

## POLICY AIM

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Our Service aims to ensure all legal and financial requirements are implemented and recognised through appropriate governance practices to ensure the accuracy and secure record-keeping of information relating to family enrolment records, attendances, and Child Care Subsidy payments. This policy details the procedures relating to roles in the organisation, background checks, access to third party software, training, compliance and reporting. We are committed to robust governance and management systems, ensuring the effective, transparent and competent operation of service.

## RATIONALE

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An Approved Provider, under *Family Assistance Law*, must accept the legal responsibilities associated with operating a childcare service (or services) and passing fee reductions on to eligible families if childcare payments are paid by the Commonwealth for those families' benefit (Child Care Provider Handbook). All administrative processes in place in Sweetpeas services must support the integrity of data supplied to the Australian Government.

Sweetpeas Management will manage Child Care Subsidy and other payments and any data relating to Service management securely and accurately. Competent data management is required to ensure compliance with the expectations of the Australian and NSW Governments and to ensure the secure recording and reporting of the data required for families' fees to be subsidised.

## SCOPE - WHO IS AFFECTED BY THIS POLICY?

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- Owners / Management
- Educators / Staff
- Families

## NATIONAL QUALITY STANDARD

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### QUALITY AREA 7 (GOVERNANCE AND LEADERSHIP)

- **Standard 7.1 (Governance)** - *Governance supports the operation of a quality service.*
- **Element 7.1.2 (Management Systems)** - *Systems are in place to manage risk and enable the effective management and operation of a quality service.*
- **Element 7.1.3 (Roles and responsibilities)** - *Roles and responsibilities are clearly defined, and understood, and support effective decision making and operation of the service.*
- **Standard 7.2 (Leadership)** - *Effective leadership builds and promotes a positive organisational culture and professional learning community.*
- **Element 7.2.1 (Continuous improvement)** - *There is an effective self-assessment and quality improvement process in place.*
- **Element 7.2.3 (Development of professionals)** - *Educators, co-ordinators and staff members' performance is regularly evaluated and individual plans are in place to support learning and development.*

## RELATED POLICIES & LEGISLATION

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### RELATED SWEETPEAS POLICIES:

- Acceptance and Refusal of Authorisations Policy
- Determining Responsible Person Policy
- Enrolment and Orientation Policy
- Ethical Code of Conduct Policy
- Governance Policy
- Payment of Fees Policy
- Handling Grievances and Complaints Policy
- Privacy and Confidentiality Policy
- Staff Recruitment Policy

### RELATED EDUCATION AND CARE SERVICES NATIONAL LAW AND REGULATIONS:

- Law s13 Matters to be taken into account in assessing whether fit and proper person
- Law s14 Regulatory Authority may seek further information

- Law s21 Reassessment of fitness and propriety
- Law s51 Conditions on service approval
- Law s162 Offence to operate education and care service unless responsible person is present
- Law s173 Offence to fail to notify certain circumstances to Regulatory Authority
- Law s174 Offence to fail to notify certain information to Regulatory Authority
- Law s175 Offence relating to requirement to keep enrolment and other documents
- Law s188 Offence to engage person to whom prohibition notice applies
- Regulation 31 Condition on service approval - quality improvement plan
- Regulation 55 Quality improvement plans
- Regulation 56 Review and revision of quality improvement plans
- Regulation 117B Minimum requirements for a person in day-to-day charge
- Regulation 157 Access for parents
- Regulation 158-162 Attendance and enrolment records
- Regulation 167 Record of service's compliance
- Regulation 168-172 Policies and procedures
- Regulation 173-176 Display and reporting of prescribed information
- Regulation 177 Prescribed enrolment and other documents to be kept by approved provider
- Regulation 181-184 Confidentiality and storage of records

## FAMILY ASSISTANCE LAW:

*Family Assistance Law* is a broad term that encompasses the following legislation:

- A New Tax System (Family Assistance) Act 1999
- A New Tax System (Family Assistance) (Administration) Act 1999
- Child Care Subsidy Minister's Rules 2017 (Minister's Rules)
- Child Care Subsidy Secretary's Rules 2017 (Secretary's Rules)
- Any other instruments (including regulations) made under the *A New Tax System (Family Assistance) Act 1999* and the *A New Tax System (Family Assistance) (Administration) Act 1999*
- Schedules 5 and 6 to the *A New Tax System (Family Assistance and Related Measures) Act 2000*.

All Approved Providers must be familiar with and comply with the legislation and legislative instruments that form *Family Assistance Law*. (Child Care Provider Handbook, Nov 24)

## TERMINOLOGY

- **Additional Child Care Subsidy (ACCS)** - An addition to the CCS, which aims to assist families and children facing barriers in accessing affordable childcare, and provide additional fee assistance to families and children who are genuinely disadvantaged including:
  - children at risk of serious abuse or neglect - **ACCS (child wellbeing)**
  - grandparents on income support who are the principal carer of their grandchildren - **ACCS (grandparent)**
  - families experiencing temporary financial hardship - **ACCS (temporary financial hardship)**
  - low-income families transitioning to work from income support - **ACCS (transition to work)**
- **Approved Provider** - The Approved Provider (or Provider) is the legal entity that has the approval for running a service and is legally responsible for managing the service.
- **Child Care Subsidy (CCS)** - Child Care Subsidy is the regular payment that assists eligible families with the costs of childcare. CCS is paid directly to Sweetpeas by the Australian Government to be passed on to families as a fee reduction. It reduces the fees that a family pays to Sweetpeas for the care of their child.
- **Child Care Subsidy System (CCSS)** - the online system used to administer the CCS (i.e. *HubWorks*)
- **CCS Personnel** - Persons with designated roles to manage:
  - childcare bookings and scheduling data submission through the CCS software,
  - manage enrolments and electronic sign in sign out systems on site,
  - authorise data submission transactions to the Child Care Subsidy System,
  - manage complying written agreements (CWAs).
- **Continuous improvement** - Ongoing improvement in the provision of quality education and care services.
- **Fit and proper person** - The regulatory authority assesses whether an Approved Provider or a person with management or control of a service is a fit and proper person to be involved in the provision of an education and care service. (Assessment includes compliance history, criminal history, financial circumstances, medical conditions and management capability.)

