

Outside School Hours Care (OSHC) Financial Integrity & Fees Procedures & Policy

AIM

This policy provides information to families and carers on the fees payable, relevant subsidies, administration associated service fees and financial integrity for the OSHC service.

POLICY

Loch Primary School Outside of School Hours Care (OSHC) is a not-for-profit service that is committed to accurate, timely and legally compliant financial administration to ensure the financial viability of its OSHC service.

The cost of attending our service contributes to the running cost of the program including but not limited to staff salaries, staff training, equipment maintenance and replacement, incursion/excursions, office materials, cleaning, food, and children's activity resources.

Loch Primary School OSHC is committed to:

- Providing a quality service at an affordable price so that all children have a right to access Loch Primary School OSHC service, regardless of economic status, cultural background, or disability
- Ensuring that families and carers are provided with information about the Child Care Subsidy (CCS) application process
- Ensuring that families and carers are provided with information about service fees, payment statements, payment methods and information about financial support
- Maintaining accurate and up to date financial records in accordance with the Confidentiality and Record Keeping Policy
- Identifying equitable solutions that address fee payment barriers for families or carers to sustain positive impacts gained for children in the service. This includes payment plans where appropriate
- Working with the School Council to sustain a sufficient income that ensures the viability of the service.

Loch Primary School Council is responsible for:

- Complying with Family Assistance Law requirements as an approved service for the Child Care Subsidy (CCS) System
- Regularly reviewing the service fees based on an OSHC service budget. This may involve utilising budget templates available from Community Child Care
- Updating policies and procedures based on any industry changes to fee requirements
- Complying with the online Child Care Subsidy System compliance and assurance reporting requirements
- Providing families and carers with information about changes to fees in writing and with 14 days' notice as per Australian Children's Education and Care Quality Authority (ACECQA) requirements
- Providing families with statements via email in advance of the payment due date
- Training all OSHC staff to:
 - Utilise the booking software or Provider Entry Point (PEP)
 - Ensure they are able to navigate Services Australia- Centrelink resources to answer or resolve any family or carer questions such as calculating daily out of pocket fees
 - Understand CCS system reporting requirements
 - Understand fee payment procedures
- Updating and maintaining professional development and training plans
- Ensuring that all OSHC employees meet all obligations and requirements, and that the childcare funding they receive is administered and directed appropriately
- Ensuring that all staff are deemed fit and proper under Family Assistance Law (refer to OSHC Governance and Management Policy, or the Child Care Provider Handbook)
- Ensuring that data and attendance reports to the Department of Education, Skills and Employment (DESE) are accurate
- Implementing systems to evaluate staff training to ensure it is effective and that delegated staff are trained to comply with the Child Care Subsidy System under Family Assistance Law, i.e., identifying and resolving discrepancies and ensuring accuracy of records
- Ensuring continued operational and financial viability
- Ensuring and understand compliance obligations with National and Family Tax Law
- Providing Professional Indemnity and Public Liability Insurance covering the OSHC service.
 These insurances are arranged through the Department of Education and Training
- Continually monitoring and evaluating the OSHC service's financial viability.

The Nominated Supervisor is responsible for:

(Note – The Nominated Supervisor and Business Manager may work collaboratively to complete the following requirements)

- Maintaining a current Quality Improvement Plan (QIP) and self-assessment
- Maintaining staff records
- Understanding and implementing Child Care Subsidy System and Family Tax Law obligations
- Attending training and utilising the approved software or PEP to answer and assist any
 family or carer questions including, calculating gap (out of pocket) fees, entitlement to
 Child Care Subsidy and 42 allowable absences/child/year

- Providing a fortnightly Statement of Entitlement to families or carers eligible for Child Care Subsidy for children enrolled in their service (see **Appendix 1** Categories and details of information required in a Statement of Entitlement)
- Referring families and carers to Centrelink for more detailed questions related to the calculation and allocation of Child Care Subsidy or Additional Child Care Subsidy (ACCS)
- Providing families and carers with information about changes to fees in writing and with 14 days' notice
- Checking payment advice, remittance and reconciliation
- Communicating to inform families of charges and responsibilities (e.g., finalising tax affairs at end of financial year) and reconciling payments
- Introducing processes and checks to make sure data reports are accurate and correct prior to submission
- Rectifying and resubmitting errors that may occur within outlined timeframes
- Submitting financial and requested reports to OSHC sub-committee and school council in a timely manner
- Complying and providing information for audits (both Commonwealth and State) as per the Department of Education and Training School Council Financial Assurance Program
- Monitoring and evaluating of Loch Primary School OSHC service's financial viability.

