



# Inquiry into the Early Childhood Education and Care Sector in Victoria

Submission

Early Childhood Australia

December 2025

EVERY  
YOUNG  
CHILD IS  
THRIVING  
AND  
<sup>1</sup> LEARNING



## About us

Early Childhood Australia (ECA) is a not-for-profit, membership-based organisation that was first incorporated in 1938. We work at both the national and local levels, with active State and Territory Committees in each Australian jurisdiction and a National Board of Directors. Our membership includes early childhood professionals, services, schools and organisations that share a commitment to the rights and wellbeing of young children.

Our vision is that every young child is thriving and learning. To achieve this, we champion the rights of young children to thrive and learn at home, in the community, within early learning settings and through the early years of school. Our work builds the capacity of our society and the early childhood sector to realise the potential of every child during the critical early years from birth to the age of eight.

ECA acknowledges the unique place of Aboriginal and Torres Strait Islander peoples in our society, the past and current injustices and realities for them across Australia, and the enduring strength of their cultures and identities. We commit to being at the forefront of achieving a reconciled nation that values, respects and celebrates Aboriginal and Torres Strait Islander ways of knowing and being.

Find out more at: [www.earlychildhoodaustralia.org.au](http://www.earlychildhoodaustralia.org.au)

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## Acknowledgement of Country

Early Childhood Australia acknowledges the Traditional Custodians of Country throughout Australia and their continuing connection to land and community. We pay our respect to them and their cultures, and to the Elders both past and present.



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## Executive Summary

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Early Childhood Australia (ECA) has long advocated for the provision of universal early childhood education and care (ECEC) that is affordable, accessible, high quality and uncompromising in keeping children safe - foregrounding their rights and best interests. The devastating reports of child harm, maltreatment and child sexual abuse in some early childhood services are shocking and deeply concerning. We remain steadfast in our commitment to working with the Australian and Victorian governments (and counterparts in other jurisdictions), and the early childhood sector towards strengthening child safety and safeguarding across all service types.

As a national organisation, our state and territory committees are important in informing and contributing to ECA's advocacy and advice to governments. ECA Victoria is a dynamic and active volunteer committee that engages members through regular communication via social media and newsletters and hold regular forums that members can attend to keep up to date with current policy, research and issues within the sector. In this submission, we seek to reflect ECA's enduring advocacy for the safety, rights and best interests of children, our knowledge of the Victorian early childhood context, its initiatives and investment, and our advocacy towards the national reform agenda. ECA appreciates the opportunity to provide this submission to the *Inquiry into the Early Childhood Education and Care Sector in Victoria*. The submission is also informed from a (brief) survey of Victorian members addressing the key elements of the Terms of Reference (see Appendix).

It is well-documented that quality early childhood education and care is important in the lives of young children and their families, but we do know that that has not been the experience for every child and family. It is important to acknowledge when considering **the adequacy of current quality and safety standards across all ECEC service types**, that quality providers and the overwhelming majority of early childhood professionals meet and/or exceed their responsibilities and obligations under the National Law and Regulations. Where fragmentation of service delivery and provision, and inconsistencies in policy, funding and approaches exist, these have been open to exploitation by bad actors – addressing inconsistencies should remain a priority.

We have heard from early childhood professionals across the sector that the compliance workload is 'heavy', most particularly with the pace of change, and that this is borne unevenly across the sector depending on the supports available. It is clear to us that child safety guidance for early childhood professionals needs to speak to all and be highly effective. With this, there is a need to clearly demonstrate what good, ethical practice towards supervision and ratios looks like in early childhood settings.

**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** is a live conversation. We know that variance in the quality of early childhood qualifications exists. It is our view that a comprehensive research study, in partnership with the sector, would be of high value to explore how variance in the delivery and provision of early childhood qualifications plays out in the quality and preparedness of graduates. Similarly that consideration of how qualifications for early childhood professionals are accredited should be in scope to consider whether similar rigor is applied as by AITSL for the schools space (or dual accredited Birth – 8 or Birth – 12 degrees). And ensuring the quality of RTOs will continue to be important; as any remaining unethical or unscrupulous RTOs are excluded.



