



Bacchus Marsh
Grammar

ELC POLICY

Early Learning Centre Child Safe Procurement Policy

Approved by the Approved Provider: 14 May 2026

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Child Safe Procurement Policy

1	Purpose and Background	2
2	Scope	2
3	Definitions	2
4	Policy Statement	2
4.1	Child Safe Procurement	2
4.2	Third party Child Safe Selection Criteria	3
5	Principles	3
6	Policy Communication, Training and monitoring	4
7	Legislation Overview	4
7.1	Education and Care Services National Law and Regulations	4
7.2	National Quality Standard	4
7.3	National Principles for Safe Organisations	4
8	Related Documents	4
8.1	Key Policies	4
8.2	Procedures	4
8.3	Resources	5
9	Sources	5
10	Authorisation	5
11	History	5
12	Appendix A: Procedure – Child Safe Procurement	6
13	Appendix B: Resource – Third party child safety and compliance declaration	11
14	Appendix C: Resource – Quick guide to Child Safe Procurement Policy	12



Quick reference: child safety | contractors | supervision | access | good and services | technology | physical infrastructure | screening and background checks | surveillance

Version	Date of release	Summary of changes
1.0	February 2026	New policy and procedure to ensure services can implement child safety requirements in relation to external contractors and providers

1 Purpose and Background

- 1.1.1 To set out how we ensure that child safety is considered in all procurement decisions made by our service
- 1.1.2 This policy helps us to comply with the *National Regulations* (reg 168(2)) and the Child Safe Standards, which require us to have policies and procedures for providing a child safe environment such as procurement policies that ensure the safety of children and young people

2 Scope

- 2.1.1 This policy applies to all:
 - Procurement activities undertaken by the approved provider and nominated supervisor on behalf of our service
 - Work conducted during operating hours and after hours, including work undertaken on-site, online, or remotely
 - Third parties engaged, contracted or otherwise procured by our service
- 2.1.2 This policy should be read in conjunction with our related policies and procedures for child safety and wellbeing, in particular our [Child Safe Environment Policy](#) and our [Child Safe Risk Management Plan](#)

3 Definitions

- 3.1.1 The following definitions apply to this policy and related procedures:
 - ‘Third party’ means any individual, organisation or entity that is not employed by our service and is engaged, contracted or otherwise procured by the service to provide goods, services, facilities, programs, equipment, digital platforms or professional support (e.g., contractors, subcontractors, consultants, tradespeople, information technology and technology providers, cleaning and maintenance providers, security, building and installation services, software and digital service providers)

Third parties may include individuals or organisations who attend our premises, interact with children or have access to children’s personal information

4 Policy Statement

4.1 Child Safe Procurement

- 4.1.1 All procurement and contracting activities undertaken by our service must prioritise the best interests, rights, safety, wellbeing and welfare of children (National Law s 2A)
- 4.1.2 Third parties will be required to comply with relevant child safe policies and procedures, including our Child Safe Code of Conduct
- 4.1.3 We will identify, assess and manage physical, digital and institutional child safety risks associated with third parties and facilities, including risks related to access to children, our premises, systems, equipment or infrastructure
- 4.1.4 The approved provider and nominated supervisor will ensure that risk assessments covering child safety risks are carried out before engaging third parties or third-party facilities
- 4.1.5 We will apply child safe procurement requirements in a manner that is proportionate to the nature of the engagement and the level of child safety risk



- 4.1.6 We must only engage third parties who are suitable to work in environments where children are present. Third parties will be appropriately screened, inducted and supervised in line with regulatory requirements
- 4.1.7 We will ensure that child safety conditions are included in contracts and service agreements, including supervision requirements, access restrictions, reporting obligations and consequences for breaches
- 4.1.8 Access to our premises, systems, environments and equipment by third parties will be controlled, monitored and documented
- 4.1.9 Any third parties who are authorised to work at our premises after hours will be monitored and the responsible person will conduct a post-work inspection to prevent unauthorised surveillance, recording or unsafe installations
- 4.1.10 We will regularly review digital, technical and infrastructure services to ensure they do not compromise children's safety, privacy or data security
- 4.1.11 We will respond promptly to any child safety breaches by third parties, and take appropriate action – including, where necessary, making reports to the relevant authorities in line with our Child Protection Policy
- 4.1.12 The approved provider and nominated supervisor will be responsible for overseeing, implementing, monitoring and reviewing our child safe procurement procedure (attached)

