



Dara School

Out of School Hours Care

Financial Integrity and Fee Policy

FINANCIAL INTEGRITY AND FEE POLICY

1. Background

Dara 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.

2. SCOPE

This policy applies to children, families, educators, management, and visitors of the Service.

3. POLICY STATEMENT

Dara OSHC Service sets fees in accordance with our annual budget to meet the income required to develop and maintain a quality service for children and families. We strive to ensure that our service is affordable and accessible to families in our community. The annual budget is ratified by the Approved Provider annually, or as necessary, and monitored carefully throughout the year.

Our Service uses "Xplor" software, which is a package specifically designed to process bookings, attendances and produces a statement to show family fees. This package is approved for the Australian Government by the Department of Education, Employment and Workplace Relations.

4. ROLES AND RESPONSIBILITIES

4.1 DARA SCHOOL OSHC IS COMMITTED TO:

- Providing a quality service at an affordable price so that all children have a right to access Dara 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 and 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 legislation.

- 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 Board to sustain a sufficient income that ensures the viability of the service.

4.2 DARA SCHOOL BOARD 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.
- 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.
- Continually monitoring and evaluating the OSHC service's financial viability.

4.3 THE NOMINATED SUPERVISOR IS RESPONSIBLE FOR:

(Note – The Nominated Supervisor and Business Manager may work collaboratively to meet 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)
- Monitoring and evaluating of Dara School's OSHC service's financial viability.

4.4 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 Dara 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.

5. IMPLEMENTATION

5.1 FINANCIAL OBJECTIVES

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

5.2 CHILD CARE SUBSIDY

Dara 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).

5.3 BOOKINGS AND CANCELLATIONS

- Bookings are to be made in advance, for the care sessions required.
- Information must include dates, times and the names of children who will attend, to ensure that the service is prepared with resources, training, and staffing to meet the children's needs.
- The program and educator rosters are based on bookings and so the service will charge fees for booked care that is not used.
 - A one week notice period 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). Bookings are essential to ensure that for any given session there is a list of children booked for care so that educators can accurately check attendances and efficiently follow up any booked children who do not arrive.

5.4 BILLING PROCEDURES

- Details of a family's fees and accounts will be confidential and stored appropriately. Families may access their own account records through the Nominated Supervisor or located on the Explor App.
- Invoices will be issued via e-mail on Monday each week.

5.5 PAYMENT PROCEDURES

- Service fees are payable from the agreed commencement date elected at enrolment
- The preferred payment method OSHC sessions at Dara School is Electronic Funds Transfer (EFT) or credit card.
- Families and carers will receive their statement with a payment due date to a nominated email address on a weekly basis with a due date of 7 days thereafter.
- 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.

5.6 OVERDUE / DISHONOUR PROCEDURE

- Dara School OSHC relies on prompt payments so that our service remains viable and Dara 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 one week encouraging the payment to be finalised within seven (7) days.
 - 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 three 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.
- Dara School reserves the right to engage a debt collection agency to collect outstanding fees overdue more than 8 weeks. The family will be informed that all associated fees with this action will be their responsibility.

- 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.
- Families are encouraged to discuss any difficulties that they may have in paying fees with the Director, who will discuss and make suitable arrangements for payment of fees as well as informing them of other avenues of financial support if required,

5.7 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

6. FINANCIAL INTEGRITY

Dara 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 Dara School will perform a risk audit (refer to Appendix 4: Financial integrity: risk assessment, fraud and corruption control).

7. POLICY REVIEW

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

8. 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:

ACCS (child wellbeing) – for families who require practical help to support their children's safety and wellbeing

ACCS (grandparent) – for grandparents who are primary carers of their grandchildren

ACCS (temporary financial hardship) – for families experiencing temporary financial hardship

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 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 subsidizing 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

9. SUPPORTING DOCUMENTS

9.1 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

9.2 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

9.3 SERVICES AUSTRALIA

Child Care Subsidy – Who can get it?
Child Care Subsidy – How much can you get?
Child Care Subsidy – How to Claim

