



**GREATER SHEPPARTON CITY COUNCIL  
CHILDREN'S SERVICES  
CHILD CARE SUBSIDY  
GOVERNANCE POLICY**

Updated: October 2023  
Next Review: March 2025



## CHILD CARE SUBSIDY GOVERNANCE POLICY

|                             |                        |
|-----------------------------|------------------------|
| <b>Version:</b>             | 1                      |
| <b>Business Unit:</b>       | Community              |
| <b>Responsible Officer:</b> | Manager Early Years    |
| <b>Approved By:</b>         | Director Community     |
| <b>Adopted By:</b>          | Early Years Department |
| <b>Updated:</b>             | March 2022             |
| <b>Next Review:</b>         | March 2025             |

### DOCUMENT REVISIONS

| <b>Version #</b> | <b>Summary of Changes</b>   | <b>Date Adopted</b> |
|------------------|---|---------------------|
| 1                | Created new Child Care Subsidy Governance policy.   | March 2022          |
| 2.               | Removed all references to Family Day Care due to cease of operation September 2023.<br>Priority of Access for Childcare updated to include:<br>Priority 2. A child currently attending the service/or the sibling of a child currently attending the service. | October 2023        |

## DEFINITIONS

| Reference term                       | Definition  |
|--------------------------------------|---|
| Approved Provider                    | A provider approved under the Family Assistance Law who provides child care in one or more of its services and receives and passes on Child Care Subsidy payments to eligible families to reduce the cost of child care. In this instance the Approved Provider is Greater Shepparton City Council.                       |
| Contractor                           | Any organisation (including subcontractors), agents or suppliers that provide works, goods and/or services to Council.  |
| Corruption                           | Dishonest activity in which a Councillor, Executive Officer, Manager, employee, contractor or volunteer of Greater Shepparton City Council acts contrary to the interests of Council and abuses their position of trust to achieve some personal gain or advantage either for themselves or for another person or entity. |
| Council (GSCC)                       | Greater Shepparton City Council (GSCC).   |
| Council Staff Member                 | Includes a Council employee or officer, any person engaged by, or acting on behalf of Council such as a contractor or volunteer.  |
| Fraud                                | Dishonest activity causing actual or potential financial loss to Council other entity or individual, including theft of monies or other property.   |
| Child Care Subsidy System (CCSS)     | The Child Care Subsidy System is an easy-to-use interface for families and childcare providers. The CCSS manages the payment and administration of the Child Care Subsidy (CCS), including recording attendance times.  |
| Child Care Subsidy (CCS)             | Provides financial assistance to families with child care fees from the Australian Government.  |
| Additional Child Care Subsidy (ACCS) | Children at risk of serious abuse or neglect may be eligible for ACCS (child wellbeing). ACCS (child wellbeing) gives a child's family; a higher rate of subsidy, and more hours of subsidised child care.  |
| IBAC                                 | Independent Broad-based Anti-corruption Commission established under section 12 of the <i>Independent Broad-based Anticorruption Commission Act 2011</i> .  |
| Local Government Inspectorate        | An independent agency that ensures Victorian Councils comply with the requirements of the <i>Local Government Act 2020</i> .  |
| DESE                                 | The Federal Government Department of Education, Skills and Employment – The Department  |

|                     |   |
|---------------------|---|
| Hubworks Hello      | Innovative, compliant and established web-based child care management software program for Australian Early Childhood services.   |
| Long Day Care (LDC) | Long Day Care is centre-based childcare provided by professional staff where babies and children up to school-starting age can be cared for while their parents work, study or have time for their other commitments. |

## **POLICY RATIONALE**

Governance includes the management, rules, relationships, policies, systems and processes whereby authority within an organisation is exercised and maintained. GSCC governance controls and manages the manner in which its business is organised, managed and operated.

GSCC ensures that it meets the requirements of

- The Education and Care Services National Law Act 2010 and
- The Education and Care Services National Regulations 2011 and
- Section 194E of the A New Tax System (Family Assistance) (Administration) Act 1999 (the Administration Act).

This includes the responsibility to ensure all persons with access to the CCSS are considered 'fit and proper' to carry out that role on behalf of the approved provider.

