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 (2024). 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.

NATIONAL QUALITY STANDARD (NQS)

QUALITY AREA 7: GOVERNANCE AND LEADERSHIP		
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 NATIONAK LAW AND NATIONAL REGULATIONS	
S12	Applicant must be fit and proper person
S 13	Matters to be taken into account in assessing whether fit and proper person
s 21	Reassessment of fitness and propriety
Part 2.1	Provider approvals
Part 2.2	Service approvals
Division 1	Applications for Service approvals
Division 3	Transfer of Service approvals
168	Education and Care Service must have policies and procedures
170	Policies and procedures to be followed

171	Policies and procedures to be kept available
175	Prescribed information to be notified to Regulatory Authority
176	Time to notify certain information to Regulatory Authority
181	Confidentiality of records kept by approved provider
183	Storage of records and other documents
184	Storage of records after service approval transferred

RELATED LEGISLATION

Child Care Subsidy Secretary's Rules 2017	Family Law Act 1975
A New Tax System (Family Assistance) Act 1999	Child Care Subsidy Minister's Rules 2017
Family Assistance Law – Incorporating all related legislation as identified within the Child Care Provider Handbook in https://www.education.gov.au/early-childhood/resources/child-care-provider-handbook	

RELATED POLICIES

CCS Account Policy CCS Data Security Policy CCS Notifications Policy CCS Personnel Policy Dealing with Complaints Policy Enrolment Policy Fraud Prevention Policy Governance Policy Payment of Fees Policy	Personnel Policy Privacy and Confidentiality Policy Professional Development Policy Recruitment Policy Record Keeping and Retention Policy Safe Use of Digital Technologies and Online Environments Policy Staffing Arrangement Policy

PURPOSE

Our 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 (the department's) approach to maintaining the financial integrity of all child care funding. Our 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 families, staff, educators, Approved Provider, Nominated Supervisor, management and visitors of the Service.

APPROVED PROVIDER DETAILS

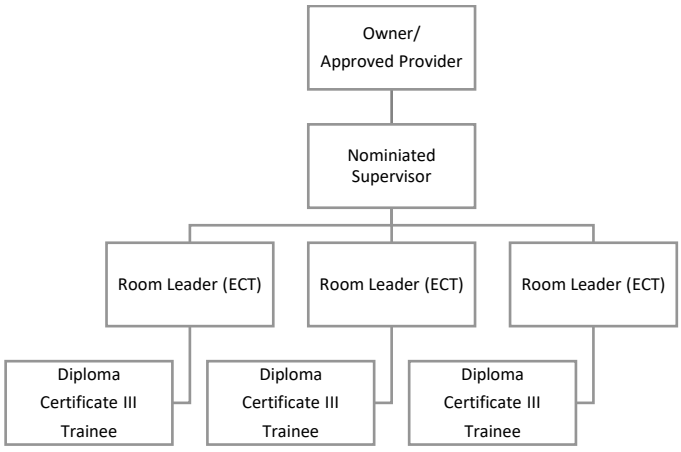
To claim Child Care Subsidy to pass onto families as a fee reduction, our Service must be approved by a delegate of the Secretary of the Department of Education by showing the required evidence and information to ensure ongoing compliance with the Family Assistance Law. Our Service will ensure all reporting 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 (Persons with Management or Control) and ensuring background checks have been undertaken for relevant key personnel.

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.

Early Education and Care Services must undertake background checks of:

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

Organisational Structure Diagram [Decision making hierarchy]



Source: CCS Provider Handbook https://www.education.gov.au/early-childhood/resources/child-care-provider-handbook

FINANCIAL OBJECTIVES

Our primary target for 2026 is to increase enrolment placements from 74% to 85%.

To achieve the above result, we routinely utilise the following promotional strategies: Facebook and Instagram.

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, collection of late fees, absences and public holidays.

NON-COMPLIANCE RISK MANAGEMENT

To ensure our continued commercial, operational and financial viability our Service will maintain a 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 service's financial viability.

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
- 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
- ensure specified personnel 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, p. 30
- 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
- ensure an appropriate arrangement of care is entered for each child
- 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
- 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
- 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 additional absences are recorded and evidence collected as per *Enrolment Policy*
- 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 *Enrolment Policy*
- 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 CCS Software
- calculate discounts prior to claiming CCS, the actual fee charged must be reported after discounts are applied. Staff discounts may be applied after CCS has been applied
- provide families with a Statement of Entitlement every 2 weeks. The Statement of Entitlement must include all details as outlined in the Childcare Provider Handbook and *Payment of Fees Policy*
- provide invoices to families each week, advising families of their gap fee payment obligations
- keep records as outlined within the *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 records relating the 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 *CCS Notification Policy* and Childcare Provider Handbook

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* • *Position Descriptions* • *CCS Notifications Policy*	The *CCS Personnel 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. The *CCS Personnel 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. The *CCS Notifications Policy* outlines guidance for Approved Providers to notify the Department of Education in relation to changes relating to specified personnel. The *Recruitment 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. The *CCS Personnel 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.
STAFF RECRUITMENT	
• *Recruitment Policy* • Child Safety and Wellbeing Policy • *Position Descriptions*	*Position Descriptions* states educators are required to have up to date knowledge and compliance of the law/ regulations/ acts (including Family Assistance Law for staff who submit data to CCS). *The Recruitment Policy* outlines that 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. The *Child Safe Environment Policy* ensures all staff and educators are considered fit and proper to be working directly with children.
ENROLMENT AND ACCS	
• *Enrolment Policy* • *Enrolment Procedure*	The *Enrolment Policy* and *Enrolment Procedure* refers to guidelines for CWAs and submission to CCS of enrolment details. Our Enrolment Policy provides guidance for parents and management regarding the

• *CCS Procedure Guide* • *Professional Development Policy*	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. The *Professional Development Policy* provides details of staff who are required to be trained in CCS administration processes. Refer to the Nominated Supervisor *Position Description* where the Nominated Supervisor 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 Nominated Supervisor 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* • *Safe Use of Digital Technologies and online Environments Policy* • *Safe Use of Digital Technologies and Online Environments Procedure*	The *Safe Use of Digital Technologies and Online Environments Policy and Procedure* 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. The Approved Provider will review any potential threats to software security on a monthly/ yearly basis. The 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

• *CCS Data Security Policy*	Information Commissioner (OAIC) by using the online Notifiable Data Breach Form. 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. 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/audit 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. The *CCS Compliance Checklist/Audit* covers details regarding ensuring the data is submitted to CCS accurately and checked against service records. Data submitted to CCS: Enrolments, Attendances, CCS Payments, Personnel and Record Keeping is cross referenced from CCS Software to service records; Enrolment forms, Sign In/out Sheets, Personnel records, Proda records. The Approved Provider will sign off on the *CCS Compliance Checklist/Audit* each month and complete an action plan for any items that need to be followed up. For example: The attendance sign in/out record is cross referenced against attendance reports recording attendances submitted through the CCS Software, the cross referencing is recorded on the *CCS Compliance Checklist/Audit* each month by the Approved Provider. 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.
DATA INTEGRITY	
• *Fraud Prevention Policy*	The *CCS Compliance Checklist/ Audit* 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 ensures data integrity within our Service in relation to correct data entry

• *Fraud and/or Corruption Prevention Procedure* • *CCS Compliance Checklist/ Audit* • *Safe Use of Digital Technologies and online Environments Policy* • *Safe Use of Digital Technologies and Online Environments Procedure* • • *Cyber Safety Policy* • *Cyber Safety Procedure* • *CCS Data Security Policy* • *Data Security Procedure* • *Data Breach Response Procedure*	for enrolments, attendances, CCS payments, personnel, and record keeping. The Managers will sign the *CCS Compliance Checklist/Audit* upon completion and complete an Action Plan to follow up any items. The *CCS Compliance Checklist/Audit* will be stored as evidence of cross checks occurring. The *Fraud Prevention Policy and Fraud Corruption Prevention 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. Families are asked to confirm any absences via CCS Software and any inconsistencies are investigated by the Approved Provider or Nominated Supervisor. 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. The *Data Security Checklist* outlines steps for services to consider and follow during recruitment and induction of new staff and educators to ensure data is stored, used and accessed in accordance with relevant policies and procedures. The Data Breach Response Procedure outlines steps for the service to follow in the event personal information is lost or subjected to unauthorised access, modification, use or disclosure or other misuse.
FRAUD PREVENTION AND DETECTION	
• *Fraud Prevention Policy* • *Fraud and/or Corruption Prevention Procedure* • *Code of Conduct Policy* • *Termination of Employment Procedure*	The *Fraud Prevention Policy and Fraud Corruption 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 Form. 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

• *CCS Data Security Policy*	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* • *Payment of Fees Policy* • *Record Keeping Quick Reference Guide and Checklist*	The *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. The *Record Keeping Quick Reference Guide and Checklist* is available to assist services to ensure day to day compliance with record keeping requirements. 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* • *Notification and Reporting Guide*	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. The *Notification and Reporting Guide* assists services to ensure they are aware of legal obligations related to matters that must be reported under the Family Assistance Law.
FEES AND DEBT RECOVERY	
• *Payment of Fees Policy* • *Overdue Fee Payment Procedure*	The *Payment of Fees Policy* outlines 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 Prevention Policy* • *Payment of Fees Policy*	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

• *Dealing with Complaints Policy* • *Complaints/ Grievance Procedure*	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.*

CONTINUOUS IMPROVEMENT/REFLECTION

Our *CCS Governance Policy* will be updated and reviewed annual basis or earlier if there are changes to legislation, ACECQA guidance or any incident related to our policy. Feedback will be requested from children, families, staff, educators and management and notification of any change to policies will be made to families within 14 days.

SOURCES

Australian Government Department of Education. *Applying for Child Care Subsidy (CCS) Approval*
Australian Government Department of Education. *Child Care Provider Handbook (2024)*
Australian Government Department of Education. *Child Care Subsidy Governance Statement (2024)*
Australian Government Department of Education. *Guide to Additional Child Care Subsidy (child wellbeing)* (2025)
Australian Government Department of Education. *Provider tool kit*
Australian Government Department of Education. *Child Care Financial Integrity Strategy, 2019*

REVIEW

POLICY REVIEWED BY	Krystle Hills	Consultant	01/03/2026
POLICY REVIEWED	March 2026	NEXT REVIEW DATE	March 2027
MODIFICATIONS	• Annual policy maintenance • No major changes to policy • Laws and regulations updated • Inclusion of Safe use of digital technologies and online environment policy and procedure instead of cyber policy and procedure.		

POLICY REVIEWED	PREVIOUS MODIFICATIONS	NEXT REVIEW DATE
January 2025	• annual policy maintenance • no major changes to policy • updated tip off information • sources checked for currency and updated as required	January 2026