- **Governance** - Refers to the systems in place to support effective management and operation of the service, consistent with the service’s statement of philosophy. Good governance requires effective management systems and clearly delineated roles and responsibilities to support the effective operation of a quality service.
- **HubHello** - The online early childhood education and care platform utilised by Sweetpeas that includes the web-based CCSS program *HubWorks*.
  - **HubHello ESI** - The electronic sign in system utilised by Sweetpeas for families to: sign children in and out of our care, check child routines and confirm absences or attendances. Also utilised for staff to: sign in/out, indicate the current Responsible Person, log child routines, attendances or absences, mark the roll and leave short messages for families.
  - **HubWorks**- The registered CCS software program utilised by all Sweetpeas services. The *HubWorks* program sits on the *HubHello* platform.
- **Management system** - A system to manage organisational risks and enable the effective management and operation of a quality service.
- **Nominated Supervisor** - A Nominated Supervisor is approved as a suitable, fit and qualified person by the Regulatory Authority and appointed by the Approved Provider to oversee the day-to-day operations of the service.
- **Responsible Person** - A person, nominated by the Approved Provider and/or Nominated Supervisor, to be designated a responsible person in day-to-day charge of the service when the Nominated Supervisor is not in attendance.

## GLOSSARY OF ABBREVIATIONS

- **ACCS** - Additional Child Care Subsidy
- **ACECQA** - Australian Children’s Education and Care Quality Authority
- **ACIC** - Australian Criminal Intelligence Commission
- **AGDE** - Australian Government Department of Education (the federal department of education)
- **ASIC** - Australian Securities and Investments Commission
- **CCS** - Child Care Subsidy
- **CCSS** - Child Care Subsidy System
- **CWA** - Complying Written Arrangement
- **ESI** - Electronic Sign In
- **MMKB** - MMKB Pty Ltd, the Owners and Approved Providers of Sweetpeas.
- **QIP** - Quality Improvement Plan
- **WWCC** - Working with Children Check

## ORGANISATION SIZE AND STRUCTURE

### APPROVED PROVIDERS AND SERVICES

1. **MMKB PTY LTD** (PR-40007965) has been operating since August 2016 and is now the Approved Provider of three service locations, trading as *Sweetpeas Kindergarten and Long Day Care Centre*: Cranebrook, Penrith and St Marys NSW. Additionally, in 2025 MMKB plans to open its first service for school-age children (5-12 years) *Sweetpeas OOSH Cranebrook*.

#### Service 1:

Registered as	Sweetpeas Kindergarten & Long Day Care		
Service approval	SE-00009178		
Centre name	Sweetpeas Cranebrook	Director’s name	Linda Lind (Nominated Supervisor - <i>pending</i> )
Phone number	(02) 4730 4600	Email	sweetpeaskindy@gmail.com
Address	24 Laycock Street, Cranebrook, NSW 2749		
Opening hours	7.00AM-6.00PM, Monday-Friday		

## Service 2:

Registered as	Sweetpeas Kindergarten and Long day Care		
Service approval	SE-00008176		
Centre name	Sweetpeas Penrith	Director's name	Brooke Howell (Nominated Supervisor - pending)
Phone number	(02) 4721 4920	Email	sweetpeaskindypenrith@gmail.com
Address	38 Union Road, Penrith, NSW 2750		
Opening hours	7.00AM-6.00PM, Monday-Friday		

## Service 3:

Registered as	Sweetpeas Kindergarten and Long Day Care Centre St Marys		
Service approval	SE-00009097		
Centre name	Sweetpeas St Marys	Director's name	Brooke Streeting
Phone number	(02) 9623 5069	Email	sweetpeaskindystmarys@gmail.com
Address	263 Great Western Hwy, St Marys, NSW 2760		
Opening hours	7.00AM-6.00PM, Monday-Friday		

## Service 4:

Registered as	Sweetpeas OOSH Cranebrook		
Service approval	SE-00017326		
Centre name	Sweetpeas OOSH	Director's name	Tanya Holmes
Phone number	(02) TBC	Email	sweetpeas.ooshcb@gmail.com
Address	72-74 Laycock St, Cranebrook, NSW 2749		
Opening hours	Before School: 6.30AM-9.00AM, Monday-Friday (school term) After School: 2.30PM-6.30PM, Monday-Friday (school term) Vacation Care: 7.00AM-6.30PM, Monday-Friday (school holidays)		

2. Sweetpeas Group Pty Ltd (PR-40021333) has been operating since January 2021 and is the Approved Provider of one service location trading as *Sweetpeas Kindergarten and Long Day Care Centre: St Clair*.

## Service 5

Registered as	Sweetpeas Kindergarten and Long Day Care Centre St Clair		
Service approval	SE-40018403		
Centre name	Sweetpeas St Clair	Director's name	Sarah Williamson (Nominated Supervisor)
Phone number	(02) 9834 6011	Email	sweetpeaskindystclair@gmail.com
Address	131 Explorers Way, St Clair, NSW 2759		
Opening hours	7.00AM-6.00PM, Monday-Friday		

All Sweetpeas employees are currently employed and paid by MMKB Pty Ltd (ABN: 38 481 209 413).