## **OBJECTIVES**

This policy is intended to guide GSCC and its Early Years Department, to recognise their obligations and responsibilities under Section 194E of the A New Tax System (Family Assistance) (Administration) Act 1999 (the Administration Act).

GSCC is required to maintain a high level of business integrity, meet all legislative requirements/legal obligations, guide relevant employment processes, and reflect a detailed description of the governance processes employed by GSCC to manage the CCSS process for the approved provider and families utilising the services operated by GSCC.

## **PROCEDURES**

The GSCC business plan in relation to the CCSS is as follows;

### **Organisation size and structure**

The process of application for the CCSS includes two approvals. These tasks are completed by the Manager - Early Years. The Manager is able to delegate actions of this role whilst maintaining overall responsibility.

This person is required to maintain an active PRODA account and is responsible for:

- Approved provider approval.
- Initial approval application.
- Any amendments such as the name of the approved provider, change of bank details, amendment to approved provider address/contact details.
- Any amendments to approved personnel, including maintaining a National/State Criminal History check less than six months old for each nominated personnel, Working With Children Check (WWCC) / Victorian Institute of Teaching (VIT) registration and other required information.
- Personal history checks through the 963 Application process with ASIC for the Director and Chief Executive Officer (CEO) of the approved provider.
- GSCC documentation, including required ASIC documents, Work Cover currency certificates and public liability insurance currency certificates.
- Liaise with CCSS team in relation to the approval. The CCSST consists of:
  - Manager Early Years

- Team Leader Children's Services
- Coordinator Children's Services
- Service leaders LDC
- Administration officers
- Individual service approvals
- Each individual service approval application is to be submitted before the service commences to ensure a smooth transition when the service commences operation.
- Notification of service closure/transfer as required.
- Maintenance of required approval documentation as above.
- Liaise with CCSS team in relation to all approvals.

The Manager Early Years is required to hold sufficient knowledge or experience in relation to the above processes. This includes a review of this policy and the associated service policies, as well as of the Child Care Provider Handbook, produced by the Department of Education, Skills and Employment. See the final section of this policy for the matters to be notified and the timeline in which these are required to be notified. Should the incumbent of the role of Manager Early Years change, the new manager will be provided with direct training and all required documentation by the outgoing manager or the Team Leader.

The Manager Early Years will review the entirety of the notifications required to ensure all are met, including those undertaken by the Service Leaders. The process of CCSS, once the approval has been granted, is managed by the Service Leaders. This person is required to maintain an active PRODA account and is responsible for ensuring the required information is within the CCSS software program ('Hubworks') used by GSCC to manage children's enrolment and attendance records, to ensure;

- Links can be established between the software and the CCSS approval once it is received.
- All family enquiries and concerns are managed in a timely manner to ensure regulatory requirements are met and families are able to access CCSS if eligible. A sign is in place at the main entrance to the service with contact details of the Early Years Department for questions or concerns. When families enroll online, they are also provided with contact details for any concerns they may have in relation to the booking and CCSS processes. An online app chat system is also in place on the GSCC service communication system to allow families to raise any questions or concerns they may have in a timely manner. The GSCC Grievances and Complaints policy are in place to support actions to be taken in the event that the concern cannot be resolved. This is applicable for the CCSS processes also.
- Management of the ACCS approval process, though the collection of application information to satisfy the Manager that the family is entitled to these benefits according to the Child Care Provider Handbook <https://www.dese.gov.au/resources-child-care-providers/child-care-provider-handbook>.
- Supervising access by Service Leaders to manage any portion of the CCSS management process.
- The Team Leader will ensure all members of the team receive appropriate training, based on the Child Care Provider Handbook, in relation to the application of families CCS allowances. This training will be provided only to those employees whose role includes interacting with the CCSS process. Training will follow the procedure listed below in the Plan for Staff Development and Training.

- The Team Leader will supervise the data integrity of CCS submissions, check submissions for correctness if required and mitigate any fraudulent claims through the reporting elements of the data management systems, 'Hubworks' and 'Harmony'.

