



Nature Alliance Family Day Care Service Child Care Subsidy (CCS) – Governance Policy



POLICY IN THIS SECTION AS REQUIRED BY

Education and Care National Regulations ,2012 Regulations:2.1 Provider Approvals, 2.2: Service Approvals, Division 1: Applications for Service Approvals, Division 3: Transfer of Service Approvals.

PURPOSE:

Our Family Day Care Service aims to comply with the Child Care Subsidy legislative requirements associated with operating a fee reduction Service for eligible families. We understand the Australian Department of Education, (the department's) approach to maintaining the financial integrity of all childcare funding.

Our Family Day Care Service has a genuine commitment to meet our obligations to maintain financial integrity and have effective compliance systems in place to ensure childcare 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).

Our financial integrity is transparent as we provide information about our organisation size and structure, decision making processes, employment procedures, fit and proper checks, operational structure, financial viability, and risk management.

SCOPE:

This policy applies to the Approved Provider, Service staff, Educators, Educator Assistants, and families of the Family Day Care Service.

GENERAL PROCEDURE

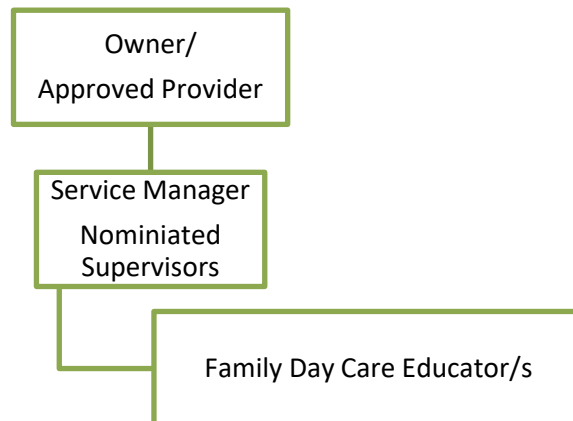
Approved provider details

To claim Child Care Subsidy to pass onto families as a fee reduction, our Family Day Care Service must be approved by a delegate of the Secretary of the Australian Department of Education, by showing the required evidence and information to ensure ongoing compliance with the Family Assistance Law. Our Family Day Care 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.

- each person who has management or control of the provider
- each person who has responsibility for the day-to-day operation of the service
- Family Day Care Educators

The Approved Provider will ensure the service is approved under the Education and Care Services National Law and maintains Provider and Service Approval, including meeting requirements of the National Quality Framework. Our Service will continue to meet the conditions for Child Care Subsidy approval as outlined within the Childcare Provider Handbook.

ORGANISATIONAL STRUCTURE DIAGRAM [DECISION MAKING HIERARCHY]



Source: CCS Provider Handbook <https://www.education.gov.au/child-care-provider-handbook>

FINANCIAL OBJECTIVES

Our primary target for 2023 - 2024 is to increase the number of Educators to 75 and to maintain 100% occupancy. We will consistently review our Educator waitlist management procedures.

To maintain a competitive position within our marketplace fees are reviewed annually and all associated functions are governed by our 'Fee Policy'. This includes management of fee increases, the recommended collection of all gap fee payments, collection of 2-week gap fee payments in advance on enrolment and the payment of the enrolment fee.

CARE PROVIDED TO CHILDREN WHO ARE RELATIVES

There is no entitlement to Child Care Subsidy or Additional Child Care Subsidy where a Family Day Care Educator, or their partner, cares for:

- their or their partner's child, including a foster care child, adopted child, kinship child or child for which they otherwise have legal responsibility, or
- their or their partner's brother, sister, half-brother or half-sister, stepbrother or stepsister.

The Family Day Care provider must ensure that less than 50 per cent of the children to whom the Family Day Care educator is providing care within the Child Care Subsidy fortnight at the service are related to the Family Day Care educator as a:

niece or nephew

cousin

grandchild (including a great-grandchild).

