



## Procedure - internal

### Family Day Care Attendance Record processing and Audit

## Table of contents

<b>Introduction .....</b>	<b>2</b>
Purpose .....	2
Scope .....	2
<b>Process .....</b>	<b>2</b>
<b>Review and evaluation.....</b>	<b>5</b>
<b>Controlled Document Information .....</b>	<b>6</b>

## Introduction

### Purpose

The service must maintain accurate records relating to payment of Child Care Subsidy entitlements to educators on behalf of parents, and must ensure all payments comply with Commonwealth legislative requirements.

The service needs:

- to design payment processes to verify the accuracy of records submitted for payment
- to assess parent and educator satisfaction levels with payment processes and care arrangements at regular intervals

Parents need:

- assurance that their Child Care Subsidy entitlements are accurately administered and their full entitlements are received
- opportunity to provide feedback to the service in relation to care quality and discuss any concerns regarding care arrangements including charging practices

Educators need:

- assurance that Child Care Subsidy claims are accurately recorded and promptly paid

### Scope

This procedure outlines practices for processing and confirming details of Attendance records, and actions that may be taken in the event of discrepancy, anomaly, irregularity and inaccuracy.

Process for establishing and confirming enrolment and booking agreement between the service and family, and charging and collecting fees, are addressed in the "Fees Charges and Conditions" Procedure.

Requirements for making the records of attendance are covered in the 'Arrival and Departure' procedure.

Principles for responding to and investigating complaints are covered in the 'Grievance' Procedure.

### Process

Review attendance records prior to submitting	<p><b>Educator will:</b></p> <ol style="list-style-type: none"> <li>1. make every effort to ensure Attendance Records and Timesheets are accurate, to substantiate fees and charges being applied and CCS claims</li> <li>2. make every effort to make a note explaining               <ol style="list-style-type: none"> <li>a) absences, or</li> <li>b) any changes to the child's usual attendance booking,</li> <li>c) educator signing children in or out of care (except in the instance of a child departing care to attend school or arriving to care from school)</li> </ol>               in the timesheet record that is submitted to the Approved Service, to transparently substantiate variations and create a robust record.             </li> </ol>	
---	---	--

**Family Day Care Attendance Record processing and  
Audit**

Procedure - internal

	<p>3. make every effort to submit all attendance records for processing by midday on the first business-day following the care week, and within 14 days of the care occurring, to assist prompt processing and meet Family Assistance law reporting obligations</p> <p>4. make every effort to advise the office as soon as practicable when:</p> <ul style="list-style-type: none"> <li>a) a child is not going to start care when booked to commence a new placement</li> <li>b) a child is terminating care</li> <li>c) a child may be absent or not use care for 14 consecutive weeks or more</li> <li>d) the child's CCS-claimant parent will be overseas for 6 weeks or more (<i>Family Assistance Act 85EE</i>)</li> </ul> <p>as these situations have implication for CCS enrolment and/or claims.</p> <p><b>Administrative Assistants will:</b></p> <p>5. review attendance record timesheet details for accuracy when processing, for items such as;</p> <ul style="list-style-type: none"> <li>- arrival and departure times are completed by parent or an authorised guardian for each session of care (e-signatures)</li> <li>- absences are noted and captured in the timesheet</li> <li>- attendance/absences claimed align with the child's booked hours and/or e-signatures recorded</li> <li>- charges applied align with hours of care</li> <li>- duplicate claims for care are not recorded/made</li> <li>- explanation of variations to attendance and/or charges are supplied</li> <li>- <i>CCS-claimant parent</i> has verified the record</li> </ul> <p>•</p> <p>6. monitor attendance records as far as practicable for items such as;</p> <ul style="list-style-type: none"> <li>- CCS claims for beginning/end of care absences,</li> <li>- periods of overseas travel</li> <li>- extended absence periods that could implicate the child's enrolment being cancelled</li> <li>- instances where all children are absent on the same day, without explanation</li> <li>- unexplained or frequent educator sign-in/out</li> <li>- unexplained or frequent variations to attendance</li> </ul> <p>•</p> <p>7. withhold incomplete or inaccurate attendance records to be clarified or rectified prior to submitting.</p> <p><b>Approved Service will:</b></p> <p>8. provide information from time to time to remind and encourage families to carefully;</p>	
--	---	--