The Team Leader is required to:

- Hold sufficient knowledge or experience in relation to the above processes.
- Review this policy and the associated service policies and procedures, as well as of the Child Care Provider Handbook, produced by the Department of Education, Skills and Employment.
- Ensure CCSS data management system in place meets all of the notification requirements required of this system, including reporting vacancies and changes to fee information.
- Should the incumbent of the role of Team Leader change, the new Team Leader will be provided with direct training and all required documentation by the outgoing Team Leader or the Manager Early Years.

The Person with Management or Control for the Approved Provider is:

- required to maintain a Criminal History Check fewer than six months old and
- a current Working With Children Check or state equivalent.
- maintain evidence of these checks and a list of expiry dates.
- provide accountability through ensuring a current staff record database which:
  - provides a warning within a short period of time before the check expires.
  - triggers the person with management or control to be sent an alert and reminder to update their records.
- ensure this process is reviewed twice yearly – January and June.

The persons in day to day control of each individual service will have no control of the CCSS operations other than to submit children's attendances and finalise rolls at the end of each session. The Manager Early Years will ensure:

- These persons have provided the required Working With Children Check (WWCC) or Victorian Institute of Teaching Registration
- Evidence of being a suitably qualified person in day to day control.

Accountability will be achieved through:

- ensuring the staff record database used by the Approved Provider is current,
- the database used provides a warning within a short period of time before the check expires.
- triggers the person with management or control to be sent an alert and reminder to update their records.
- The Manager People and Development has a process in place to inform Early Years Department when certificates and checks are due to expire.
- Manager Early Years ensuring staff remain certified.
- Working with Children's Checks are reviewed on an annual basis.

## Decision-making levels

The Person with Management or Control of the Approved Provider (Manager Early Years, Director of Community and Chief Executive Officer GSCC), are responsible for the appointment of the persons responsible for the implementation of the CCSS within GSCC.

The Person with Management or Control are required to maintain an active PRODA account at all times.

**Organisation chart**



## **Staff/Employment plan**

### ***Plan for recruitment – fit and proper persons***

All persons named 'fit and proper', with the ability to interact directly with any CCSS processes (including applications, management of links to the GSCC CCSS system and family liaison in relation to CCSS) will be required to provide mandatory documents including a current Police Check (less than six months old), and a current Working With Children Check (or approved equivalent) on commencement in this role. A PRODA access approval will also be required. These persons will be the service contact for all CCS matters.

### ***Staff recruitment/expertise/experiences levels***

GSCC have a detailed Recruitment and Selection Corporate Procedure. This procedure includes the preparation for recruitment, the interview process, referee checks, pre-employment screening and ongoing management procedures.

In addition to this procedure, when considering vacant positions for persons with access/ management responsibility of the CCSS (CCSS), the relevant Manager, will consider the following factors in relation to persons deemed as 'fit and proper':

- Criminal History Check Results
- Financial suitability according to the CCSS systems and declare that they have not been investigated or charged with any offences against the Family Assistance Law. This may involve a personal history check with ASIC
- Have the attributes of good character, diligence, honesty, integrity and good judgement
- Previous knowledge of or willingness to train in the CCSS management process (including the CCSS calculator)
- Previous experience in customer service management.

### ***Plan for staff development and training***

All staff that interact with any part of the CCSS will be trained by the Team Leader, Manager Early Years and / or by the software provider as appropriate to their proposed role/responsibilities.

Training will include:

- 1:1 guidance in the processes, procedures (including troubleshooting)
- Legal obligations of persons interacting with the CCSS system and GSCC data management system.
- The relevant Manager/ Team Leader/ Coordinator, taking the proposed staff member through the relevant procedure, providing written direction as required and
- Supervising the proposed staff member's own interaction with the process until the required level of competence has been achieved.
- The Manager Early Years will review this on a regular basis to ensure an effective CCSS process is in place at all times.

The Team Leader will be trained to review closed attendances received from individual services for accuracy. Since the process for families/educators to sign their child in and out is digital, accuracy is assured as times are automatically populated and cannot be amended. If the attendance times appear inconsistent to bookings or staffing allocations, families will be contacted to confirm the accuracy of children's attendance agreement.

