PROMPT WORKS STUDIO

Chaos to calm, built to be yours.

Kestrel Street Kids Club

AI use policy

Prepared for the Owner

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> **A made-up example.** Kestrel Street Kids Club and its people aren't real. The software, its terms and the rules in it are real, as read on the dates shown.

PROMPT WORKS STUDIO

Part 1: How this policy was built

This is your final policy, after our call on Thursday 5 November. Part 1 records what I found and what you decided, so when the Owner reviews it next May, the reasons behind each rule are here. Part 2 is the policy your team signs.

It was written with AI (Claude) and checked by me. It isn't legal advice, or advice about your obligations under the National Law.

What went into it

Step	When	What it gave the policy
Workflow Audit, a full day on site	Wednesday 14 October	The four admin jobs that take 16 hours a week, the AI already in use, and the fix-now list
Staff survey, anonymous, all 8 staff besides the Owner answered	Thursday 22 to Wednesday 28 October	Which tools your team uses, what goes into them, and what they'd like help with
Interview with the Owner and the Coordinator, about an hour	Thursday 29 October	How each job runs, who checks what, and your choices on the hard questions
Each tool's terms read on the makers' own pages	Before the call, and again on Sunday 8 November for this copy	Which tools can be on the register (the appendix)
Draft, then our 30-minute call	Tuesday 3 November, Thursday 5 November	Your decisions below, and one round of changes

What I found, and what the policy does about it

What I found	What the policy does	Section
Incident notes with children's first names in them were being tidied in a free chatbot on a personal phone, at the service	Free and personal AI accounts are out, personal phones stay off the floor, and educators write incident records with no AI	4, 6, 7
The digital technologies policy and the privacy policy don't mention AI, and ACECQA says the first should	AI goes into the digital technologies policy and this policy sits inside it. The privacy policy gets a line on AI	11, 15, 17
About 16 hours a week go on the roll, rosters, incident records and policies	Claude is approved for a short list of admin jobs, with children's details kept out and a named person checking each	4, 5
No one was named for AI and there was no list of tools	The Coordinator is the AI lead and keeps the register. The Owner is responsible	3, 4
Three free Gmail accounts, one shared service password, two-step sign-in off on two of them, and a recovery phone that belongs to a past coordinator	One login a person. The Owner ends the shared password and changes it that day, two-step sign-in goes on, and the service holds the recovery details. The two Claude seats go on addresses at the service's own domain	4, 6
Good supervision depends partly on rosters, and supervision is one of the most commonly breached parts of the law	Claude drafts a roster from booked numbers and staff availability only. The Coordinator rebuilds it and signs off every roster	4, 5, 8
Payroll and accounts run in Xero, which has AI of its own	Xero's AI is out. Payroll holds staff tax file numbers and no job needs it	2, 4

What I found	What the policy does	Section
Nobody had been shown how to use AI safely	A short session before anyone uses a tool, and again each year	10
Your busiest times are the start of each term and the fortnight before each vacation care program	No new tool or new use is added in those times	3

What your team said

All 8 staff besides you answered the survey. With six or more, you see the answers as written, and you did.

They add up to this. Two had used a free chatbot on their own phone for work wording. Most want help with messages to families, the Master Roll and rosters, and several asked whether AI could write learning stories. None had been shown what's allowed.

Your decisions

You made these on our call. Where you went a different way from my recommendation, the reason's recorded.