FAMILY DAY CARE RECORD KEEPING

Family Day Care providers are responsible for ensuring they comply with the below requirements. The Service will:

- update policies and procedures to reflect the requirements.
- communicate the requirement with all Family Day Care (FDC) Educators

- incorporate a question in the provider’s Complying Written Arrangement and enrolment notice asking if a child is related to the FDC Educator so necessary information is gathered.
- ensure there is a log of any Educator who are currently providing care to the specified relatives across a given fortnight.
- establish a weekly or fortnightly reporting mechanism for educators to flag what, if any, care is delivered to relatives.
- provide details of the name of the individual who would otherwise be eligible for Child Care Subsidy (for example, the parent or their partner)
- provide the name of the Family Day Care Educator (whether this is the same individual) and their childcare personnel identification number (ID), the relevant child and their customer registration number (CRN)
- whether the child is still eligible for Family Day Care because the child is an eligible disability or Inclusion Support Program child, or is a remote area child, or the Educator is usually in paid work or formal study at the time care is usually provided.
- engage with the provider’s childcare software provider regarding the incorporation of a reporting mechanism into the attendance reporting system.
- provide regular monitoring of FDC educators to ensure compliance with Family Assistance Law, including physical visits to the service, as per the Monitoring, and Support of FDC Educators and Educator Assistants Policy NA-POL-0026.

THE APPROVED PROVIDER WILL:

- ensure the service operates for a minimum of 48 weeks per year
- ensure the service meets the eligibility requirements as described within the Childcare Provider Handbook
- continue to meet the conditions for service approval as outlined within the Childcare Provider Handbook
- ensure that all staff and FDC Educators comply with their legal obligations and conditions for continued CCS approval which includes:
 - ensuring the Approved Provider, FDC Educators and relevant personnel are fit and proper, and remain fit and proper, persons to have a role in the receiving and passing on of Child Care Subsidy payments
 - ensuring background checks, including Working With Children Checks/Clearances (WWCC) and National Criminal Checks are carried out for all staff and FDC Educators
 - ensuring relevant key personnel and FDC Educators who are involved in administering Child Care Subsidy to families are registered with PRODA
 - ensuring notification of any changes to relevant key personnel or Persons with Management or Control are submitted to the Department of Education within 7 days
- use an approved and registered software provider to interact with the CCS system, including submitting data in accordance with the Childcare Provider Handbook
- identify specified personnel;
 - including Persons with Management or Control,
 - Persons with Day-to-Day Operation and Service Contacts and FDC Educators
- ensure specified personnel and Educators have registered with PRODA.
- identify and record any conflict of interest between specified personnel and the service operation.

- ensure all specified personnel are “fit and proper” and remain fit and proper in accordance with conditions described within the Childcare Provider Handbook
- ensure specified personnel have completed all required background checks as per PRODA registration and Family Assistance Law requirements as outlined within the CCS Personnel Policy
- ensure enrolment notices are completed for each child and submitted within 7 days from:
 - from the end of the week in which the provider and family made an arrangement
 - the provider or service being approved or
 - the end of a suspension
- ensure enrolment notices must include details as outlined with the Childcare Providers Handbook
- ensure enrolment notices and arrangements are updated if details have changed or if the enrolment ends
- create a Complying Written Agreement (CWA) for each child and ensuring the CWA is signed by each family
- ensure the CWA includes information as outlines within the Enrolment Policy and Childcare Provider Handbook
- request families confirm enrolment notices through Centrelink online through myGov.
- ensure an appropriate arrangement of care is entered for each child
- update enrolment notices or arrangements if details have changed or if the enrolment ends
- follow legislated requirements as outlined within the Childcare Provider Handbook when entering 3rd party payments
- ensure 3rd party payments are calculated before CCS or ACCS is applied, conditions may apply where a state or territory government agency is contributing to childcare fee payments
- request vacancy information from Educators
- submit vacancies each week
- prioritise enrolments according to recommendations (services are not legally obliged to) from the Childcare Provider Handbook
 - children at risk of serious abuse or neglect
 - a child of a sole parent who satisfies, or parents who both satisfy the activity test through paid employment
- submit sessions of care, ensuring sessions are not over 12 hours in length (or 2 sessions are submitted if session is over 12 hours)
- submit sessions of care within 14 days
- record and submit attendance actual time in or out for each child
- ensure sessions of care are submitted with details as outlined within the Childcare Provider Handbook and Family Assistance Law
- ensure Educators advise the FDC Service, in writing via email each week, of any incorrect sessions or session reports which require correction
- resubmit incorrect sessions of care within 28 days to which the report refers to
- provide a reason for session reports which are varied after 28 days, as per Childcare Provider Handbook