**Family Day Care Attendance Record processing and Audit**

Procedure - internal

	<p>a) review their Timesheets weekly before authorising, and</p> <p>b) review their fortnightly care Statements, and advise the Approved Service promptly if they believe there may be an error, so that the record can be rectified.</p> <ul style="list-style-type: none"> <li>•</li> </ul> <p>9. process attendance record claims for CCS weekly, except when adjusted for periods of Approved Service closure</p> <ul style="list-style-type: none"> <li>•</li> </ul> <p>10. only process Attendance records when</p> <p>a) the record is complete, and</p> <p>b) the CCS-claimant parent has electronically-signed the record to verify the record's accuracy, or otherwise only at the discretion of the Nominated Supervisor or delegate</p> <p>11. only process Attendance Records, being a claim for payment/child care subsidy, when it believes the record to be accurate</p>	
Confirm and clarify details of attendance with educators and parents	<p><b>Administration Assistants will:</b></p> <p>12. clarify any anomalies in Attendance records or charges or CCS claims with educators and/or parents as appropriate, and;</p> <p>a) make a note of explanation and rectify the record if reasonable and appropriate to do so, or</p> <p>b) seek instruction from the Nominated Supervisor or delegate in a timely manner if the information warrants further clarification</p> <ul style="list-style-type: none"> <li>•</li> </ul> <p>13. prepare and examine the Educator Limit Report following processing, to clarify any instances of an educator exceeding maximum number of children in care, and advise the Nominated Supervisor (or delegate) of any unexplained exceptions</p> <p>14. regularly contact a selection of families to discuss their care, including;</p> <ul style="list-style-type: none"> <li>- changes that have occurred to their care placement, bookings, or CCS, and</li> <li>- attendance record processes and payment arrangements and make a record of their responses.</li> </ul>	Parent audit interview questions form
Examine unresolved discrepancies / anomalies / irregularities	<p><b>Administration Assistants will:</b></p> <p>15. record and collate details of unresolved discrepancies, anomalies, or patterns of repeated irregularities, and refer these to the Nominated Supervisor or delegate for possible further inspection</p> <p><b>Nominated Supervisor (or delegate) will:</b></p> <p>16. arrange for initial examination of unexplained discrepancies, anomalies or patterns of repeated irregularities, that may include (but not necessarily limited to):</p>	

**Family Day Care Attendance Record processing and  
Audit**

Procedure - internal

	<ul style="list-style-type: none"> <li>a) reviewing previous records submitted by the educator,</li> <li>b) communicating with the parent/s by telephone and/or email and/or meeting-in-person to review and confirm the information recorded, and collect any further information</li> <li>c) contacting other families attending the educator's service</li> </ul> <ul style="list-style-type: none"> <li>•</li> </ul> <p>17. inform Manager of Community Partnerships and Internal Auditor of all confirmed discrepancies that implicate possible dishonesty, fraud, or stealing, and;</p> <ul style="list-style-type: none"> <li>a) provide copies of collected information as soon as possible</li> <li>b) determine whether to escalate and proceed the matter in accordance with the Service Complaints Handling Procedure if a serious discrepancy alleging contravention of Family Assistance Law or Educator Registration Agreement is identified</li> </ul>	
Notifications	<p><b>Approved Service will:</b></p> <p>18. refer / report suspicion of dishonest, fraudulent or stealing activity to relevant authorities</p> <ul style="list-style-type: none"> <li>•</li> </ul> <p>19. notify the relevant authority within 24 hours of becoming aware that key personnel, staff or FDC educator:</p> <ul style="list-style-type: none"> <li>a) has been charged with, convicted or found guilty of a serious indictable offence, <ul style="list-style-type: none"> <li>- offence punishable by a maximum of 2 years imprisonment or 40 penalty units</li> <li>- an offence involving violence or a sexual offence</li> <li>- an offence involving fraud, stealing or dishonesty</li> </ul> </li> <li>b) was a director or secretary of a corporation when the corporation went in to administration, receivership or liquidation or at any time during the 12 months beforehand</li> <li>c) becomes bankrupt, or</li> <li>d) has their WWCC refused, amended or cancelled</li> </ul> <ul style="list-style-type: none"> <li>•</li> </ul> <p>20. notify the relevant authority within 7 days of becoming aware, any event or circumstance that reasonably indicates a person with management or control, person responsible for day-to-day operation, or educator is not likely to be a fit and proper person to be involved in the administration of CCS.</p>	<a href="#">child care package - notification obligations</a> – Department of Education Skills and Employment

## Review and evaluation

Lake Macquarie City Council Internal Auditor may be consulted for advice and direction to this Procedure as required. FDC staff evaluate implementation of this procedure in identifying irregularities in Attendance Records and claims for CCS, and rectifying or resolving these in a timely manner.

This Procedure will be reviewed at least every 4 years, and when there are changes to any applicable or relevant regulatory requirements or recommended practices.