4.2 Third party Child Safe Selection Criteria

- 4.2.1 All third parties engaged by the service must demonstrate legal, professional, and operational suitability to work in environments where children are present
- 4.2.2 Third parties must hold a valid Australian Business Number (ABN), current business registration, appropriate public liability insurance, and all relevant licences and qualifications required to perform the contracted work – unless otherwise exempt under the law (e.g., voluntary work, not for profit, government representatives)
- 4.2.3 Third parties must also demonstrate compliance with child safety requirements. We may require third parties to provide: a valid Working With Children Check where applicable; a Child Safety Policy or Statement; formal agreement to comply with our Child Safe Code of Conduct; evidence of staff screening where relevant; and a declaration confirming that neither the third party nor their personnel have any relevant criminal history that would make them unsuitable to work in child-related environments
- 4.2.4 For information technology, electrical, security, and installation services, third parties must meet additional technology and surveillance controls. This includes providing: written confirmation that no unauthorised recording, monitoring, or hidden devices will be installed, full disclosure of all hardware and software to be installed, provision of access credentials to management where required, and confirmation that no remote access will be enabled without prior written approval
- 4.2.5 We may require third parties to demonstrate professional reliability and integrity by providing at least two referees, evidence of previous experience in child-related or sensitive environments, and confirmation that there are no known regulatory breaches, compliance failures, or adverse findings relating to their operations
- 4.2.6 Where third party facilities or external premises are used as part of our service delivery, we will ensure those facilities are suitable for children and do not pose physical, environmental, digital or institutional child safety risks. This may include consideration of supervision arrangements, access controls, safety features, emergency procedures and the presence of any surveillance or recording systems

5 Principles

- 5.1.1 The safety, rights, best interests and wellbeing of children are paramount, and we are committed to implementing the Child Safe Standards and the National Quality Framework across all levels of our service
- 5.1.2 Child safety is a shared responsibility, including by third parties engaged by the service



- 5.1.3 Procurement decisions are informed by a risk-based approach
- 5.1.4 Transparency, accountability and due diligence underpin all procurement activities

6 Policy Communication, Training and monitoring

- 6.1.1 This policy and related documents can be found on our Web site, staff one drive and in our Policy folder found in the gallery
- 6.1.2 The approved provider and nominated supervisor provide information, training and other resources and support regarding the Child Safe Procurement Policy and related documents
- 6.1.3 The approved provider and nominated supervisor monitor third parties and address non-compliance. Breaches to this policy are taken seriously and may result in disciplinary action against a staff member
- 6.1.4 At enrolment, families are given access to/information about our Child Procurement Policy and related documents
- 6.1.5 Families are notified in line with our obligations under the National Regulations when changes are made to our policies and procedures

7 Legislation Overview

7.1 Education and Care Services National Law and Regulations

Law	Description
s 2A	Paramount consideration – safety, rights and best interests of children
s 167	Offence relating to protection of children from harm and hazards
Regulations	
reg 168	Education and care services must have policies and procedures
reg 170	Policies and procedures to be followed
reg 171	Policies and procedures to be kept available

7.2 National Quality Standard

Standard/Element	Concept	Description
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

7.3 National Principles for Safe Organisations

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

8 Related Documents

8.1 Key Policies

Child Safe Environment Policy | Child Protection Policy | Child Safe Code of Conduct | Child Safe Risk Management Plan | Complaint Handling Policy | Governance and Management Policy | Technology and Device Use Policy | Photography and Video Policy | Work Health and Safety Policy | Visitor Policy | Volunteer and Student Policy | CCTV Policy | AI Policy

8.2 Procedures

Child Safe Procurement Procedure (attached)



8.3 Resources

ACECQA Risk Assessment and Management Tool | Child Safe Standards Guidance | National Principles for Child Safe Organisations | Active Supervision Guidelines (ACECQA) | ACECQA NQF Child Safe Culture Guide | ACECQA NQF Online Safety Guide | Contractor Child Safety Declaration Template (attached) | Contractor Induction Checklist (attached) | Contractor Compliance Register (attached) | Post-Work Inspection Checklist (attached) | Child Safety and Wellbeing Breach – Incident Report Form (in Child Safe Environment Policy) | Quick Guide – Procurement and Contracting (Child Safety) (attached)