## MANAGEMENT TEAM

### Managing Director/Approved Provider: Janine Evans

Janine has over 30 years' experience in Early Education and Care and had experience managing and directing other services, prior to working with Sweetpeas. Janine is qualified with an Associate Diploma of Social Science (Child Studies) and is over halfway through completing her Bachelor of Education. Each Sweetpeas service is operated day-to-day by a Director appointed and trained by Janine.

### Assistant Manager: Cassandra Way

Cassandra has been Assistant Manager of Sweetpeas Kindergarten and Long Day Care since August 2016. Cassandra's role is to oversee systems administration of the company, including policy and procedures, staff recruitment and compliance matters. Cassandra has 17 years' experience in education and care services and is qualified with a Bachelor of Education (Early Childhood Education).

## DECISION MAKING

### FINANCIAL AND BUSINESS DECISIONS

Persons with management or control of the Approved Provider(s) are:

- Michelle Collins - MMKB Pty Ltd Company Director
- Damian Busst - Sweetpeas Group Pty Ltd Company Director
- Janine Evans - Sweetpeas Managing Director

These are people who participate directly or indirectly in the decision making or management of the childcare services operated by the Approved Provider.

These people may:

- change bank account details and other information regarding the childcare service,
- add and remove other persons, such as persons responsible for the day-to-day operation of the service from the CCSS,
- authorise data submission transactions to the CCSS,
- notify the NSW Department of Education of the cessation of operations,
- submit an application to add or remove a service.

Person or persons responsible for the day-to-day operation of the childcare service (CCS Personnel):

- The Approved Provider is responsible for ensuring the safety and wellbeing of children at the service and will consider a person's qualifications, experience and age when deciding whether they are suitable to be placed in day-to-day charge of the service (National Regulation 117A).
- Educators fulfilling the role of Responsible Person are nominated by the persons with management or control of the Approved Provider (see *Determining Responsible Person Policy*). These educators include service Directors, and others assessed to be suitable as per the applicable criteria.
- **At this time, no educator at Sweetpeas (other than Janine Evans) has been nominated as both Responsible Person and CCS Personnel.**
  - **November 2024 update:** Cassandra Way (Assistant Manager) has been nominated to be CCS Personnel for all Sweetpeas services and is currently completing the necessary background checks and PRODA registration.
- Each service Director acts as Janine's delegate to ensure that the day-to-day operation of Sweetpeas services complies with Law and Regulations.
- In the future, Sweetpeas service Directors who have accepted the role of Nominated Supervisor under the conditions of the National Regulations will be nominated as CCS Personnel with designated roles to manage enrolments and electronic sign in sign out systems on site. They will undertake the background checks and training specified in the *Staff Employment, Training and Management* section of this policy.
- Administration staff with designated roles and functions related to the CCS (e.g., managing childcare bookings, scheduling and data submission) may in the future be nominated as CCS Personnel.

CCS Personnel may:

- add and remove persons responsible for the day-to-day operation of the service in the CCSS software,
- authorise data submission transactions to the CCSS,
- manage enrolments, scheduling of hours and complying written agreements,
- notify the NSW Department of Education of changes in respect of the service for which they are responsible (excluding bank account details and cessation of operations).

Responsible Persons (non-CCS Personnel):

Currently, Responsible Persons at Sweetpeas can view each day's attendance record in the *HubHello* system, and sign children in or out when families fail to record their attendance, however they **do not** have the required permissions to submit attendances or other information via the CCSS software (see section: [Access to Software and Roles](#)).

Additional information about attendance records and *HubHello*:

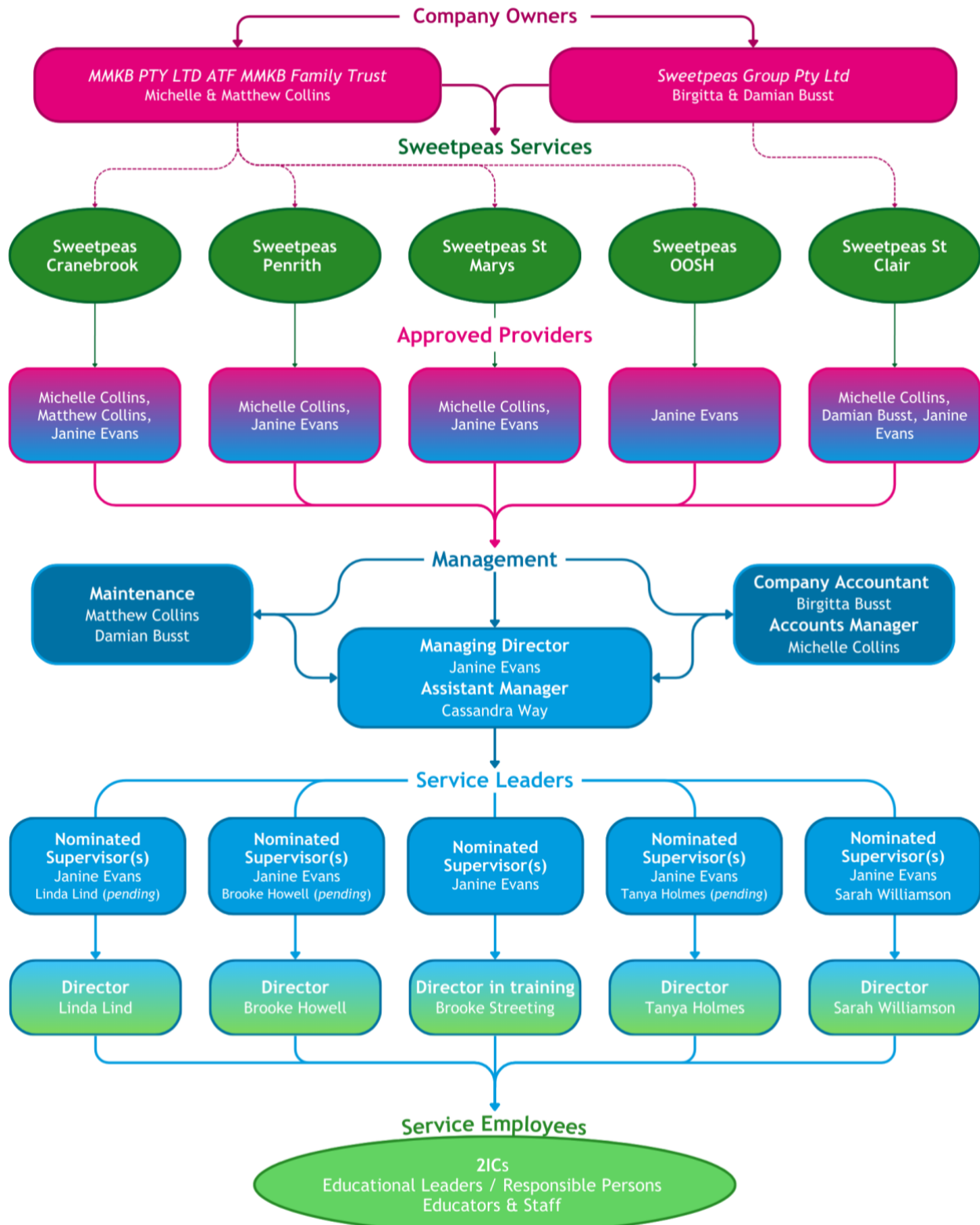
- *HubHello* records which staff member has recorded a child's attendance.

