care and Kinship care arrangements.
- Whenever possible Uniting representatives must ensure that the parents/carers/guardians are aware of the phone call, by seeking their approval before making contact with the child/young person.
- There must be an established need for a call to the child/young person and the purpose of the call must be made clear to all parties and recorded in the consumer file. Every effort must be made to conduct and resolve the call, in accordance with its purpose.

## 2.5 Email

- There must be an established need for Uniting representatives to email children/young people i.e., details about program or seeking formal feedback.
- Complex matters involving the child/young person must not be discussed with a child/young person in email and should be redirected to a face-to-face or virtual (Microsoft Teams) meeting with the Uniting representative and the child/young person and their parent/carer/guardian as appropriate.
- All emails to children/young people must be from a Uniting email address, not the representative's personal email address or any other address.
- All email to children/young people must have a third-party adult included (e.g., parent and/or another Uniting representative).
- Emails to children/young people are not to be deleted, thereby keeping record in the software system, until they have been documented on the consumer file.
- Pictures, including photos, should not be forwarded via email or texted to children/young people unless relevant to service delivery.
- All records of email communication with a child/young person must be kept. This includes the content, time, date and the recipient/sender. All email communication must be recorded in the consumer file.

## 2.6 SMS

- SMS must be sent from a Uniting phone, not the representative's personal device.
- In emergency situations only, a non-official Uniting phone can be used as part of service provision, where pre-approval for communication with the child/young person on this device has been provided by your direct line manager. Pre-approval, as well as all communication that occurs on a non-official Uniting device is to be recorded in the consumer file.
- There must be an established need for SMS communication sent to the child/young person e.g., details about program or seeking formal feedback.
- All SMS communication to children/young people must have a third-party adult included (e.g., parent and/or another Uniting representative) unless the

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exceptions in **Section 2.2** apply. If a response is received only by the representative, further communication should include a third party.

- All records of SMS communication with a child/young person must be kept until they have been documented on the consumer file. This includes the content, time, date and the recipient/sender. All SMS communication must be recorded in the consumer file.

## 2.7 Social media

The following protocols apply to the use of social media in communicating with children and young people:

- Uniting representative must not use social media accounts to communicate with a child or young person, outside of any Uniting official social media networks (e.g., Facebook, Twitter, Snapchat, TikTok, Be Real etc.). Refer to Uniting’s [Code of Conduct](#) and [Child Safety Code of Conduct](#).
- The Uniting representative must ensure there is a valid reason for the communication to a child/young person via social media prior to any such communication. This should be Uniting program or service related and approved by the direct line manager.
- Messaging groups of or individual children/young people via social media must be in line with Uniting social media standards. Refer to [Social Media Procedure](#).
- Uniting representatives must not connect/engage with consumers that are children/young people via the representatives’ personal social media account/MS.
- All social media communication with children/young people must take place on a Uniting approved account. Accounts must be managed by more than one person and must allow access and review from direct line supervisor at any time. have a third-party adult included (e.g., parent and/or another Uniting representative) – no closed conversations between the Uniting representative and child/young person can must occur.
- Uniting representatives must not give out any personal details of children/young person when communicating on social media (e.g., name of school, email address, home address, etc.).
- Uniting social media platforms that engage with children/young people will have a moderator appointed to ensure all content is appropriate and doesn’t breach policy, laws or individual privacy.
- Inappropriate or potentially offensive or harmful comments on public/group Uniting forums will be removed (e.g., social media group chats used as part of program/service delivery).
- If the use of any other social media platform not described in this procedure is proposed by a child/young person, the Uniting representative should report this to their direct line manager for further guidance on how to proceed with this engagement.

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- There are numerous social media tools currently in use including many not supported by Uniting; these are changing and will grow over the years to come and cannot all be listed in this policy. The following protocols apply:
  - Uniting representatives must not use any platform that allows for anonymity (e.g., Formspring) to communicate with children/young people. These applications can make children/young people vulnerable to cyber-bullying.
  - Uniting representatives must not use applications where no records of communication are retained (e.g., Snapchat) to communicate with children/young people. As messages and photos are only available for set time after viewing, children/young people are vulnerable to cyberbullying and sending/receiving of inappropriate images.
  - Uniting representatives must not seek out children/young people to be friends on their personal social media accounts (e.g., Facebook).
  - Posts on other people’s profile or comments on their posts must be general and kept to a minimum. These posts must be kept public so that other people can see what’s going on.
  - If using messenger platforms (e.g., Facebook Messenger), no private messages are to be sent. If messages are sent, they must be Uniting program or service related and have at least one other Uniting representative or parent/guardian in the conversation.
  - If a representative receives a message via a private message (e.g., Facebook Messenger), they must document the message in the consumer file and move the conversation to either face to face or telephone or include another person in the conversation as noted above.