9 Sources

Education and Care Services National Law and Regulations | National Quality Standard | QLD government resources on the Child Safe Standards | Government resources including Obligations of early childhood education and care providers | ACECQA’s Guide to Child Safe Environment Policies and Procedures | Early Childhood Australia Code of Ethics | ACECQA’s NQF Child Safe Culture Guide | NQF Online Safety Guide | eSafety Commissioner Resources | National Principles for Child Safe Organisations

10 Authorisation

ELC Document Name	Child Safe Procurement Policy	
Name of Reviewer: Approved Provider	Andrew Neal	Signature:
Name of Reviewer: Nominated Supervisor	Kerry Osborn	Signature:
Date Revised	May 2026 Reviewed annually and when there are changes that may affect this policy or related procedures. 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	

11 History

Date	Amendment
May 2026	1. New policy



12 Appendix A: Procedure – Child Safe Procurement

When to use this procedure

When we are considering, arranging or managing the engagement of any third parties where there is potential for interaction with children, access to children’s information, or access to service premises, systems or infrastructure – e.g., situations where third-parties:

- Work directly with children or provide services in children’s environments
- Attend the service during operating or non-operating hours
- Have access to service premises, learning spaces, toilets, sleep areas or outdoor areas
- Have access to digital systems, records, images, video, networks or remote access arrangements
- Install, maintain or service equipment, infrastructure, technology or surveillance-related systems
- Provide cleaning, maintenance, therapy, transport, IT, security, utilities or other ongoing services

This procedure applies to both one-off and ongoing engagements, including emergencies, short-term works and after-hours work.

It should be implemented by the approved provider or nominated supervisor or a delegated nominee.

‘Third party’ in this procedure means any individual, organisation or entity that is not employed by the service and is engaged, contracted or otherwise procured by the service to provide goods, services, programs, equipment, digital platforms or professional support

1. Conduct and document pre-procurement risk assessment BEFORE engaging third parties
2. Identify child safety risks, including:
 - Will the work occur near children?
 - Will the contractor access learning spaces?
 - Will the contractor access digital systems?
 - Will equipment be installed?
 - Will the contractor work after hours?
 - Will work involve cameras, wiring, networks, or devices?
3. Identify child safety risks of any third-party facility or external premises used by the service, including:
 - What are the physical safety and supervision arrangements?
 - What are the access controls and how are visitors managed?
 - What are the emergency procedures and environmental hazards?
 - Are there digital systems, online platforms or technology in use?
 - Any surveillance, monitoring or recording practices?
4. Assess the level of risk, e.g.,

Risk Level	Description
Low	No contact, no access to child areas



Moderate	Limited access, supervised only
High*	Access to rooms, systems, or infrastructure

*High-risk engagements require the approved provider’s approval

5. Plan and implement appropriate control measures to manage the identified risk, such as:

AREA	EXAMPLES OF CONTROL MEASURES
ACCESS AND SUPERVISION	<ul style="list-style-type: none"> Restrict contractor access to specific areas only Schedule work outside times when children are present Ensure a staff member supervises contractors at all times when children are present Prohibit contractors from entering toilets, nappy change areas or sleep spaces while children are present Require contractors to sign in and out and wear visible identification
SCREENING AND SUITABILITY CHECKS	<ul style="list-style-type: none"> Require a valid Working With Children Check where legally required or assessed as necessary Verify identity, qualifications or licences relevant to the work Use pre-approved suppliers with established child safe practices Refuse engagement where screening requirements are not met
INDUCTION AND CODE OF CONDUCT REQUIREMENTS	<ul style="list-style-type: none"> Provide contractors with child safe induction information before commencing work Require acknowledgement of the Child Safe Code of Conduct Clearly communicate prohibited behaviours, including <ul style="list-style-type: none"> No physical contact with children No one-on-one contact No photography, recording or use of personal devices
PHYSICAL ENVIRONMENT, EQUIPMENT AND INFRASTRUCTURE INSPECTIONS AND SECURITY	<ul style="list-style-type: none"> Secure rooms, cupboards and equipment not required for the works Inspect areas before and after work for hidden cameras, unsafe installations or hazards Escort contractors when moving through the service Lock down areas under maintenance or installation
THIRD-PARTY FACILITIES OR EXTERNAL VENUES	<ul style="list-style-type: none"> Maintain required educator-to-child ratios and active supervision at all times Restrict children’s access to non-approved areas and equipment Ensure children are never left alone with third party staff or other adults Confirm emergency procedures, exits and assembly points before use Monitor entry, exit and visitor access while children are present Identify and manage any surveillance, recording or monitoring systems

