

Fraud Prevention Policy



Procedure Relevant to:	Management, Staff, Educators, and Families
Last Reviewed:	February 2021
Next Review:	February 2023
NQS:	7.1, 7.1.2, 7.1.3
NQF	197, 206, 220

Rationale

Child Care Subsidy (CCS) is intended to support families to meet the genuine cost of care provided for children. Most services and families adhere to their legal obligations; however, some individuals choose to engage in non-compliant, fraudulent or criminal behaviour. Family Assistance Law contains offence and civil penalty provisions for breaches of conditions of service approval. This policy is to be read in conjunction with the *Fraud and/or Corruption Prevention Procedure*.

Purpose

Adventure Patch services aim to comply with the Child Care Subsidy obligations outlined under Family Assistance Law and National Law to prevent fraud and corruption from occurring within our services.

Definitions

Corruption and fraud can be distinguished as unethical behaviour. The following definitions are based on those contained in the *Australian Standard for Fraud and Corruption Control*.

Corruption

Dishonest activity in which a director, executive, manager, employee, contractor, volunteer or work experience student acts contrary to the interests of the department and abuses his/her position of trust in order to achieve some personal gain or advantage for him or herself or for another person or entity.

Fraud

An intentional act by one or more individuals involved in deception to obtain an unjust or illegal advantage.

Implementation

Adventure Patch is approved to administer Child Care Subsidy (CCS) on behalf of eligible families. We take compliance with the law seriously and aim to meet the required conditions for continued approval to administer child care funding. We will work in collaboration with staff and educators to maintain compliance with our legal obligations and conditions for continued approval





Adventure Patch will:

- ensure there is an effective fraud and corruption risk management procedure
- ensure a clear understanding of the ramifications for fraudulent activity
- reinforce the commitment shared with the Department of Education, Skills and Employment to adhere to the CCS requirements
- ensure the appropriate administration of CCS
- provide parents with a Statement of Entitlement for CCS each fortnight including details for the sessions of care provided and the resulting fee reduction amounts
- articulate clear standards and procedures to encourage the prevention of fraud and corruption within the Service
- provide regular training to staff and educators to assist in the identification of fraud and corruption
- reinforce the requirements for all employees to refrain from corrupt and fraudulent conduct
- at all times act honestly with integrity
- report any individual or service that is not operating in a law-abiding way
- adhere to the correct procedure to ensure that all suspected fraudulent and corrupt activity is handled appropriately
- ensure staff and educators are not placed in a potentially difficult or compromising position
- provide notification to the Department of Education, Skills and Employment within seven (7) days that
 - information in an enrolment notice has become incorrect, or
 - information has become available that should have been included in the enrolment notice
- ensure variations to a Complying Written Arrangement (CWA) are in writing if that information becomes incorrect
- ensure the department is notified within the correct time frames when an enrolment for care at an Adventure Patch service ends.

Families Will:

- provide accurate documentation about their child/ren upon enrolment at Adventure Patch service including:
 - birth certificate
 - current immunisation statement from the Australian Immunisation Register
 - details of any court orders, parenting orders or parenting plans
- not provide false or misleading information related to claiming Additional CCS through Centrelink
- inform Centrelink of any changes to their or their partner's personal circumstances and check their information is up to date
- check their *Statement of Entitlement* provided by Adventure Patch to ensure correct information has been submitted on the sessions of care provided for their child, absence days, fees charged and how their CCS has offset those charges
- ensure invoices and receipts issued by Adventure Patch for payment of fees are correct
- check their notice of determinations of entitlement each quarter as provided by Centrelink



Fraud Prevention and Detection in relation to CCS Data

Adventure Patch Management will ensure all employees who administer CCS as a fee reduction to families are aware of Fraud Prevention strategies as outlined in the *Fraud Prevention and Corruption Procedure*. Adventure Patch accepts the legal responsibilities associated with claiming CCS within the Family Assistance Law.

Any Fraudulent activity relating to CCS is to be reported to Adventure Patch or directly to CCS via the CCS Tip-Off Line. The *Fraud Prevention and Corruption Procedure* outlines the details required when submitting concerns around the fraudulent use of CCS payments within Adventure Patch services. Our services will follow the guidelines within the CCS handbook to ensure compliance of CCS payments and to ensure funding is processed and administered correctly.

Internal Control to prevent Fraud

Adventure Patch uses Xplor to ensure compliance of CCS payments to families. The *CCS Compliance checklist* will be completed each month, together with staff who use the CCS software to administer CCS payments to families. The *CCS Compliance Checklist* is used as a tool to facilitate fraud prevention and detection within our services.

Tip-off Line

Information about any potential breach of CCS can be provided anonymously by contacting the department's tip-off line on: 1800 664 231 or in writing through tipoffline@dese.gov.au

Source

Australian Standard for Fraud and Corruption Control, AS 8001-2008

Australian Children's Education & Care Quality Authority. (2014).

Australian Government Department of Education, Skills and Employment.

<https://www.education.gov.au/compliance>

Australian Government Department of Education, Skills and Employment. CCS Provider Handbook

<https://www.education.gov.au/child-care-provider-handbook>

Australian Government Department of Education, Skills and Employment. Child Care Financial Integrity Strategy. (2019).

[Education and Care Services National Regulations](#). (2011).

Guide to the National Quality Framework. (2017). (Amended 2020).