Question	My recommendation, and why	What you decided
What never goes into AI	A child's name, photo, health, family or enrolment details, who collects them, and anything about an allegation. ACECQA says to leave children's personal information out	As recommended, with bus runs added
What AI is never used for	Notifications, allegations, first aid, the final roster, session reports and learning documentation	As recommended
Incident records	Let the Coordinator use Claude to word minor incidents, with nothing that identifies the child. It's in the Audit's map	**Changed:** no AI in incident records. Educators write them from the one-page guide. At your size, even a minor account can point to one child, and the record is kept until the child is 25
Messages to families	Yes, Claude drafts notices, vacation care programs and reminders, and the Owner or Coordinator reads each one first	As recommended
The weekly roll gap list	Yes, from a roll export with the names, birth dates and health details removed. If they can't be removed, the closing educator's checklist does the job	As recommended. A roll showing any of those never goes in
Who gets a Claude seat	The Owner and the Coordinator, on the Team plan, one login each. Educators don't need one	As recommended
Where AI work is recorded	A line in the Master Roll notes whenever Claude helped fix a gap	**Changed:** one log sheet on the shared drive. Xplor's records are Child Care Subsidy records, kept for 7 years, and the log should hold nothing about a child
Children using AI at the service	No. You have no program for it	As recommended

Question	My recommendation, and why	What you decided
Who's the AI lead	The Coordinator, who runs rosters	As recommended
The privacy policy's AI line	Add it now, naming Claude's draft rosters from staff availability. You're covered by the Privacy Act, so the 10 December rule applies to you	As recommended. Your adviser worded the line
Email addresses for the Claude seats	Anthropic's pages say a Team invite must use one of the service's own allowed domains, and Gmail can't be one. So the two seats go on addresses at the service's own domain	**Changed from the Audit:** that reason. The Audit has the two seats but not the addresses. The other mail accounts stay as they are until the Owner decides on a business mail plan
Xero's AI	Not approved. JAX's own page says it doesn't train, but payroll holds staff tax file numbers and no job needs it	As recommended
Breaking the policy, and owning up	Like any other breach of your rules. Owning up isn't punished	As recommended

Rules for your field

- **ACECQA**, AI in education and care services, 28 September 2025. Ground rules for staff and families, AI in the digital technologies policy, and no personal information about children in AI tools. Sections 7, 11 and 17.
- **Personal devices and photos.** From 27 February 2026 the law limits personal devices and how images of children are captured, stored and sent. Sections 6 and 7.
- **The Queensland regulator.** Policies current, tailored, reviewed after incidents, and open to all staff and families. Its policies page says nothing on AI, and more amendments are expected in 2027. Sections 17 and 18.
- **Child safety.** Every educator is a mandatory reporter, serious matters go to the regulator on short clocks, and the Reportable Conduct Scheme began on 1 July 2026. People make those calls. Section 8.
- **The Privacy Act.** The OAIC lists child care centres among health service providers, which the Act covers whatever their turnover. A small business with a turnover of $3 million or less mostly isn't covered, but being a health service provider is what brings you in. Your adviser confirmed in October 2026 that an OSHC service counts. Section 15 has the data breach steps. From 10 December 2026, a business under the Act that uses a program in decisions that could significantly affect someone must say so in its privacy policy. You're covered, so your privacy policy line names the draft rosters.
- **The Fair Work Commission.** You have staff, so section 14 covers its AI rule, in force since 20 October 2026.

What's not in it, and why

- **AI agents and AI note-takers.** You use none, so the register says they aren't approved.
- **Copyright** in AI-made work. You don't use AI for pictures or marketing.

If that changes, my emails at 3, 6 and 12 months cover it. I can also make changes at a yearly review for $350 inc GST.

Part 2: The policy

AI use policy, Kestrel Street Kids Club

Policy owner	Owner (approved provider)
AI lead	Coordinator (nominated supervisor)
Version	1.0
Adopted	Friday 6 November 2026
Next review	May 2027
Current copy	The shared drive's Policies folder, and the policies folder families can ask to see. A printed copy may be out of date, so check the version first
Goes with	Our policy on the safe use of digital technologies and online environments, our privacy policy, our enrolment form, and our family newsletter

This policy was drafted with AI (Claude) by Prompt Works Studio, then checked and approved by Chad Maxwell. Kestrel Street Kids Club has read it, changed it to fit and adopted it as its own. It isn't legal advice.

1. Why we have this policy

About 140 families trust us with their children before school, after school and in the holidays. We use AI to take some of the admin off our plate, like the Master Roll, rosters and notices, so there's more time on the floor with the children. This policy sets out how we use it so the children stay safe and families' information stays private.

