CHILD CARE SUBSIDY (CCS) GOVERNANCE POLICY

To comply with legislation when either applying or maintaining the Child Care Subsidy (CCS) a CCS Governance Policy is required. Our policy covers: evidence ensuring ongoing compliance with Education and Care National Law and Regulations, Family Assistance Law, Australian Taxation laws, Australian Securities and Investment Commission (ASIC) and the Australian Government's guidelines provided in the Child Care Provider Handbook (2018). Our financial integrity is transparent as we provide information about our organisation size and structure, decision making processes, employment procedures, fit and proper checks for all personnel, operational structure, financial viability and risk management.

NATIONAL QUALITY STANDARD (NQS)

QUALITY AREA 7: GOVERNANCE AND LEADERSHIPS		
7.1	Governance	Governance supports the operation of a quality service
7.1.2	Management Systems	Systems are in place to manage risk and enable the effective management and operation of a quality service
7.1.3	Roles and responsibilities	Roles and responsibilities are clearly defined, and understood, and support effective decision making and operation of the service.

EDUCATION AND CARE SERVICES NATIONAL REGULATIONS	
2.1	Provider approvals
2.2	Service approvals
Division 1	Applications for Service approvals
Division 3	Transfer of Service approvals

RELATED LEGISLATION

Child Care Subsidy Secretary's Rules 2017	Family Law Act 1975
A New Tax System (Family Assistance) Act 1999	Family Assistance Law – Incorporating all related legislation for Child Care Provider Handbook in Appendix G https://www.dese.gov.au/resources-child-care-providers/resources/child-care-provider-handbook

RELATED POLICIES

CHILD CARE SUBSIDY (CCS) GOVERNANCE POLICY

CCS Notifications Policy	Payment of Fees Policy
CCS Personnel Policy	Personnel Policy
CCS Account Policy	Privacy and Confidentiality Policy
Cyber Safety Policy	Professional Development Policy
Dealing with Complaints Policy (Families)	Recruitment Policy
Enrolment Policy	Record Keeping and Retention Policy
Fraud Prevention Policy	Staffing Arrangement Policy
Governance Policy	

PURPOSE

Our Out of School Hours Care (OSHC) Service aims to comply with the Child Care Subsidy legislative requirements associated with operating a fee reduction Service for eligible families. We understand the Department of Education, Skills and Employment (the department's) approach to maintaining the financial integrity of all child care funding. Our OSHC Service has a genuine commitment to meet our obligations to maintain financial integrity and have effective compliance systems in place to ensure child care funding we receive is administered appropriately. Our Service accepts the legal responsibilities associated with claiming Child Care Subsidy within the Family Assistance Law. We will continuously examine our business and Service model to identify opportunities to cater to the needs of our families and community. (Child Care Financial Integrity Strategy, 2019)

SCOPE

This policy applies to children, families, staff, management and visitors of the OSHC Service.

APPROVED PROVIDER DETAILS

To claim Child Care Subsidy to pass onto families as a fee reduction, our OSHC Service must be approved by a delegate of the Secretary of the Department of Education and Training by showing the required evidence and information to ensure ongoing compliance with the Family Assistance Law. Our OSHC Service will ensure all reporting requirements for claiming and administering CCS payments will be maintained. These include the requirement for the provider to undertake fit and proper checks on all relevant key personnel and ensuring background checks have been undertaken for relevant key personnel

Out of School Hours Care Services must undertake background checks of:

- each person who has management or control of the provider

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- each person who has responsibility for the day-to-day operation of the service

Required information includes:

Provider Approval Number	
Service Approval Number	
Business Name	Baycare Inc
Trading Name	Baycare Inc
Contact Person	Libby Haines
Telephone	
Mobile	
Email	
Address	
NQA IT System details	Are you registered? YES ☐ NO ☐
Provider Entity Name	Baycare Inc
ABN	
Relevant Entity Documents (Financial Statements, signed partnership agreement etc) provided	YES ☐ NO ☐
Financial Management Checks	Submit an extract from the National Personal Insolvency Index Bankruptcy search, include a Nil Result (dates no more than three (3) months prior to the application Current and historical personal name extract search of the Australian Securities and Investment Commission (ASIC) dated no more than three (3) months before the date of the application. Evidence that the person does not appear on the banned and disqualified register of ASIC
Details in which the provider or their personnel have an interest	Submit position of person completing the document: Owner, Director, Manager, Nominated Supervisor

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External Management Organisation	Is your Service under the management of an external group? YES ☐ NO ☐
Number of years of operation	

[The approved Service can only be operated by the Approved Provider and must continue to be delivered as the same type of service that was approved. If the Service is sold to another provider, that provider will need to obtain its own separate approval and continue to comply with any conditions of their approval.]