Families or Carers are Responsible for:

- Checking eligibility for CCS through Centrelink and if eligible, lodging CCS application, confirming enrolment details to receive their eligible fee reductions
- Providing Loch Primary School OSHC with accurate Customer Reference Number (CRN) details for the purpose of the CCS system
- Updating Centrelink should the family or carer circumstance change which may impact CCS
- Payment of session fees for the care of their child / their children on a regular fortnightly basis
- Ensuring any outstanding payments are finalised prior to the end of school term. If the account balance is not at nil, future bookings may be affected
- Ensuring that the OSHC service is made aware of any delays to paying fortnightly fees on time
- Notifying the OSHC program if their child/ren will be absent, with reasonable notice. No reason needs to be given for initial 42 allowable absences/child/day/year
- Providing evidence to DESE (as per CCS guidelines) after 42 allowable absences have been used, to ensure CCS payment depending on entitlements, e.g., a medical certificate, when your child/ren are absent from the service after initial 42 allowable absences have been used.

LOCH PRIMARY SCHOOL OSHC FINANCIAL OBJECTIVES

Loch Primary School will make sure the service remains viable and financially sustainable by meeting its financial objectives (see **Appendix 2** Loch Primary School OSHC Financial Objectives).

CHILD CARE SUBSIDY

Loch Primary School is responsible to adhere to Department Education, Skills and Employments Child Care Subsidy guidelines and obligations to administer Child Care Subsidy as a fee reduction for eligible families as outlined under Family Assistance Law (see definitions and Appendix 3 Child Care Subsidy Entitlements).

PAYMENT METHOD PROCEDURE

- Service fees are payable from the agreed commencement date elected at enrolment
- The preferred payment method OSHC sessions at Loch Primary School is direct debit
- Families and carers are required to provide bank details when enrolling their child to allow direct debits to commence
- Families and carers will receive their statement with a payment due date to a nominated email address on a fortnightly basis as per family or carer request
- Payments will be withdrawn by Loch Primary School OSHC via direct debit, on a Thursday evening from the bank that was nominated at enrolment
- · Direct debits occur on a weekly basis for the previous week
- Families and carers may elect to arrange part payments or pay for the service in advance rather than in arrears, provided this is discussed directly with the OSHC Nominated Supervisor
- Families and carers are to be mindful that additional fees may be applied per session, i.e., non-attendance fees, late collection fees. These additional fees will be evidenced in the fortnightly statement that is emailed. Additional fees are outlined below under 'Other Fees'
- Cash or cheques will only be accepted in rare circumstances provided these circumstances are discussed directly with the OSHC Nominated Supervisor in advance.

OVERDUE / DISHONOUR PROCEDURE

- Loch Primary School OSHC relies on prompt payments so that our service remains viable and Loch Primary School OSHC understands that payment issues and delays may arise
- Whenever possible, families with overdue fees are encouraged to inform the OSHC Nominated Supervisor of payment delays or financial hardship so that options for assistance can be arranged
- Families that cannot afford fees will be provided with information on avenues of financial support, including Special Childcare Assistance
- The following dishonour or overdue payment procedure will be adhered to:
 - No payment received on due date, or a dishonour occurs post direct debit; a written reminder will be sent within 24 hours encouraging the payment to be finalised within two weeks
 - No payment received after two weeks past due date; a second written reminder will be sent to the nominated contact on the enrolment form. Written reminder will include the offer to discuss payment difficulties directly with the OSHC Nominated Supervisor. A follow up phone call will be held between the contact on the enrolment form and the OSHC Nominated Supervisor to discuss all payment options
 - No payment received after four weeks past due date; a letter will be issued advising that all OSHC bookings are revoked until payments are made. The offer to explore

payment plans with the school will be discussed with the OSHC Nominated Supervisor or Person with Management or Control. Avenues of financial support will be explored

- Loch Primary School reserves the right to engage a debt collection agency to collect outstanding fees overdue more than 8 weeks
- OSHC services may not recommence until such time as an account balance returns to nil balance after four weeks overdue *or* a payment plan has been set up with input from the OSHC Nominated Supervisor or Person with Management or Control.