2. Who it covers, and what counts as AI

It covers everyone who works for us or with us, including casual and relief staff and anyone who helps with vacation care, on any device used for our work. Personal phones can't be used or carried while working directly with children (section 6).

It also covers anyone we bring in to help, like an IT provider. They use AI on our information only as the register allows, with the Owner's written yes.

AI means any tool that writes, sums up, suggests or decides things for us. That includes chatbots like Claude, and any AI inside software we already use, such as Xplor, Xero and our Gmail accounts. It doesn't include a spreadsheet formula, Xplor's cut-off times, or the reports Xplor already makes.

3. Who's in charge

- **The Coordinator is our AI lead.** They keep the AI register in section 4, show new staff how to use our tools, answer questions, and are who you tell when something goes wrong.
- **The Owner is responsible** for everything we send out and every record we keep, however it was made, and signs off this policy.
- **Each term the Owner looks at three pieces of AI work** from the log and checks they were recorded and checked as this policy says.
- **No new tool or new use goes on the register in the first fortnight of a term, or in the fortnight before a vacation care program.** A request then waits for the middle of the term.

4. Our AI register

We only use the tools on this list, on the service's own accounts, for the jobs listed. A tool goes on the list only after the AI lead has read its terms and they say our data won't be used to train it, and the Owner has agreed. Want a new tool, or a new use for one on the list? Ask the AI lead.

The register can change between reviews without the policy being adopted again. Every change goes on the review record, and the AI lead tells the team before anyone uses the change.

Tool	Account	Approved for	Children's or families' details?	Approved
Claude	The service's Team plan, two seats: the Owner and the Coordinator, one login each, on addresses at the service's own domain. Nobody uses thumbs up or down on a reply, because feedback can be used for training	Messages to families (notices, vacation care programs, reminders, the 14-day notice). The weekly roll gap list. A draft roster from booked numbers and the staff list. A policy change, its plain-English summary, and a translation an educator who reads that language checks	No. Never a child's or family's name, photo, health, family or enrolment details (section 7). The roster job takes staff first names, availability and qualifications only, and nothing on performance or personal circumstances. Anything with personal information is run in Claude chat by the Owner or the Coordinator, never on a schedule	6 November 2026, by the Owner

Not approved:

- Xero's AI, JAX and suggested coding. JAX's page says it doesn't train on your data, but payroll holds staff tax file numbers and no job needs it. Xero's terms don't say whether suggested coding trains (appendix).
- Any AI feature in Xplor, or a partner tool listed on its site such as Safe-Sight.AI. The Xplor page read describes no AI feature of Xplor's own and says nothing on training (appendix).
- Any personal or free AI account, including free ChatGPT and the free Gemini in our Gmail accounts. ChatGPT's terms let it train on what goes in, and Gemini's say activity is kept by default (appendix).
- Deputy and Deputy AI. Deputy says it doesn't train on customer data, but no job needs it, and the pages read don't say where it keeps staff details (appendix).
- OWNA AI. It would mean leaving Xplor, and its page says AI is both "on by default" and "opt-in" (appendix).
- The Desktop's PolicyDesk AI. The page read says never to put personal information in, and says nothing on training (appendix).
- AI note-takers, or anything that records or transcribes children, calls or meetings.
- AI agents that send, book, pay or change things without a person each time.
- AI toys, and children using AI tools at the service.
- Any tool that would make, or help make, a decision about a child, a family or a staff member. That needs a line in our privacy policy first (section 15). The one approved use that touches staff is Claude's draft roster, from availability and qualifications only. The Coordinator rebuilds it and decides every shift, and our privacy policy names it because we're covered.

What each tool's terms say about training is in the appendix.

5. How AI is used in our work

Every job has a person who checks the AI's work before it's used. Some steps stay with people for good (section 8).

