

## ECECP Procedure 31.1

### Fraud and corruption prevention

Controlled Document

|                        |                                                    |                          |                     |                                                     |               |
|------------------------|----------------------------------------------------|--------------------------|---------------------|-----------------------------------------------------|---------------|
| <b>Version:</b>        | 1.0                                                | <b>Date of approval:</b> | February 2026       | <b>Date of next review:</b>                         | February 2029 |
| <b>Document Owner:</b> | Manager – Early Childhood Education & Care         |                          | <b>Approved by:</b> | Executive Manager, Children & Youth Services        |               |
| <b>Reviewed by:</b>    | Project Officer – Early Childhood Education & Care |                          |                     | Fees Coordinator – Early Childhood Education & Care |               |

|                                          |                         |
|------------------------------------------|-------------------------|
| <b>Policy attached to this procedure</b> | Fraud Prevention Policy |
|------------------------------------------|-------------------------|

Working in conjunction with the *Fraud Prevention Policy*, this procedure aims to help guide the steps taken for preventing, controlling and investigating fraudulent activity within the Service. The approved provider and all employees have a responsibility for the mitigation of fraud and/or corruption within the Service.

NQS QA 7: Element 7.1, 7.1.2 and 7.1.3 Governance practices and procedures

#### STEP 1: GOVERNANCE AND COMPLIANCE REQUIREMENTS

|          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |  |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| <b>1</b> | The approved provider, nominated supervisor and educators will review and update the Service's <i>Fraud Prevention Policy</i> every three years unless otherwise required, to ensure an awareness of fraud and corruption prevention strategies                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |  |
| <b>2</b> | The approved provider is responsible for satisfying obligations under the National Law and Regulations and compliance with Family Assistance Law for continued approval to administer childcare funding                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |  |
| <b>3</b> | <p>The approved provider must ensure that all staff and educators comply with their legal obligations and conditions for continued approval which includes:</p> <ul style="list-style-type: none"> <li>ensuring the approved provider and relevant personnel are fit and proper and remain fit and proper, persons to have a role in the receiving and passing on of Child Care Subsidy payments</li> <li>ensuring background checks, including Working with Children Check/Clearance (WWCC) and National Criminal Checks are carried out for all staff and educators where required</li> <li>ensuring relevant key personnel who are involved in administering Child Care Subsidy to families are registered with PRODA</li> <li>ensuring notification of any changes to relevant key personnel or persons with management or control are submitted to the Department of Education within 7 days</li> </ul> |  |

|          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |  |
|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| <b>4</b> | The approved provider will ensure the Department of Education has current details of the Service including: <ul style="list-style-type: none"> <li>• full legal name and trading name</li> <li>• street and postal address</li> <li>• Australian Business Number (ABN)</li> <li>• service approval to provide child care in the state or territory in which each of its child care services operate</li> <li>• name and contact details for each person with management or control of the provider</li> <li>• weeks the service will be operating throughout the year</li> <li>• approved software provider to interact with Child Care Subsidy System (if applicable)</li> </ul> |  |
| <b>5</b> | Employees, volunteers and management must disclose actual, perceived or potential conflicts of interest in accordance with CatholicCare requirements.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |  |

## STEP 2: ADMINISTRATION OF CCS AND RECORD KEEPING

To support compliance with Family Assistance Law and minimise the risk of fraud and corruption, authorised personnel will monitor and maintain:

- accurate enrolment records and Complying Written Arrangements (CWAs)
- enrolment notices and enrolment end dates
- attendance records and session reporting
- records supporting absences and additional absences
- CCS and ACCS payment administration
- personnel registrations and authorisations, including PRODA where applicable
- records required under Family Assistance Law
- notifications required by the Department of Education
- secure access to CCS software and associated systems.

Any identified discrepancies, anomalies, incomplete records or suspected non-compliance will be reviewed and addressed in accordance with the Fraud Prevention Policy and CatholicCare procedures.

### The approved provider will ensure:

|          |                                                                                                                                                                                                                                                                                                                                     |  |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| <b>1</b> | accurate enrolment records are kept for each child as per enrolment record policy                                                                                                                                                                                                                                                   |  |
| <b>2</b> | accurate Complying Written Arrangements (CWA) are recorded and signed by the parent/guardian for each child claiming CCS.<br><br>The CWA will include: <ul style="list-style-type: none"> <li>• name and contact details of the provider</li> <li>• start date of arrangement</li> <li>• name and date of birth of child</li> </ul> |  |

|           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |  |
|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
|           | <ul style="list-style-type: none"> <li>whether the sessions of care provided will be routine or casual fees charged</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |  |
| <b>3</b>  | accurate session reports are submitted within 14 days of the child's attendance indicating the session start and finish times, child's actual in and out attendance times, actual fees charged and amount the parent was liable to pay for the session of care                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |  |
| <b>4</b>  | notification of absences is recorded                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |  |
| <b>5</b>  | a reason for any additional absence is recorded, keep evidence of additional records on file                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |  |
| <b>6</b>  | an attendance statement- <i>Statement of Entitlement</i> - is issued for families once a fortnight, outlining the child's days of attendance, hours in care, total fee amount and the childcare subsidy fee received                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |  |
| <b>7</b>  | any variations to session reports must be made up until 28 days after the start of the week to which the report relates                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |  |
| <b>8</b>  | anticipated vacancy information is submitted for the following week                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |  |
| <b>9</b>  | any changes to operating hours or service closure periods                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |  |
| <b>10</b> | all CCS and ACCS payments are passed onto families as a fee reduction                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |
| <b>11</b> | any 3 <sup>rd</sup> party payments are administered according to the CCS Provider Handbook                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |  |
| <b>12</b> | accurate records are kept regarding ACCS (Child Wellbeing) payments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |  |
| <b>13</b> | payment for gap fee payments are collected from families as per <i>Fees Policy</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |  |
| <b>14</b> | ensure parents pay gap fees via electronic means                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |  |
| <b>15</b> | <p>they keep and maintain records including:</p> <ul style="list-style-type: none"> <li>complaints made to the provider, or to any of the services of the provider, relating to compliance with Family Assistance Law</li> <li>a record of attendance for each child</li> <li>statements or documents demonstrating additional absence days</li> <li>copies of invoices and receipts issued for payment of childcare fees</li> <li>copies of all statements of entitlement issued and any statements issued to advise there was a charge of entitlement</li> <li>notifications, including statements or documents, about a child at risk of abuse or neglect</li> <li>evidence and information provided with an application for approval about persons with management or control of a provider or persons responsible for the day-to-day operation of a service</li> <li>evidence or information produced to obtain police checks and Working With Children Checks/Clearances (WWCC)</li> </ul> |  |