The WWCC is an important mechanism and ECA supports changes to strengthen this process. Additionally, educative guidance around the WWCC would be beneficial to early childhood providers and services about how the WWCC works and their explicit obligations as child safe champions.

Taking a view of the early childhood ecosystem in Victoria that is made up of provider and service types is needed to consider **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**. Building and embedding quality in every part of the ecosystem will be challenging, yet imperative. Families need to be able to trust that their children are safe wherever they attend, and that the complexity of the sector does not compromise the commitment to children's safety. ECA puts forward a provider commitment as a potential mechanism to support the translation of the paramountcy of children's safety, rights and best interests into practice, and a potential renegotiation of the sector by government to determine who might then remain or enter the early childhood system.

The impact of workforce conditions, such as pay, job security, workload and recognition on educator wellbeing, retention and service quality are noted. It is ECA's view that **pay, conditions and lack of professional recognition continue to detract from the recruitment of prospective early childhood professionals, the retention of knowledgeable and experienced early childhood professionals and the potential return of those who may have left the sector**. The work of early childhood professionals is highly specialised important work. Workforce churn creates a real problem, undermining child safety, safeguarding and quality - defining expectations, obligations and responsibilities for different career stages, and particularly where we recognise likely vulnerability in specific cohorts would be advantageous. We know that changes with compliance have added to the administrative burden at provider and service level.

**The adequacy of staff-to-child ratio regulations, including ratios being averaged across entire services rather than applied per room warrants urgent consideration.** The National Quality Framework and its minimum ratios were never intended to be a staffing formula, instead they are a baseline. Addressing how under roof ratios are applied and whether they are maintained in the National Quality Framework, should continue to be a live conversation. A review of the ratios that enable quality and safety would be sensible.

Consideration of **whether there is sufficient oversight of the Department of Education and the role it plays in monitoring and maintaining child safety**, ECA is supportive of the establishment of an independent and well-resourced regulatory authority (as recommended within the Victorian Child Safety Rapid Review. If quality and safety are to be strengthened across provider and service types, ascertaining need across the entire early childhood ecosystem is imperative - consideration is important of provider and service types that may be less supported (i.e. due to geographies, governance, funding and other factors)

Additionally, unhelpful narratives in the legacy media and on social media platforms have compounded a sense amongst early childhood professionals that ethical, principled work in the sector is not seen, nor valued. We know that educator wellbeing is important in and of itself, but also because early childhood professionals are working directly with children and families and are key to establishing and maintaining a culture of safety in early childhood settings. Initiatives such as Be You, and other high quality, complementary programs should be considered, particularly those which have reach into parts of the sector where educator wellbeing may be most affected and/or where supports may be limited or not available. **Genuine stories of quality early childhood education and care could assist in restoring public confidence and morale of the early childhood workforce.**



## Response to Terms of Reference (TOR)

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

The current focus on quality and safety, needs to address every part of the early childhood sector. It is reasonable for parents/carers to expect that their children are safe and receiving quality education and care wherever they access early childhood education and care – across different provider and service types.

It is well-documented that high quality early childhood education and care has positive impacts on young children's learning, development and wellbeing, most particularly for children at risk of disadvantage or living with complexity. ECA's asserts that the majority of providers, services and early childhood professionals work diligently for quality provision and children's safety, but also that a focus on strengthening and embedding high quality, durable child safety practice is important in every setting where children attend.

Where fragmentation of service delivery and provision, and inconsistencies in policy, funding and approaches exist, emerging gaps can be exploited by bad actors. ECA's members acknowledged the importance of government and the sector responding proactively, while conversely not moving so quickly that responses were not well-conceived.