REFUND PROCEDURE

- Refunds will be arranged when a family or carer has paid for a service session that they
 no longer wish their child to attend
- Families and carers may choose to be reimbursed or refunded or keep their payment as credit for future sessions.

FINANCIAL INTEGRITY

Loch Primary School OSHC is responsible for:

- Ensuring the OSHC program future financial integrity, continued operational sustainability and financial viability
- Maintaining a Quality Improvement Plan (QIP), professional development and training plans, staff records, Professional Indemnity insurance, Public Liability insurance and an approved childcare management system
- Understanding the obligations to comply with requirements for the governance and financial administration of payments of childcare funding and continually monitor and evaluate the OSHC service's financial viability
- At least annually, the principal of Loch Primary School will perform a risk audit (refer to **Appendix 4:** Financial integrity: risk assessment, fraud and corruption control).

ROLES AND RESPONSIBILITIES

Role	Responsibility
Educators and Supervisors	Person with Management or Control, Educators, Supervisors, Nominated Supervisor/Educational Leader will oversee the implementation and service adherence to this policy All Educators are responsible for the daily implementation of the policy when directly supervising children.
Families and carers	As account holders, families or carers must ensure they fulfil their payment obligations and provide their banking details prior to their child starting care, as required.
School Council / Principal	Provide official sign off on the Policy

REFERENCES

DEFINITIONS

Additional Child Care Subsidy (ACCS): The Additional Child Care Subsidy (ACCS) is a top-up payment in addition to the Child Care Subsidy (CCS) and, except for the ACCS (transitioning to work); it will cover all of a child's childcare fees in most cases. ACCS includes four elements:

- 1. ACCS (child wellbeing) for families who require practical help to support their children's safety and wellbeing
- 2. ACCS (grandparent) for grandparents who are primary carers of their grandchildren
- 3. ACCS (temporary financial hardship) for families experiencing temporary financial hardship
- 4. ACCS (transition to work) for families transitioning from income support to work.

Allowable Absences: Child Care Subsidy is payable for up to 42 absence days (52 days allowable for 2022/2023 financial year) for a child in a financial year for sessions of care a child is enrolled in and did not attend, but only for sessions of care where an individual still incurs a genuine fee liability to pay for the care. A reason does not need to be provided for a child's initial 42 days of absence. After the 42 days, reasons will need to be provided (refer to Child Care Provider Handbook - Child Care Subsidy System).

Child Care Subsidy (CCS): Child Care Subsidy (CCS) is designed to assist eligible families with the cost of accessing approved and registered childcare services, by subsidising some of the cost.

Child Care Subsidy System (CCSS): Is the interface for families and childcare providers. The CCSS manages the payment and administration of the Child Care Subsidy (CCS), including recording attendance times, which was mandatory from January 2019

REFERENCES

LEGISLATION, STANDARDS AND PROVISIONS

- Education and Care Services National Law Act 2010
- Education and Care Services National Regulations 2011
- A New Tax System (Family Assistance) (Administration) Act 1999
- A New Tax System (Family Assistance) Act 1999
- Family Law Act 1975
- Child Care Subsidy Secretary's Rules 2017 (legislation.gov.au)
- Child Safe Standards
- National Quality Standard, Quality Area 6 Collaborative Partnership with Families and Communities
- National Quality Standard, Quality Area 7 Governance and Leadership
- Equal Opportunity Act 2010 (Vic)
- Privacy Act 1988 (Cth)
- Privacy and Data Protection Act 2014 (Vic)
- Public Interest Disclosures Act 2012 (Vic)
- Financial Management Act 1994 (Vic)
- A New Tax System (Goods and Services Tax) Act 1999 (Cth)
- Fringe Benefits Tax Act 1986 (Cth)
- Income Tax Assessment Act 1997 (Cth)
- Associations Incorporation Act 1981
- Audit Act 1994
- Public Administration Act 2004
- Education and Training Reform Act 2006
- Education and Training Reform Regulations 2007

SUPPORTING DOCUMENTS

Department Education and Training (DET) - School Operations

Department Education and Training: School Council

Department of Education and Training: School Council - Conduct and Conflict of Interest

Department Education and Training: Fraud and Corruption Control

Department Education and Training: Information Security, InfoSafe

Department Education and Training: School Council Financial Assurance Program

• Department Education and Training (DET) - Human Resources

https://www2.education.vic.gov.au/pal/complaints-information-employees/overview

Department Education and Training: Conflict of Interest

Department Education and Training: Report Fraud or Corruption

Australian Children's Education and Care Quality Authority (ACECQA)