OUR OUT OF SCHOOL HOURS CARE SERVICE AND BUSINESS STRUCTURE

The following information describes the type and size of our OSHC Service operation including personnel, recruitment and professional development strategies, fee structure, philosophy and financial position.

Entity Type (Partnership, Private Company, Sole Trader, Public Company etc)	
Information provided with application for provider approval	YES ☐ NO ☐
Number of Managers	Managers may include: Director, Nominated Supervisors, appointed Project Manager of multiple services
Number of operation personnel	Educators, administration staff and trainees
Recruitment and Professional Development Plans	Recruitment process and documentation [See Childcare Centre Desktop's Human Resource / Management Resources.] Professional Development [See Childcare Centre Desktop's Professional Development Module.]
Structure of the business	See diagram on next page.
Number of sites and locations	Submit here:
Service Type	Out of School Hours Care (OSHC)

OPERATIONAL STRUCTURE

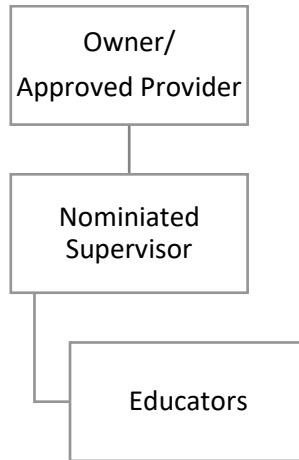| Address	Address
Days of Operation	Monday to Friday
Hours of Operation	6.00am to 9.00am. 3.00pm to 6.00pm each week day Vacation Care dates/times
Weeks of Operation	The minimum operating requirements for CCS are seven (7) weeks per year for OSHC.

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Fee Schedule	0-1: $xx, 2-3: $xx, 4-6: $xx You may also wish to attach your Payment of Fees Policy
Number of Licensed Children	XX
Services Provided	- Philosophy [Attach or cut & paste here] - Child Care Features [Unique features of your facility]

Current Employees & Qualification	Name	Qualifications
	• Staff 1 • Staff 2 • Staff 3 • Etc…	

Collection of Fees	Payment types accepted [Credit card, external provider?] Centrelink arrangements [Managed via your CCMS Provider] Bond or enrolment fee arrangements
Liabilities	Do you have any significant liabilities such as loans, hire purchase etc? [Submit the name of the organisations here. Actual amounts may be requested.]
Are other services operated by the Approved Provider?	Please provide number of other services and names
Does the Approved Provider operate other businesses under the legal entity?	Please provide details of other businesses and how they fit into the service (including any RTO organisations the business may be associated with)
External Management Organisation	Is your Service under the management of an external group? YES ☐ NO ☐ Identify details of external management; Ie location
CCS Administration	Identify who will oversee the administration of CCS within the service Identify where administration tasks will be located (if off-site provide details)

Organisational Structure Diagram [Decision making hierarchy]

CHILD CARE SUBSIDY (CCS) GOVERNANCE POLICY

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┌─────────────────┐
│   Owner/        │
│ Approved Provider│
└────────┬────────┘
         │
┌────────┴────────┐
│   Nominiated    │
│   Supervisor    │
└────────┬────────┘
         │
    ┌────┴────────────┐
    │   Educators     │
    │                 │
    └─────────────────┘
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Source: CCS Provider Handbook https://www.dese.gov.au/resources-child-care-providers/resources/child-care-provider-handbook

FINANCIAL OBJECTIVES

Our primary target for 20___ is to increase enrolment placements from xx% to xx% [If your OSHC service is full replace this statement with: Our primary objective is to maintain 100% occupancy and consistently review our waitlist management procedures.]

To achieve the above result, we routinely utilise the following promotional strategies: [Submit a list of routine promotional activities. This may include referral strategies, events, advertising, signage etc.]

To maintain a competitive position within our marketplace fees are reviewed annually and all associated functions are governed by our '*Payment of Fees Policy*'. This includes; management of fee increases, the collection of a Bond or administration annual fee, collection of late fees, absences and public holidays.

