



Affinity Education Group

28 November 2025

Ms Anasina Gray-Barberio
Chair, Select Committee on the Early Childhood Education and Care Sector in Victoria
Parliament House
Spring Street
EAST MELBOURNE VIC 3002
Via email: earlyeducation@parliament.vic.gov.au and the [webform online](#)

Dear Chair,

Submission to the Inquiry into Early Childhood Education and Care Sector In Victoria

Affinity Education Group (Affinity) welcomes the opportunity to provide this submission to the Select Committee on the Early Childhood Education and Care Sector in Victoria's Inquiry into the Early Childhood Education and Care (ECEC) sector.

We believe this Inquiry can be an opportunity to achieve meaningful change; Affinity supports genuine, evidence-based reform across the sector that delivers higher quality and more consistent early learning and care outcomes for children and improves standards and conditions for employees.

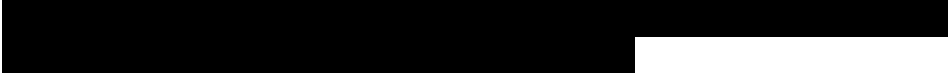
With this in mind, we commend the Victorian Government's instigation of the Rapid Child Safety Review and its ongoing efforts to implement the review's findings as quickly as possible. Affinity also supports the important reform efforts occurring in other jurisdictions and at a national level.

We acknowledge that our sector has been challenged in recent times by instances and allegations of abuse that have shocked the Australian community and caused concern and distress among families and educators – particularly in the state of Victoria. We share this distress, and in response have focused significant efforts and investments on further improving the safety and quality of our services.

Continued private investment in the sector will be crucial to achieving such reform and delivering accessible, high-quality early learning to young children, especially in rural and regional areas where childcare accessibility is already limited.

For this reason, we believe it is vital that any proposed reforms recognise and support private sector contributions to the provision of childcare. They must also benefit the whole sector by raising standards to ensure the delivery of higher-quality and more consistent early learning and care outcomes for children, without prejudicing private operators only.

Affinity looks forward to assisting the Committee with this important Inquiry and believes our experience in providing quality early childhood education can meaningfully inform future government reforms.



Yours sincerely,

Glen Hurley
Chief Executive Officer

Response to the Terms of Reference

Term of Reference (a): the adequacy of current quality and safety standards across all ECEC service types

Affinity believes that the provision of both safe and high-quality care must be the most important priority for all providers in the early education and care (ECEC) sector.

In recent years, Affinity has invested more than \$70 million to enhance compliance, safety and the overall quality of care across its national network of services.

Affinity recognises that continuous improvement is essential. To this, we remain firmly committed to ongoing investment in our services and to also working collaboratively with regulators to elevate standards across the sector. At the same time, we continue to advocate for evidence-based regulatory settings that support, in a focused and meaningful way, the delivery of consistent high-quality care.

Affinity also believes that one of the most effective means of safeguarding the health, safety, and wellbeing of children is through the recruitment and retention of a highly skilled and committed workforce, supported by robust policies and procedures that demonstrate genuine commitment to, and compliance with, regulatory standards.

Affinity's approach to child safety is proactive and comprehensive. We have implemented a range of measures that go beyond minimum regulatory requirements, including mandatory child safety training for all employees, fast-tracked installation of CCTV across all our centres nationally, personal device secure employee lockers and centre layout audits to eliminate blind spots. These initiatives are designed to foster a safe environment for all children in our centres and have been supported by formal consultations with families, staff and regulators, designed to foster a safe environment for the children in our centres.

We believe in these measures and would welcome the adoption of them sector wide. We also support the Victorian Government's reforms to the sector following the Rapid Child Safety Review – both those it is delivering directly and those it is working with the Federal Government to deliver.

Affinity would also recommend the Victorian Government consider mandating enhanced safety technologies and frameworks across all ECEC services, such as requiring secure entry systems, regular safety checks and emergency drills. There should also be established protocols for parental consultation regarding sensitive care activities such as toileting and nappy changes; and ensuring that providers maintain detailed, accessible compliance histories at the centre level.

Affinity Recommendation

Affinity recommends the Victorian Government consider mandating enhanced safety technologies and frameworks across all ECEC services, such as requiring secure entry systems, regular safety checks and emergency drills.