ACECQA National Quality Standard

National Quality Agenda IT System

Quality Improvement Plan and Self-assessment Tool

Australian Government Department Education, Skills and Employment (DESE)

Child Care Provider Handbook - Child Care Subsidy System

Guide to Additional Child Care Subsidy (child wellbeing)

Child Care Subsidy - Specified Personnel Roles

Child Care Subsidy - Fit and Proper Requirements Personnel

Child Care - Financial Integrity

New Child Care Package - Information resources for providers

Child Care Subsidy System

Outside School Hours Care hourly cap

Child Care Enforcement Action Register

Applying for Child Care Subsidy (CCS) Approval

Child Care grant opportunities

Services Australia - Information for Families

Child Care Subsidy - Who can get it?

Child Care Subsidy - How much can you get?

Child Care Subsidy - How to claim

POLICY REVIEW AND APPROVAL

The Policy will be reviewed every 12 months. The ongoing monitoring and compliance to this policy will be overseen by Nominated Supervisor, Loch Primary School OSHC and Person with Management or Control of the Service where practical. Feedback from Quality Assessment and Regulation Division (QARD), received through the assessment and rating process and/or compliance visits will inform this policy review. Feedback from stakeholders, e.g., families and carers, school community etc. will also inform policy updates and review.

This policy was last reviewed and updated by both School Council and OSHC staff on 27th March 2023 and is scheduled for review in March 2024.

STAFF ACKNOWLEDGEMENT

I acknowledge:

- receiving the Loch Primary School OSHC Financial Integrity and Fee Policy;
- that I will comply with the policy; and
- that dependent on the seriousness of any breach there may be disciplinary consequences if I fail to comply, which may result in the termination of my employment.

Your Name:	
Signed:	
Date:	
Loch OSHC sign off:	Date:

CATEGORIES AND DETAILS OF INFORMATION REQUIRED IN A STATEMENT OF ENTITLEMENT

Issue	Details
The Statement	Name of the individual to whom the statement is issued.
	Name of the child to whom any sessions of care were provided.
	Unique identifier (assigned by the department) to the enrolment of the child for
	care by the service.
	Date of issue and start and end dates of the statement period.
The Service	Name of the provider.
	Any business name of the service registered with the Australian Securities and
	Investments Commission.
	Australian Business Number (if any) of the provider and (if different) the Australian
	Business Number under which the service trades.
	Unique identifier of service and the provider (assigned by the department).
Sessions of	Daily and weekly totals of the number of hours of care provided during the
Care	statement period, including start and end times for each session of care.
	Daily and weekly totals of the number of hours of the child's physical attendance
	during the statement period, including start and end times of the child's physical
	attendance.
	For the statement period and cumulatively for the financial year until the date
	of issue of the statement—the sum of:
	- the number of days on which the service is taken to have provided a session
	of care
	to the child while the child was absent (up to 42 days in the financial year) (that is an initial absence day)
	- the number of days on which the service is taken to have provided a session
	of care to the child, beyond 42 cumulative days in the financial year and
	particular circumstances apply (that is an additional absence day).
Fees	Hourly session fee for each session of care provided by the service to the child
	in the statement period.
	Daily and weekly totals of the amount of all fees charged by the provider for
	care provided during the statement period, including details about any discounting
	or refund applied in order to pass on fee reductions.
Fee Reduction	For the statement period:
Amounts	- the number of hours for which the fees were reduced (or for which the individual
	otherwise received the benefit of a fee reduction amount)
	- the total of the fee reduction amounts of which the provider was given notice
	by the department
	- a breakdown of the amounts of fee reduction for each session of care and
	whether it related to a payment of Child Care Subsidy or Additional Child Care
	Subsidy.
Actual	Session reports are required to record actual attendance in and out times (except
Attendance	for absences).
Times	

APPENDIX 2

LOCH PRIMARY SCHOOL OSHC FINANCIAL OBJECTIVES

The primary target for 2023 is to establish the Loch Primary School OSHC and increase utilisation from 40% to 90%. Loch Primary School OSHC aims to run a break-even service by 30^{th} June 2023.