# CCS Governance & Management Policy

- Families must confirm accurate sign in/out times when they next log in.
- Only Managing Director, Janine Evans, has the required permissions to submit attendance records and any other information via the *HubHello* CCSS software (see section: [Access to Software and Roles](#)).
- For the audit process regarding these records, see section: [Data Quality](#).

## ORGANISATION STRUCTURE DIAGRAM (DECISION-MAKING HIERARCHY)

Key: **Owners** → **Management** → **Employees** (and Services)



## STAFF EMPLOYMENT, TRAINING AND MANAGEMENT

The Approved Provider and Managing Director, or their assigned nominee will approve all recruitment decisions as outlined in the Sweetpeas *Staff Recruitment Policy*. Each Sweetpeas service employs a Director, a 2IC educator, a cook and additional educators to meet regulatory requirements.

Administration is overseen on the company level by the Managing Director and Assistant Manager, with day-to-day service administration tasks performed by the service Director.

### BACKGROUND CHECKS

The Approved Provider and/or Nominated Supervisor will ensure any person with management or control of the Provider provide the following checks to be considered **fit and proper persons** to be involved in the administration of CCS and ACCS:

- A copy of the results of a bankruptcy search conducted through the Australian Financial Security Authority (AFSA) website.
- A copy of the results of a National Police Check obtained from the NSW police service or an agency accredited by the Australian Criminal Intelligence Commission (ACIC).
- A current and historical personal name extract obtained through the Australian Securities and Investments Commission (ASIC) website.
- Evidence that the person does not appear on the banned and disqualified register held by the ASIC (in the form of a computer printout of the results of the search).
- Details of their NSW Working With Children Check (WWCC).

Responsible Persons, who have been nominated as CCS Personnel must provide:

- A copy of the results of a National Police Check obtained from the NSW police service or an agency accredited by the ACIC,
- Details of their NSW WWCC,
- Their PRODA RA number (where applicable).

Employees are provided CCS Personnel access to *HubWorks* software on the *HubHello* platform only after obtaining a satisfactory National Police Check, passing their WWCC, registering with PRODA and completing training with a member of Management (see [Staff Induction and Training](#) below).

### ACCESS TO SOFTWARE AND ROLES

- The **Managing Director**, Janine Evans, will have secure access to *HubWorks* to oversee all functions, including:
  - the enrolment process (arrangement for care of a child, submission of enrolment notice, ceasing enrolment) and submission of weekly session reports to the CCSS,
  - the financial components of *HubWorks* to complete Statement of Entitlement and invoices family for fees, less reduction amounts.
- Once approved as CCS Personnel, Assistant Manager, Cassandra Way, will be assisting Janine with the above.
- **Management** can see who has actioned what and when via the detailed audit log. The audit log details any and all actions, including the updating of attendance information, and contains a filter function for ease of monitoring certain actions, people or periods of time.
- **Responsible Persons** will have access to enrolment and attendance information for verification purposes to ensure accuracy of the session reports via the *HubHello* platform.
- Each **employee** of Sweetpeas is issued their own username and password for the *HubHello* platform upon completing their induction to the service.
  - Usernames and passwords are only issued to the persons for whom they are created and only retained by the Assistant Manager on behalf of the Managing Director.
  - Management can allocate privileges in *HubHello* to control what staff and educators see or access in *HubWorks*.
  - Educators at each childcare service will assist to identify children and families who may require extra support through Additional Child Care Subsidy (ACCS) (child wellbeing).
- **Parents and guardians** are given secure access to third-party software (*HubHello* platform) for the purposes of signing their children in/out in real time, confirming attendances/absences, updating enrolment records and accessing invoices.

## STAFF INDUCTION AND TRAINING

- All staff working for Sweetpeas are required to have a current WWCC, the verification of which is retained by the Service on our *WWCC Register*.
- Relevant 1:1 training and induction (e.g. webinars, FAQs) will be provided for each person who will be using the *HubWorks* software.
- All staff nominated as CCS Personnel will be provided with access to a copy of the *Child Care Provider Handbook*,
- All CCS Personnel will be given a position description outlining their role in the management of the CCS, including training and support to fulfil the role and tasks within the position description.
- All CCS Personnel (and other staff where relevant) will be provided training as to their responsibilities under *Family Assistance Law*.
- CCS Personnel will be provided ongoing training and support and informed of any changes to the *Family Assistance Law* or CCS.