|    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |  |
|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| 16 | that all employees refer to the <i>Fraud Prevention Policy</i> to ensure there is a clear understanding of their legal requirements                                                                                                                                                                                                                                                                                                                                           |  |
| 17 | Management and staff responsible for enrolments, CCS administration, finance or compliance will: <ul style="list-style-type: none"> <li>complete relevant GECKO compliance modules</li> <li>maintain current knowledge of CCS requirements and Family Assistance Law</li> <li>review Department of Education communications, newsletters and compliance updates</li> <li>participate in ongoing professional learning relating to fraud prevention and compliance.</li> </ul> |  |
| 18 | any changes regarding a person with management or control, or employee who is no longer deemed fit and proper, must be notified to the Department of Education within 7 days                                                                                                                                                                                                                                                                                                  |  |
| 19 | the Department of Education is notified with 7 days if a person with management or control obtains an interest or where a conflict of interest might be reasonably be perceived to exist                                                                                                                                                                                                                                                                                      |  |
| 20 | acceptance of the legal responsibilities associated with claiming Child Care Subsidy within the Family Assistance Law                                                                                                                                                                                                                                                                                                                                                         |  |
| 21 | staff will follow the guidelines within the Child Care Provider Handbook to ensure compliance of CCS payments and to ensure funding is processed and administered correctly                                                                                                                                                                                                                                                                                                   |  |
| 22 | allegations of fraud and/or corruption will be actioned in accordance with legislation outlined in Family Assistance Law as outlined in the Fraud Prevention Policy                                                                                                                                                                                                                                                                                                           |  |

### STEP 3: RESPONDING TO SUSPECTED FRAUD OR CORRUPTION

#### The approved provider will:

|   |                                                                                                                                                                                                                                                                                                                                                                          |  |
|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| 1 | ensure awareness of the potential indicators of fraud such as: <ul style="list-style-type: none"> <li>unusual attendance patterns</li> <li>inaccurate records</li> <li>unexplained financial irregularities</li> <li>misuse of information</li> <li>undisclosed conflicts of interest</li> <li>or other behaviours identified in the Fraud Prevention Policy.</li> </ul> |  |
| 2 | treat any allegation relating to fraudulent activity as serious                                                                                                                                                                                                                                                                                                          |  |
| 3 | refer to CatholicCare's <i>Code of Ethics and Conduct</i> if an employee is involved                                                                                                                                                                                                                                                                                     |  |
| 4 | ensure privacy and confidentiality and safeguard any person reporting suspected fraud                                                                                                                                                                                                                                                                                    |  |

|   |                                             |  |
|---|---------------------------------------------|--|
| 5 | gather supporting documents and/or evidence |  |
|---|---------------------------------------------|--|

#### STEP 4: REPORTING FRAUD OR CORRUPTION

|   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |  |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| 1 | The approved provider, or employee will report fraudulent activity or potential breaches of Family Assistance Law (CCS) anonymously through an online report to the Department of Education; for more details, visit their website: <a href="#">Reporting fraud via a tip-off</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |  |
| 2 | Any reasonable suspicion of fraud or corruption should be reported promptly. Individuals are not required to prove misconduct before making a report.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |  |
| 3 | <p>The approved provider, or employee will provide the following information:</p> <ul style="list-style-type: none"> <li>Who is involved? Include as much detail as possible, including name of the person or organisation, addresses and phone numbers</li> <li>What fraud you think has occurred? Provide details of your concerns, including how, when and where the fraudulent activity occurred <ul style="list-style-type: none"> <li>How did you come across this information?</li> <li>Do you believe the behaviour is continuing?</li> <li>Your contact details</li> </ul> </li> <li>The Department of Education will assess each allegation of suspected fraud and where appropriate, investigate the matter for potential referral to the Commonwealth Director of Public Prosecution.</li> </ul>                                                                              |  |
| 4 | <p><b>DISCIPLINARY SYSTEMS</b></p> <p>CatholicCare Wollongong takes all allegations of fraud and corruption seriously. Where fraudulent or corrupt conduct is substantiated, appropriate action will be taken in accordance with legislation, organisational policies and contractual obligations. Consequences may include:</p> <ul style="list-style-type: none"> <li>formal warnings</li> <li>disciplinary action up to and including termination of employment or engagement</li> <li>recovery or repayment of misappropriated funds</li> <li>referral to regulatory, enforcement or prosecution agencies</li> <li>cancellation or suspension of provider approval</li> <li>civil penalties</li> <li>financial penalties</li> <li>criminal prosecution</li> <li>a criminal record</li> <li>loss of professional registration, approval or future employment opportunities.</li> </ul> |  |
| 5 | Reports of suspected fraud, corruption or misconduct will be managed confidentially and in accordance with CatholicCare reporting procedures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |  |