9.3 OSHC POLICIES

A2 Financial Integrity & Fee Policy OSHC

A1 Enrolment and Orientation OSHC Policy
A7 Governance and Management OSHC Policy
A6 Complaints OSHC Policy

Dara School Board Approval: March 2022

Review Date: July 2023

Appendix 1 – Categories & details of information required in a Statement of Entitlement

Issue	Details
The statement	<ul style="list-style-type: none"> • Details 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	<ul style="list-style-type: none"> • 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 care	<ul style="list-style-type: none"> • Daily and weekly totals of the number of hours of care provided during the 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: <ul style="list-style-type: none"> - 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	<ul style="list-style-type: none"> • 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 amounts	<ul style="list-style-type: none">• For the statement period:<ul style="list-style-type: none">- 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 attendance times	<ul style="list-style-type: none">• Session reports are required to record actual attendance in and out times (except for absences).

Appendix 2 – Dara School OSHC Financial Objectives

The primary target for 2022 and 2023 is to establish the Dara School OSHC and establish a utilization rate of 75% within 12 – 18 months. Dara School OSHC aims to run a break-even service by 31 December 2023.

To achieve this objective, Dara School Board will:

- Develop an OSHC budget
- Routinely utilise the orientation try-out days, bring a friend day, and school open days to promote the OSHC service.
- 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 Dara 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 \$10.77 (as at 27 June 2022), for primary school age children.

Session Fees

Before School Care	\$ 16.50	
After school Care	\$ 25.00	
Early Finish	\$ 30.00	
Vacation care	\$ 60	
Pupil Free Day	\$ 60	
Excursion Supplement	\$ 12.50	
Late fee	\$ 1.00	For every minute not collecting their child
Upfront Payment of fees		Only applicable to non-school community families, or families that have not paid their vacation care fees on time in previous holidays
Enrolment Fee	\$ 25.00	Per Term

Other Fees

- **Walk in Fees**
 - Families or carers will incur an additional charge on top of the service fee outlined above 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 they 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 pm. This is equated as \$1 per child per minute 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.
- **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
- **Vacation Care Bookings**
 - Families are financially responsible for all days booked for Vacation Care regardless of whether the child attends.
 - If we can resell the child's place to another family, we will credit the family's account.
 - The two-week notification of cancelling bookings does not apply here.
- **Emergency Care**
 - If a child is not collected from school the Service will only provide emergency care,
 - if the child is currently enrolled in the service, educator to child ratios are not exceeded and capacity of the service is not exceeded.
 - Any fees associated with Emergency care will be discussed with the family or carer at the time.

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 Child Care Subsidy (ACCS)

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
- Dara 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. Dara School uses Xplor.	Data accuracy reviewed by Business Manager monthly
School Audits	Monthly reports to Finance Committee Annual Financial Review Administration end of year Annual Budget Report	Reports to be provided (CCS, income, OSHC budget)
Insurances	Public liability insurance provided as part of the School's overall policy	Reviewed and renewed annually
Service Competition	Insert a statement regarding your 'self-assessment' and 'quality improvement planning' process.	Continuous improvement is to be assessed through a monthly report by the OSHC Sub-committee
Submission of attendees	The service inputs attendance on a daily/weekly basis.	Ongoing
Submission of vacancies	Submission of vacancies will be incorporated into CCS software.	Ongoing
Staff Skills and Knowledge	An annual Professional Development and training plan is created and reviewed twice yearly	Annually
Child Care Subsidy System Accurate Data Reports	The OSHC Director will use XPlor to manage submission of accurate reports	Daily/weekly
Family Statement of Entitlement	The OSHC Director will use Xplor to generate and email statements of entitlement to families	Fortnightly

Risk Management Procedures

School staff including OSHC staff, are obligated to prevent, detect and respond to fraud and corruption within the School. The School's Fraud Control and Corruption Prevention Policy (the Fraud Policy):

- Provides a definition of fraud and corruption
- Describes the relevant legislative obligations of the Department
- States the School's position on fraud and corruption
- Describes the School's management model for the control of fraud and corruption.
- Describes the School's reporting requirements
- Sets out the responsibilities in relation to fraud and corruption.

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

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

Dara 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