



Australian Government
Department of Education,
Skills and Employment

CCS Service Governance Workbook

Applying for Child Care Subsidy Approval





CCS Service Governance Workbook

What is this Workbook? This Workbook is a question and answer document used to provide additional information about the governance of a child care service in relation to Child Care Subsidy (CCS) and Additional Child Care Subsidy (ACCS) payments.

Who can use this Workbook? Child care providers who are applying for CCS approval for one or more of their child care services.

What will the Workbook be used for? An applicant may submit the completed Workbook to the department's CCS Assessment Team to provide governance information about their child care service/s in support of their CCS Application.

Is the Workbook compulsory for all CCS Applications? No. Applicants can provide all necessary service governance information in the CCS Application. However, this Workbook can be used where additional information is necessary or applicants need guidance in identifying what information is required.

This Governance Workbook is submitted in support of CCS Application for:

CCS Application ID Number (if known)

Provider Name

Service Name

Background

To become approved to administer the CCS payment, the Secretary of the Department of Education, Skills and Employment must consider the provider to be fit and proper to be approved to be a provider to administer CCS payment to families.

As outlined in Section 194E of the *A New Tax System (Family Assistance) (Administration) Act 1999* (the Administration Act), in determining whether or not the provider is fit and proper, the Secretary may consider:

- g) the arrangements the person has:
 - i. to ensure the person complies with the family assistance law; and
 - ii. to ensure anyone the person is responsible for managing complies with the family assistance law;

This means that in order to be considered fit and proper, providers must be able to satisfy the Secretary that their organisation has sufficient governance to protect the integrity of public funds they will administer at each one of their services and to ensure ongoing compliance with the family assistance law.

Note – Governance requirements for CCS Approval are **different** to those required for regulatory approval under the Education and Care Services National Law (National Law). This is because CCS Approval is related to the administration of public money however National Law Approval is related to the quality of care and safety of children.

Demonstrating your governance arrangements

To meet the requirement of Section 194E, the applicant must include information in the CCS application that outlines their governance arrangements. Applicants are seeking approval to administer substantial amounts of taxpayer money and must be able to satisfy the Secretary that their organisation has the governance arrangements needed to ensure the funds will be used as intended and are secure from fraud or dishonesty.

In other words, in their CCS application, applicants need to demonstrate that their organisation can administer CCS payments appropriately. The information needs to include:

- how the organisation is structured;
- how decisions will be made at each service;
- how the applicant will ensure everyone at the service has the information and knowledge to comply with the family assistance law;
- how the applicant will check that service personnel are acting honestly and with diligence; and;
- what steps will be taken when there is a problem.



1. Organisation Size and Structure

So that we can understand how your child care service/s will operate, we need you to describe what your business looks like and how it is organised. You may want to describe this in words or you can choose to demonstrate the information with a diagram below or as an attachment.

How large is your organisation and how is it organised?

You might like to include the following information in your response however these points are listed to guide you to the type of detail required. You do not have to answer each and every question.

- Does the legal entity operate businesses other than child care services and where do these businesses fit into the organisation?
- In a larger organisation, is there a management team or head office overseeing all of the administration and for a smaller organisation, how is the administration undertaken?
- Where is the organisation – both the administration and child care service/s - physically located?
- For Family Day Care (FDC)/In Home Care (IHC) providers, are there regional offices or educators in remote locations?

TYPE OR PASTE YOUR RESPONSE IN THE BOX BELOW. IF YOU ARE PROVIDING THE INFORMATION WITH AN ATTACHED DOCUMENT, TYPE 'SEE ATTACHED' AND THE NAME OF THE DOCUMENT YOU ARE ATTACHING.



2. Decision Making

The decision makers in your organisation must be listed on your CCS approval records held by the department. To understand who will be responsible for how the business and the child care services are operated, we need you to explain how decisions are made in your organisation.

Explain who makes the decisions in your business and how this happens.

You might like to include the following information in your response however these points are listed to guide you to the type of detail required. It is not mandatory for you to answer each and every question.

- At what level can financial and business decisions be made about the service in regard to staff recruitment, hours of operation, fee policies and major operational decisions such as business closure?
- What decision making processes are used – for example, does the child care service director seek written approval from the owner or CEO before making a decision?
- Who is responsible for certifying ACCS and additional absence decisions?
- Who is responsible for reviewing policies and procedures and how often is this done?

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3. Staff Employment, Training and Management

Your service staff and key personnel will act on your behalf in the operation of your child care service/s. To be satisfied about how CCS will be managed in your service/s, we need to know about your staff.

Explain how you will ensure you employ suitable staff to administer the CCS payment and ensure that they are knowledgeable about the family assistance law.