Job	Where AI helps	Who checks, and against what
CCS enrolments and weekly reports	The weekly gap list: from a roll export with no names, dates of birth or health details, Claude lists booked children who didn't arrive, missing sign-in or sign-out times, and absences not marked, by row	The Owner checks each gap in Xplor and fixes it there. The Owner sends the session reports from Xplor
CCS enrolments and weekly reports	Reminders to families who haven't confirmed their enrolment, drafted from a template with no family name in it	The Owner adds the name in Xplor and reads each one before it goes
Rosters that meet ratios	A draft roster from booked numbers for each session and the staff list, flagging any session short on ratio or qualifications	The Coordinator checks ratios and qualifications for every session and signs off the roster
Incident records	None. Educators write each record in their own words from the one-page guide	The Coordinator reads every record against what happened, as now
Messages to families	Drafts of notices, vacation care programs and reminders	The Owner or the Coordinator reads each one before it goes from Xplor
Keeping policies up to date	A draft change from a new rule or an incident review, a plain-English summary, and a translated version	The Owner checks every change against the source before it's adopted. An educator who reads the language checks any translation

Right and wrong, in our work

Right. It's Monday morning. The Coordinator takes the names, birth dates and health details out of last week's roll export from Xplor, and the Owner reads it over. In Claude chat the Owner asks for the gaps by row: three missing sign-outs and two absences not marked. They fix each in Xplor, add a line to the log sheet, and send the session reports well inside the 14 days.

Wrong. An educator on the after school session pastes an incident note, with a child's first name in it, into a free chatbot on their own phone to tidy the wording. That's four things the policy rules out: a personal phone on the floor, a free AI account, a child's name in AI, and AI in an incident record. What to do instead: write the record yourself from the one-page guide, hand it to the Coordinator, and tell the AI lead. You won't be in trouble (section 16).

Wrong. It's the fortnight before vacation care, and the Coordinator asks Claude to plan an excursion, pasting in the children's names, allergies and who collects them. Names and health details never go in, and excursion plans aren't a job on the register, which can't change in that fortnight. What to do instead: write the plan and its risk assessment by hand, keep the allergy list in Xplor and on paper for the educators on the excursion, and put the idea to the AI lead for the middle of the term.

6. Personal accounts and devices

Don't use a personal AI account for our work, on your phone or anywhere else. That includes the free version of a tool we pay for. Personal phones, watches and cameras can't be used or carried while working directly with children, except in the limited cases the law allows, so AI is never opened on one on the floor. Claude is used on a service computer, in the office. If you've got children's details in a personal account now, tell the AI lead. You won't be in trouble (section 16).

Every account we use for service work has one login a person, two-step sign-in on, and recovery details the service holds. The Owner ended the shared service password on Friday 6 November and changed it that day. When someone leaves, the Owner changes any password they knew that day.

7. What goes in, and what never does

- Our own templates, public information and general questions can go into the register's tool.
- **Never put in:** a child's name, nickname, age, class, photo or video, health, allergy, disability, behaviour or family details, custody or court information, who collects them, bus runs, or enrolment and CCS details. Never a family's names, addresses, phone numbers or bank details.
- **Never put in, in any form:** anything about an allegation of abuse, a notification to the regulator or the Queensland Family and Child Commission, or a report to Child Safety. Not even with the name taken out.
- **Staff:** first names, availability and qualifications only, for the roster. Never pay, leave reasons, health or performance details.
- **The roll:** the Coordinator takes the names, dates of birth and health details out of the export before it goes in. If any are left, it doesn't go in.
- If something goes in by mistake, tell the AI lead the same day.

