

SA Montessori Pre-schools Policies

Third Party Provider Policy

Statement

SA Montessori Pre-schools recognise that appropriately selected and well-governed third-party providers can support the safe, effective and compliant operation of our services. This Policy outlines how SA Montessori engages, manages and monitors third-party providers to ensure alignment with the National Quality Standards (NQS), National Regulations and best practice in child protection and safeguarding. This reflects our collective responsibility to uphold children's health, safety, wellbeing, privacy and dignity, while ensuring strong and effective management and professional practices.

Rationale

SA Montessori services may engage third-party providers or platforms to facilitate, maintain or improve the quality of their operations. Where this occurs, transparent and consistent procedures must be in place to ensure that all third-party engagements are carefully vetted, appropriately governed and managed to minimise risk and promote quality outcomes for children, families and staff.

Definitions

Third-party provider: Any external individual, organisation or platform engaged to provide services, systems or support to SA Montessori services, including but not limited to IT services, marketing specialists, consultants, contractors or management support services.

Platform: A digital system or application used to support service operations, such as CCS software, digital documentation platforms, financial or management systems, communication tools or cloud-based storage systems.

Personnel: Any individual engaged by or representing a third-party provider who interacts with SA Montessori services, systems, data, staff, children or families.

Procedures

1. Identification and Engagement of Third-Party Providers

Each SA Montessori service may engage third-party providers where this supports operational efficiency, compliance, quality improvement or service sustainability. Engagements must be approved by the Approved Provider, Person with Management or Control (PMC), or an authorised delegate.

2. Due Diligence and Vetting

All third-party providers are selected through a process of due diligence to assess their suitability for the role. This process may include:

- Assessment of relevant qualifications, expertise and experience
- Review of policies and procedures related to privacy, data security, child safety, ethical conduct and workplace behavior

- Consideration of compliance with the National Law and Regulations, NQS, Privacy Act 1988 (Cth) and child safe standards
- Review of the provider's history, reputation and alignment with sector best practice
- Confirmation that digital platforms meet recognised industry standards for security, access control and data storage.

Providers whose policies or practices are inconsistent with SA Montessori's values, regulatory obligations or quality expectations will not be engaged.

3. Governance, Oversight and Accountability

SA Montessori maintains oversight of all third-party arrangements through:

- Clearly defined scopes of service or contractual agreements
- Defined protocols, including limitations, for access to information, data and physical environments
- Ongoing monitoring of performance, compliance and risk
- Regular review of provider suitability, particularly where services involve access to children's information, images or personal data.

Engagement of third-party providers does not transfer or diminish the legal responsibilities of the Approved Provider or PMCs under the National Law.

4. Children's Health, Safety and Privacy

Third-party providers must not compromise children's health, safety, wellbeing or dignity. In particular:

- Providers must comply with SA Montessori's *Digital Device, Photography and Phone Policy* and the *National Model Code* where their role involves access to images, videos or records of children
- Access to children's personal information, images or documentation is limited to what is strictly necessary for the agreed purpose
- Platforms used for digital portfolios, communication or record-keeping must have high-level security credentials and clear policies for data storage, retention and breach response
- Third-party personnel must not take images or recordings of children unless explicitly authorized in writing and in accordance with SA Montessori policies and parental consent.
- Where data sharing is necessary in the course of the authorised duties of the third-party provider, due diligence will be undertaken to ensure that this is transferred, stored and managed in accordance with regulations, laws and the National Model Code.
- Authorised to access sensitive information in the course of the authorised duties of the third-party provider or platform will be managed with caution to ensure that all confidentiality requirements are appropriately maintained as per Regulation 181.

5. Conduct, Behaviour and Workplace Standards

Personnel from third-party providers are expected to meet the same standards of professional conduct as SA Montessori employees while engaged with our services. This includes compliance with:

- Respect at Work Policy
- Staff Communication Policy
- Inclusion and Anti-Bias Policy
- Ethical Conduct Policy
- Any other relevant SA Montessori policies and procedures
- All relevant legislation, regulations and guiding documents

Unacceptable conduct, including harassment, discrimination, unsafe behaviour or breaches of confidentiality, will not be tolerated and may result in termination of the engagement.

6. Training and Awareness

Where relevant, third-party providers may be required to demonstrate understanding of:

- Child safe principles and practices
- Privacy and confidentiality obligations
- Appropriate professional boundaries and communication
- SA Montessori policies relevant to their role.

SA Montessori staff involved in managing or liaising with third-party providers will receive guidance to ensure consistent implementation of this Policy.

7. Limitation of Liability

SA Montessori takes reasonable steps to select reputable third-party providers and to limit risks through governance and oversight. However:

- SA Montessori cannot be held liable for actions or omissions of third-party providers that occur outside the reasonable control of the service, including external system failures or data breaches
- Third-party providers remain responsible for their own compliance with applicable laws, contractual obligations and professional standards
- Third-party providers are responsible for maintaining their own comprehensive insurance and indemnity
- Any identified risks or breaches associated with third-party providers will be addressed promptly, including notification to authorities where required.

8. Breaches and Review

Any concerns regarding a third-party provider's conduct, compliance or performance must be reported to the Centre Director, Approved Provider or PMC. Appropriate action may include corrective measures, suspension of access or termination of the engagement.

9. Consent

By enrolling in the service, parents/guardians consent to the engagement of third-party providers and platforms as necessary in accordance with this Policy.

Training and awareness

This Policy will be accessible through the SA Montessori staff Onboarding and Ongoing Development course to ensure staff are knowledgeable about its

principles, contents and requirements.

Linkage to other policies

Confidentiality Policy
Digital Device, Photography and Phone Policy
Duty of Care Policy
Ethical Conduct Policy
Flexible Working Arrangements Policy
Grievance Policy
Inclusion and Anti-bias Policy
IT Policy
Policy Development Policy
Respect at Work Policy
Staff Communication Policy
Working with Children Check Policy

Sourcing

National Model Code for Taking Images or Videos of Children while Providing Early Childhood Education and Care
Early Childhood Australia (ECA) Code of Ethics
Privacy Act 1988 (Cth)
National Regulations 181

Development date

The Policy under this title was developed 1/12/25

'SA Montessori' Definition

For the purposes of these Policy documents the term 'SA Montessori' refers to a collective of centres functioning as a professional network with shared management through 'MMM'. These documents have been developed by MMM to reflect consultation, critical reflection and community input from each of the SA Montessori centres, with intellectual property rights retained. By accepting these Policy documents, the company directors, approved providers and/or persons with management or control (PMCs) of each entity acknowledge that these policies do not release them from their responsibilities, obligations, or liabilities.

SA Montessori Pre-school centres include:

Cedars Montessori Pre-school
Chancery Lane Montessori Pre-school
Echoes Montessori
Jescott Montessori Pre-school
Lilliput Village Montessori
Little Oxford Montessori
Rosemont House Montessori

Review date

All SA Montessori Policies will be reviewed at least annually by MMM. In addition to the annual review, individual policies may be adjusted at any time in the event of community feedback, changes to guiding documents or legislative updates.

Review history:

Date	Policy satisfactory	Policy amended	Comments	Next review due: