



CHILD CARE SUBSIDY GOVERNANCE POLICY



POLICY RATIONALE

Governance (as defined by the Australian Institute of Company Directors) includes the management, rules, relationships, policies, systems and processes whereby authority within an organisation is exercised and maintained. The Team Holiday Pty Ltd (trading as TeamKids) governance controls, manage the manner in which its business is organised, managed and operated.

TeamKids ensures that it meets its duty of care obligations under the Education and Care Services National Law Act 2010 and Education and Care Services National Regulations 2011; however, it also needs to meet the requirements of 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 Child Care Subsidy System (CCSS) are considered 'fit and proper' to carry out that role on behalf of the approved provider.

POLICY OBJECTIVES

This policy is intended to guide TeamKids and its management team, to recognise that under Section 194E of the A New Tax System (Family Assistance) (Administration) Act 1999 (the Administration Act), TeamKids 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 TeamKids to manage the CCSS process for the approved provider and families utilising the services operated by TeamKids.

PROCEDURES

The TeamKids business plan in relation to the Child Care Subsidy System is as follows:

ORGANISATION SIZE AND STRUCTURE

The process of application for the Child Care Subsidy System (CCSS) includes two approvals. These tasks are completed by the National Quality & Compliance Manager.

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 Police 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, such as those required in different states. This may include the Blue Card and Teacher Registrations. Personal reference checks at the time of commencement as a company employee will also be considered.
- Personal history checks through the 963 Application process with ASIC for the Director of the approved provider.
- Company documentation, including required ASIC documents, Workcover currency certificates and public liability insurance currency certificates.

- Liaise with Child Care Subsidy System team in relation to the approval.
- 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 Child Care Subsidy System team in relation to all approvals.

The National Quality & Compliance Manager 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 role of National Quality & Compliance Manager change, the new manager will be provided with direct training and all required documentation by the outgoing manager or the Customer Service Manager.

The National Quality & Compliance Manager will review the entirety of the notifications required to ensure all are met, including those undertaken by the Customer Service Manager.

The process of Child Care Subsidy System (CCSS), once the approval has been granted, is managed by the Customer Service Manager.

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

- Ensuring the required information is within the Child Care Subsidy System software program (Fully Booked) used by TeamKids 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 customer service team for questions or concerns. When families enrol online, they are also provided with contact details for any concerns they may have in relation to the booking and CCSS processes. A chat system is also in place on the TeamKids website to allow families to raise any questions or concerns they may have in a timely manner. The TeamKids 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 Additional Child Care Subsidy (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 other Customer Service Team Members to manage any portion of the CCSS management process.
- The Customer Service Manager will ensure all members of the team receive appropriate training, based on the Child Care Provider Handbook, in relation to the application of families Child Care Subsidy 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 Customer Service Manager will supervise the data integrity of CCS submissions, check submissions for correctness and mitigate fraudulent claims through the reporting elements of the data management system, Fully Booked.

The Customer Service Manager 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. The Customer Service Manager is responsible for ensuring that the 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 role of Customer Service Manager change, the new manager will be provided with direct training and all required documentation by the outgoing manager or the National Quality & Compliance Manager.

The person with management or control for the Approved Provider is required to maintain a Police check of fewer than six months old and a current Working With Children Check or state equivalent. The National Quality & Compliance Manager will maintain copies of these documents and a list of expiry dates of these documents. Further accountability will be achieved through the staff record database used by the Approved Provider (Employment Hero), which provides a warning within a short period of time before the check expires. This then triggers the person with management or control to be sent an alert and reminder to update their records. The National Quality & Compliance Manager will ensure this process is reviewed on a bi-annual basis.

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 National Quality & Compliance Manager will ensure that these persons have provided the required check of a Working With Children Check (WWCC) or individual state-required Teaching Registration that is required to be a suitably qualified person in day to day control. Accountability will be achieved through the staff record database used by the Approved Provider (Employment Hero), which provides a warning within a short period of time before the check expires. This then triggers the person with management or control to be sent an alert and reminder to update their records. The Human Resources Manager will ensure this process is reviewed on a bi-annual basis.

DECISION-MAKING LEVELS

The Person with Management or Control of the Approved Provider (The Director of TeamKids), the Chief Financial Officer and the Chief Executive Officer are responsible for the appointment of the persons responsible for the implementation of the Child Care Subsidy System within TeamKids.

The Person with Management or Control, Chief Executive Officer and National Quality & Compliance Manager is required to maintain an active PRODA account at all times.

See Organisational Chart as attached to highlight the reporting structures of TeamKids.

STAFF/EMPLOYMENT PLAN

Plan for recruitment – fit and proper persons

All persons named 'fit and proper', with the ability to interact directly with any Child Care Subsidy System (CCSS) processes (including applications, management of links to the TeamKids child care management 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

TeamKids have a detailed Policy known as the Guidelines for the recruitment of staff, educators and volunteers. This policy includes the preparation for recruitment, the interview process and ongoing management procedures.

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

- Police Check Results
- Previous knowledge of the CCSS management process (including the CCSS calculator)
- Previous knowledge of the Child Care Subsidy System (TeamKids software provider)
- Previous experience in customer service management

If the person will hold a responsible position in relation to CCSS, such as the Person with Management or Control, Customer Service Manager or National Quality & Compliance Manager, they will be required to establish 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.

Plan for staff development and training

All staff that interact with any part of the Child Care Subsidy System (CCSS) will be trained by the Customer Service Manager or the National Quality & Compliance Manager as appropriate to their proposed role/responsibilities.

Training will include 1:1 guidance in the processes, procedures (including troubleshooting) and legal obligations of persons interacting with the CCSS system and TeamKids data management system. The relevant Manager will take the proposed staff member through the relevant procedure, providing written direction as required and then supervise the proposed staff member's own interaction with the process until the required level of competence has been achieved. The Manager will review this on a regular basis to ensure an effective CCSS process is in place at all times.

The customer service team 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 now digital, accuracy is assured in that 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.

Children's attendance figures can be audited through the software provider, Fully Booked enrolment database, which shows each child's attendance and weekly summaries. Customer Service Team members 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 customer service team will be made aware of the method available to retrieve past records as required.

Should a new Customer Service Manager or the National Quality & Compliance Manager be appointed, the other Manager will conduct the training as listed above.

SERVICE DELIVERY MODEL

General financial position and forward plans

TeamKids is the trading name of the approved provider, Team Holiday Pty Ltd. The approved provider is a business with financial responsibilities and reporting requirements according to relevant government agencies. TeamKids employ a team of staff to manage financial record keeping and requirements. This includes bookkeepers, accounts, chief financial officer and an outside accountancy firm.

TeamKids is a solvent company with a sole Director. This person holds the role of Person with Management or Control of the approved provider.

Description of prospective customers

The customer base of TeamKids consists of:

- Families whose children will attend one or more of these components of an approved service:
 - › Before School Care
 - › After School Care
 - › Vacation Care
- Government / Relevant Agencies (including child protection and family support agencies) who may provide children 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 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 3:** any other child

Fee setting policy

Each service has an individual fee set for each service component. For example, the vacation care component of one service may have a higher or lower fee than another service operated by the same approved provider. The setting of each service fee and each component of that service's fee is the joint responsibility of the TeamKids Executive Management Team.

Further details of the TeamKids fees policy is available on the TeamKids website. This is therefore available to all families at any time.

Business admin 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. Full terms and conditions are available on the TeamKids website and in confirmation when enrolment is completed.

The following additional conditions apply:

- In relation to Before and After School Care, if a cancellation is made within 48 hours of the booked session, the account is charged in full. If cancellation is made before this time, the account is credited in full. A charge of \$5 applies if a booking is made within 24 hours of the booked day that the child/ren will attend.
- In relation to Vacation Care, if a cancellation is made within 24 hours of the booked session, the account is charged in full. If cancellation is made before this time, the account is credited in full. A charge of \$5 applies if a booking is made within seven days of the booked day that the child/ren will attend.
- Families / Guardians are eligible for 42 days of absences without impacting their CCSS benefits. This information is available for families on the TeamKids website, and the customer service team is 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 within five days and will then be given full credit to their account.
- A child enrolment is ACTIVE for eight weeks following the last day that 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 again, including CCSS connections. This is in particular with Vacation Care services. If the booking is cancelled the first or last day of the child/ren's enrolment with TeamKids, 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.

When a new enrolment is made, the TeamKids process creates an automated email response, prompting the family/guardian to confirm their CCSS enrolment. They will receive a reminder every day for a week until it is confirmed. Once this has occurred, the customer service team will refresh the account. If incorrect details are provided, an automated email informs them that something is not right and to call the customer service team. The CCSS is then applied. TeamKids will make all efforts to assist the family/guardian to adjust their fees, including resubmitting data, refreshing accounts etc. TeamKids will refund monies to the family/guardian if any CCSS is paid back to TeamKids.

INVOICING

Families/guardians are required to provide Direct Debit details on enrolment to enable Ezidebit to charge families either through their credit card or bank account. Statements of account are available at any time on the family/guardian enrolment portal.

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

- Associated Ezidebit fees & access to the Ezidebt Financial Services Guide
- Cancellation fees
- Daily/Booking fees
- Additional fees (such as excursions/incursions/activity fees)
- Administration fees
- Multi-child discounts
- Outstanding debts
- Late pick up fees
- Child Care Subsidy process/contact details, including the requirement of the family/guardian to link their account to TeamKids.

COMPLAINTS HANDLING POLICY AND PROCEDURE

A detailed Grievances and Complaints policy and procedure are available to families/guardians for any person to access via the TeamKids website. Also included are a detailed Frequently Asked Questions (FAQ) section and contact details for any complaints to be directed.

The customer service team is available during business hours to answer family/guardian invoice questions and at any time via email.

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

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

TeamKids 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 strategy involves the Department goals of:

- Details the principles that fair and consistent decisions in financial integrity matters.
- Outlining department expectations and potential intervention responses.
- Helps provide services, educators and families to gain skills and knowledge to comply with Law.

The tiers are as follows:

- Integrity Strategy
- Operational Strategies
- Operational Guidance

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. Tip-offs may be passed on to other government agencies.

RECORD-KEEPING POLICY & PROCEDURES

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

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

TeamKids 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 Additional Child Care Subsidy [ACCS]).
- Record of any absences from care for each child and the reason for the absence (regardless of eligibility for CCS and/or Additional Child Care Subsidy [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 of a change of entitlement.

TeamKids follow the Child Care Subsidy 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 Child Care Subsidy 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 the care, to which the information or event relates, was provided).

The following legislation is adhered to:

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

ADDITIONAL CHILD CARE SUBSIDY (ACCS)

Additional Child Care Subsidy (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 Child Care Subsidy 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 Child Care Subsidy 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 Child Care Subsidy 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 Child Care Subsidy hourly rate cap).

In most cases, this is paid to the provider; however, at some times, it can be paid directly to the family.

The Child Care Provider Handbook (Appendix B) details the full applications of this scheme and different contributing factors and with which payment type the family is to access.

TeamKids will not charge any family who is eligible for ACCS more than what they would originally charge an individual who is eligible for Child Care Subsidy.

The Customer Service Manager 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, 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 TeamKids, to accept liability for the fees. A child protection worker is then to provide TeamKids with a support letter to confirm the child is ‘at risk’.

TeamKids 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. TeamKids 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.

CCSS OPERATIONS

Systems access and training for childcare subsidy data reports

The TeamKids CCSS software system 'Fully Booked' provides all childcare subsidy system (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

TeamKids maintains a contract with Fully Booked, who provides the enrolment/booking processes but also the CCMS submission system to manage session reports/submission, report absences and electronic submission requirements.

Fully Booked/EziDebit is PCI DSS (Payment Card Industry Data Security Standard) compliant, at a Level 1 standard (the highest level of compliance that can be achieved by an organisation). This ensures that a family/guardian's details are handled with maximum security. This is reviewed annually by a Qualified Security Assessor, as well as numerous security checks and tests conducted throughout the year.

In relation to the security of TeamKids, Fully Booked has provided a declaration that the software has been tested against scenarios provided by the Department of Education, Skills and Employment and has provided an undertaking to abide by CCMS IT Security Principles for Software Developers.

Access and management of educator care records (for FDC and IHC)

This is not required for TeamKids, who do not include Family Day Care or In-Home Care components in their delivery model to date. Should this change in the future, amendments will be made to this policy and the relevant procedures.

ASSURANCE – FRAUD PREVENTION OR DETECTION/RISK/AUDIT PROCESS

Evaluation to ensure staff training has been effective

The Customer Service team conduct bi-annual performance reviews to ensure all staff are meeting department key performance indicators.

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

Individual progress meetings are held at monthly intervals.

The Customer Service Manager consistently reviews and reflects on the business practices to ensure all regulatory requirements are met in an accurate and reduced risk manner. A full audit process is in place within the software package that allows any entry to be traced to whom 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, Fully Booked, 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 Customer Service 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 National Quality & Compliance Manager. Should fraud be detected, the relevant Manager will notify the required authorities.

Processes ensuring that data reports to the department are accurate

The Customer Service Manager provides feedback to the CCSS software (Fully Booked) provider in relation to any data reports that may not be accurate. The provider responds to TeamKids 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.

Any passwords are maintained by the Customer Service Manager and the National Quality & Compliance Manager. These are only passed on to persons who have met the required check processes and undergone the required staff training as listed above.

REFERENCES:

- Child Care Provider Governance Requirements (December 2018)
- Child Care Provider Handbook
- Quality Area 7 – Leadership and Service Management
- Education and Care Services National Regulations (2011)
- Education and Care Services National Law Act (2010)
- Child Care Financial Integrity Strategy 2019

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