## 2.8 Teleconference/video calling

- Uniting representatives must ensure there is a valid reason for communication with a child/young person via video call or teleconference (e.g., FaceTime) prior to any such communication taking place.
- Uniting representatives will use Microsoft Teams as the online platform for teleconferencing with consumers. Refer to Uniting’s [Teleconferencing guide for working with consumers and families](#).
- Zoom, or other online platforms may be used if Teams is not available or not appropriate for the consumer with consultation and pre-approval provided by your direct line manager.
- In line with Uniting’s **Teleconferencing guide for working with consumers and families** children/young should be given the choice about whether a teleconference or a face-to-face service will meet their needs.
- All video communication with children/young people must have a third-party adult included on or off camera (e.g., parent and/or another Uniting

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- representative), unless it is a specific program requirement authorised by program manager or living with a child/young person.
- If you have concerns that seeking parental or guardian consent for and/or inclusion in video conferencing would compromise the safety of a child or young person, discuss these concerns with your direct line manager to determine how to best proceed with service provision. This includes, where a young person is deemed a mature minor.
  - Refer to Uniting’s **Teleconferencing guide for working with consumers and families** for privacy and confidentiality requirements when using this platform to communicate with children/young people, including prohibition of video recording and screenshots.
  - Practice expectations for teleconferencing appointments with a child or young person includes:
    - The Uniting staff member conducts the video call from a private Uniting workspace (e.g., consult room). Where a video call with a child or young person is part of the staff members WFH arrangement, the call will be conducted in a suitable home office environment (e.g., not in a bedroom, or other intimate setting).
    - The Uniting staff member will communicate a preferred preference for the video call to not be conducted in the child or young person’s bedroom, or other intimate setting.
    - The Uniting staff member will ensure their video/camera is always ‘on’.
    - Record any communication that occurs in the chat function in the client file.
    - Notify direct line manager if any concerns around behaviour or communication from young person occurs during video call.
  - Details of any video calls or teleconferencing should be documented in the consumer file.

## 2.9 Where inclusion of a third-party contact is not practical, safe or impacts therapeutic relationship

There are some circumstances where the inclusion of third-party in electronic communication with children/young people may not be practical, safe or conducive to service delivery such as:

1. The young person is a recipient of the service in their own right, without parental/guardian consent required to participate (e.g., youth homelessness services, Orange Door, Young Carer services). This includes young people assessed as mature minors, or;
2. Parental/guardian consent has been attained through the **Child/Young Person Contact Authority Form**, or;

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3. Where inclusion of a third-party for electronic communications may not be practical, safe or consented to by the child/young person, or;
4. Inclusion of a third-party would impact the therapeutic relationship.

In these instances, a Uniting representative must:

- Notify their direct line manager
- Use an official Uniting device for all communication
- Document all electronic communication in the consumer file
- Regarding SMS, email and other written forms of electronic communication, all records of this communication must be kept and not deleted from the device, until they are documented in the consumer file.

Where a child/young person does not approve or consent to a third party being included in electronic communications with them, the following steps should be taken, in consultation with the direct line manager:

- Refer to Uniting’s [Consent Guidelines](#), to determine consent requirements, including where a young person may be considered a mature minor.
- Determine if the child or young person may consider another trusted/known worker from Uniting to act as the third-party.
- Is there another verified adult can be utilised as the third-party contact e.g., a school counsellor, aunt/uncle etc. (the Uniting representative will need to verify this is a person over the age of 18 years and assess the safety of including this person in the communication)? Uniting’s [Advocate Support Person Agreement](#) to be used in this instance.
- Consider that electronic means are not used for communication with the child/young person e.g., service only occurs face-to-face, appointments are only recorded on an appointment card not via SMS etc.
- Document the outcome of this decision in the consumer file.

### 3. Definitions

Term	Meaning
Child or young person	Includes all children and young people under the age of 18 years receiving Uniting services
Official Uniting Device or Account	Includes all Uniting owned devices and accounts, where electronic communication may occur. Including: <ul style="list-style-type: none"> <li>- Landline telephones</li> <li>- Mobile phones</li> <li>- Tablets</li> <li>- Laptops</li> <li>- Computers</li> <li>- Game consoles</li> <li>- Email accounts</li> </ul>

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Term	Meaning
	<ul style="list-style-type: none"> <li>- Telephone numbers/accounts</li> <li>- Gaming IDs or accounts</li> <li>- Social media platforms/accounts (e.g., Uniting Facebook or twitter accounts)</li> </ul>
Social media	Websites and applications that enable users to create and share content and to participate in social networking. This includes, but is not limited to websites such as Facebook, Twitter, YouTube, Flickr, or any other web-based media which allows for public comment and sharing of information
SMS	Stands for short message service and is the text messaging service component of mobile phone systems.
Video conferencing	Using a live, visual connection between two or more people for the purpose of communication.
Facetime	An application for mobile communications devices that enable people to speak to each other whilst simultaneously being able to see each other on video display.

## 4. Legislation/Regulations

National Principles for Child Safe Organisations  
 Victorian Child Safe Standards  
 Reportable Conduct Scheme (Victoria)  
 Australian Privacy Principles

*Privacy Act 1988 (Cth)*

*Privacy Regulation 2013 (Cth)*

*Child Wellbeing and Safety Act 2005 (Vic)*

*Child Wellbeing and Safety Regulations (Vic)*

*Children, Youth and Families Regulations 2017 (Vic)*

*Crimes Act 1958 (Vic)*

*Commission for Children and Young People Act 2012 (Vic)*

*Children, Youth and Families Act 2005 (Vic)*

*Children, Young Persons and Their Families Act 1997 (Tas)*

*Criminal Code Act 1924 (Tas)*

*Status of Children Act 1974 (Tas)*

*Commissioner for Children and Young People Act 2016 (Tas)*

## 5. Related Documents

[Child Safety Commitment Statement](#)

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[Diversity Statement](#)

Child Safety Policy

Code of Conduct

Child Safety Code of Conduct

Consent Guidelines

Duty of Care Policy

Victorian Reportable Conduct Scheme Procedure

Reporting Allegations of Child Abuse Procedure

Acceptable Use Policy

Privacy Policy

Social Media Procedure

Image & Story Consent form

Teleconferencing guide for working with consumers and families

Individual advocacy for consumers guidelines

Advocate Support Person Agreement

Child/Young Person Contact Authority Form

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