The amount of Child Care Subsidy (CCS) families can receive is based on the Hourly fee for Outside School Hours Care- before, after and vacation care charge

In some cases, a child's age will mean a different hourly rate cap.

https://www.humanservices.gov.au/individuals/services/centrelink/child-care-subsidy/how-much-you-can-get/type-child-care-you-use-affects-it

The Outside School Hours Care hourly cap is currently $10.77

[Attach or cut & paste Payment of Fees Policy if requested]

NON-COMPLIANCE RISK MANAGEMENT

To ensure our continued commercial, operational and financial viability our OSHC Service will maintain a

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current Quality Improvement Plan (QIP), Professional Development and Training Plan, Personnel files, Professional Indemnity and Public Liability Insurance and a Child Care Management System. We understand our obligations to comply with requirements for the governance and financial administration of payments of child care funding and continually monitor and evaluate our OSHC Service's financial viability.

TYPE OF RISK	PREVENTION / STRATEGIES IN PLACE	ACTION TO BE TAKEN
CCS Compliance	Submit the title of your approved CCS software provider	How do you monitor accuracy and any potential issues/error?
Insurances	What insurance policies are established?	Are they automatically renewed? Are they reviewed annually?
Service Competition	Insert a statement regarding your 'self-assessment' and 'quality improvement planning' process.	How do you monitor continuous improvement? Is it a weekly/monthly agenda item?
Submission of attendees	This is usually managed via your approved CCS software. Submit a statement to reflect this.	Ongoing
Submission of vacancies	This is usually managed via your approved CCS software. Submit a statement to reflect this.	Ongoing
Staff Skills and Knowledge	Submit a brief statement describing how you facilitate your Professional Development Plans and associated training	Annually Quarterly Monthly
Accurate Data Reports	This is usually managed via your approved CCS software. Submit a statement to reflect this.	Daily Weekly

NOTE: As with any business changes, you may want to seek further guidance from your financial management team, legal advisor, management committee, board, accountant and/or other financial advisor as to how these changes may specifically affect your Service.

POLICIES, PROCEDURES OR DOCUMENTS TO SUPPORT CCS APPLICATION

Related Policies, Procedures or Documents	Obligations under CCS
FIT AND PROPER CHECKS	

CCS Personnel Policy *Recruitment Policy* *Job Descriptions* *Recruitment Policy* *CCS Notifications Policy* *Child Safe Environment Policy*	*CCS Personnel Policy*: Ensuring key personnel who submit data to CCS are registered with PRODA and have relevant Provider and Service background checks, including WWCC and reference checks. Determining whether a person is fit and proper. The *CCS Personnel Policy* outlines procedures for management to notify DESE and if required the regulatory authority in the event of key personnel not meeting the requirements to remain fit and proper. *CCS Notifications Policy* outlines guidance for Approved Providers to notify the Department of Education, Skills and Employment in relation to changes relating to personnel. *Recruitment Policy*: All staff are required to hold a current WWCC before they begin working with children in any capacity. Working in line with the *CCS Personnel Policy* staff are required to submit any documentation required for background checks related to the position they are applying for. *Child Safe Environment Policy:* outlines procedures for management to follow regarding the review and maintenance of WWCC and to ensure key staff remain fit and proper as per Family Assistance Law.
STAFF RECRUITMENT	
Recruitment Policy *Child Safe Environment Policy*	*Job Descriptions:* Up to date knowledge and compliance of the following law/ regulations/ acts (including Family Assistance Law for staff who submit data to CCS). *Recruitment Policy:* The Approved Provider or assigned nominee will approve all recruitment decisions as outlined in the Recruitment Policy. The *Recruitment Policy* provides details regarding advertising strategies and opportunities. The policy outlines background checks (WWCC, reference checks, PRODA background checks) required for specific positions. The position outlines induction and probation periods for all employees.
ENROLMENT AND ACCS	
Enrolment Policy *CCS Procedure Guide* *Job Descriptions*	Refer to *Enrolment Policy* for guidelines for CWAs and submission to CCS of enrolment details. Our Enrolment Policy provides guidance for parents and management regarding the requirements for Complying Written Agreements (CWA) which must be signed before a child enters care. The policy outlines details which must be included on the CWA and outlines any conditions when a new CWA is to be signed. The policy states an enrolment notice must be submitted within 7 days of a signed CWA and enrolment acceptance.