To achieve this objective, Loch Primary School council will:

- Develop an OSHC budget
- Routinely use promotional material, school open days to promote the OSHC service to new users.
- Promote the OSHC service through newsletters/communication streams/apps

To maintain a competitive position within the marketplace fees will be reviewed annually against both a set break even fee and the fee of local providers. All associated functions are governed by the Loch Primary School OSHC 'Fees Policy'. This includes; management of fee increases, collection of late fees, absences and public holidays. The amount of Child Care Subsidy (CCS) families can receive is based on the hourly fee for OSHC before, after and vacation care charge (as applicable). The Outside School Hours Care hourly cap is currently \$11.15 (as at July 2023), for primary school age children.

SESSION FEES

Session	Times	Price	Includes
Before School Care	7:00am - 8:45am	\$16	Breakfast
Before School Care (Casual)	7:00am - 8:45am	\$20	Breakfast
After School Care	3:30pm - 6:00pm	\$20	Afternoon Tea
After School Care (Casual)	3:30pm - 6:00pm	\$24	Afternoon Tea
After School Care End of term 1, 2 & 3	2:30pm to 6:00pm	\$26	Afternoon Tea
Pupil Free Day	7:00am - 6:00pm	\$50	Breakfast, Morning Tea, Afternoon Tea (BYO Lunch)

OTHER FEES

• Walk in Fees

- Families or carers will incur an additional charge on top of the service fee above of \$5 per child when a child attends Before School Care or After School Care without prior confirmation.

Late Collection Fees

- Whenever practical, a family or carer should advise if will be collecting their child late by calling the OSHC service so their child can be notified

- A late collection fee will be incurred if the child has not been collected by 6.00pm. This is equated as \$30 per child per 15 minutes (or part thereof) until your child is collected
- A late collection fee is not covered by Child Care Subsidy
- Continual late collections may result in changes to your regular bookings. The Nominated Supervisor will discuss these decisions directly with the family or carer.

Cancellation Fees

- A 24-hour notice period of is required if notifying the service that a booking will be cancelled for the following session. These notice periods are applicable when making cancellations to service bookings
- If notice periods are not met, the service fee will be charged as usual with CCS applied (as long as 42 allowable absences/child/year have not been exhausted).

• End of Term Fees

- Extended hours of care may be result in an increased fee to regular After School Care or casual After School Care bookings for the last day of term due to the session commencing earlier.

Last Day of Booking Absence

- If the child is absent on the last day of their booking, the service will not be eligible to claim the child's CCS on their behalf. In this instance the family or carer may incur a full fee for session.

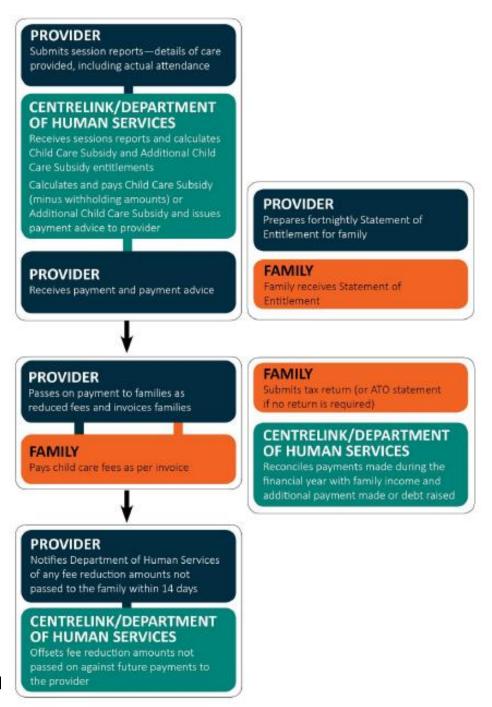
APPENDIX 3

CHILD CARE SUBSIDY ENTITLEMENTS

The amount of Child Care Subsidy (CCS) paid for care is determined by:

- Family income—the adjusted taxable income of the individual claimant and their partner (if they have one)
- Results of an activity test—this test considers the number of hours in a CCS fortnight
 that an individual engages in a recognised activity (such as paid work or a training
 course to improve their employment prospects) and affects the number of hours of
 subsidised care available to the individual
- Type of eligible childcare services—a different CCS hourly rate cap applies depending on the type of service the child attends.

