

(Created September 2025)

## **Policy statement:**

Mueller College Outside School Hours Care (OSHC) aims to meet obligations and procedures for managing Child Care Subsidy (CCS) matters, including enrolment and linking, personnel access, notifications, data security, governance of CCS accounts and the process where a family's attendance has ceased and must be re-linked. This policy ensures families understand how their information is used, and that CCS cannot be administered without appropriate authorisation. This policy applies to the approved provider, nominated supervisor, all educators and administrative staff, families, and contractors who handle enrolments, CCS data or financial accounts for the Service.

## **Background:**

The National Regulations require approved providers to keep accurate child enrolment records, including authorisations and information necessary to administer subsidies and meet compliance obligations. In addition, Regulation 183 requires that these records and other documents be stored securely to protect the confidentiality of families, children and young people. Under the Family Assistance Law, services must submit and maintain accurate enrolments, session reports, and governance records in the Child Care Subsidy System, and families must confirm these enrolments through Services Australia. The Child Care Subsidy (CCS) cannot be applied for unless families provide authorisation for their information to be shared with Services Australia and the Department of Education. This policy brings together personnel, governance, data security, notification, and account management requirements to ensure the Service operates with integrity, transparency, and in compliance with all relevant legislation.

## **Important terms:**

<b>Children and young people</b>	Refers to the children and young people present in the care environment.
<b>Educator</b>	Refers to the staff employed by the Service to provide care for children and young people attending.
<b>Parent/guardian</b>	Refers to the primary carer/s of the child or young person attending the Service.
<b>Family</b>	Refers to the group of people, including the primary carer, who engage daily with the child or young person in the home environment.
<b>Nominated supervisor</b>	The person designated under the Education and Care Services National Law as responsible for the day-to-day management of the Service.
<b>Approved provider</b>	The individual or organisation that holds the licence to operate the Service and is legally responsible for ensuring compliance with the Education and Care Services National Law and Regulations.
<b>Family Assistance Law</b>	Federal law governing CCS and related recordkeeping obligations
<b>CCS</b>	Commonwealth subsidy to assist families with approved childcare fees
<b>Provider Entry Point</b>	Department of Education's online system (the Child Care Subsidy System) is used to submit enrolments and session reports. Providers must register with PRODA.
<b>CRN</b>	Centrelink Customer Reference Number
<b>Complying written agreement</b>	The written agreement between family and provider that sets out fees, sessions and CCS arrangements

## **Legislation**

### **National Quality Standard (NQS):**

Quality Area      **2: Children's Health & Safety**  
                              **7: Governance & Leadership**

<b>2.1</b>	Health	Each child's health and physical activity are supported and promoted.
2.1.2	Health practices and procedures	Effective illness and injury management and hygiene practices are promoted and implemented.
<b>2.2</b>	Safety	Each child is protected.
2.2.1	Supervision	At all times, reasonable precautions and adequate supervision ensure children are protected from harm and hazard.
2.2.2	Incident and emergency management	Plans to effectively manage incidents and emergencies are developed in consultation with relevant authorities, practised and implemented
<b>7.1</b>	Governance	Governance supports the operation of a quality service.

7.1.2	Management systems	Systems are in place to manage risk and enable the effective management and operation of a quality service.
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## Education and Care Services National Regulations