- ensure FDC Educators submit attendance records and session of care reports each week through CCS Software
- ensure records are kept for children who are relatives of the FDC educator
- ensure care provided to children who are relatives of the Educator is less than 50% of children cared for across the week
- ensure additional absences are recorded and evidence collected as per Enrolment and Placement of Children Policy NA-POL-0010
- ensure CCS is not claimed if the service is closed. CCS may be claimed if the service is closed due to a public holiday or a period of emergency
- ensure ACCS – Child Wellbeing is administered according to the Childcare provider Handbook and ACCS Policy NA-POL-0014.
- keep records and evidence relating to the submission of ACCS
- reconcile CCS payments, entitlements paid to families and family payments within the CCS Software
- record payments made by families within the Harmony Software
- calculate discounts prior to claiming CCS, the actual fee charged must be reported after discounts are applied
- provide families with a Statement of Entitlement every week. The Statement of Entitlement must include all details as outlined in the Childcare Provider Handbook and Payment of Fee Policy NA-POL-0034
- provide invoices to families each week, advising families of their gap fee payment obligations
- keep records as outlined within the NA-POL-0037 Service Confidentiality, Privacy, Record Keeping and Retention Policy and Childcare Provider Handbook, including:
 - Complaints
 - Additional records (including attendance records)
 - Additional absence records
 - Copies of fee documents
 - Notice about a child at risk
 - Copies of evidence supporting approval applications for CCS
 - Documenting police checks and Working with Children Checks/Clearances
 - Notices provided by a state or territory body about a child at risk of abuse or neglect
 - Evidence about a Persons with Management or Control or Persons responsible for the day-to-day operation of the service
 - Evidence of police checks and Working with Children Checks/Clearances for specified personnel
- ensure FDC Educators keep records as outlines with the NA-POL-0037 Service Confidentiality, Privacy, Record Keeping and Retention Policy and Childcare Provider Handbook and provide records to the FDC Service when the educator provides resignation/termination of engagement.
- ensure records relating to CCS and the Family Assistance Law are kept for a period of 7 years
- keep staff details up to date for all staff
- notifications are made according to the NA-POL-0038 CCS Notification Policy and Childcare Provider Handbook

- ensure a Register of Care is completed when a FDC Educator is caring for another FDC Educator's child, if required

EDUCATORS WILL:

- register and maintain registration with PRODA
- ensure they are fit and proper, and remain fit and proper, persons to have a role in the receiving and passing on of Child Care Subsidy payments
- understand and comply with all legal obligations and conditions of Family Assistance Law
- use an approved and registered Harmony Software provider to submit attendances and information to the FDC Service
- identify and notify the FDC Service of any conflicts of interest
- notify the service of any vacancies
- submit attendance and sessions of care information each week to the FDC Service
- record and submit attendance actual time in or out for each child to the FDC Service
- advise the FDC Service, in writing via email each week, of any incorrect sessions or session reports which require correction
- ensure records are kept for children who are relatives of the FDC Educator
- ensure care provided to children who are relatives of the educator is less than 50% of children cared for across the week
- ensure additional absences are recorded and evidence collected as per NA-POL-0010 Enrolment and Placement of Children Policy
- provide evidence of additional absences to the FDC service
- advise the FDC service of any planned or unplanned service closures
- keep a record documenting the approved venue address and contact number (if care is not provided for at the FDC educators residence)
- provide records and evidence relating to ACCS submissions to the FDC Service
- keep records as outlined within the NA-POL-0037 Service Confidentiality, Privacy, Record Keeping and Retention Policy and Childcare Provider Handbook, including:
 - Complaints
 - Additional records (including attendance records)
 - Additional absence records
 - Copies of fee documents
 - Notice about a child at risk
 - Copies of evidence supporting approval applications for CCS
 - Documenting police checks and Working with Children Checks/Clearances
 - Notices provided by a state or territory body about a child at risk of abuse or neglect
 - Evidence of police checks and Working with Children Checks/Clearances for specified personnel
- provide records and documentation to the FDC service upon resignation/termination of engagement
- ensure records relating the CCS and the Family Assistance Law are kept for a period of 7 years
- ensure notifications are made according to the NA-POL-0038 CCS Notification Policy and Childcare Provider Handbook

- ensure a Register of Care is completed when caring for another FDC educator’s child, if required
- notify the FDC Service of any changes to their Working With Children Checks/Clearances (WWCC) and National Criminal Checks status

NON-COMPLIANCE RISK MANAGEMENT

To ensure the continued commercial, operational, and financial viability our Family Day Care Service will maintain a current Quality Improvement Plan, Professional Development and Training Plan, Personnel files, Professional Indemnity and Public Liability Insurance and a Child Care Management System. (Harmony Software).