There should also be established protocols for parental consultation regarding sensitive care activities such as toileting and nappy changes; and ensuring that providers maintain detailed, accessible compliance histories at the centre level.

Term of Reference (b): the quality and oversight of educator training, professional development and qualifications, including a review of the effectiveness of Working with Children Checks and of Registered Training Organisations issuing early childhood certifications

Affinity Education Group recognises that the quality of educator training, professional development and qualifications is central to the delivery of safe, high-quality early childhood education and care. Affinity believes that one of the most effective means of safeguarding the health, safety and wellbeing of children is through the recruitment and retention of a highly skilled and committed workforce, supported by robust policies and procedures that demonstrate genuine commitment to, and compliance with, regulatory standards.

To address this challenge, Affinity recommends the Victorian Government take a proactive role in strengthening sector capability by developing and delivering a structured suite of professional development programs for early childhood educators across the state. These programs should be responsive to specific compliance issues identified at individual services, enabling a more targeted and effective approach to quality improvement.

While we recognise the current availability of online resources provided by state and territory regulatory authorities, there is significant opportunity to strengthen this offering for Victoria specifically. This is best done through offerings like face-to-face workshops, targeted training modules and in-situ coaching. A more comprehensive and differentiated model of professional learning would help to build provider capability, support ongoing compliance and ultimately contribute to improved quality outcomes for children across the sector.

We commend the Victorian Government's efforts to strengthen Working With Children Checks (WWCC) through legislative and administrative reform, and by providing additional resources to the WWCC screening authority.

High-calibre Providers

Operating an ECEC service is fundamentally distinct from managing a retail or commercial enterprise. It is the delivery of a complex and a necessarily highly regulated social service that demands appropriately qualified staff, a deep understanding of child development and a comprehensive knowledge of statutory obligations under the National Quality Framework.

Currently, regulatory authorities place significant reliance on criminal history or police checks to assess the suitability of individuals applying to become Approved Providers. In some jurisdictions, applicants are also required to complete a multiple-choice assessment or participate in an interview to demonstrate a basic understanding of the regulatory framework governing early childhood services, including long day care, outside school hours care (OSHC) and family day care.

In addition, individuals identified as Persons with Management or Control (PMCs) are subject to the same criminal history checks and must be familiar with the Education and Care Services National Law and Regulations, as well as their statutory responsibilities. However, there is currently no requirement for PMCs to have any assessed knowledge of the Education and Care Services National Law and Regulations.

Requiring PMCs to demonstrate at least a baseline level of competency or formal knowledge of the Education and Care Services National Law and Regulations would strengthen leadership capability, promote more informed decision-making and ultimately contribute to improved outcomes for children.

Affinity Recommendations

Affinity recommends that:

1: The Victorian Government take a proactive role in strengthening sector capability by developing and delivering a structured suite of professional development programs for early childhood educators across the state. These programs should be responsive to specific compliance issues identified at individual services, enabling a more targeted and effective approach to quality improvement; and

2: To ensure an appropriate baseline knowledge of governance bodies and operators, the Victorian Government should require individuals identified as Persons with Management or Control to demonstrate sufficient knowledge of the Education and Care Services National Laws and Regulations. It should mandate standard knowledge completion in key areas for all new and existing Approved Providers:

- a. Child safety and child safe standards
- b. National Law, National Regulations, and compliance obligations

The government should make completion of the knowledge test a prerequisite for initial and ongoing provider approval and require at least one individual in a managerial role possesses a minimum number of years' experience in senior leadership or management roles within the education or related sector..

Term of Reference (c): the impacts of Victoria's predominantly privatised ECEC system, including a comparison with public, not-for-profit and cooperative models in terms of accessibility, affordability, safety and outcomes

As one of Australia's largest private ECEC providers, Affinity plays a vital role in supporting the overall capacity, accessibility and quality of both the national and Victorian ECEC system.

Private providers collectively deliver more than 70 per cent of all approved centre-based care in Australia. Without this contribution, which is complementary to the portion of the sector comprised of for-purpose, community-based and government providers, the sector would be unable to meet the growing demand for ECEC services particularly in expanding suburban, regional, and outer metropolitan areas.

The ability of the sector to support women's workforce participation and family economic stability, a longstanding bipartisan policy objective since the 1980s, is heavily dependent on the sustained capacity of private providers.