Children's attendance figures can be audited through the software provider, 'Hubworks' enrolment database, which shows each child's attendance and weekly summaries. Service Leaders will be trained to ensure they know to notify their Manager if they note any irregularities. This may include children's sign in or out records outside of normal operational hours. All previous data is archived electronically, and the Service Leaders will be made aware of the method available to retrieve past records as required.

When a new Team Leader or Manager Early Years is appointed, the other Service Leaders will conduct the training listed above in conjunction with the software providers

## **SERVICE DELIVERY MODEL**

### **General Financial position and forward plans**

GSCC is the trading name of the approved provider. The approved provider is a business with financial responsibilities and reporting requirements according to relevant government agencies. GSCC is a Victorian Local Government and has a Corporate Services Directorate which includes the Finance and Rates Department. GSCC employ a team of staff to manage financial record keeping and requirements. This includes bookkeepers, accountants, Finance Manager, and internal and external accountancy audits.

GSCC follow the State Government legal requirements for implementing the budget process for each fiscal year. This determines the increase in childcare fees, forward planning costings for the following year's budget income and expense.

The CEO, Director Community and Manager Early Years each hold the role of Person with Management or Control of the approved provider.

### **Description of prospective customers**

The customer base of GSCC consists of:

- Families whose children will attend one or more of components of an approved service;
  - LDC
  - Occasional Care
  - Government / Relevant Agencies (including but not limited to Child Protection and family support agencies) who may provide support for children and families who attend the above components which are associated with the following groups:
    - Support to families of children with additional needs
    - Placement enquiries and initial contact/enrolment for children with a diagnosed additional need, parents with an identified additional need/vulnerability

- Children identified at risk of abuse or neglect
- Children in the custody of the State and associated Foster Care Agencies.

Children will be enrolled using the Priority of Access Guidelines as below:

- Priority 1 : a child at risk of serious abuse or neglect
- Priority 2: a child currently attending the service/or the sibling of a child currently attending the service
- Priority 3: a child of a single parent or parents who satisfy the work/training/study test under Section 14 of the 'A New Tax System (Family Assistance) Act 1999.
- Priority 4 : any other child

### Fee setting policy

CCS is generally paid to the service who pass it on to families as a fee reduction. Families make a co-contribution by paying the gap fee. GSCC reports fee information to the government via their software systems.

Each service has an individual fee set for each service component. The setting of each service fee and each component of that service's fee is the joint responsibility of:

For LDC

- GSCC Early Years Department,
- LDC service

in line with Council's budget process.

Further details of the GSCC Fees policy is available on the GSCC website. This is available to all families at any time.

<https://greaterShepparton.com.au/community/childrens-services/eyc-policies>

The following documents are the basis for setting the fiscal years Child Care Fees and Charges;

- Local Government Victoria Model Budget [https://www.localgovernment.vic.gov.au/\\_data/assets/pdf\\_file/0020/183233/Model-Budget-2022-2023-Better-Practice-Guide.pdf](https://www.localgovernment.vic.gov.au/_data/assets/pdf_file/0020/183233/Model-Budget-2022-2023-Better-Practice-Guide.pdf)
- GSCC Financial budget information: <https://greaterShepparton.com.au/council/rates-finance-property/finance/budget>
- GSCC Financial Plan <https://greaterShepparton.com.au/council/council-documents/financial-plan>
- GSCC Fees and Charges <https://greaterShepparton.com.au/council/rates-finance-property/finance/finance-fees>

Families and the community are encouraged to provide feedback to Council about proposed draft Council budgets process.

Once the fees are set, families and communities are given four weeks' notice of change.

Manager, Early Years ensures the required budget fee information is set up within the CCSS software program ('Hubworks'). Links are established between the software and the CCSS approval once it is received. The CCS and Additional CCS is applied and gap fee then charged to families.

## **Business administration policies, e.g. Advance estimates of entitlements, charging for absences**

Families/Guardians make bookings for their child/ren's attendance via an online booking system or directly with the service. Full terms and conditions are available on the GSCC website and in confirmation when enrolment is completed.