We understand our obligations to comply with requirements for the governance and financial administration of payments of childcare funding and continually monitor and evaluate our FDC Service’s financial viability.

Related Policies, Procedures or Documents	Obligations under CCS
FIT AND PROPER CHECKS	
<ul style="list-style-type: none"> • NA-POL-0028 Employment of FDC Staff Policy • Job Descriptions • NA-POL-0038 CCS Notifications Policy • NA-POL-0020 Registration of Educators • NA-POL-0022 Fit & Proper Persons Policy 	<p>The Employment of FDC Staff Policy ensures specified personnel, including Persons with Management or Control, who submit data to CCS are registered with PRODA and have relevant Provider and Service background checks, including WWCC, Police Checks and reference checks, determining whether a person is fit and proper as per Family Assistance Law requirements.</p> <p>The Employment of FDC Staff Policy outlines procedures for management to notify the Department of Education and if required the regulatory authority in the event of specified personnel not meeting the requirements to remain fit and proper, including the change in status of WWCC.</p> <p>The CCS Notifications Policy outlines guidance for Approved Providers to notify the Department of Education in relation to changes relating to personnel.</p> <p>The Fit and Proper Policy ensures 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.</p> <p>The Fit and Proper Policy provides guidance to ensure that FDC educators are fit and proper, suitably qualified and passionate to be involved in the provision of education and care to young children.</p> <p>The Employment of FDC Staff Policy will ensure all Persons with Management or Control are identified at the service and have undergone required background checks. The service will notify the Department of Education of any changes to specified personnel, including Persons with Management or Control.</p>

STAFF RECRUITMENT	
<ul style="list-style-type: none"> Job Description NA-POL-0028 Employment of FDC Staff Policy 	<p>Job Descriptions state staff are required to have up to date knowledge and compliance of law/ regulations/ acts (including Family Assistance Law for staff who submit data to CCS).</p> <p>The Employment of FDC Staff Policy outlines that the Approved Provider or assigned nominee will approve all recruitment decisions as outlined in the Employment of FDC Staff Policy.</p> <p>The Employment of FDC Staff 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.</p>
ENROLMENT AND ACCS	
<ul style="list-style-type: none"> NA-POL-0010 Enrolment and Placement of Children Policy NA-POL-0014 ACCS Policy 	<p>The Policy refers to guidelines for CWAs and submission to CCS of enrolment details. Our Enrolment and Placement of Children 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.</p> <p>The ACCS 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).</p> <p>Refer to the Office Manager/ Nominated Supervisor Job Description where the Office Manager/ 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 Office Manager / NS.</p>
INVOICING AND STATEMENTS	
<ul style="list-style-type: none"> NA-POL-0034 Fee Policy 	<p>The Fee Policy outlines procedures regarding invoicing and providing statements to families. A Statement of Entitlement will be provided to families each week as per CCS requirements.</p>
THIRD PARTY SOFTWARE SECURITY	

<ul style="list-style-type: none"> • NA-POL-0032 Social Media Policy • NA-POL-0039 CCS Data Security Policy 	<p>The Social Media Policy outlines that 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.</p> <p>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.</p> <p>The Approved Provider will ensure all Personnel using the software will have their own log in username and password. Personnel are encouraged to change their password for CCS Software every 6 months.</p> <p>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.</p> <p>The CCS Data Security Policy provides information regarding the processes relating to the administration of Child Care Subsidy (CCS) to families and ensures our Service is compliant and adhering to Family Assistance Law obligations as part of the service's ongoing approval under Family Assistance Law.</p>
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DATA INTEGRITY