8. What we never use AI for

- **Deciding whether something is notified, and anything about an allegation of abuse.** Serious incidents and abuse allegations go to the regulator within 24 hours, other risks within 7 days, some matters to the Queensland Family and Child Commission, and every educator is a mandatory reporter to Child Safety. People make those calls.
- **First aid, and the conversation with a family.** AI can't care for a child, and the call or the talk at pick-up stays with us.
- **The final roster, and changes on the day.** Good supervision depends partly on them, and the Coordinator signs off every roster.
- **Sending the session report.** It has to be accurate and complete, and that's on the approved provider.
- **Learning stories, observations and any analysis of a child's progress.** ACECQA says AI can never replace an educator's knowledge of the child.
- **Photos and video of children, or anything meant to mislead anyone.**

9. Checking AI work

- The person who checks must know the work well enough to spot a mistake. Section 5 says who.
- Check names, numbers, dates and ratios against the source: Xplor, the booked numbers, the staff list or the policy. AI can make things up that look right.
- Don't use AI to answer a question you couldn't check yourself. If you're not sure an answer's right, don't use it. Ask.

10. Training

- Before anyone uses a tool on the register, the AI lead shows them how, what it's approved for, and this policy, and they sign the sign-off page. All other staff, casual and relief included, are shown the policy at induction and sign too.
- Each year, in the middle of a term, the team goes over this policy again, with any register change. The AI lead keeps a list of who's been shown what, and when.

11. Telling our families

- ACECQA asks us to set ground rules for AI and talk them through with families. Our adviser worded a line for our enrolment form and our digital technologies policy saying we use AI for admin only, and that nothing about a child goes into it. A newsletter on Monday 9 November 2026 tells existing families, and the line starts 14 days on, on Monday 23 November.
- Nothing about a child goes into AI, so we tell families and don't ask. If that ever changes, we ask for each family's written OK first.
- Our privacy policy says we use AI tools, which kinds of information go into them, and that some may be processed overseas. Our adviser worded it, and it names Claude's draft rosters from staff availability.
- If a family asks how AI was used on their child's records or messages, we tell them.

12. Keeping a record

When AI helps with a job in section 5, add a line to the log sheet on the shared drive: the date, the tool, what it did, and who checked it. Never put a child's or family's details in the log. It takes a line, and it's how the Owner's term review in section 3 works.

13. Fake voices and messages

AI can copy a voice or a face. Before we pay anything, change bank details for us, change who collects a child, or give anyone access to our systems, we call back on a number we already have in Xplor or on file. That goes even when the request seems to come from the Owner, or from a parent we know well. A child isn't released to anyone not on their authorised list until a call to the family on that number confirms it.

14. Fair Work Commission documents

If AI helps write anything for a Fair Work Commission case, the document says AI was used and how, and a person checks it and says they have. Using AI only for spelling, grammar or layout doesn't count. A witness statement is in the witness's own words. Other people's personal details and confidential case information don't go into AI for it at all. The Commission counts paid Claude as public AI, so that covers our tool.

15. Privacy and data breaches

- We're covered by the Privacy Act. The OAIC lists child care centres among health service providers, and a health service provider is covered whatever its turnover. Our adviser confirmed in October 2026 that an OSHC service counts. That's why a turnover of $3 million or less doesn't take us out.
- If personal information goes somewhere it shouldn't, through AI or anything else, tell the AI lead the same day. The AI lead and the Owner act straight away to contain it.
- The Owner then works out, within 30 days, whether it's likely to cause someone serious harm. If it is, and we can't stop that harm, we tell the people affected and the OAIC, as the Privacy Act requires.
- Before any tool would make, or help make, a decision about a person, our privacy policy has to say so. That rule applies from 10 December 2026. None of our approved uses decides anything about a child or family. The one that touches staff is the draft roster, and our privacy policy names it.

16. When something goes wrong

- Tell the AI lead the same day if a child's or family's information went somewhere it shouldn't, AI work went out with a mistake in it, or a tool did something unexpected.
- If a tool is down, we carry on by hand, with the close-of-session checklist and the roster template.
- A matter about a child's safety or an allegation goes straight to the Owner and the Coordinator, with no AI in it (section 8).
- Breaking this policy is handled like any other breach of our rules. Owning up to a mistake, or to AI you've already been using, won't get you in trouble. We'd rather know.