The following additional conditions apply:

- In relation to casual occasional care, to cancel or alter booked time families need to notify the Centre by 4.30pm the day before booked care, or the cost of booking will still be charged
- Families / Guardians are eligible for 42 days of absences without impacting their CCSS benefits. This information is available for families on the GSCC website, and the Service Leaders are experienced in explaining this process to families to ensure shared understanding.
- If a child is unwell or unable to attend, on the day that they are booked to attend, the family/ guardian can provide a medical certificate and an absence is applied
- A child enrolment is active for eight weeks following the last day the child/ren attends the service. If a period of more than eight weeks has elapsed, the child will automatically be provided with a new enrolment when the family/guardian attempt to book the child/ren into the service. All information will need to be re-entered, including CCSS connections. If the booking is cancelled the first or last day of the child/ren's enrolment with GSCC, the CCSS may be removed by the Department of Education, Skills and Employment. In this situation, the family/guardian will be charged the full fee for the session with no childcare subsidy applying to this day.
- GSCC CCST will keep up to date with changes notified by DESE
- Fee updates are applied to the relevant software systems.

When a new enrolment is made, the GSCC process informs the family they will receive notice from Centrelink, prompting the family/guardian to confirm their CCSS enrolment. Once this has occurred, the Service Leader will refresh the account. The CCSS is then applied. GSCC CCST will make all efforts to assist the family/guardian to adjust their fees, including resubmitting data, refreshing accounts etc. GSCC will refund monies to the family/guardian if any CCSS is paid back to Council. Families can choose to leave the money in as credit against further childcare.

### **Gap Fees**

Families who receive CCS are required to make a co-contribution to their child care fees under Family Assistance Law. Families do this by paying the difference between the provider's fee and the CCS amount. This is known as the out-of-pocket or gap fee. A maximum hourly rate of subsidy for each service type is set by CCS and applied via GSCC software system.

## **INVOICING**

Families/guardians are required to provide Direct Debit details on enrolment to enable 'Hubworks' to charge families through their bank account. Statements of account are available at any time.

There are Terms and Conditions provided during the enrolment process, which detail:

- Cancellation fees
- Daily/Booking fees
- Additional fees (such as excursions/incursions/activity fees)
- Multi-child discounts
- Outstanding debts
- Late pick up fees
- CCS process/contact details, including the requirement of the family/guardian to link their account to GSCC.

## **COMPLAINTS HANDLING POLICY AND PROCEDURE**

A detailed Grievances and Complaints Policy and Procedure are available to families/guardians for any person to access. This can be hard copy or via the GSCC website.

The Manager, Team Leader or Service Leader is available during business hours to answer family/guardian invoice questions and at any time via email.

Service Leaders will support the families to contact GSCC Early Years debtor's officer to discuss payment plans or alternative payment options.

At each service, a sign displayed at the main entrance provides contact details of the

- GSCC Early Years Department.
- State Government Department of Education and Training
- Federal Government Department of Education, Skills and Employment Child Care Tip Off Line

The terms and conditions on the enrolment procedure also include the process for complaints handling.

GSCC reflects on the Child Care Financial Integrity Strategy and its Child Care Financial Integrity Framework Tiers to understand the role of the Department and its practices. The aims of this process are to prevent error, non-compliance and fraud before it occurs, as well as to provide a risk-based approach to planning and decision making.

The goals of the Integrity Framework are to:

- support voluntary compliance and encourage an ongoing pattern of compliant behaviours
- increase providers' awareness about their obligations to comply with requirements as they will be held accountable for the governance and financial administration practices they engage in, and for any breaches
- embed modern approaches to continually detect and adapt to financial integrity risks across the child care sector

- take strong action to deal with serious non-compliance and fraud that is defensible, including imposing conditions on approval, debt recovery, referrals to other agencies, criminal prosecutions and removal from the market
- inform the public, families, child care providers and their employees about the department's responses to proven non-compliance and fraud.

The Child care Financial Integrity Framework Tiers are:

1. Integrity Strategy
2. Operational Strategies
3. Operational Guidance

Further information about the Child Care Financial Integrity Strategy can be found at:

<https://www.dese.gov.au/financial-integrity/resources/child-care-financial-integrity-strategy>

### Tip-offs

The Child Care Tip-off line and other departmental channels are monitored for information about potential breaches. Anyone who is aware of practices that could be incorrect or illegal is encouraged to contact the tip-off line on 1800 664 231. Information can be given anonymously. Alternatively, information can be given in writing to the department through [tipoffline@dese.gov.au](mailto:tipoffline@dese.gov.au) Tip-offs may be passed on to other government agencies.