168	<p>(1)The approved provider of an education and care service must ensure that the service has in place policies and procedures in relation to the matters set out in subregulation (2).</p> <p>Penalty: \$1100.</p> <p><i>Note—</i></p> <p>These may include policies and procedures prepared by the approved provider in accordance with an education law of the participating jurisdiction.</p> <p>(2)Policies and procedures are required in relation to the following—</p> <p>(a)health and safety, including matters relating to—</p> <p>(i)nutrition, food and beverages, dietary requirements; and</p> <p>(ii)sun protection; and</p> <p>(iii)water safety, including safety during any water-based activities; and</p> <p>(iv)the administration of first aid; and</p> <p>(v)sleep and rest for children, including the matters set out in regulation 84B;</p> <p>(b)incident, injury, trauma and illness procedures complying with regulation 85;</p> <p>(c)dealing with infectious diseases, including procedures complying with Regulation 88;</p> <p>(d)dealing with medical conditions in children, including the matters set out in regulation 90;</p> <p>(e)emergency and evacuation, including the matters set out in regulation 97;</p> <p>(f)delivery of children to, and collection of children from, education and care service premises, including procedures complying with regulation 99;</p> <p>(g)excursions, including procedures complying with regulations 100 to 102;</p> <p>(ga)if the service transports or arranges transportation of children other than as part of excursions, transportation including procedures complying with Division 7 of Part 4.2 of <a href="#">Chapter 4</a>;</p> <p>(gb)the safe arrival of children who travel between an education and care service and any other education or early childhood service within the meaning of regulation 102AA, including the matters set out in regulation 102AAB;</p> <p>(h)providing a child-safe environment, including matters relating to the promotion of a culture of child safety and wellbeing within the service;</p> <p>(ha)the safe use of digital technologies and online environments at the service, including—</p> <p>(i)the taking, use, storage and destruction of images and videos of children being educated and cared for by the service; and</p> <p>(ii)obtaining authorisation from parents to take, use and store images and videos of children being educated and cared for by the service; and</p> <p>(iii)the use of any optical surveillance device at the service; and</p> <p><i>Example—</i></p> <p>The use of closed-circuit television.</p> <p>(iv)the use of any digital device issued by the service; and</p> <p>(v)the use of digital devices by children being educated and cared for by the service;</p> <p>(i)staffing, including—</p> <p>(i)a code of conduct for staff members; and</p> <p>(ii)determining the responsible person present at the service; and</p> <p>(iii)the participation of volunteers and students on practicum placements;</p> <p>(j)interactions with children, including the matters set out in regulations 155 and 156;</p> <p>(k)enrolment and orientation;</p> <p>(l)governance and management of the service, including confidentiality of records;</p> <p>(m)the acceptance and refusal of authorisations;</p> <p>(n)payment of fees and provision of a statement of fees charged by the education and care service;</p> <p>(o)dealing with complaints, including matters relating to—</p> <p>(i)the provision of a complaint handling system at the service that is child-focused; and</p> <p>(ii)the management of a complaint that alleges a child is exhibiting harmful sexual behaviours.</p>
177	<p>(1)For section 175(1) of the Law, the following documents are prescribed in relation to each education and care service operated by the approved provider—</p> <p>(a)the documentation of child assessments or evaluations for delivery of the educational program as set out in regulation 74;</p> <p>(b)an incident, injury, trauma and illness record as set out in regulation 87;</p> <p>(c)a medication record as set out in regulation 92;</p> <p>(d)a record of assessments of family day care residences and approved family day care venues conducted under regulation 116;</p> <p>(e)In the case of a centre-based service, a staff record as set out in regulation 145;</p> <p>(f)a record of volunteers and students as set out in regulation 149;</p> <p>(g)the records of the responsible person at the service as set out in regulation 150;</p> <p>(h)In the case of a centre-based service, a record of educators working directly with children as set out in regulation 151;</p> <p>(i)a record of access to early childhood teachers as set out in regulation 152;</p> <p>(j)In the case of a family day care service, a record of staff engaged or employed by the service is kept under regulation 154.</p> <p>(k)a children's attendance record as set out in regulation 158;</p> <p>(l)child enrolment records as set out in regulation 160;</p> <p>(m)a record of the service's compliance with the Law as set out in regulation 167;</p>

	<p>(n) a record of each nominated supervisor and any person in day-to-day charge of the education and care service under section 162 of the Law;</p> <p>(o) In the case of a centre-based service, a record of children embarking on a means of transport at the education and care service premises as set out in regulation 102E(4)(c);</p> <p>(p) In the case of a centre-based service, a record of children disembarking a means of transport at the education and care service premises as set out in regulation 102F(4)(d).</p> <p><i>Note</i>—See section 269(1) of the Law, which requires the approved provider to keep a register of each family day care educator, each family day care co-ordinator and each family day care educator assistant engaged, employed or registered to provide education and care to a child.</p>
181	<p>The approved provider of an education and care service must ensure that information kept in a record under these Regulations is not divulged or communicated, directly or indirectly, to another person other than—</p> <p>(a) to the extent necessary for the education and care or medical treatment of the child to whom the information relates; or</p> <p>(b) a parent of the child to whom the information relates in accordance with regulation 177 (except in the case of information kept in a staff record); or</p> <p>(c) the Regulatory Authority or an authorised officer; or</p> <p>(d) as expressly authorised, permitted or required to be given by or under any Act or law; or</p> <p>(e) with the written consent of the person who provided the information.</p>