	The *Enrolment Policy* provides details regarding the ACCS process. It provides guidance to the types of ACCS and how parents/services can apply for ACCS. Additional statements refer to families that must be approved for CCS to be eligible for ACCS and that families who are claiming ACCS are signing a CWA on enrolment. The policy outlines steps for the service to apply for ACCS (Child Wellbeing).
	The *CCS Procedure Guide* provides guidance to services regarding the administration of CCS, including information relating to CWA and ACCS.
	Refer to the Director/ Nominated Supervisor *Job Description* where the Director/ NS will be responsible for working with families and agencies regarding ACCS eligibility and application requirements. The Service Administration will be responsible for entering ACCS applications into the CCSS software in collaboration with the Director/ NS as per *Enrolment Policy* and CCS Handbook.
INVOICING AND STATEMENTS	
CCS Account Policy Payment of Fees Policy	The *Payment of Fees Policy* outlines procedures regarding invoicing and providing statements to families. A Statement of Entitlement will be provided to families each fortnight as per CCS requirements.
	The *CCS Account Policy* provides details regarding when invoices will be issued to families. Invoices and Statements are available to families upon request.
THIRD PARTY SOFTWARE SECURITY	
CCS Compliance Checklist/ Audit Cyber Safety Policy Fraud Prevention Policy *Fraud Prevention and Detection Procedure*	Refer to the *Cyber Safety Policy:* The Approved Provider will ensure the CCSS software used at the service has policies and procedures regarding safe storage of sensitive data before using the software, the Approved Provider will review the privacy policy of the CCS software on a yearly basis or as required. The Approved Provider will review any potential threats to software security on a monthly/ yearly basis. The Director/ Nominated Supervisor will advise the Approved Provided as soon as possible regarding any potential threat to security information and access to data sensitive information. Any breaches of data security will be notified to the Office of the Australian Information Commissioner (OAIC) by using the online Notifiable Data Breach Form. All Personnel using the software will have their own log in username and password. Each Personnel who is responsible for submitting attendances and enrolment notices to CCSS will be registered with PRODA as a Person with Management or Control of the Provider or as a Person with Responsibility for the Day-to-Day Operation of the Service. The Approved Provider will review staff log ins on a monthly basis and ensure this procedure is followed by all staff who access CCS software to submit data to CCS.

	The *CCS Compliance Checklist/ Audit* will be used each month by the Approved Provider to review usernames and passwords of staff using CCSS Software and to review the privacy policy of individual CCSS Software. The Approved Provider will use the *CCS Compliance Checklist/Audit* to ensure usernames and passwords used for CCSS Software have not been shared or compromised
DATA INTEGRITY	
Fraud Prevention Policy *Fraud Prevention and Detection Procedure* *CCS Compliance Checklist/ Audit*	Refer to the *CCS Compliance Checklist/ Audit* as the checklist is used each month to identify any data anomalies within incorrect data submissions are picked up in a timely manner. This checklist is used as a tool to facilitate fraud prevention and detection within our Service in relation to correct data entry for enrolments, attendances, CCS payments, personnel, and record keeping. The *Fraud Prevent Policy and Procedure* outlines that CCS Software will be monitored by the Approved Provider to ensure data integrity and security is maintained by all staff who process CCS payments to families. Attendances are cross referenced against child booking reports to ensure sessions are correct when submitted to CCS. Sessions which require resubmission are resubmitting to CCS within 14 days. CCS payments are checked by the financial officer each month and any anomalies are discussed with the Approved Provider and Director/ Nominated Supervisor. CCS Payment reports and invoices are electronically stored each week for future cross referencing and checking.
FRAUD PREVENTION AND DETECTION	
Fraud Prevention Policy *Fraud Prevention and Detection Procedure*	The *Fraud Prevention Policy and Procedure* outlines fraud prevention and detection in relation to CCS data, internal controls to prevent fraud and reporting of fraudulent activity and/or corruption. Including details of the Child Care Tip Off Line. The policy outlines that an internal audit regarding CCS payments will be completed by the Approved Provider/ Finance Officer each month to ensure payments received by the Australian Government recorded in the service bank account reconciles with the payments recorded in the CCS Software system The *Code of Conduct* Policy and *Termination of Employment Procedure* provides actions to follow regarding termination of employment following a breach of conduct.
RECORD-KEEPING	
Record Keeping and Retention Policy	Refer to the *Record Keeping and Retention Policy* where records are maintained and managed in a private and confidential manner, in accordance with legislative requirements including the Family Assistance Law. Records relating to CCS are kept for a period of 7 years as per CCS Handbook.