<ul style="list-style-type: none"> • NA-POL-0033 Fraud Prevention Policy • NA-POL-0032 Social Media Policy • NA-PO-0039 CCS Data Security Policy. 	<p>The Fraud Prevention Policy 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.</p> <p>Attendances are cross referenced against child booking reports to ensure sessions are correct when submitted to CCS. Families are asked to confirm any absences via CCS Software and any inconsistencies are investigated by the Approved Provider or Nominated Supervisor.</p> <p>Sessions which require resubmission are resubmitting to CCS within 14 days.</p> <p>CCS payments are checked by the Office Manager each week and any anomalies are discussed with the Approved Provider and/or Manager/ Nominated Supervisor. CCS Payment reports and invoices are electronically stored each week for future cross referencing and checking.</p>
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FRAUD PREVENTION AND DETECTION

<ul style="list-style-type: none"> • NA-POL-0033 Fraud Prevention Policy • NA Code of Conduct • CCS Compliance Checklist • NA-POL-0039 CCS Data Security Policy 	<p>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 Offline.</p> <p>The policy outlines that an internal audit regarding CCS payments will be completed by the Approved Provider/ Office Manager 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.</p> <p>The Code of Conduct and Employment of FDC Staff Policy provides actions to follow regarding termination of employment following a breach of conduct.</p>
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RECORD-KEEPING

<ul style="list-style-type: none"> • NA-POL-0037 Confidentiality, Privacy, Record Keeping and Retention Policy • NA-POL-0034 Fee Policy 	<p>The Confidentiality, Privacy, Record Keeping and Retention Policy refers to how 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.</p> <p>The Fee Policy outlines procedures for staff to follow in regard to supplying parents with invoices and Statement of Entitlements, invoices are issued weekly in arrears and Statement of Entitlements are issued to families weekly.</p>
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NOTIFICATIONS

<ul style="list-style-type: none"> • NA-POL-0038 CCS Notifications Policy 	<p>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.</p>
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FEES AND DEBT RECOVERY

<ul style="list-style-type: none"> • NA-POL-0006 Educator Fee Policy • NA-POL-0034 Fee Policy 	<p>The Fee Policy outlines that our fees have been developed in line with our business plan. Our Fee Policy provides families with a clear understanding of the service fee structure, payment requirements and CCS benefits prior to enrolment.</p> <p>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 non-payment of fees procedure outlines processes for staff and families regarding late payments of fees.</p>
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COMPLAINTS-HANDLING

<ul style="list-style-type: none"> • NA-POL-0033 Fraud Prevention Policy • NA-POL-0034 Fee Policy • NA-POL-0008 Grievance and Complaints Policy 	<p>The Grievance and Complaints Policy and Fee 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 Grievance and Complaints Policy and Fraud Prevention Policies.</p>
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SOURCE

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

<https://www.education.gov.au/applying-child-care-subsidy-ccs-approval>

Australian Government Department of Education, Skills and Employment. *New Child Care Package for providers (from 2 July 2018)*

<https://www.education.gov.au/child-care-package-providers>

Australian Government Department of Education, Skills and Employment. *Child Care Provider Handbook (2018)*

<https://www.education.gov.au/child-care-provider-handbook-0>

Australian Government Department of Education, Skills and Employment. *Guide to Additional Child Care Subsidy (child wellbeing) (2019)* <https://www.education.gov.au/accs-child-wellbeing-guide>

Australian Government Department of Education, Skills and Training. *Business support tools and resources for child care services* <https://www.education.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://docs.education.gov.au/node/52656>

Australian Government Department of Education, Skills and Employment. *Mandatory Documents for Care Subsidy Approval Applications August 2019*

<https://docs.education.gov.au/node/50221>

Australian Government Department of Education, *Child Care Subsidy (CCS) Specified Personnel Roles (2020)*

<https://docs.education.gov.au/documents/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://docs.education.gov.au/system/files/doc/other/business_support_resource_1.pdf

Related Documents

NA-POL-0006 Educator Fees Policy

NA-POL-0008 Grievance and Complaints

NA-POL-0010 Enrolment and Placement of Children Policy

NA-POL-0014 ACCS Policy

NA-POL-0020 Registration of Educators

NA-POL-0028 Employment of Family Day Care Service Staff

NA-POL-0032 Social Media Policy

NA-POL-0033 Fraud Prevention Policy

NA-POL-0034 Fee Policy

NA-POL-0037 Service Confidentiality, Privacy, Record Keeping and Retention Policy

NA-POL-0039 Data Security