ROBE CHILD CARE ON WHEELS SERVICE

CHILD CARE SUBSIDY (CCS) GOVERNANCE POLICY

Responsible Officer:	*Manager Childcare Services*
Version	*V1*
Date of Document Issue:	*November 2026*
Date of Next Review:	*November 2027*
Relevant Regulations:	N/A
National Quality Standards (NQS):	QUALITY AREA 7: GOVERNANCE AND LEADERSHIP 7.1 Governance - Governance supports the operation of a quality service that is child safe. 7.1.2 Management Systems - Systems are in place to manage risk and enable the effective management and operation of a quality service that is child safe. 7.1.3 Roles and Responsibilities - Roles and responsibilities are clearly defined and understood and support effective decision-making and operation of the service.

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Our Service maintains governance systems that support compliance with Child Care Subsidy (CCS) requirements under Family Assistance Law (FAL). FAL establishes the legislative framework for CCS and Additional Childcare Subsidy (ACCS), including requirements for approved providers and the administration of subsidised child care.

Our policy provides a framework for managing CCS approval, personnel, decision-making, internal controls, reporting, records, and risk management and compliance. Detailed requirements for administering CCS are outlined in our related policies, procedures and resources.

RELATED LEGISLATION

Child Care Subsidy Secretary's Rules 2017	A New Tax System (Family Assistance) (Administration) Act 1999
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	

RELATED POLICIES

Child Care Subsidy (CCS) Account Policy	Governance Policy
Child Care Subsidy (CCS) Data Security Policy	Payment of Fees Policy
Child Care Subsidy (CCS) Notifications Policy	Privacy and Confidentiality Policy
Enrolment Policy	Recruitment Policy
Fraud Prevention Policy	Record Keeping and Retention Policy

PURPOSE

The purpose of this policy is to ensure appropriate governance arrangements are in place to support the approved provider in meeting its responsibilities under FAL, maintaining the Service's CCS approval and supporting eligible families.

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Our CCS governance arrangements support:

- clear accountability and decision-making
- appropriate personnel and fit and proper arrangements
- accurate CCS administration, reporting and record keeping
- financial integrity
- effective internal controls and risk management
- appropriate management of CCS non-compliance, fraud and corruption
- regular monitoring, review and continuous improvement.

SCOPE

This policy applies to families, staff, educators, management, the approved provider and the nominated supervisor of the Service.

DEFINITIONS

Persons with management and control (PMC): People who take part in decision-making or management of the provider under FAL.

Person or persons responsible for the day-to-day operation of a service: People who participate in decision making and the daily operations of a service and are identified by the approved provider as responsible for its day-to-day operation. These people are also referred to as 'persons responsible at the service' and may include service directors, managers or coordinators.

Service contact: A person appointed by the PMC or the person responsible for the day-to-day operation of the Service who is authorised to communicate with the department on administrative matters, such as family entitlements or transaction processing. This role is optional.

Fit and proper: A person's suitability to hold a relevant role under FAL, considering matters such as their competence, character, compliance with the law, financial and regulatory history, conflicts of interest, and understanding of and commitment to FAL obligations. Providers, PMCs and persons responsible for the day-to-day operation of a service must be fit and proper.

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IMPLEMENTATION

The approved provider will communicate this policy to all relevant personnel and ensure they have access to the information, resources and training needed to understand and fulfil their CCS responsibilities under this policy.

Personnel with specific CCS administration responsibilities will also receive relevant training (e.g. CCS-related Geccko training) to support their understanding of and compliance with FAL and the conditions of CCS approval.

The approved provider retains overall responsibility for the Service's compliance with FAL and the conditions of CCS approval, regardless of whether CCS functions are performed by the approved provider, delegated to other relevant personnel or undertaken using CCS software.

CCS APPROVAL

The approved provider is responsible for ensuring the Service meets the applicable requirements of FAL to obtain and maintain approval to administer CCS.

The approved provider will:

- ensure the Service meets the applicable eligibility requirements and conditions for CCS approval
- ensure the required application and supporting documentation are completed and submitted
- maintain the Service's CCS approval by meeting ongoing approval conditions and applicable requirements.

See the *CCS Approval Guide* for information about applying for CCS approval.