Additional support for educators and the community is available in GSCC Complaints and Concerns policy.

## RECORD-KEEPING AND POLICY AND PROCEDURES

GSCC has a detailed record-keeping policy and procedures. This includes adhering to all required timeframes under the legislative frameworks that apply to GSCC services.

With records mainly electronic, the storage of records is maintained within the software system in use. GSCC has ensured that they have access to these records for the legislated timeframes, to ensure it meets legal/audit requirements.

GSCC is subject to the Australian Privacy Principles (APPs) under the Commonwealth Privacy Act 1988 in the handling of personal information, as required by Regulation 195 of the Education and Care Services National Regulations 2011. Complying with the APP's is a condition of continued approval to operate under Section 195 of the A New Tax System (Family Assistance) (Administration) Act. The following records are retained in a secure location (either in hard copy or electronically) at the Service:

- Complaints made to the Provider (or to any of the services of the provider) relating to compliance with the Family Assistance Law.
- Record of attendance for each child for whom care is provided (regardless of eligibility for CCS and/or ACCS).
- Record of any absences from care for each child and the reason for the absence (regardless of eligibility for CCS and/or ACCS)

- Statements or documents demonstrating that Additional Absent Days in excess of the initial 42 absent days meet the criteria.
- Copies of invoices and receipts issued in relation to the payment of fees.
- Copies of all Statements of Entitlement issued and any statements issued to advise change of entitlement.

GSCC follow the CCS Secretary's Amendment (Building on the Child Care Package and Other Measures) Rules 2020 in relation to record-keeping requirements and timeframes, following from the CCS Secretary's Rules 2017.

All records must be retained for a minimum of seven years (starting at the end of the financial year in which they were created).

The following legislation is adhered to:

| LEGISLATION  | REFERENCE  |
|--|--|
| A New Tax System (Family Assistance) (Administration) Act 1999 | Division 3 – Requirement in relation to records Section 204F – Requirements to notify Secretary of certain matters.    |
| Child Care Subside Minister's Rules 2017                       | Part 5 – Provider requirements   |
| Child Care Subsidy Secretary's Rules 2017                      | Part 4 – Provider requirements<br>Division 3 – Requirement to make records<br>Division 4 – requirement to keep records |

### ADDITIONAL CHILD CARE SUBSIDY (ACCS)

ACCS is the process of providing families with additional fee assistance to support vulnerable or disadvantaged families and children. This may be before the family are working with Child Protection agencies for some elements of ACCS.

There are four payments within this scheme:

- Child Wellbeing - a subsidy equal to 100 per cent of the actual fee charged, up to 120 per cent of the CCS hourly rate cap, for up to 100 hours of assistance per fortnight.
- Grandparent - a subsidy equal to 100 per cent of the actual fee charged, up to 120 per cent of the CCS hourly rate cap, for up to 100 hours of assistance per fortnight.
- Temporary financial hardship - a subsidy equal to 100 per cent of the actual fee charged, up to 120 per cent of the CCS hourly rate cap, up to 100 hours of assistance per fortnight. It is limited to 13 weeks per event that gives rise to temporary financial hardship.
- Transition to work - a subsidy equal to 95 per cent of the actual fee charged (up to 95 per cent of the CCS hourly rate cap).

In most cases, this is paid to the provider; however, in some circumstances they may be paid to the family in line with CCS guide.

The Child Care Provider Handbook (Appendix B) <https://www.dese.gov.au/child-care-package/ccp-resources-providers/child-care-provider-handbook> details the full applications of this scheme and different contributing factors and with which payment type the family is to access.

GSCC will not charge any family who is eligible for ACCS more than the normal charges for an individual who is eligible for Child Care Subsidy.

The Team Leader will manage this process and the administration of this subsidy. The backdating of claims for 28 days will only be considered once the family/third party support agency has provided all the required information.