In contrast, for-purpose and government-run services, while highly valued, often face constraints related to capital availability, slower approval or governance processes and limitations in land access or use. These structural challenges can significantly impede their ability to scale at the pace required to meet demand.

The investment agility of private operators supports the expansion and responsiveness of the Victorian ECEC network, ensuring families without viable local or flexible care options have access to services.

Running a sustainable, profitable business does not come at the cost of quality care – in fact, it is essential to its delivery. Our model allows for significant reinvestment in quality improvements and professional development.

Private Provider Investment Capacity and Market Responsiveness

Private providers such as Affinity are uniquely positioned to respond efficiently to population growth, emerging infrastructure needs and evolving community demand due to their capacity for long-term capital investment. This includes the ability to:

- Establish new centres in growth corridors;
- Expand or upgrade existing facilities; and
- Introduce and scale specialised or flexible service offerings.

In contrast, for-purpose and government-run services, while highly valued, often face constraints related to capital availability, slower approval or governance processes and limitations in land access or use. These structural challenges can significantly impede their ability to scale at the pace required to meet demand. The investment agility of private operators supports the expansion and responsiveness of the Victorian ECEC network, ensuring families without viable local or flexible care options have access to services.

Economic Impact and Workforce Participation

The economic implications of ECEC supply shortfalls are substantial. Access to quality, affordable ECEC is a critical enabler of workforce participation, especially for women. The Productivity Commission has estimated that improved access to care could enable up to 110,000 parents, primarily women, to enter or increase their participation in the workforce. Moreover, if Australia achieved female workforce participation levels comparable to those of Nordic countries, it could deliver an additional \$132 billion in GDP annually (Grattan Institute, 2023).

Private providers are instrumental in enabling this participation by offering the majority of available ECEC places, often with the extended or flexible hours needed to support non-standard and modern work arrangements. Affinity alone supports tens of thousands of families across Australia by providing reliable, high-quality education and care through approximately 250 centres providing early education to over 23,000 children, including 51 centres in Victoria.

Investment in Quality and Professional Development

Affinity's number one priority is the provision of safe, reliable and high-quality care and early education. Running a sustainable, profitable business does not come at the cost of quality care - in fact, it is essential to its delivery.

Our model allows for significant reinvestment in quality improvements and professional development:

- Over \$70 million invested in improvements to compliance, safety, care, systems and processes across our network over the past three years;
- More than \$1.2 billion spent on wages, training, goods and services over this timeframe;
- The Affinity Learning Academy, an employer-funded development pathway that has helped more than 2,300 people across Australia receive nationally recognised qualifications (Certificate III, IV or Diploma) in early childhood education, community services and business; and
- A retention-based bonus scheme for centre and area managers, providing \$15,000 for centre managers and \$30,000 for area managers that vests over three years to encourage retention and recruitment.

Social Infrastructure and Long-term Sustainability

ECEC is a foundational social infrastructure that promotes social mobility, helps address intergenerational disadvantages, and supports optimal child development during the critical early years. Federal Government funding mechanisms such as the Child Care Subsidy (CCS) are essential in ensuring affordability for families and sustainability for providers. However, the effectiveness and reach of these mechanisms are significantly enhanced by the scale and operational efficiency that private providers bring to the system.

Without the scale and efficiency of private sector operations, the current government funding for the sector would not stretch nearly as far, nor reach as many families. Private investment in ECEC is not merely complementary to government or for-purpose provision - it is essential. The sector's capacity to meet national objectives in relation to economic productivity, gender equity and child wellbeing is intrinsically tied to the ongoing contribution of private providers.

Policy Certainty and Financial Sustainability

Ensuring policy certainty and the financial sustainability of private providers is critical to maintaining supply, encouraging innovation and delivering inclusive outcomes for families nationwide. The continued expansion of the sector to meet growing demand, particularly in underserved areas, relies on the investment capacity and operational agility that private providers bring to the ECEC system.

Affinity Recommendation

We believe it is vital that any proposed reforms recognise and support private sector contributions to the provision of childcare. They must also benefit the whole sector by raising standards to ensure the delivery of higher-quality and more consistent early learning and care outcomes for children, without prejudicing private operators only.