## Education and Care Services National Law

175	<p>(1) An approved provider of an education and care service must keep the prescribed documents available for inspection by an authorised officer in accordance with this section.</p> <p>Penalty:</p> <p>\$4500, in the case of an individual.</p> <p>\$22 900, in any other case.</p> <p>(2) Documents referred to in subsection (1)—</p> <p>(a) must, to the extent practicable, be kept at the education and care service premises if they relate to—</p> <p>(i) the operation of the service; or</p> <p>(ii) any staff member employed or engaged by the service; or</p> <p>(iii) any child cared for, or educated at, those premises—</p> <p>in the previous 12 months; and</p> <p>(b) In any other case, they must be kept at a place and in a manner that they are readily accessible by an authorised officer.</p>
273	<p>(1) An individual who is, or who has been, a person exercising functions under this Law must not disclose to another person protected information.</p> <p>Penalty: \$5700.</p> <p>(2) However, subsection (1) does not apply if—</p> <p>(a) the information is disclosed in the exercise of a function under, or for, or in accordance with, this Law; or</p> <p>(b) the disclosure is authorised or required by any law of a participating jurisdiction, or is otherwise required or permitted by law; or</p> <p>(c) the disclosure is with the agreement of the person to whom the information relates; or</p> <p>(d) the information relates to proceedings before a court or tribunal and the proceedings are or were open to the public; or</p> <p>(e) the information is, or has been, accessible to the public, including because it was published for, or in accordance with, this Law; or</p> <p>(f) The disclosure is otherwise authorised by the Ministerial Council.</p> <p>(3) In this section—</p> <p><i>protected information</i> means information—</p> <p>(a) that is personal to a particular individual and that identifies or could lead to the identification of the individual; and</p> <p>(b) that comes to a person's knowledge in the course of, or because of, the person exercising functions under this Law.</p>

### Principles:

The service will only access or act on a family's CCS entitlement where the family has provided the required authorisation and information. The Service will securely collect, store and disclose CCS and personal information strictly in line with Family Assistance Law, the Education and Care Services National Law and Regulations, the Privacy Act and relevant Department / Services Australia guidance. Families who do not provide or withdraw authorisation for data sharing or fail to confirm enrolment with Services Australia/myGov may not be eligible for CCS and will be billed accordingly.

### Procedure:

#### Families will:

- Supply accurate information, including CRNs and DOBs, complete necessary MyGov/Services Australia tasks (confirm enrolment) and notify changes in circumstances.

**Educators will:**

- Follow data-handling procedures and refer CCS queries to the CCS Administrator.

**The CCS Administrator will:**

- Create and maintain enrolments in Provider Entry Point/CCSS, manage accounts receivable, communicate with families about confirmation tasks, and maintain audit logs.

**The Nominated Supervisor and Approved Provider will:**

- Authorise staff access, ensure staff are trained, approve enrolments when required and oversee linking/relinking procedures.
- Ensure compliance with Family Assistance Law and the National Law/Regulations, appoint staff with access rights, oversee CCS governance, ensure secure recordkeeping, manage disputes and audits.
- Share the 'Child Care Subsidy Policy and Procedure' with all employees upon their induction and ensure it is available to staff and families at all times.
- Additional professional development will be provided as needed and during review processes.
- All Service policy will be reviewed annually through consultation with all stakeholders or sooner should there be identified changes or updates to legislative requirement.

**New families: enrolment & linking CCS**

1. Initial application & CWA
  - The family completes the Service's enrolment form and signs a Complying Written Agreement that includes the sample consent clause (Section 9). Mueller College OSHC collects the child or young person's full name, DOB, family CRNs, residential address, Medicare details if requested and emergency/contact details.
2. Mueller College OSHC creates enrolment in CCSS
  - The appointed CCS Administrator creates the enrolment in the Provider Entry Point (CCSS/PEP) with the details supplied. Providers must use PRODA to access CCSS.
3. Family confirms enrolment
  - Once Mueller College OSHC submits the enrolment, Services Australia sends a Centrelink/myGov task asking the family to confirm. Families must confirm in their MyGov/Services Australia account before CCS can be paid to the Service. If families need assistance, staff may guide them, but must not access the family's MyGov account on their behalf.
4. Session reporting & attendance
  - Mueller College OSHC must submit session reports for each attendance period per CCSS rules. CCS payments are calculated from confirmed enrolment and session reports.

**Families who have not attended / re-linking process (re-enrol after a gap)**

- Identify laps when a child or young person has not attended for a period that results in the enrolment being ended or unconfirmed in CCSS (e.g., prolonged absence, termination of enrolment), the appointed CCS Administrator staff will flag the child or young person's record. The Service will notify the family in writing of the enrolment status and steps to reinstate CCS.