## EVALUATION TO ENSURE STAFF TRAINING HAS BEEN EFFECTIVE

- The Managing Director conducts bi-annual performance reviews to ensure all staff are meeting key performance indicators.
- Any updates to Service or Government policy are shared with staff via group messaging to ensure thorough and consistent communication.
- Individual progress meetings are held at regular intervals, allowing staff opportunities to ask questions or receive updated training.
- A full audit process is in place within the software package that allows any entry to be traced to whom completed the action. This allows Management to trace any errors and identify any employee in need of additional training.

## CCS OPERATIONS

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### FEE POLICIES

Please see Sweetpeas *Payment of Fees Policy* for all information related to:

- Payment of fees
- Overdue invoices
- Late collection charge
- Accounts
- Make up days
- Termination of enrolment
- CCS and CCSS
- ACCS
- Statements
- Complying Written Arrangements

### ENROLMENTS

Please see the Sweetpeas *Enrolment and Orientation Policy* for all information related to:

- Accepting enrolments
- Waiting list
- Enrolment packs
- Enrolment form
- Parenting orders
- Orientation
- Termination of enrolment
- Responsibilities

### RECORDING ATTENDANCES AND ABSENCES

Sweetpeas uses the [HubHello platform](#) to manage all administrative systems pertaining to the Sweetpeas services and the CCSS system, including recording attendance and absences, providing Statements of Entitlement, invoices, and receipts.

A record of attendance that is kept in the *HubHello ESI* portal, includes:

- The date;



- The full name of each child booked to attend for that day;
- Arrival and departure times; and
- The digital signature of the person who delivers and collects the child.

Families are required to sign their child in on arrival and sign out on departure; they may scan a QR code at the Service entrance or utilise the Service kiosk iPad to complete the attendance record. They are informed upon enrolment of their responsibility to record their child's attendance and receive reminders throughout their enrolment via newsletters, signage and verbal discussion (see *Enrolment and Orientation Policy*).

Staff regularly review the attendance record throughout the day to always ensure its accuracy. In instances when a parent or authorised nominee has not signed the child in, a staff member will sign to confirm that the child is in attendance and the Parent will be prompted to confirm the attendance the next time they sign in to the *HubHello ESI*.

Absences will be recorded during the day. The child's Parent(s) will verify absences the next time they sign in to the *HubHello ESI*.

The Responsible Person closing the service at the end of each day will verify all children are either signed out or marked as absent. The Responsible Person will notify Managing Director, Janine Evans, after the day's attendance has been verified and Janine will submit the attendance record. Once approved as CCS Personnel, the Assistant Manager, Cassandra Way, will be assisting Janine in this role. The attendance data will automatically submit to the department at the end of the week once all five days have been individually submitted.

## THIRD-PARTY SOFTWARE SECURITY

Sweetpeas maintains a contract with *Hubworks!* who provide the enrolment/booking processes but also the CCMS submission system to manage session reports/submission, report absences and electronic submission requirements. *Hubworks!* boasts high standards in Government compliance, including:

- Data sovereignty - all data is hosted onshore on Amazon Web Services in Sydney.
- Disaster recovery - Deployed across multiple AWS availability zones within the Sydney region.
- Backups created using streaming replication. Encrypted and stored offsite using AWS S3 / Glacier.
- *HubWorks!* is registered by the AGDE and abides with the CCSS and CCMS IT Security and Development Principles for Software Providers.
- 256-bit encryption and SSH used for all communication between nodes.
- Abides with the Australian Government's 13 Australian Privacy Principles.
- Approved against Department of Services Australia's 'Secure Cloud Strategy for Integrated Third-Party Software' aligned with the Digital Transformation Agency's Secure Cloud Strategy.

*Hubworks!* ensures that a family/guardian's details are handled with maximum security.

## ADDITIONAL CHILD CARE SUBSIDY (ACCS) PAYMENTS (SEE ALSO PAYMENT OF FEES POLICY)

- Applications for ACCS (child wellbeing) are submitted for the first 6 weeks through *HubWorks*, if a child is identified who meet the at-risk criteria.
- Subsequent applications for the same child are submitted after consultation with relevant persons/agencies or authorities with the appropriate information and letters of support provided.
- Staff continue to liaise with the parent/guardian and relevant agencies to assess if the child requires continued support through ACCS.
- CCS Personnel are responsible for the submission of all ACCS claims; however the service Directors (and all Sweetpeas staff) receive detailed information on accessing ACCS and its application process via the *Payment of Fees Policy*.

## KEEPING RECORDS

Sweetpeas keeps and maintains records of the following:

- complaints made relating to compliance with *Family Assistance Law*,
- a record of attendance for each child for whom care is provided (regardless of eligibility for CCS), including records of any absences from care (*HubHello*),
- statements or documents demonstrating that additional absence days in excess of the 42 allowable absence days satisfy requirements,
- copies of invoices and receipts issued for the payment of childcare fees (*HubHello*),
- copies of all Statements of Entitlement issued, and any statements issued to advise that there was a change of entitlement (*HubHello*),

- any notice given to a state or territory body about a child at risk of abuse or neglect,
- copies of the evidence and information provided with an application for approval about persons with management or control of a Provider and persons responsible for the day-to-day operation of a service,
- any evidence or information produced to obtain police checks and working with children checks for personnel and to support any statements about these checks in an application for provider or service approval,
- written records of all required background checks for specified personnel (incl. persons with management or control of the Provider, persons responsible for the day-to-day operation of the service, service contacts)

As per requirements, Sweetpeas written records may include records that are made and stored electronically, as long as they are stored safely and any changes, apart from incidental changes related to their storage and display, are also recorded.