Term of Reference (d): the impact of workforce conditions, such as pay, job security, workload and recognition on educator wellbeing, retention and service quality

Early childhood educators and teachers represent some of the most dedicated and hardworking professionals in Australia. These individuals play a vital role in the development and wellbeing of our youngest citizens and, as such, deserve fair remuneration, professional respect and consistent access to high-quality development opportunities.

Affinity is committed to consistently meeting or exceeding educator-to-child ratio requirements across all our centres. Surplus staffing provides multiple benefits: it enables more personalised interactions with children, supports smoother transitions throughout the day, and ensures coverage during breaks or unforeseen absences without compromising care. This practice also promotes educator wellbeing by reducing pressure on individuals, fostering stronger team collaboration, and allowing more time for observation, planning, and reflection, which are key elements of high-quality early learning.

Affinity fully supports the Federal Government's commitment to a 15 per cent wage increase for early childhood educators over the next two years, which commenced in December 2024. Affinity implemented the pay rise for eligible educators and teachers from 1 December 2024. Affinity continues to advocate for sustained Government investment to support both educator wages and regulatory capability.

In addition to paying staff at, on average, five per cent above award and complying with regulated labour ratios, Affinity has made significant investments in recent years including a retention-based bonus scheme for centre and area managers. Employees in both are required to hold a minimum

Diploma qualification (many are Bachelor qualified) to be eligible once they are through probation. This is a straightforward cash bonus retention scheme of \$15,000 for centre managers and \$30,000 for area managers that vests over three years to reward tenure and encourage retention and recruitment of staff. It has no other KPIs beyond tenure.

Workforce Development as a Driver of Quality

Remuneration in early childhood education is closely linked to qualification levels. Affinity places significant emphasis on workforce development as a key strategy for delivering high-quality education and care.

Through the Affinity Learning Academy, we provide nationally recognised qualifications, structured leadership pathways and comprehensive training programs that support educators at all stages of their careers. Since 2017, more than 2,000 Affinity employees have completed their Certificate III or Diploma in Early Childhood Education through employer-funded study. These programs, some offering up to 100 per cent subsidised qualifications, are a cornerstone of Affinity's commitment to workforce capability.

Educators' capacity to support children's behaviour particularly in moments of emotional dysregulation is critical to maintaining safe, positive learning environments. Regulatory breaches and serious incidents often stem from gaps in educator training and support in this area. While pre-service qualifications are essential, access to ongoing, targeted professional development is equally vital for ensuring educator preparedness and safety.

Affinity Recommendations

To strengthen the professional standing, safety and capability of early childhood educators and teachers, Affinity recommends the following:

1: Require Minimum Annual Professional Development Hours as Part of Registration

To promote lifelong learning and maintain contemporary practice standards, introduce a mandatory minimum number of professional development hours per year for all educators registered under the Victorian Early Childhood Workforce Register that is currently under development:

- Require an average minimum of 20 hours of relevant professional development annually as part of ongoing registration, including specific behaviour-focused professional development.
- Develop a centralised platform or PD logbook to record and verify completion.

2: Advocate that the Federal Government extend its existing Bursary and Subsidy Program to further remove Financial Barriers to Educator Qualifications

To address cost-related barriers to educator upskilling and improve workforce capability, the Federal Government should extend existing targeted financial assistance for early childhood educators undertaking higher qualifications.

- Improve and expand access to the dedicated bursary scheme.
- Explore the viability of allocating public funding directly to universities and training providers to reduce tuition fees for priority early childhood education qualifications.

3: Fund a Statewide Behaviour Support and Emotional Regulation Training Program

To strengthen educator capability in supporting children with complex behaviours, introduce a government-funded, statewide professional development program focused on behaviour support and emotional regulation.

- Design the program around evidence-based practices.
- Ensure training includes practical strategies, trauma-informed practice and support for children with additional needs.
- Deliver via multiple modalities (online, face-to-face, in-service coaching) to maximise accessibility.

Term of Reference (e): the adequacy of staff-to-child ratio regulations, including ratios being averaged across entire services rather than applied per room

Affinity is committed to consistently meeting or exceeding educator-to-child ratio requirements across all our centres. Surplus staffing provides multiple benefits: it enables more personalised interactions with children, supports smoother transitions throughout the day, and ensures coverage during breaks or unforeseen absences without compromising care.