1. Family confirms intention to return
  - The family must contact Services Australia/myGov to confirm historic details or create a new claim if necessary. Where an enrolment was ended, a new enrolment will need to be submitted by Mueller College OSHC and confirmed by the family.
2. Provider submits new enrolment/edits
  - The CCS Administrator will submit a new enrolment or will update the existing enrolment in the Provider Entry Point and will notify the family to confirm via myGov. If the family fails to confirm, CCS will not be paid, and the family will be charged full fees.
3. Special circumstances
  - Where ACCS (Additional Child Care Subsidy) or other transitional arrangements may apply (e.g., child wellbeing), follow Department guidance and submit required determinations or certificates.

## CCS data security & recordkeeping

1. Minimum recordkeeping
  - The Service will keep enrolment records and required supporting documents as specified under the Education and Care Services National Regulations
2. Storage & retention
  - Records required by the National Regulations and Family Assistance Law must be stored securely for the legislated retention period and protected against unauthorised access, loss, or misuse.
3. Access controls
  - Only authorised staff (CCS Admin, Approved Provider, nominated supervisor) have access to CCSS/Provider Entry Point credentials and local copies of sensitive documents.
4. Encryption & transmission
  - Personal information transmitted electronically must use secure channels; local copies should be encrypted or password-protected. Hard-copy records will be held in locked storage.
5. Disposal
  - When records are no longer required to be retained, they will be disposed of securely (shredding or secure deletion) consistent with recordkeeping rules.
6. Privacy compliance
  - The Service will comply with the Privacy Act 1988 (Commonwealth) where applicable and with all Department / Services Australia privacy guidance about the handling of CCS data.

## When families withdraw permission to share information

- If a family withdraws consent to share CCS-relevant information, the Service will explain the consequences (CCS cannot be claimed on their behalf) and, where necessary, treat the enrolment as non-subsidised and charge full fees. The Service will document the withdrawal and seek written confirmation.

## Governance, audits & compliance

1. Audit trail

- The Service will maintain an auditable trail of enrolments, session reports, changes to enrolments, communications with families about CCS, and authorisations.
- 2. Internal review
  - The nominated supervisor will conduct quarterly checks of CCS enrolment records and account reconciliation to ensure compliance with Family Assistance Law and departmental guidance.
- 3. External requests/investigations
  - The Service will cooperate with requests from the Department of Education or Services Australia and provide records as required under law. If fraud or serious non-compliance is suspected, the Service will report to the Department / Services Australia as directed.

### Fees & billing when CCS is not available

- If CCS cannot be claimed because the family has not provided the required information, has not confirmed enrolment, or has withdrawn consent to share information, the Service will invoice the family full fees for attendance until CCS is reinstated. The Service will notify the family in writing prior to applying full fees.

### Dispute resolution

- Families can raise CCS disputes in writing to the Service Director. The Service will investigate, provide evidence of enrolment submissions and confirmations, and respond within an appropriate time frame. Families retain the right to contact Services Australia for CCS payment disputes.

### **See Also:**

- Mueller College OSHC Record Keeping Policy & Procedure
- Mueller College OSHC Enrolment, Waitlists & Orientation Policy & Procedure
- Mueller College OSHC Fees and Cancellation Policy & Procedure

### **REFERENCES:**

- Education and Care Services National Law Act 2010, Current as at October 2024
- Education and Care Services National Regulations, Current as at September 2025
- Education and Care Services National Law Act (QLD) 2011, Current as at September 2025
- Guide to the National Quality Framework, Revised September 2025
- My Time, Our Place – Framework for School Age Care in Australia, V2.0 (2022)
- The Code of Ethics – Early Childhood Australia Inc. (2025 update)
- Family Assistance Law – A New Tax System (Family Assistance) (Administration) Act 1999 (Cth) and subordinate legislation.
- Privacy Act 1988 (Cth).
- Australian Children's Education & Care Quality Authority (ACECQA). *Guide to the Education and Care Services National Law and National Regulations* (latest version).
- Department of Education (Australian Government). - *Child Care Subsidy System (CCSS/Provider Entry Point) – Provider Information*.
- Services Australia (Australian Government).





## REVIEW

POLICY REVIEWED BY:	Rachel Rose	OSHC Director	27/09/25
POLICY REVIEWED	SEPT 2025	NEXT REVIEW DATE	JAN 2026
VERSION NUMBER	V1		
MODIFICATIONS	<ul style="list-style-type: none"><li>Policy created</li></ul>		
POLICY REVIEWED	PREVIOUS MODIFICATIONS		PAST REVIEW DATE
	<ul style="list-style-type: none"><li></li></ul>		