## Controlled Document Information

### Authorisation Details

<b>Folder No:</b>	F2004/12276-04	<b>TRIM Record No:</b>	D09529239
<b>Audience:</b>	Departmental - Family Day Care Staff, Educator and Stakeholders		
<b>Department:</b>	Community Partnerships	<b>Officer:</b>	Service Manager Family Day Care - Kim Hartmann
<b>Key focus area(s):</b>	FDC attendance record processing and auditing processes		
<b>Review Timeframe:</b> Max < 4 years	4 years	<b>Next Scheduled Review Date:</b>	1 September 2026
<b>Authorisation:</b>	Manager Community Partnerships - Andrew Bryant - 1 September 2022		
<b>Authorisation Date:</b>	1 September 2022		

### Related Document Information, Standards & References

<b>Related Legislation:</b>	(Legislation Name) A New Tax System (Family Assistance) (Administration) Act 1999 (the Family Assistance Administration Act)  Child Care Benefit (Eligibility of Child Care Services for Approval and Continued Approval) Determination 2000  Child Care Benefit (Session of Care) Determination 2016  Child Care Benefit (Children in respect of whom no-one is eligible) Amendment Determination 2016  Child Care Benefit (Eligibility of Child Care Services for Approval and Continued Approval) Amendment Determination 2016	(Relationship/Context)
<b>Related Policies:</b>	(Policy Name)	(Relationship/Context)
<b>Related Procedures, Guidelines, Forms, WHS Modules/PCD's, Risk Assessments, Work Method Statements:</b>	(Document Name) Family Day Care Complaints Handling Procedure Educator Audit and Parent Survey Questions	(Relationship/Context)
<b>Standards, COP's &amp; Other References</b>	(Standard, COP or Other References) Child Care Services Handbook, Department of Human Services	(Relationship/Context)

## Family Day Care Attendance Record processing and Audit

Procedure - internal

### Definitions

Term / Abbreviation	Definition
<b>Nominated Supervisor</b>	Authorised Supervisor of Lake Macquarie Family Day Care, Nominated Supervisor – responsible (along with the Approved Provider) for ensuring the scheme is following the Law and the Regulations, Certified Supervisor – a person with a supervisor certificate placed in day to day charge of an education and care service.
<b>Administrative Officer</b>	an employee or employees of Lake Macquarie City Council for service within Lake Macquarie Family Day Care in the position of Administrative Officer
<b>Staff</b>	an employee or employees of Lake Macquarie City Council for service within Lake Macquarie Family Day Care
<b>Educator</b>	<p>(a) a person actually involved in educating, minding or caring for children at his or her residence or venue and whose name appears on a current Lake Macquarie Family Day Care Register of Educators (a primary educator) ; and</p> <p>(b) a person whose name appears on a current Lake Macquarie Family Day Care Register of Educators and who is engaged as a relief educator to educate, mind or care for children in the residence or venue of a primary educator</p> <p>(c) a person whose name appears on a current Lake Macquarie Family Day Care Register of Educators and who is engaged as an educator assistant to educate, mind or care for children in the residence or venue of a primary educator for no more than 4 hours</p>
<b>Parent</b>	<p>The parent of a child registered for care with Lake Macquarie Family Day Care and includes:</p> <p>(a) guardian of the child, and/or</p> <p>(b) a person who has the legal custody of the child</p>
<b>Service</b>	an education and care service operated by an educator whose name appears on a current register of educators for Lake Macquarie Family Day Care
<b>Service user</b>	an educator, relief educator, staff member, child, parent, volunteer or visitor to the education and care service operated by the educator
<b>Scheme</b>	Lake Macquarie Family Day Care
<b>Regulatory requirement</b>	State and Federal government regulations that are relevant to the provision of Family Day Care services in NSW

### Consultation (update for each version created)

<b>Key Departments, Teams, Positions, Meetings:</b>	Family Day Care Staff, Educator and Stakeholders
---	--

### Version History

Version No	Date Changed	Modified By	Details and Comments
2	9/3/2006	J. Wade	Update references
3	5/1/2009	J. Wade	Update references, remove requirement for Quarterly Parent Statements, update carer definition,
4	08/07/2010	B. Torpey	Update Responsible Officer, Update/Edit Process details and Attendance Record Audits, remove Audit questions as an attachment and make separate document, add reference to Explanation sheets in 3.3
5	09/12/2011	S. Vickers	Update reference of Child Care Benefit to include Child Care Rebate, home to residence or venue, initial to sign, update definition of Authorised Supervisor/Service Manager

This is a controlled document. Before using this document, check it is the latest version by checking it on Council's intranet.  
Unless otherwise shown, printed or downloaded versions of this document are uncontrolled.

**Family Day Care Attendance Record processing and  
Procedure - internal Audit**

6	03/01/2014	J. Morgan	Updated references and standards. Reference to Family Assistance Office changed to Department of Human Services. Removed the weekly requirement to audit.
7	01/12/16	J Morgan	Removed duplication of sentence and added reference to email. Legislation reference updated
8	07/07/2022	K Hartmann	<p>Clarified Scope of the Procedure, as differentiated from establishing booking agreements with families, making attendance records, and dealing with complaints/allegations.</p> <p>Re-formatted in to key activities, and responsibilities.</p> <p>Captured standard practices of review and monitoring and confirming details of records.</p> <p>Broadened scope for examining anomalies or irregularities, to allow for customising actions according to the situation.</p>