Records are to be kept for seven years.

## NOTIFYING THE DEPARTMENT ABOUT RELEVANT CCS MATTERS

Sweetpeas will notify the Department of any of the following changes to our service(s) via our CCSS software or the NQA ITS, within the timeframe specified:

Matters to be notified	Timeframe for notification
Any change to the fee information.	Within 14 days of any of the following: <ul style="list-style-type: none"> <li>• commencement of the service</li> <li>• notice of approval of the service</li> <li>• any change.</li> </ul>
Any change to the operating hours.	Within 14 days of: <ul style="list-style-type: none"> <li>• commencement of the service</li> <li>• notice of approval of the service</li> <li>• any change.</li> </ul>
The number of anticipated full-day vacancies for each day of the following week (beginning on a Monday).	By 8.00 pm (AEST) each Friday.
Ceasing to operate an approved childcare service	Within 24 hours after ceasing to operate the service.
Change of physical or postal address of: <ul style="list-style-type: none"> <li>• the Provider</li> <li>• the premises from which any of the Provider's approved childcare services operate.</li> </ul>	No later than 30 days before the change or, if the change was not foreseeable at that time, as soon as practicable.
Change to the name of the Provider or service	Within 14 days after the change.
Change of any of the following contact details of the Provider or of any of the Provider's approved childcare services: <ul style="list-style-type: none"> <li>• email address</li> <li>• website</li> <li>• telephone number.</li> </ul>	Within 14 days after the change.
Information about any new person with management or control of the Provider (including any person who becomes responsible for the day-to-day operation of any Sweetpeas approved childcare services).  The information must include: <ul style="list-style-type: none"> <li>• the name and contact details of the new person,</li> <li>• a declaration that Sweetpeas has undertaken all background checks required for the new person, together with details of the new person's WWCC, if applicable.</li> </ul>	Within seven days after the new person becomes a person with management or control of the Provider.
Change of the name or contact details for any of the following persons:	Within seven days after the Provider becomes aware of the change.

Matters to be notified	Timeframe for notification
<ul style="list-style-type: none"> <li>a person with management or control of the Provider</li> <li>any person who is responsible for the day-to-day operation of any of the Provider's approved services</li> </ul>	
<p>The Provider becomes aware, because of a background check undertaken for a specified person, that the person:</p> <ul style="list-style-type: none"> <li>has a serious conviction or finding of guilt for any of the following offences under a law of Australia or of a foreign country                             <ul style="list-style-type: none"> <li>an indictable offence punishable by a maximum of two years imprisonment or 40 penalty units</li> <li>an offence involving violence or a sexual offence</li> <li>an offence involving fraud, stealing or dishonesty</li> </ul> </li> <li>is an undischarged bankrupt, or</li> <li>was a director or secretary of a corporation when the corporation went into administration, receivership or liquidation, or at any time during the 12 months beforehand.</li> </ul>	<p>Within seven days after the Provider receives a record of the check.</p>
<p>An event or circumstance in relation to a person with management or control of the Provider (including a person responsible for the day-to-day operation of any of the Provider's approved childcare services) that reasonably indicates that the person is not likely to be a fit and proper person to be involved in the administration of Child Care Subsidy.</p>	<p>Within seven days after the Provider becomes aware of the event or circumstance.</p>
<p>A person stops having management or control of the Provider (including when a person stops having day-to-day responsibility for the operation of any of the Provider's approved childcare services).</p> <p>The Provider must also notify the Secretary of the Department of Education of when, and the reason, the person stopped having management or control of the Provider.</p>	<p>Within seven days after the person stops having management or control of the Provider.</p>
<p>An educator obtains a childcare qualification from a registered training organisation and:</p> <ul style="list-style-type: none"> <li>the Provider or person with management or control has an interest in that registered training organisation by virtue of which the Provider or person owns, operates, controls or carries out the registered training organisation, and either</li> <li>it appears that the educator has not obtained the qualification solely on her or his own merit</li> <li>the qualification has otherwise been obtained in circumstances that might be perceived as demonstrating a conflict of interest.</li> </ul>	<p>Within seven days after the Provider becomes aware of the matter.</p>
<p>A Provider or a person with management or control of the Provider obtains an interest, or is likely to obtain an interest, in a business which may affect their ability to comply with <i>Family Assistance Law</i>, where the approval may benefit the business or where a conflict of interest might reasonably be perceived to exist.</p>	<p>Within seven days of the Provider becoming aware of the matter.</p>
<p>Change in the WWCC for anyone who is required to have such a card under section 195D of the <a href="#">A New Tax System (Family Assistance) (Administration) Act 1999</a>—for example, if the WWCC is amended, suspended or revoked.</p>	<p>Within 24 hours after the Provider becomes aware of the change of status.</p>

Matters to be notified	Timeframe for notification
The Provider enters into administration, receivership, liquidation or bankruptcy, and the details of this event.	Within 24 hours after the event.
Unexpected closure of any of Sweetpeas approved childcare services due to unforeseen circumstances.	Within 24 hours after the closure.
A serious conviction or finding of guilt of: <ul style="list-style-type: none"> <li>a person with management or control of the Provider (including a person who becomes responsible for the day-to-day operation of any of the Provider's approved childcare services).</li> </ul>	Within 24 hours after the Provider becomes aware of the charging, conviction or finding of guilt.

## FRAUD AND RISK MANAGEMENT

### DATA QUALITY

Random data checks are carried out regularly by persons with management and control of the Provider (see [Decision Making](#) section) through an internal audit checking process to ensure accuracy of data records and reports. Session reports must include information as outlined in the *Child Care Provider Handbook*.