Like most providers, Affinity uses a blend of permanent and casual educators to ensure we can consistently meet ratio requirements, especially during staff leave or absences. All casual educators are qualified and required to meet the same standards as permanent employees. Our surplus staffing approach means that casuals are used to complement rather than replace core team coverage. This practice also promotes educator wellbeing by reducing pressure on individuals, fostering stronger team collaboration, and allowing more time for observation, planning, and reflection, which are key elements of high-quality early learning.

Affinity Recommendation

Affinity makes no recommendation in relation to this term of reference.

Term of Reference (g): any other matter in relation to the adequacy, implementation, compliance and/or enforcement of child safety standards and regulations in the ECEC sector.

Affinity has welcomed the recently announced measures that are being introduced by the Victorian Government and governments across Australia to improve safety and compliance across the ECEC sector. Importantly, Affinity is not waiting for further regulatory reforms to be mandated and has already either implemented or is in the process of implementing many measures at scale and with immediate effect.

Our ability to act swiftly is supported by robust governance frameworks, sector expertise and significant investment over the past three years in both systems and workforce capability. This proactive approach not only advances child safety and care standards today but also provides a practical model for how these reforms can be effectively applied across the sector.

Affinity emphasises a strong self-reporting culture through executive communications, training, policies and processes. Our policies require immediate action, including:

- Centres must log the incident into our internal reporting system within 12 hours;

- Mandatory reporting to relevant authorities within 24 hours;
- Making direct contact proactively and in a timely manner with the child's family;
- Staff involved stood down and/or terminated in serious cases; and
- A full internal investigation conducted with relevant authorities.

Our current commitments include:

- Updated, mandatory training for every Affinity employee across Australia on child safety policies, practices and legal obligations;
- Fast-tracking the installation of CCTV across all centres to enhance supervision and safety;
- Seeking parental preference regarding who assists their child with toileting or nappy changes;
- Rolling out personal secure employee lockers nationally;
- Reviewing centre layouts to identify and rectify blind spots;
- Formal consultations with our teams, parents and regulators on additional safety measures; and
- Partnering with Bravehearts to deliver mandatory child protection training to all staff, including tailored modules for leaders on how to create and sustain child-safe environments.

These initiatives further enhance the child safe measures already in place across Affinity's network of centres, including:

- Personal device ban;
- Enhanced employment screening;
- Comprehensive child safety policies;
- Child safety and protection procedures;
- Ongoing training and education;
- Secure environments; and
- Transparent communication.

About Affinity Education Group

Affinity Education Group is one of Australia's largest providers of early childhood education and care, operating more than 250 centres nationwide under trusted brands such as Milestones, Papilio, Kids Academy, and Aussie Kindies.

Since its establishment in 2013, the group has focused on delivering high-quality, evidence-based education for children from birth to school age. Today, Affinity supports over 20,000 children and 8,000 families, with a workforce of more than 5,700 educators and staff committed to creating safe, inclusive, and nurturing environments where children can thrive. Its mission is to give every child the best start in life, recognising the critical importance of early years for individual and societal development.

Central to Affinity's approach is its exclusive Lifelong Learning Curriculum, which is aligned with the national Early Years Learning Framework. This curriculum integrates research-based practices such as Attachment Theory, the Abecedarian Approach, and Project-Based Learning to support children's development across emotional, social, physical, and foundational learning domains. Complementary programs, including STEM initiatives and cultural education partnerships, further enrich the learning experience. Affinity also prioritises safety and wellbeing through rigorous compliance measures, regular audits, and a culture of accountability, ensuring that every child feels secure and supported.

The organisation invests significantly in workforce capability through the Affinity Learning Academy, which provides nationally recognised qualifications, professional development, and career pathways for educators. This commitment to staff development reflects Affinity's belief that the quality of early education is intrinsically linked to the capability and wellbeing of its educators. Partnerships with universities and industry bodies reinforce its leadership in early childhood education innovation, while recognition as an Employer of Choice underscores its strong organisational culture.

Affinity Education Group operates as a purpose-driven organisation guided by values that emphasise professionalism, inclusion, and continuous improvement. Its strategic focus on curriculum excellence, educator development, and family engagement positions it as a key contributor to Australia's early childhood education sector. Through its scale, research-informed practices, and commitment to quality, Affinity plays a vital role in shaping positive outcomes for children, families, and communities nationwide.