Procurement Policy for Third-Party Services and Child Safety

1. Purpose

The purpose of this policy is to ensure that all procurement of facilities and services from third-party providers at Stott's College is conducted in a manner that prioritises and safeguards the safety, wellbeing, and rights of children and students.

This policy establishes requirements for assessing, engaging, and monitoring third-party providers to ensure alignment with the College's Child Safety Policies and Procedures and compliance with applicable regulatory standards.

2. Scope

This policy applies to all staff and contractors involved in the procurement, engagement, or management of third-party providers who:

- Deliver services directly to students;
- Access College premises or student environments;
- Provide accommodation, facilities, or support services;
- Have direct or indirect contact with students under 18 years of age.

3. Regulatory Context

Stott's College is committed to complying with all relevant child safety and regulatory obligations, including:

- VRQA Minimum Standards for School Registration (2021)
- Ministerial Order 1359 – Managing the Risk of Child Abuse in Schools
- Victorian Child Safe Standards (2022)
- National Principles for Child Safe Organisations (2019)
- Children, Youth and Families Act 2005 (Vic) (as applicable)
- Privacy Act 1988 (Cth) and Australian Privacy Principles

This policy supports the College's obligations to demonstrate that procurement practices actively mitigate risks to children and students.

4. Policy

Stott's College requires that:

4.1 Child Safety in Procurement

- All procurement decisions involving third parties must include an assessment of child safety risks.
- No third-party provider may be engaged where risks to student safety cannot be adequately mitigated.

4.2 Due Diligence and Screening

- All third-party providers must undergo documented screening prior to engagement.
- Where applicable, providers must supply:
    - Valid **Working with Children Check (WWCC)** or equivalent;
    - Police checks (where relevant);
    - Evidence of child safety training or policies;
    - References and past performance history.

4.3 Contractual Requirements

- All contracts with third-party providers must include:
    - A Child Safety Clause requiring compliance with the College's Child Safety Policy;
    - Clear expectations regarding appropriate conduct with students;
    - Mandatory reporting obligations;
    - Immediate termination rights for breaches relating to child safety.

4.4 Induction and Awareness

- All third-party providers must:
    - Receive the College's Child Safety and Wellbeing Policy and Child Safety Code of Conduct;
    - Acknowledge and agree to comply prior to commencing services.

4.5 Monitoring and Review

- The College will:
    - Monitor third-party compliance on an ongoing basis;
    - Conduct periodic reviews of high-risk providers;
    - Maintain records demonstrating compliance with this policy.

4.6 Non-Compliance

- Failure to meet child safety requirements may result in:
    - Suspension or termination of contracts;
    - Reporting to relevant authorities where required.

5. Procedures

All third-party procurement must follow the procedure outlined below.

This procedure ensures:

- Consistent risk assessment;
- Documented due diligence;
- Clear accountability and audit evidence for VRQA compliance.

Step 1: Identification

- Determine whether the provider will:
    - Have direct or indirect contact with students;
    - Access College facilities where students are present.

Step 2: Initial Screening

- Collect and verify:
    - WWCC (or equivalent);
    - Police checks (if applicable);
    - Child safety policies/training evidence;
    - References and past conduct.

Step 3: Risk Assessment

- Assess:
    - Level of student interaction;
    - Nature and duration of services;
    - Environment in which services are delivered.

Step 4: Contractual Controls

- Ensure all agreements include:
    - Child Safety compliance clause;
    - Code of Conduct adherence;
    - Mandatory reporting obligations;
    - Termination rights for breaches.

Step 5: Induction

- Provide:
    - Child Safety and Wellbeing Policy;
    - Child Safety Code of Conduct;
- Obtain signed acknowledgment prior to commencement.

Step 6: Ongoing Monitoring

- Conduct:

- Periodic compliance checks;
- Performance reviews;
- Incident follow-up where required.

Step 7: Review and Record Keeping

- Maintain records of:
  - Screening and approvals;
  - Contracts and compliance evidence;
- Conduct regular review of procurement practices.

6. Privacy and Information Sharing

6.1 Protection of Student Information

Third-party providers must handle all student information in accordance with the College's *Privacy Policy* as well as applicable legislation.

Student information may only be used or shared to:

- Support student education, wellbeing, and safety;
- Prevent or lessen risks of harm;
- Enable reasonable adjustments or support services;
- Maintain a safe and secure environment.

6.2 Reporting Obligations

- Third-party providers must immediately report any child safety concerns to the College.
- Where required, information may be disclosed to external authorities (e.g. Police, Child Protection) in accordance with mandatory reporting obligations.

7. Related Documents

- VCE-POL-01 Child Safety and Wellbeing Policy
- VCE-CC-03 Child Safety Code of Conduct
- VCE-GUI-06 Guidelines to responding to incidents, disclosures and suspicions of child abuse
- VCE-POL-07 Supervision Policy
- VCE-POL-09 Excursions Policy
- 2.3.4.1 Visitor Access and Sign-In Policy and Procedures
- 7.3.3 Student Record Management Policy and Procedures
- 6.2.3 Critical Incident Policy anfd Procedure
- 2.3.8 Welfare Arrangements for International Students Aged Under 18
- 2.5.1 Homestay Provider Engagement and Monitoring Policy and Procedure
- Privacy Policy
- 6.2.2 Health and Safety Policy

- Emergency Management Plan (EMP)

8. Roles and Responsibilities

Governing Board

- Approves this policy and ensures oversight of child safety governance.

Chief Executive Officer

- Accountable for implementation and compliance with this policy.

Head of Operations / Campus Operations Manager (or equivalent)

- Ensures procurement processes include child safety due diligence;
- Maintains records of third-party compliance.

Staff Engaging Third Parties

- Must follow this policy and associated procedures;
- Ensure all required documentation is obtained prior to engagement.

Third-Party Providers

- Must comply with all child safety requirements;
- Maintain valid screening checks;
- Report any concerns relating to student safety.

9. Document Information

Document Name	Procurement Policy for Third-Party Services and Child Safety
Document Number	VCE-POL-17
Purpose	To ensure that procurement of third-party services prioritises the safety, wellbeing, and rights of children and students, and complies with the College's Child Safety requirements and regulatory obligations.
Audience	☒Staff | ☒Students| ☒Public
Category	Learning Environment
Subcategory	Child Safety and Wellbeing
Approval Date	08/05/2026
Effective Date	08/05/2026
Last date of approval	08/05/2026
Next Review Date	08/05/2028 (Review required every two years, or after any

	significant child safety incident)
Policy Advisors	Head of Operations, Head of Quality and Risk
Approving Authority	Board of Directors

10. Change Log

Date	Version	By	Notes