PERSONNEL AND FIT AND PROPER REQUIREMENTS

The approved provider will establish appropriate arrangements for people involved in CCS administration. The approved provider will:

- identify personnel who are required to be fit and proper

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- complete the required background checks within the applicable timeframes (see *Recruitment Policy*)
- retain evidence of the required background checks, including declarations, and provide this evidence to the Department of Education when required (see *CCS Notifications Guide*).
- ensure personnel required to be fit and proper continue to meet these requirements and understand their responsibilities under FAL and the conditions of CCS approval
- notify the Department of Education of required changes to personnel, background checks, fit and proper findings, and other relevant information within applicable timeframes (see *CCS Notifications Guide*).

Detailed requirements are outlined in the *CCS Approval Guide* and the Department of Education's Fit and proper guidance and Background checks guidance.

ROLES AND RESPONSIBILITIES

The Service's organisational structure, including the approved provider, PMCs and persons responsible for the day-to-day operation of the Service, will be documented in the Service's organisational structure chart. Responsibilities and reporting lines will be clearly defined and communicated to the relevant personnel.

The approved provider will establish appropriate arrangements for the following aspects of CCS administration.

Planning, oversight and compliance

- selecting, purchasing and maintaining appropriate CCS administration software, including allocating a budget for software costs
- monitoring CCS administration processes and completing compliance checks
- identifying, assessing and managing risks associated with CCS administration, including fraud, corruption and CCS non-compliance
- addressing identified issues and implementing corrective actions
- reviewing CCS administration arrangements to ensure they remain appropriate and effective.

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Day-to-day management

- managing CCS systems and using the Service's selected CCS software
- ensuring personnel who use CCS systems are registered with Provider Digital Access (PRODA)
- verifying and approving CCS information
- administering enrolments and complying written arrangements (CWAs) in accordance with the
  Enrolment Policy and relevant procedures
- recording and checking attendance, session information and absences
- managing vacancies
- managing fees, payments and CCS fee reductions
- managing ACCS
- maintaining required records
- managing corrections and resubmissions
- managing required notifications and reporting.

The approved provider retains overall responsibility for CCS administration, including oversight, verification, approval, reporting and compliance, and will assign relevant responsibilities and authorisations to appropriate personnel.

Specific responsibilities and procedures for CCS administration are outlined in relevant position descriptions, policies and procedures, including the *CCS Account Policy*, *Fraud Prevention Policy*, *Enrolment Policy*, *CCS Notifications Policy* and *CCS Procedures Guide*.

INTERNAL CONTROLS AND RISK MANAGEMENT

The approved provider will establish and maintain internal controls to support accurate CCS administration, protect CCS funds and information, and reduce the risk of fraud, corruption and CCS non-compliance. Controls may include:

- assigning clear responsibilities and separating duties where appropriate
- controlling access to CCS systems and information
- identifying and managing conflicts of interest, and using conflict of interest declarations, where applicable.

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The Service will use the *CCS Compliance Checklist* and other appropriate tools and resources to monitor compliance, identify risks and support continuous improvement. Risks related to fraud and corruption will be identified using the *Fraud and Corruption Risk Assessment*. High-risk activities will be managed in accordance with the *CCS Data Security Policy, Fraud Prevention Policy* and *Fraud and Corruption Prevention Procedure*.

RECORDS AND INFORMATION MANAGEMENT

The Service maintains accurate and secure records and evidence required to demonstrate compliance with FAL and other applicable requirements. CCS records will be retained for at least 7 years from the end of the financial year in which the care to which the information or event relates was provided, or longer where required by law or court order. Records will be made available to the Department of Education when required.

The approved provider understands that record-keeping requirements under FAL differ from those under the Education and Care Services National Law. Detailed requirements are outlined in the *CCS Data Security Policy, Enrolment Policy* and *Record Keeping and Retention Policy*.

RESOURCES

Australian Government, Department of Education, *Provider tool kit*. This toolkit provides practical resources, guides and tools to help providers understand and manage their CCS responsibilities.

CONTINUOUS IMPROVEMENT/REFLECTION

Our *CCS Governance Policy* will be evaluated and reviewed annually, or earlier if there are changes to legislation, ACECQA guidance, or if an incident occurs that relates to this policy. Feedback will be sought from children, families, staff, educators and management. All families will be notified 14 days before any policy change that may have a significant impact on the provision of education and care to a child enrolled at the Service or on the family's ability to utilise the Service, in accordance with the *Governance Policy*.