The *HubWorks* system includes the 'Quarantine' function, which catches errors services make before they go to Government. This gives the service a chance to fix and resubmit in a very timely manner without needing to make adjustments to data sent to the Government.

The Managing Director provides feedback to *HubWorks* in relation to any data reports that may not be accurate. *HubWorks* responds to Sweetpeas 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.

### FRAUD PREVENTION, DETECTION AND AUDIT PROCESS

- Management consistently review and reflect on the business practices to ensure all regulatory requirements are met in an accurate and reduced risk manner.
- 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, *HubHello*, may be contacted by telephone with follow up emails in the case of suspected errors or fraud. This ensures a documented history of the investigation process.
  - The Managing Director 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 Approved Provider and, depending on the investigation, may involve Responsible Persons to ensure a quick and thorough investigation.
- Should fraud be detected, the relevant Manager will notify the required authorities.

#### Auditing and cross checking

The internal audit checking process includes:

1. Random data checks carried out by Management regularly, including checks on:
  - a. CWAs,
  - b. schedules,
  - c. session reports,
  - d. statements of entitlement, and
  - e. fees.
2. Biannual internal audit check by the Managing Director.
3. The Approved Provider completes the external audit process once per year. The Nominated Supervisor provides to the Approved Provider:
  - a. copies of all Complying Written Agreements,
  - b. a copy of weekly schedules of all children to compare CWA's,
  - c. as well as reconciliations of individual parent accounts with CCS payments received and Bank Statements.

- If an issue is identified, an investigation will be triggered, advice sought if necessary and reporting of any substantiated breach to the appropriate authority. Depending on the situation, staff discipline procedures may have to be implemented (see *Ethical Code of Conduct Policy*).

## RISK MANAGEMENT

To ensure our continued commercial, operational and financial viability Sweetpeas will maintain a current Quality Improvement Plan, professional development and training plan, staff records, Professional Indemnity and Public Liability Insurance and a Child Care Management System.

Type of risk	Prevention / Strategies in place	Action to be taken
CCS Compliance	<i>HubWorks / HubHello</i> software is utilised to manage and track data, reducing instances of human error.	Weekly checks of attendance and corrections
Insurances	Building, liability, workers compensation.	Automatically renewed
Service Competition	<ul style="list-style-type: none"> <li>Continuous improvement plan</li> <li>Build strong community links through families and local businesses</li> <li>Internet presence through website and social media</li> <li>Advertise centre locally and online</li> </ul>	Continuous improvement occurs weekly for program and routines it is also agenda item for critical reflection in meetings and the focus of fortnightly leader meetings.
Submission of attendees	Managed via <i>HubWorks</i> . Submitted by approved CCS Personnel.	<ul style="list-style-type: none"> <li>Submitted daily after attendance and absences verified by service Director/Responsible Person.</li> <li>Weekly attendance submits automatically to Department after Friday attendance is submitted.</li> </ul>
Submission of vacancies	Managed via <i>HubWorks</i> .	Ongoing
Staff Skills and Knowledge	<ul style="list-style-type: none"> <li>Goals are set, evaluated, and extended.</li> <li>Staff evaluate knowledge and the educational leader works to assist completion of goals through mentoring or professional development.</li> </ul>	Biannually, or if needed
Accurate Data Reports	Managed via <i>HubWorks</i> by Managing Director.	Random data checks (see <a href="#">Data Quality</a> below).

## BREACH OF POLICY

In the case of a breach of this policy and procedure, the following process will be followed:

- All information is to be documented and stored securely including details of the breach, name of parties involved, time and date of breach.
- Details of the breach to be discussed with relevant parties and investigated by Sweetpeas Management.
- Sweetpeas Management will make recommendations to prevent a similar breach and to initiate disciplinary procedures.

## COMPLAINTS

If any stakeholders have complaints or concerns about practices relating to the administration of subsidies (i.e. CCS, ACCS), they should first follow the procedures outlined in the Sweetpeas *Handling Grievances and Complaints Policy*.

If they have already followed the complaints procedure and do not feel their concerns regarding the administration of CCS/ACCS have been addressed, they are advised to contact the Department of Education: <https://www.education.gov.au/about-department/contact-us/online-contact-form>

Suspected fraud can be reported to the Department of Education via their anonymous online tip-off form: <https://www.education.gov.au/early-childhood/compliance-and-enforcement/report-ccs-fraud>

## RELATED SWEETPEAS DOCUMENTS

- Terms & Conditions of Enrolment (Enrolment Package/End of enrolment forms)
- WWCC Register

## REFERENCES

- A New Tax System (Family Assistance) (Administration) Act 1999
- A New Tax System (Family Assistance) Act 1999
- Australian Children’s Education and Care Quality Authority (ACECQA) - <https://www.acecqa.gov.au/>
- Australian Privacy Principles - <https://www.oaic.gov.au/privacy/australian-privacy-principles>
- Child Care Provider Handbook - <https://www.education.gov.au/early-childhood/resources/child-care-provider-handbook>
- Child Care Subsidy - <https://www.servicesaustralia.gov.au/child-care-subsidy>
- Child Care Subsidy Governance Statement - <https://www.education.gov.au/early-childhood/resources/child-care-subsidy-governance-statement-cbdc-and-oshc>
- Child Care Subsidy Minister’s Rules 2017 (Minister’s Rules)
- Child Care Subsidy Secretary’s Rules 2017 (Secretary’s Rules)
- Child Safe Standards - <https://ocg.nsw.gov.au/child-safe-scheme/why-we-have-child-safe-standards>
- Children (Education and Care Services) National Law (NSW) No 104a of 2010
- Children and Young Persons (Care and Protection) Act 1998
- Children’s Guardian Act 2019
- Commonwealth Privacy Act 1988
- Early Childhood Australia (ECA) Code of Ethics - <https://www.earlychildhoodaustralia.org.au/our-publications/eca-code-ethics/>
- Education and Care Services National Regulations 2011
- Family Assistance Law - <https://www.education.gov.au/early-childhood/provider-obligations/family-assistance-law>
- Freedom of Information Act 1982
- HubHello - <https://www.hubhello.com.au/>
- List of registered child care software - <https://www.education.gov.au/early-childhood/child-care-subsidy/it-system/list-registered-child-care-software>
- National Principles for Child Safe Organisations - <https://www.childsafety.gov.au/resources/national-principles-child-safe-organisations>
- National Quality Standard (Revised 2018)
- NSW Associations Incorporation Act 2009
- Sweetpeas Philosophy