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Payment of Fees policy	The *Payment of Fees policy* outlines procedures for staff to follow in regard to supplying parents with invoices and Statement of Entitlements, invoices are issued weekly in arrears (adjust as required) and Statement of Entitlements are issued to families fortnightly.
NOTIFICATIONS	
CCS Notifications Policy	The *CCS Notifications policy* has been developed to ensure all notifiable circumstances and situations pertaining to the administration of Child Care Subsidy are reported in accordance with relevant legislation. The *CCS Notifications Policy* has been developed from the guidelines within the Child Care Subsidy Provider Handbook.
FEES AND DEBT RECOVERY	
Payment of Fees Policy *Overdue Fee Payment Procedure*	Refer to *Payment of Fees Policy* outline that our fees have been developed in line with our business plan. Our *Payment of Fees Policy* provides families with a clear understanding of the service fee structure, payment requirements and CCS benefits prior to enrolment.

This policy provides guidance to families for fees that are payable when children attend, such as pupil free days, sick days, family holidays, public holidays and service closure periods. Our *Overdue Fee Payment Procedure* outlines processes for staff and families regarding late payments of fees. |
| **COMPLAINTS-HANDLING** | |
| *Fraud Prevent Policy* *Fraud Prevention and Detection Procedure* *Payment of Fees Policy* *Dealing with Complaints Policy* *Dealing with Complaints Procedure* | The *Dealing with Complaints Policy and Payment of Fees Policy* provide procedures for families to follow regarding complaints and disputes relating to fees, invoices, CCS payments, statement of entitlements and other CCS related issues. Families who have a complaint regarding CCS payments can refer to the CCS tipoff line, details are provided in the *Dealing with Complaints Policy, Fraud Prevention Policy and Payment of Fees Policy.* |

SOURCE

Australian Government Department of Education, Skills and Employment. *Applying for Child Care Subsidy (CCS) Approval*

https://www.dese.gov.au/child-care-subsidy/applying-child-care-subsidy-approval

Australian Government Department of Education, Skills and Employment. *Care Package (2021)*
https://www.dese.gov.au/child-care-package

Australian Government Department of Education, Skills and Employment. *Child Care Provider Handbook (2018)*
https://www.dese.gov.au/resources-child-care-providers/resources/child-care-provider-handbook

Australian Government Department of Education, Skills and Employment. *Guide to Additional Child Care Subsidy (child wellbeing)* (2019)
https://www.dese.gov.au/additional-child-care-subsidy/resources/guide-accs-child-wellbeing

Australian Government Department of Education, Skills and Training. *Business support tools and resources for child care services*
https://www.dese.gov.au/business-support-tools-and-resources-child-care-services

Australian Government Department of Education, Skills and Employment. *Child Care Financial Integrity Strategy, 2019*
https://www.dese.gov.au/financial-integrity/resources/child-care-financial-integrity-strategy

Australian Government Department of Education, Skills and Employment. *Mandatory Documents for Care Subsidy Approval Applications August 2019*
https://www.dese.gov.au/child-care-package/resources/mandatory-documents-child-care-subsidy-approval-applications

Australian Government Department of Education, *Child Care Subsidy (CCS) Specified Personnel Roles* (2020)
https://www.dese.gov.au/child-care-package/resources/child-care-subsidy-specified-personnel-roles

Australian Government Department of Education and Training (2017) *Child Care Services Business Support Resource – A guide for considering your business* https://www.dese.gov.au/key-official-documents-about-early-childhood/resources/child-care-services-business-support-resource

REVIEW

POLICY REVIEWED BY	Libby Haines	Director	November 2021
POLICY REVIEWED	AUGUST 2021	NEXT REVIEW DATE	NOVEMBER 2021
MODIFICATIONS	• Update of Related Legislation • Update of Related Policies • Update of sources used within policy • inclusion of Policies, Procedures or documents to support CCS Application section		
POLICY REVIEWED	PREVIOUS MODIFICATIONS		NEXT REVIEW DATE
NOVEMBER 2020	• Inclusion of Personnel requirements • Additional source of references • Addition of reference to Family Law requirements • Update of source of references		NOVEMBER 2021

CHILD CARE SUBSIDY (CCS) GOVERNANCE POLICY

NOVEMBER 2019	New policy draft	NOVEMBER 2020