You might like to include the following information in your response however these points are listed to guide you to the type of detail required. It is not mandatory for you to answer each and every question:

- How many people does your organisation currently, or plan to, employ and what are the different roles (eg. Area Manager, Centre Director, Educator etc)?
- How and where do you recruit new staff? What sort of experience or skills/qualifications do you expect of the staff at each level?
- What background or compliance checks do you undertake on new staff?
- Is there a probation period or regular assessment of their fitness and propriety? Does your organisation have policies about staff who return adverse fit and proper checks i.e. criminal history checks?
- What mandatory training do you require your staff to undertake? For example, do you require your administrative staff to undertake training about the family assistance law and the CCS payment? What format is this training (is it done in group sessions or one-to-one), how often is the training conducted and how do you check that the training has been effective?
- What family assistance law resources (for example, the CCS Provider Handbook) are made available to your staff, particularly those responsible for submitting attendance records (for FDC/IHC this includes your Educators)? How do you ensure that staff are aware of available resources in relation to administration of CCS and the family assistance law. For example, are staff directed to Fact Sheets on the Department of Education, Skills and Employment's CCS webpages?
- For FDC and IHC providers operating across large or remote areas, what arrangements do you have in place to support and monitor outposted Educators?
- For FDC and IHC providers, what are the requirements and arrangements for sub-contract and/or employed Educators?

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4. Service Business Model

To support access to stable child care for families, the department needs to assess the financial viability of approved providers and services.

You will need to demonstrate how you will promote your business, generate income and remain financially viable. These issues, and other related matters, are often included in an organisation's Business Plan.

You might like to include the following information in your response however these points are listed to guide you to the type of detail required. It is not mandatory for you to answer each and every question.

What is your organisation's general financial position and forward plans for financial growth and/or stability?

Who are your prospective customers and what types of services will be included in the care you provide? Are there plans for expansion?

What are your revenue and income policies in your child care service/s? For example, how do you set fees and ensure that you remain competitive? What are your policies covering issues such as cancelled enrolments, fee estimates for families, make-up days for absences, discounts, outstanding fees or other revenue related matters?

What financial controls and audits are in place for your organisation? How are your accounts managed (e.g. do you use a chartered accountant)?

Does the organisation have sufficient insurance to protect its financial viability?

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5. CCS Operations

Your service will be administering the CCS payment through an online information system by entering data, receiving electronic payments and providing accounts to families. The department needs information about how this will be managed in your organisation.

Explain how CCS data will be compiled and submitted in your organisation.

You might like to include the following information in your response however these points are listed to guide you to the type of detail required. It is not mandatory for you to answer each and every question.

- How is the attendance recorded at your service/s? Are there sign-in sheets or electronic registers? How do you know that these records are being correctly completed and are there policies regarding administrative errors?
- What processes are followed to rectify identified errors?
- For an FDC/IHC – What are the arrangements for submission and recording of educator timesheets and other records such as evidence for absences?
- What software product do you, or will you, use to enter attendance data and produce family statements? Which members of staff are responsible for using the software? What support do the staff have when there is an IT issue? What security measures do you use to protect log-on details for these staff?
- How do you assist families to understand their CCS entitlements? How are fee disputes and complaints handled?
- What are your policies for record keeping of CCS and ACCS related data and documents?

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6. Fraud and Risk Management

You are seeking approval to administer public money on behalf of the Australian Government. We need to know what you will do to protect those funds and prevent the risk of fraud and dishonesty.

Explain what you will do in your service/s to prevent the risk of fraud in the reporting of attendances, absences or fees.

You might like to include the following information in your response however these points are listed to guide you to the type of detail required. It is not mandatory for you to answer each and every question.

- Do you conduct audits and cross-checks of actual attendance, submitted data and supporting documentation?
- What sort of checking do you carry out and how often?
- Do you record the results of these checks?
- If you find cases of fraud or dishonesty, what action would you take?
- For FDC and IHC providers, what processes are in place to ensure that care is being provided in accordance with CCS legislation such as: there is genuine liability and gap fees are paid, there is no child swapping, absences are correctly reported, there is genuine liability for cost of care and that fee gaps are being collected? How often do you monitor FDC Educator processes and reporting?

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7. Declaration

This Declaration must be signed by an individual specified on your Provider Approval or in your CCS Provider Application as a Person with Management or Control of the Provider.

I declare that:

- **All information provided in this Workbook is true and correct.**
- **I am authorised on behalf of the child care provider's legal entity to provide the information contained in this Governance Workbook.**
- **I understand the information I have provided in this Workbook is in support of an application for CCS Approval and will be recorded on the service's CCS Approval to which this information relates.**
- **I understand that making false statements or providing misleading information in an application for CCS Approval is a serious offence under the Criminal Code Act 1995 (Cth) section 137.1.**

Person Name

Organisational Role

Provider Organisational Name

Date
