

POLICY/PROCEDURE NAME & REVIEW PROCESS	CCS FRAUD POLICY <p>This policy and procedure has been created to provide all stakeholders with clear guidelines and transparency to our practices and procedures.</p> <p>We welcome feedback and input from all stakeholders at any time and this policy is subject to review based on feedback or due date of annual review.</p>
NATIONAL QUALITY STANDARD	QUALITY AREA 7 GOVERNANCE AND LEADERSHIP 7.1 GOVERNANCE 7.1.2 Management systems. 7.1.3 Roles and responsibilities. 7.2 LEADERSHIP 7.2.1 Continuous improvement.
NATIONAL LAW AND REGULATIONS	170-Policies and procedures to be followed 171-Policies and procedures to be kept available 172- Notification of change to policies or procedures
RELATED POLICIES and RECORDS	<ul style="list-style-type: none"> CCS policy CCS notification timeframes record CCS fraud checklist record Payment of fees policy
SCOPE OF POLICY	This policy applies to all children, educators, families, management, students, volunteers, and visitors at our service.
AIM OF POLICY	To ensure that our service has strong guidelines, procedures, and practices in place regarding the honest handling of the Child Care Subsidy system. Our aim is to provide a clear policy, implement the policy, support practices relating to the policy, train staff regarding the policy and maintain and update the compliance of the policy for all our stakeholders.
SERVICE IMPLEMENTATION	<p>An approved provider must have in place effective internal controls to ensure integrity and accountability, to ensure that fraudulent activity in relation to any Child Care Subsidy (CCS) is prevented at all costs.</p> <p>There are a series of steps and procedures that must be adhered to in order to ensure compliance under Family Assistance Law and National Law in regard to the processing of Child Care Subsidy (CCS).</p> <p>These processes must be made clear to all employees through induction on commencement to the role if it involves the employee processing CCS.</p> <p>Employees must be made aware and supported through policy and documents and through ongoing training. Consequences of fraudulent activity must be made clear to all employees.</p> <p>Fraud involving any stakeholder's account will never be tolerated and will result in instant termination of position in the service and reporting to police and Family Assistance Law.</p> <p>Misappropriation of taxpayer funds is an extremely serious issue.</p> <p>Non-compliant behaviour and defrauding the government of childcare funding damages the public's perception of the childcare sector and the department and increases costs to the Australian Government and taxpayers.</p> <p>Fraud is the intentional act of deception for personal or financial gain.</p> <p>Examples include, but are not limited to:</p> <ul style="list-style-type: none"> Falsifying children's attendance records. Submitting incorrect or false enrolment data. Charging for care not provided. Manipulating absences or attendance to increase CCS. Withholding information that affects subsidy entitlements. Families providing false information to Centrelink or the service. <p>Childcare Financial Integrity Framework and strategy is in place to ensure compliance:</p> <p>The Integrity Framework outlines the strategies and operational processes used by the department to make sure that childcare subsidy and any funding is:</p> <ul style="list-style-type: none"> Being properly administered by providers. Directed to assist eligible families meet the real costs of genuine childcare. <p>If approved provider has knowingly or unknowingly been involved in fraudulent activity or deemed to be non-compliant relating to any government subsidies the result may be:</p>

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- Suspension of the approved provider's approval.
- Cancellation of the approved provider's approval.
- Suspension of the service approval
- Cancellation of the service approval.

Therefore, in conjunction with the procedures outlined in the childcare subsidy policy the approved provider will ensure:

They place persons in charge of CCS who are deemed Fit and Proper according to Family Assistance Law – this is determined by the following: They must be clear of

- Any evidence of law-breaking.
- Any court proceedings and convictions or findings of guilt.
- Any past administrative decisions relating to a person's suitability to be involved in childcare.
- Any evidence of fraud or dishonesty
- Any history of managing public funds.
- Any past or current debts to the Commonwealth
- Any records of financial management, including any instances of bankruptcy, insolvency, or administration.
- Any potential conflicts of interest
- Any other matter relevant to the suitability of the provider and their staff and any other matter considered relevant.

Approved provider will outline and ensure that employees understand the legal outcomes of any fraudulent activity.

They will ensure that any employees appointed to one of the roles responsible for the implementation of CCS or application of funding is suitably qualified and has all the mandatory appropriate qualifications and checks in place to perform this role such as:

- National police check.
- Working with children check
- National personal insolvency index check
- Evidence that the person is not on ASIC's banned and disqualified register.
- A current and historical personal name extract search of Asic records.

Fraud prevention measures:

- Only qualified staff manage CCS submissions and reporting.
- Transparent induction and regular training on compliance and fraud recognition.

A Childcare Financial Integrity Framework is followed to:

- Administer funding accurately.
- Support genuine care arrangements for eligible families.

Red Flags of Fraud

Staff must watch for warning signs including:

- Duplicate or unexplained attendances.
- Enrolments without physical attendance.
- High unexplained absences.
- Reports inconsistent with observed service use.
- Families requesting to "swap days" or falsify absences.

Provider will ensure that families gap fees are only paid by a form of Electronic Funds Transfer EFT such as the following:

- Bank or credit card, including mobile wallets.
- Direct deposit or bank transfer.
- Online payment systems through third party software
- Bpay or CentrePay
- Prepaid debit card.
- Management will monitor and ensure that appropriate administration of CCS such as correct reporting of child/ren attendance. It is imperative that employees do not alter or remove attendances for parents/guardians unless compliant procedures are adhered to. Employees must not alter absences or annual leave to benefit a family. Employees must not modify

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enrolment patterns (e.g. day swaps or make-up sessions) for the purpose of manipulating subsidy entitlements. ~~Employees must not swap days or make-up days.~~

- They will ensure that parents/ guardians receive a statement of entitlement for CCS each fortnight including details for the sessions of care provided and the resulting fee reduction amounts.
- Ensure that employees are supported with extra or further training to maintain compliancy as well as how to recognise fraudulent activity and how to report this.
- They provide notification to the department of education, within seven days that information in an enrolment notice has become incorrect, or information has become available that should have been included in the enrolment notice.
- Will ensure that variations to a complying written arrangement (CWA) are rectified if that information becomes incorrect.
- If for any reason employees or families are suspicious of fraudulent activity it is advised to approach nominated supervisor in the first instance or approved provider. If unable to do so due to the nominated supervisor or approved provider being involved in the fraudulent activity you can report to the Department of Education via the following: [Contact Us - Department of Education, Australian Government](#) and you can provide information anonymously. The CCS fraud tip-off form can be used to report this: [Child Care Subsidy \(CCS\) tip-off form | Department of Education](#)

Investigation Process

Upon receiving a report:

- A confidential investigation will begin immediately.
- Staff may be asked to provide records or participate in interviews.
- Temporary suspension may occur where necessary to protect service integrity.

If fraud is substantiated:

- The staff member will face instant dismissal.
- The matter will be referred to police and the Department of Education.

Whistleblower Protection

Individuals who report suspected fraud in good faith will be:

- Treated with confidentiality and respect.
- Protected from reprisal or victimisation.
- Supported throughout the investigation process.

Record Keeping and Documentation

Approved provider will retain all financial and CCS-related records for a minimum of 7 years, in accordance with law. All documents are securely stored with access restricted to authorised personnel.

Each member of the team plays an important role in the implementation of each policies guidelines, and they are outlined as below but not limited to the following:

The Approved Provider

- Will ensure they are responsible for making sure that they and their employees meet all obligations and requirements, and that the childcare funding they receive is administered appropriately and directed where it should be.
- Will ensure that they provide measures to protect the processing of CCS against any fraudulent activity by completing a **CCS fraud checklist record** on a monthly basis.
- Will ensure CCS is administered lawfully and only by persons assessed as “fit and proper” under Family Assistance Law.
- Will ensure that their fit and proper persons maintain current knowledge of legislative obligations.
- Will ensure that fit and fit and proper persons are clear of and have in place the following:
 - National police check.
 - Working with Children Check.
 - National Personal Insolvency Index check.
 - ASIC banned/disqualified register check.
 - ASIC historical personal name extract.
- Will ensure that obligations under the Education and Care Services National Law and National Regulations are met.

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- Will ensure they take reasonable steps to ensure that the nominated supervisor, educators, staff, and volunteers follow the policy and procedures.
- Will ensure they provide the nominated supervisor, educators, staff and volunteers the documentation to perform their role, follow policy, procedure, and document according to regulatory and service requirements.
- Will ensure that adequate induction process is provided to all staff to ensure they have time to read and understand policies and procedures and seek further information if unsure.
- Will ensure that the nominated supervisor and staff are equipped with ongoing professional development and training they require to comply with this policy.
- Will encourage feedback from stakeholders regarding the policy's effectiveness, particularly in relation to identifying and responding to child safety concerns.
- Will ensure the policy is kept up to date with current legislation, research, and best practice.

The Nominated Supervisor

- Will ensure that when CCS is administered as a fee reduction to families, the nominated supervisor is aware of fraud and is knowledgeable of correct procedures and prevention strategies by completing a **CCS fraud checklist record** on a monthly basis.
- Will accept the legal responsibilities associated with claiming Child Care Subsidy within the Family Assistance Law.
- Will adhere to and implement the obligations under the Education and Care Services National Law and National Regulations.
- Will ensure they take reasonable steps to ensure that the educators, staff, and volunteers follow the policy and procedures.
- Will ensure they provide the educators, staff and volunteers the documentation to perform their role, follow policy and procedure and ensure they are checking the documentation according to regulatory and service requirements.
- Will ensure that a rigorous recruitment process is completed, and a thorough induction process is provided to all staff to ensure they have time to read and understand policies and procedures and seek further information if unsure.
- Will ensure that the staff are supported with ongoing professional development and training they require to comply with this policy.
- Will encourage feedback from stakeholders and staff regarding the policy's effectiveness, particularly in relation to identifying and responding to child safety concerns.
- Will ensure the policy is kept up to date with current legislation, research, and best practice.
- Will conduct regular staff meetings to address policy compliance with legislation, policy implementation, changes to policy and or collect feedback for annual review of policy.

