


NQS-QA7 Preventing and Detecting Fraud Policy		 Longreach Regional Council
Policy Number:	12.38	
Policy Category:	Childcare Centre	
Authorised by:	Res-2026-05-140	
Date approved:	21 May 2026	
Review Date:	21 May 2028	

SCOPE

This policy provides a framework to guide all actions for the Approved Provider, nominated supervisor, all team members, children, parents, volunteers, contractors, suppliers, and any visitors to the service.

Failure to adhere to this policy, or any of its associated documents, may result in disciplinary action being taken up to and including termination of employment for personnel, refusal of service for clients, and/or the dissolving of contractual agreements with suppliers, contractors, and/or individuals outside of our service.

INTRODUCTION

The objective of this policy is to facilitate the development of controls that will aid in the detection and prevention of fraud. It is the intent of our service to promote consistent behaviour by providing guidelines and assigning responsibility for the development and implementation of controls and conduct of investigations where fraudulent activity is identified or is suspected.

POLICY STATEMENT

ACTIONS CONSTITUTING FRAUD

Fraud is defined as the intentional, false representation or concealment of a material fact for the purpose of inducing another to act upon it to his or her injury.

The terms defalcation, misappropriation, and other fiscal irregularities refer to, but are not limited to:

- Any dishonest or fraudulent act,
- Misappropriation of funds, supplies or other assets,
- Impropriety in the handling or reporting of money or financial transactions, including Child Care Subsidy (CCS) transactions,
- Disclosing confidential and proprietary information to outside parties,
- Disclosing to other persons securities activities engaged in or contemplated by the company,
- Destruction, removal, or inappropriate use of records, furniture, fixtures, and equipment, and/or
- Any similar or related irregularity.

DETECTING AND PREVENTING FRAUD

We understand that there is no foolproof method for detecting and preventing fraud,

however we are strongly committed to implementing systematic and effective practices and approaches to mitigate the risk of fraudulent behaviour occurring.

The Approved Provider, or their delegate, is responsible for the detection and prevention of fraud, misappropriations, and other irregularities. Each member of the team will be familiar with the types of improprieties that might occur and be alert for any indication of irregularity.

Please refer to our *QA 7: Child Care Subsidy (CCS) Governance Procedure* for detailed information about the strategies and approaches we use to minimise the potential for fraud in relation to the Federal Government's distribution of CCS.

REPORTING CONCERNS AND IRREGULARITIES

- Any irregularity that is detected or suspected must be reported immediately to the Approved Provider.
- Any individual who suspects dishonest or fraudulent activity will notify the Approved Provider/Manager immediately and will not attempt to personally conduct investigations or interviews/ interrogations related to any suspected fraudulent act.
- The reporting individual (the 'complainant') may remain anonymous.
- The complainant will be advised of the following:
 - Not to contact the suspected individual in any way,
 - That they are not to be involved in investigating the allegations or concerns in any way,
 - Not to discuss the case, facts, suspicions, or allegations with anyone unless specifically asked to do so by the Approved Provider or a member of the investigation team.

INVESTIGATING IRREGULARITIES

- The Approved Provider has the primary responsibility for the investigation of all suspected fraudulent acts as defined in this policy.
- The Approved Provider may coordinate an investigation into the matter using external consultants and business advisors.
- In the event of an investigation into irregularities, the following applies:
 - The Approved Provider and any other parties who may be involved in the investigation will treat all information received confidentially.
 - Persons conducting the investigation will have:
 - Free and unrestricted access to all service records and premises, whether owned or rented; and
 - The authority to examine, copy and/or remove all or any portion of the contents of files, desks, cabinets, and other storage facilities on the premises without prior knowledge or consent of any individual who might use or have custody of any such item or facilities when it is within the scope of the investigation.
 - Those conducting the investigation will take great care whilst undertaking their investigation of suspected improprieties or irregularities so as to avoid mistaken accusations or alerting a suspected individual that an

investigation is under way.

- No information concerning the status of an investigation will be given out. The proper response to any inquiry is: "I am not at liberty to discuss this matter." Under no circumstances should any reference be made to "the allegation," "the crime," "the fraud," "the forgery," "the misappropriation," or any other specific reference.
- If the investigation substantiates that fraudulent activities have occurred, the Approved Provider may report the matter to the police and/or regulatory agencies for independent investigation.
- All inquiries concerning the activity under investigation from the suspected individual, his or her attorney or representative, or any other inquirer should be directed to the Approved Provider.

OTHER IRREGULARITIES

Irregularities concerning an employee's moral, ethical, or behavioural conduct should be resolved by the Approved Provider or their delegate. However, if there are any questions as to whether an action constitutes fraud, the Approved Provider will seek guidance from an external consultant.

PRIVACY AND CONFIDENTIALITY

The Approved Provider will ensure that they, and all team members, visitors and families, have access to, are aware of and are strongly encouraged to read the *QA 7 Confidentiality, Privacy & Security* procedure and understand their obligations.

TERMINATION

If an investigation results in a recommendation to terminate the employment of an individual or terminate a contractual relationship with a customer, consultant, vendor or contractor, the recommendation will be reviewed by the Approved Provider. The investigator does not have the authority to terminate an employee.

RELATED POLICY DOCUMENTS

- QA 7 CCS governance procedure
- QA 7 Governance and leadership policy
- QA 7 Confidentiality, privacy and security procedure
- QA 4 Staff code of conduct procedure
- QA 4 Staff disciplinary procedure
- QA 6 Family code of conduct procedure

Authorised by resolution as at 21 May 2026:



Brett Walsh
Chief Executive Officer

DOCUMENT CONTROL

Version	Date Reviewed	Modifications	Next Policy Review Date	Role responsible for review
1.1	May, 2022	Removed broken reference link and found new applicable reference. Added Related Policy Documents.	Q2, 2024	SPI Team
1.2	Nov 2024	Reviewed. Removed old references.	Q4, 2026	Policy Manager