17. Our duties as an approved provider

- ACECQA says AI belongs in our policy on the safe use of digital technologies and online environments. This policy is part of it, and we change that policy to say so. We talk the ground rules through with staff and families (sections 10 and 11).
- Our policies are current, suit our service, and are open to every staff member and family, translated where an educator needs it. We review a policy after an incident or complaint.
- Families get at least 14 days' notice of this policy, and of any future change that could affect fees or how care is given or used.
- Supervision comes first. AI never replaces a person on the floor, and never touches a photo of a child.

18. Reviewing this policy

The Owner reviews this policy each May, in the middle of a term, and sooner if we take on a new tool, something goes wrong, or the law or guidance changes, including the amendments expected in 2027. Every review goes on the review record, even when nothing changes. When the policy changes, everyone signs a fresh sign-off page.

Review record

Fill in a row at every review, and whenever the policy or the AI register changes. The AI lead keeps this page with the policy.

Date	What was reviewed or changed	Why	Reviewed by	Team signed again?
6 November 2026	First adopted	Written after the Workflow Audit and the policy interview	Owner	Yes, all nine

Sign-off

Everyone who works for us signs this page: the team on the day the policy's adopted, and anyone who joins after that, before they use any AI tool for our work and at induction (section 10). When the policy changes, everyone signs again on a fresh page. The AI lead keeps the signed pages.

Version signed: 1.0, adopted 6 November 2026.

By signing, I confirm I've read this policy, I've been shown the tools I'm approved to use, and I'll follow it.

Role	Name	Signature	Date
Owner			
Coordinator			
Assistant Coordinator			
Educator			
Educator			
Educator			
Educator			
Educator			
Educator			

Appendix: what each tool's terms say about training

Read on each maker's own pages before the register was approved, and again on Sunday 8 November 2026 for this copy. Before approving Claude, the AI lead also read its commercial terms.

Tool	What the maker says	Where, and when read
Claude, Team plan	"By default, we will not use your inputs or outputs from our commercial products" to train its models, unless someone sends feedback. Its pricing page lists Team model training as "None by default"	privacy.claude.com, page dated 18 August 2026, and claude.com/pricing, 8 November 2026
Xero, JAX and suggested coding (not approved)	JAX: "No, JAX chat doesn't use your data to train the LLMs it uses." Suggested coding: Xero's terms let it make anonymised data from yours "to provide and improve our services", and no page read says whether it trains AI. Not approved because payroll holds staff tax file numbers and no job needs either	xero.com/au JAX page, 8 November 2026. Terms of use read 2 November 2026 and not re-read
Claude, Team plan email addresses	An invite "must use one of your organization's allowed email domains", and "Personal email domains (like Gmail) and .edu domains can't be added to the allowed list." So the seats are on the service's own domain	support.claude.com, Manage members on Team and Enterprise plans, and Find and join a Team or Enterprise organization, 8 November 2026
Xplor (not approved)	The OSHC page describes no AI feature of Xplor's own, only a partner, Safe-Sight.AI, and says nothing on training. Any Xplor AI stays off	ourxplor.com, 8 November 2026
ChatGPT, free version (not approved)	"we may use your content to train our models" for Free, Plus and Pro	help.openai.com, page updated about 21 October 2026, read 8 November 2026
Gemini in free Gmail (not approved)	"If you're 18 or over, Keep Activity is on by default." The part read doesn't say text chats don't train models	support.google.com/gemini, 8 November 2026
Deputy AI (not approved)	"Your data is never used to train AI models." Not approved because no job needs it and its pages don't say where staff details are kept. Its pricing page says AI price "may change"	deputy.com/ai and deputy.com/au/pricing, 8 November 2026
OWNA AI (not approved)	"We don't use centre, educator, or child data to train OWNA's AI models." Not approved because it would mean leaving Xplor, and the page says both "on by default" and "opt-in"	owna.com.au, 8 November 2026
The Desktop, PolicyDesk AI (not approved)	"Never enter a child's, family's or staff member's personal information into an AI tool." The page read says nothing on training and links another page not read	thedesktop.com.au, effective 19 August 2026, read 8 November 2026