Educators

- Will adhere to and implement the obligations under the Education and Care Services National Law and National Regulations.
- Will ensure they take reasonable steps to follow the service policy and procedures and seek advice or further support if unsure.
- Will ensure they complete and document any related records regarding the implementation of this policy and practice requirements of the service.
- Will attend any ongoing professional development, staff meetings and training they require to comply with this policy and practice requirements of the service.
- Will provide feedback to the nominated supervisor or approved provider regarding the policy's effectiveness, particularly in relation to identifying and responding to child safety concerns.
- Will provide feedback regarding policy review when required.

Families

- Will ensure they provide nominated supervisor with the correct paperwork required in order to enrol a child and for the nominated supervisor to correctly claim childcare subsidy or any other state or government related subsidies.
- Will ensure they provide updated information relating to the child's enrolment.
- Will ensure they do not provide false or misleading information related to the enrolment or any additional subsidies that may be applied to the account.
- Will ensure they inform Centrelink of any changes to their or their partner's personal circumstances.

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REGULATION IMPLEMENTATION	The following procedures outline and support all stakeholders to understand and implement the regulatory guidelines of this policy.
In regard to regulation 170- Policies and procedures to be followed.	<p>Approved Provider will</p> <ul style="list-style-type: none"> Ensure that all staff and volunteers are made aware of Regulatory policies and procedures by ensuring that this forms a part of the induction process. Ensure probationary reviews will be conducted once new staff are appointed at the 3- month and 6-month mark to ensure that they are following policy and procedure and to review and revise regulatory policies. Ensure staff meetings will be conducted on a regular basis to allow for review of policy and procedure and further training and revision of procedural practices in relation to policy and procedure. Ensure annual review and revision of policies and procedures will be conducted, and all educators will be given the opportunity for input.
In regard to Regulation 171- Policies and procedures to be kept available.	<p>Approved Provider will</p> <ul style="list-style-type: none"> Ensure that policies and procedures are available to all staff and the location and availability will form a part of the induction process. Ensure policies will be available on request for all staff members to have access when required. Ensure policies will be available when required for staff members to download copies and/or print out if required in order to complete assignments or to form part of their research and/ or update their knowledge. Ensure policies will be available for all stakeholders when requested and when updating.
In regard to Regulation 172- Notification of change to policies or procedures	<p>Approved Provider will</p> <ul style="list-style-type: none"> Ensure staff meetings will be conducted on a regular basis to allow for review of policy and procedure, provide further training and allow for input if required in relation to policy and procedure. Ensure stakeholders will be invited to provide feedback for policies and procedures at any time, not just on annual review but will also be invited to add feedback at review time or after an event that may require change to policy or procedure. Ensure policies and procedures will be emailed or put on display in the foyer for stakeholders to have the ability to provide feedback. Ensure feedback will be considered from stakeholders and educators and may result in a change in policy. Ensure policy and procedure may be changed at any time if there has been an incident in the service that has required a change to be implemented for the safety and health of children and or educators. Ensure in the event of a change to a policy after feedback or a situation that occurs, we will provide 14 days' notice to all stakeholders before the change takes effect.
CONTINUOUS IMPROVEMENT	<p>We are dedicated to the ongoing improvement of our practices and procedures through the following actions:</p> <ul style="list-style-type: none"> Conducting regular reviews and updates of this policy with all stakeholders. Actively seeking feedback from children, families, and staff members. Providing targeted skill development and training for staff when areas for improvement are identified or when gaps in policy and procedure implementation are observed.
KEY TERMS	<ul style="list-style-type: none"> ACECQA – Australian Children’s Education and Care Quality Authority -The independent national authority that works with all regulatory authorities to administer the National Quality Framework, including the provision of guidance, resources, and services to support the sector to improve outcomes for children. CCS-Child Care Subsidy -The main Australian Government payment to assist families with the costs of education and care for their children. It is, with some exceptions, paid directly to providers to be passed on to families as a fee reduction. Fraud - Dishonest activity causing actual or potential monetary loss to any stakeholder or employer which could include theft of money or other property by employees or persons external to the employer. An act that involves deception in order to perform the activity. Stakeholder - a person or group of people who have an interest in a business, a person such as an employee or customer. They have a sense of responsibility toward it and an interest in its success.

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WE GRATEFULLY ACKNOWLEDGE THE FOLLOWING SOURCES

- Australian Children’s Education & Care Quality Authority. ACECQA
- Australian Government Department of Education
- Australian Government Department of Education- Child Care Financial Integrity Strategy. (2019). <https://www.education.gov.au/child-care-package/resources/child-care-financial-integrity-strategy>
- Australian Government Department of Education,
- Child Care Provider Handbook July 2024
- Education and Care Services National Law Act 2010.
- Education and Care Services National Regulations.
- Guide to the Education and Care Services Education National Law and the Education and Care Services National Regulations.
- Guide to the National Quality Framework.
- National Quality Standard.
- United Convention on the Rights of the Child

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