In relation to the ACCS (Child Wellbeing) subsidy, only the approved provider can apply for this subsidy on behalf of the individual (agency, parent, and guardian) not the child, although the child must already be registered for Child Care Subsidy. All required documents must be submitted by the approved provider, including a Complying Written Arrangement (CWA) enrolment between the individual applying for the ACCS (Child Wellbeing) and GSCC, to accept liability for the fees. A child protection worker is then to provide GSCC with a support letter to confirm the child is 'at risk'.

GSCC may provide a 'certificate' for the first six weeks, and if the subsidy is required for longer than this (up to 13 weeks), an application must be made to Services Australia for a determination. GSCC will charge full fees until the family is deemed to be CCS/ACCS eligible.

The documentation required for this subsidy may vary, depending on the family circumstances.

GSCC Manager will ensure the service leaders applying for ACCS, follow the most current CCSS requirements: <https://www.dese.gov.au/additional-child-care-subsidy/child-wellbeing#toc-how-do-i-apply->

## **CCSS OPERATIONS**

### **Systems access and training for childcare subsidy data reports**

The GSCC CCSS software systems 'Hubworks' provides all CCSS data reports. Only staff members who have received training will have access to amend/contribute to CCSS data. See Plan for Staff Development and Training section above for details on training provided.

### **Third-party software security**

GSCC maintains a contract with 'Hubworks', software providers (or their equivalent if new providers are sought) to provide the enrolment/booking processes and the CCSS to manage session reports/submission, report absences and electronic submission requirements.

'The software systems:

- are registered CCS compliant child care subsidy system programs.
- are approved against Department of Services Australia's 'Secure Cloud Strategy for Integrated Third Party Software' aligned with the Digital Transformation Agency's Secure Cloud Strategy.
- Abides with the Australian Government's 13 Australian Privacy Principles
- Additional security information is available at:
  - Hubworks <https://www.hubworks.com.au/technology.html>

GSCC will ensure that the software systems used by GSCC Children's Services that operate CCSS, continue to abide by the software – third party, security compliance requirements.

GSCC will check the currency of compliance for the software company every two years or when CCS requirements change impacting the CCSS.

GSCC Manager Early Years will ensure an annual audit of the services data systems, taking into account electronic family sign in and out systems, absences application, ACCS process application.

GSCC will ensure all software systems access will be in accordance with GSCC - Use of Information, Communication and Technology Systems | 52.PRO1 Information Management (M15/13774).

### **Access and management of educator care records (for LDC)**

GSCC will ensure that access and management of educator care records are maintained and updated as educators change. The software provider system allows for the Service Leaders, Team Leader and Early Years Manager to restrict educator access to relevant areas.

GSCC will ensure persons with management or control for the provider, can add, update or remove the details of all child care personnel staff details are added to and kept up to date through the software portal.

Persons responsible for the day-to-day operation of the service can add, update or remove the details of child care personnel for the service or services they manage. Where necessary, child care personnel deemed appropriate may be allocated one of the following roles;

- persons with management or control of the provider
- persons responsible for the day-to-day operation of the service (operational responsibility).

### **RECORD KEEPING**

GSCC will keep and maintain the following records in line with the CCSS record keeping requirements: <https://www.dese.gov.au/resources-child-care-providers/child-care-provider-handbook/record-keeping-and-notifications/record-keeping> and GSCC policies and procedures (M20/15850):

- complaints made to the provider, or to any of the services of the provider, relating to compliance with Family Assistance Law
- a record of attendance for each child for whom care is provided (regardless of eligibility for Child Care Subsidy), including records of any absences from care
- statements or documents demonstrating that additional absence days in excess of the allowable absence days satisfy requirements
- copies of invoices and receipts issued for the payment of child care fees
- copies of all Statements of Entitlement issued and any statements issued to advise that there was a change of entitlement.
- any notice given to a state or territory body about a child at risk of abuse or neglect

- copies of the evidence and information provided with an application for approval about persons with management or control of a provider and persons responsible for the day-to-day operation of a service
- any evidence or information produced to obtain criminal history checks and Working With Children Checks for personnel and to support any statements about these checks in an application for provider or service approval.

## **ASSURANCE – FRAUD PREVENTION OR DETECTION/RISK/AUDIT PROCESS**

### **Evaluation to ensure staff training has been effective**

The Service Leaders conduct annual performance reviews to ensure all staff are meeting department key performance indicators.