STEPS IN THE PAYMENT AND RECOVERY PROCESS



ADDITIONAL

Additional Child Care Subsidy provides additional fee assistance to support vulnerable or disadvantaged families and children. There are four different payments:

- Child wellbeing—a subsidy equal to 100 per cent of the actual fee charged, up to 120 per cent of the Child Care Subsidy hourly rate cap, for up to 100 hours of assistance per fortnight
- Grandparent—a subsidy equal to 100 per cent of the actual fee charged, up to 120 per cent of the Child Care Subsidy hourly rate cap, for up to 100 hours of assistance per fortnight
- Temporary financial hardship—a subsidy equal to 100 per cent of the actual fee charged, up to 120 per cent of the Child Care Subsidy hourly rate cap, up to 100 hours of assistance per fortnight. It is limited to 13 weeks per event that gives rise to the temporary financial hardship
- Transition to work—a subsidy equal to 95 per cent of the actual fee charged (up to 95 per cent of the Child Care Subsidy hourly rate cap)

CHILD CARE SUBSIDY - WITHHOLDING

- Services Australia withholds a percentage of Child Care Subsidy (this is usually 5 per cent) to reduce the likelihood that individuals will incur debts. This means that the full subsidy amount, less the withholding amount, is paid to providers on behalf of families following submission of session reports
- Loch Primary School OSHC will be able to see the amount withheld on the payment advice they receive each fortnight. The amount withheld will be part of the gap fee that needs to be paid by families or carer to the provider.

CHILD CARE SUBSIDY - RECONCILIATION

• After the end of each financial year, when families settle their tax affairs (completing tax return), the total entitlements and payments for each child will be reconciled against the individual's adjusted taxable income. After this review, any outstanding subsidy amount will be paid to the individual or they will be advised of any debt. This process of reviewing and recalculating entitlements for the full year is called 'reconciliation' (also called income review or balancing payments).

APPENDIX 4

FINANCIAL INTEGRITY: RISK ASSESSMENT, FRAUD AND CORRUPTION CONTROL

TYPE OF RISK	STRATEGIC PLANNING	ACTION TO BE TAKEN
CCS Compliance	 Approved CCS software program and provider Contact details (phone and email) 	 Xplor reports to be review weekly Audits as per required
School Audits	 Type of school audits and frequency 	 Reports to be provided (CCS, income, OSHC budget)
Insurances	DET Public Liability	Covered by the Department of Education
Service Competition	• The 'self-assessment' and 'quality improvement planning' will be reviewed and updated regularly.	OSHC Sub-committee, OSHC Coordinator and educators will regularly review plans and identify area of improvement.
Submission of attendees	 The service inputs attending on a daily basis. 	Ongoing
Submission of vacancies	This is usually managed by Xplor.	Ongoing
Staff Skills and Knowledge	Staff will undertake a Professional Development Plan and will be reviewed by the Principal or nominee	AnnuallyQuarterlyMonthly
Child Care Subsidy System Accurate Data Reports	The OSHC Administration Manager will use the Xplor or PEP to manage submission of accurate reports.	Weekly
Family Statement of Entitlement	The OSHC Administration Manager will use Xplor to generate and email statements of entitlement to families	Fortnightly

RISK MANAGEMENT PROCEDURES

Department Education and Training - Fraud and Corruption Control (School Operations)

School staff including OSHC staff, are obligated to prevent, detect and respond to fraud and corruption in Victorian government schools. The Fraud, Corruption and Other Losses Control Policy (the Fraud Policy):

- · Provides a definition of fraud, corruption and other losses
- Describes the relevant legislative obligations of the Department

- State the Department's position on fraud and corruption
- Describes the Department's management model for the control of fraud, corruption and other losses
- Describes the Department's reporting requirements
- Sets out employee responsibilities in relation to fraud, corruption and other losses.

Refer to Department Education and Training - Fraud, Corruption and Other Losses Control Policy.

Department of Education and Training - Fraud and Corruption (Human Resources)

All Loch Primary School OSHC staff and the Loch Primary School council must report a complaint or public interest disclosure if there is knowledge or reason to believe a departmental employee, contractor or service provider has been involved in fraudulent or corrupt conduct.

Refer to Department of Education and Training - Report Fraud or Corruption

Department of Education, Skills and Employment - Child Care Financial Integrity

Loch Primary School OSHC staff must alert the Department of Education, Skills and Employment to any potential breaches in Child Care financial integrity. OSHC staff who are aware of practices that could be incorrect or illegal will contact the tip-off line on 1800 664 231 (information can be given anonymously). Alternatively, information can be given in writing to the department through tipoffline@dese.gov.au Tip-offs may be passed on to other government agencies.

Refer to Department of Education, Skills and Employment - Child Care Financial Integrity Strategy