<p>AFTER-HOURS MONITORING AND RESTRICTIONS</p>	<p>Limit children’s access to digital systems, Wi-Fi or screens unless approved</p> <p>Document and communicate any conditions of use to staff</p> <p>Require written approval for all after-hours access</p> <p>Limit access to agreed dates, times and areas only</p> <p>Use staff presence, CCTV (where approved), or check-in procedures during works</p> <p>Conduct post-work inspections before children return</p>
<p>DIGITAL AND INFORMATION SECURITY MEASURES, INCLUDING EQUIPMENT AND SURVEILLANCE</p>	<p>Restrict system access to the minimum required</p> <p>Disable remote access when not actively required</p> <p>Prohibit access to children’s personal information unless essential</p> <p>Require confidentiality agreements for IT or digital service providers</p> <p>Prohibit installation of cameras, microphones or recording devices without explicit approval</p> <p>Review placement of sensors, monitors or smart devices</p> <p>Require technical sign-off for cabling, networks or monitoring equipment</p>
<p>CONTRACTUAL AND GOVERNANCE CLAUSES TO ENSURE CHILD SAFETY COMPLIANCE</p>	<p>Include child safety clauses in contracts or service agreements</p> <p>Require compliance with child safe policies as a condition of engagement</p> <p>Include termination clauses for breaches of child safety obligations</p>
<p>MONITORING, COMPLIANCE AND REVIEW SYSTEMS</p>	<p>Regularly review contractor conduct during engagement</p> <p>Inspect and review arrangements for third party facilities</p> <p>Encourage staff to report concerns immediately</p> <p>Review risk controls if the scope of work changes</p> <p>Suspend works immediately if child safety concerns arise</p> <p>Remove contractor access where risk cannot be managed</p> <p>Report concerns in line with child protection and reporting procedures</p>

6. Include child safety conditions in contracts and service agreements:

- Contracts and service agreements must include child safety conditions appropriate the nature of engagement and the level of risk. Depending on the circumstances, we may require:
 - Compliance with all child safety policies and procedures, including our [Child Safe Code of Conduct](#)
 - Adherence to supervision and access requirements
 - Prompt reporting of concerns



- Acknowledgement that breaches of child safety obligations may result in termination of the engagement
7. Get required documentation before third party starts work:
- Documentation appropriate to the nature of the engagement and level of risk must be obtained, verified and kept on file. Depending on the circumstances, documentation may include:
 - A signed contractor agreement
 - Current insurance certificate
 - Valid Working With Children Check/s where required
 - Child Safety Declaration and acknowledgement of our Child Safe Code of Conduct (see form attached)
8. Induct third parties before they start:
- Induction requirements for third parties should be proportionate to their role, level of access and assessed child safety risk. Where a formal induction is required, it must cover:
 - Child safe expectations
 - Child Safe Code of Conduct
 - Supervision and access requirements
 - Reporting obligations,
 - Privacy and confidentiality obligations
 - Any role-specific child safety procedures
9. Ensure supervision and access controls are in place for third parties as follows:
- **During operating hours:**
 - Must be supervised at all times and must never be left alone with children
 - Must remain within the line of sight of authorised staff and may only access approved areas of the service
 - Must not enter bathrooms, sleep and rest rooms, or nappy-changing and change areas unless prior approval has been granted and they are accompanied and continuously supervised by an authorised staff member
 - **After hours work:**
 - All after-hours access to the service premises requires prior approval from management
 - Entry and exit times must be recorded in accordance with service procedures
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- All permitted work areas must be documented prior to and following completion of works
- Security systems must be activated and monitored to ensure the safety and security of the service environment

10. Conduct a full inspection of relevant areas following third parties conducting after-hours or technical work, including:

- Checks for unauthorised devices, such as hidden or undisclosed cameras, surveillance systems, audio devices, or digital recording software
 - Verification of all cabling, wiring, hardware, and installed equipment to confirm that no unauthorised recording, monitoring, or transmission equipment is present
11. Document and securely store all documents associated with this procedure (e.g., risk assessments, records of suitability to work with children, contracts, declarations, inductions etc) in line with our [Record Keeping Policy](#) and procedures
12. If a third party breaches our child safety policies or practices, or poses a risk to the health, safety or wellbeing of any child in our care, follow our [Child Protection Policy](#) to ensure we manage any risks they pose and meet our child safety and protection reporting obligations



13 Appendix B: Resource – Third party child safety and compliance declaration

Contractor/ business name and address:	
ABN:	
Contact person	
Requirements	
Legal and Business Compliance	<p>We hold a valid ABN and business registration</p> <p>We hold current public liability insurance</p> <p>We hold all relevant licences and qualifications required to perform the contracted work</p>
Child Safety Compliance	<p>We understand that this service operates under a strict regulatory framework that includes the Child Safe Standards</p> <p>We agree to comply with all child safety policies and procedures of the service, including for the use of personal devices and photography at the service</p> <p>We have read and agree to comply with the Child Safe Code of Conduct</p> <p>All relevant personnel hold valid Working With Children Checks (where applicable)</p> <p>Our staff have been appropriately screened and assessed</p> <p>We declare that neither we nor our staff have any relevant criminal history that would make us unsuitable to work in child-related environments</p>
Supervision and Access Requirements	<p>We understand that we must never be left unsupervised with children</p> <p>We agree to comply with all supervision, access, and identification requirements</p> <p>We will only access approved areas and systems</p>
Technology and Surveillance Controls	<p>We confirm that we will not install, activate, or use any unauthorised cameras, surveillance systems, audio devices, recording equipment, monitoring software, or data capture systems</p> <p>We will fully disclose all hardware, software, wiring, and systems installed</p> <p>We will provide all access credentials to management where required</p> <p>We will not enable remote access without written approval</p> <p>We understand that unauthorised surveillance or recording is strictly prohibited</p>
Reporting and Conduct	<p>We will immediately report any child safety concerns, incidents, hazards, or breaches</p> <p>We will cooperate with investigations, audits, and compliance checks</p> <p>We will comply with all directions from management relating to child safety</p>
Acknowledgement and Consequences	<p>We understand that breaches of child safety obligations may result in immediate termination of our contract and reporting to relevant authorities</p> <p>We acknowledge that failure to comply may constitute a serious breach of law and policy</p>
Declaration and signature	<p>I/we declare that the information provided is true and correct</p> <p>I understand and agree to comply with all child safety requirements of the service.</p> <p>Signature: _____ Date: ____ / ____ / ____</p> <p>Name: _____ Position _____</p> <p>_____</p>



14 Appendix C: Resource – Quick guide to Child Safe Procurement Policy

Our service:

- Prioritises child safety in all procurement and contracting decisions
- Makes children’s best interests, rights, safety, welfare and wellbeing the paramount consideration in all our decisions and actions
- Identifies and manages physical, digital and institutional child safety risks
- Only engages third parties who are suitable to work in child-related environments

Before we engage third parties such as contractors or service providers, we:

- Assess child safety risks
- Confirm legal, professional and operational suitability
- Verify licences, qualifications, insurance and business registration where required
- Apply additional scrutiny for higher-risk or child-related engagements

Where applicable, third parties will be required to:

- Provide a Working With Children Check
- Demonstrate child safety policies or practices
- Agree to supervision, access restrictions and reporting obligations
- Comply with contract conditions relating to child safety and privacy

Third parties are not permitted unsupervised access to children and must comply with our [Child Safe Code of Conduct](#)

Managing access and monitoring

- Access to premises, systems and equipment is controlled, monitored and documented
- After-hours work is monitored, with post-work inspections conducted
- Digital, technical and infrastructure services are reviewed to prevent safety, privacy or data risks

Responding to concerns or complaints

- We respond promptly to any child safety concerns or breaches involving third parties and take appropriate action, including reporting to authorities where required, in line with our Child Protection Policy.

Our full [Child Safe Procurement Policy](#) is available on our Web site, staff one drive and in our Policy folder found in the gallery