A monthly 'Service Leadership catch up' allows for the team to discuss current practices as a group and share relevant information, ensuring a consistent shared message.

Service Leadership progress meetings are held twice a term (eight times per year), and any concerns are raised and answers supported. This includes any budget/ fees queries.

The Manager Early Years and Team Leader Children's Services regularly review and reflect on the business practices to ensure all regulatory requirements are met. A full audit process is in place within the software package that allows any entry to be traced to the person who completed the action. Any concerns in relation to fraud or adverse risk are identified, documented and investigated as a matter of urgency. The provider of the data management system, 'Hubworks' may be contacted by telephone with follow up email in the case of suspected errors or fraud.

This ensures a documented history of the investigation process. The Manager will determine the investigation path and who should be involved to ensure a timely resolution and notification requirements are met. Once commenced, this investigation process will be shared with the executive level of the approved provider and the Manager Early Years. Should fraud be detected, the relevant Manager will notify the required authorities.

Fraud Prevention and Detection will be guided by Child Care Financial Integrity Strategy and GSCC Fraud Corruption and Control Policy (ICO21/1484)

### **Processes ensuring that data reports to the department are accurate**

The Team Leader provides feedback to the CCSS software ('Hubworks') provider in relation to any data reports that may not be accurate or where anomalies are identified. The software provider is required to respond to GSCC in a timely manner to ensure data reports meet regulatory requirements and business needs. Enquiry reference numbers are maintained to ensure a trace of enquiries is possible if required.

Where there are ongoing discrepancies identified in the data reports the Manager will initiate contact via email and phone, to have a meeting with the software provider to resolve any concerns.

Any passwords are maintained by the Service Leaders and the Manager Early Years will conduct an annual audit to ensure any changes to staffing has been reflected in the updates of the software systems. New passwords are only passed on to persons who have met the required check processes and undergone the required staff training as listed above.

Each staff will keep their PRODA and Hubworks user name and password secure and confidential.

Their PRODA Registration Authority Number will also be kept secure. It will be shared with Approved Provider, as they will need their specified personnel's PRODA Registration Authority Number to link to them in the Child Care Subsidy System.

The storage of passwords are kept within our Record Data Storage System – 'Content Manager' and access to the passwords locked to the individual staff, Manager Early Years, Team Leader Children's Services and Service Leader only.

Passwords are updated when there is a change of Manager, Team Leader or Service leader for that service or as notified by the data systems being utilised.

## REFERENCES

- Child Care Provider Governance Requirements (December 2018)
- Child Care Provider Handbook <https://www.dese.gov.au/child-care-package/ccp-resources-providers/child-care-provider-handbook>
- Quality Area 7 – Leadership and Service Management - <https://www.acecqa.gov.au/nqf/national-quality-standard/quality-area-7-governance-and-leadership>
- Education and Care Services National Regulations (2011) - <https://www.acecqa.gov.au/nqf/national-law-regulations>
- Education and Care Services National Law Act (2010) - <https://www.legislation.vic.gov.au/in-force/acts/education-and-care-services-national-law-act-2010/013>
- Child Care Financial Integrity Strategy 2019 [file:///C:/Users/jackie.vibert/Downloads/child\\_care\\_financial\\_integrity\\_strategy.pdf](file:///C:/Users/jackie.vibert/Downloads/child_care_financial_integrity_strategy.pdf)

## RELATED POLICIES AND PROCEDURES

- Complaints and Concerns policy (M21/16369)
- Records and Information Management Policy( M20/15850)
- Fraud and Corruption Control Policy (ICO20/1484)
- Use of Information, Communication and Technology Systems | 52.PRO1 Information Management (M15/13774)

## REVIEW

The Early Years Quality Assurance Coordinator in conjunction with Manager Early Years and Manager Corporate Governance is to review this Policy no later than four years from the date of adoption. All reviews will be undertaken in conjunction with the Manger Early Years, with proposed amendments presented to Director Community for consideration.

Updated 09/2023 - removing reference to Family Day Care due to cease of Family Day Care operations

*L. Mitchell*

5/10/23

**Louise Mitchell**  
**DIRECTOR COMMUNITY**

**Date**