## REVIEW AND AMENDMENTS

This policy will be updated regularly to ensure compliance with all relevant legal requirements. Appropriate consultation of all stakeholders (including staff and families) will be conducted on a timely basis. In accordance with *Regulation 172* of the National Regulations, families of children enrolled will be notified at least 14 days and their input considered prior to any amendment of policies and procedures that have any impact on their children or family.

Version	Amendment(s)	Review Date	Updated By
1.	<ul style="list-style-type: none"> <li>• Policy implemented</li> </ul>	January 2019	Janine Evans (Nominated Supervisor)
2.	<ul style="list-style-type: none"> <li>• Regulations updated</li> <li>• Staff updated</li> <li>• Formatting</li> <li>• NQS &amp; Regulations Added</li> <li>• Added pending new service (St Clair)</li> </ul>	June 2020	Janine Evans (Nominated Supervisor)

Version	Amendment(s)	Review Date	Updated By
2.1.	<ul style="list-style-type: none"> <li>Updated to include current philosophy, current fees current staff</li> </ul>	July 2021	Janine Evans (Nominated Supervisor)
3.	<ul style="list-style-type: none"> <li>Staff</li> <li>Formatting</li> <li>NQS &amp; Regulations added</li> <li>Added new service - St Marys</li> <li>Added new position - Managing Director</li> <li>Current fees, current address</li> </ul>	July 2022	Janine Evans (Nominated Supervisor)
3.1.	<ul style="list-style-type: none"> <li>Added more information on CCS Procedures and Family Assistance Law responsibilities                             <ul style="list-style-type: none"> <li>Background Checks</li> <li>Date Quality</li> <li>Audits</li> <li>Record Keeping</li> </ul> </li> <li>Added relevant terminology section</li> <li>Rearranged order for better flow with new sections</li> </ul>	August 2022 (1)	Cassandra Way (Assistant Manager) Janine Evans (Managing Director)
3.2.	<ul style="list-style-type: none"> <li>Added additional info on Responsible Persons</li> <li>Added section titled "Third-party software security"</li> <li>Added further clarification to Access Software section</li> <li>Added clearer staff training evaluation</li> <li>Added more info to Audit section and renamed it "Fraud Prevention or Detection/Risk/Audit Process"</li> </ul>	August 2022 (2)	Cassandra Way (Assistant Manager)
3.3.	<ul style="list-style-type: none"> <li>Updated policy version numbering (Aug22(2) was previously v6.2)</li> <li>Updated hierarchy diagram</li> <li>Cosmetic template changes</li> <li>Added <i>Glossary of Abbreviations</i> to make policy clearer/more accessible</li> </ul>	October 2023	Cassandra Way (Assistant Manager)
4.	<ul style="list-style-type: none"> <li>Combined previous four individual service versions of this policy into one company policy.</li> <li>Separated non-CCS governance practices into <i>Governance Policy</i></li> <li>Extended on <i>Policy Aim</i> to be more descriptive of governance practices.</li> <li>Small updates were made to the following sections:                             <ul style="list-style-type: none"> <li>National Quality Standard</li> <li>Related Policies &amp; Legislation</li> <li>Terminology</li> <li>Glossary of Abbreviations</li> </ul> </li> <li>Sections of the policy were reordered and/or renamed to align with the AGDE's <a href="#">CCS Governance Statement</a> template.                             <ul style="list-style-type: none"> <li><i>Background</i> renamed <i>Organisational Size and Structure</i></li> <li><i>CCS Procedures</i> renamed <i>Staff Employment, Training and Management</i></li> <li><i>Record Keeping</i> renamed <i>Keeping Records</i></li> </ul> </li> <li>Added headings &amp; subheadings for clarity and readability:                             <ul style="list-style-type: none"> <li><i>Decision Making</i></li> <li><i>Management Team</i></li> <li><i>Approved Providers and Services</i></li> <li><i>Responsible Persons (non-CCS Personnel)</i></li> <li><i>CCS Operations</i></li> <li><i>Fee Policies</i></li> <li><i>Related Sweetpeas Documents</i></li> </ul> </li> <li>Added information about new service - Sweetpeas OOSH Cranebrook</li> <li>Added references to the nomination of Cassandra Way for CCS Personnel, where relevant.</li> <li>Updated plan for future nominations of CCS Personnel to include Nominated Supervisors.</li> <li>Updated <i>Organisation Structure Diagram</i> (previously hierarchy diagram) with new information, new service, headings and a new line for directors.</li> <li>Moved some info from <i>Evaluation</i> to ensure staff training has been effective to <i>Auditing and Cross-Checking</i> for clarity.</li> <li>Removed some information that was a copy of info in related policies which are also attached to CCS applications.</li> <li>Updated reference list and checked hotlinks.</li> </ul>	November 2024	Cassandra Way (Assistant Manager) Janine Evans (Managing Director)