The National Quality Framework was largely well regarded by members, but concerns were raised around inconsistent application. A lack of, or limited knowledge and understanding of the National Law and Regulations and related obligations is concerning.

*"I think the framework is essentially sound....it is the capacity of individual services to maintain that level of quality and safety in the context of workforce challenges, poor training, complex communities and resourcing/for-profit priorities for some services" Survey respondent (Dec, 2025)*

The compliance workload is generally considered to be 'heavy', most particularly with the pace of change, and that this could be borne unevenly across the sector depending on the supports available, with some providers offering higher and more systematic support.

*"The bans on personal devices was announced to the public in June. Services did not receive official advice until August and so were given a limited time frame in which to adopt the changes" Survey respondent (Dec, 2025)*

A lack of understanding around appropriate and inappropriate practice can potentially put children at risk of harm. High quality, evidence-based pre- and in-service child safety training and professional learning that relates closely to the everyday work of educators should be considered an absolute and enduring priority and serve as a mechanism to improve everyday practice. Addressing the gaps in knowledge around prevention of child harm, maltreatment and child sexual abuse must remain a priority, with how to recognise and report early signs of inappropriate and/or nefarious conduct an obvious focus. We know that there are different understandings of how and when to report. It is ECA's view that guidance for early childhood professionals needs to speak to trainee and student educators, as well as Certificate III and Diploma educators, early childhood teachers and leaders. It is important that early childhood professionals understand their obligations in keeping children safe, and that they are able to act on these appropriately, as and when needed.



*[Reporting mechanisms] ..completely need an overhaul. Too many stories of staff not wanting to report for fear of reprisal. Staff not knowing what to do if they see something. Lack of checking history of workers. If someone has worked for short periods at multiple services – this is a major red flag. Training in Child Safety MUST be COMPULSORY and completed at least annually" Survey respondent (Dec, 2025)*

ECA shares with members concern around ratios – particularly how under roof ratios can be applied – that can see education teams desperately short-staffed and children potentially at risk. ECA has stated in our communications that the ratios of the National Quality Framework were never set out to be a staffing formula, but instead a minimum standard. We have heard from members and colleagues that some services are operating to the minimum, for a number of reasons, but still meet the National Law and Regulations.

*"I know services are breaching the regulations in regard to ratios. They have Cert IIIs running rooms, sometimes they have enough people in the room but no Diploma qualified in contact with the children. Services should be shutting rooms when they are understaffed and can't get casuals, but they give in to the pressure from parents to have their children" Survey respondent (Dec, 2025)*

There can be variance with how ratios are applied due to workforce challenges, lack of viability in regional, rural, and remote, and different approaches by provider and service type. Acknowledging the work already being undertaken by ACECQA; ECA believes that more needs to be done to demonstrate what good practice in active supervision really means and how we can eliminate the risk of a child being subjected to abuse in an ECEC setting. While ratios are important, there are additional factors that impact on the number of educators needed for child safeguarding and rich learning experiences - factors such as group size, learning environment size and layout as well as programming that allows children freedom of movement between indoor and outdoor areas. In depth practice-based research into staffing practices is needed, this would clarify how ratios interact with other factors and how we can ensure that there are at least two educators working with children at all times in centre based settings where there is a team of educators that changes across the day.

#### **Recommendations:**

- 1. Support providers, services and early childhood professionals to meet and exceed their responsibilities and obligations under the National Law and Regulations.**
- 2. Better understand the compliance workload, most particularly with the pace of change, and ascertain how this is borne across the sector, and if any supports available.**
- 3. Ensure that child safety guidance for early childhood professionals speaks to all educators and is effective at improving child safety and safeguarding.**
- 4. Clearly demonstrate what good practice in active supervision and ratios looks like in early childhood settings.**
- 5. In-depth practice research on staffing practices that deliver on safety and quality.**



**(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**

There is an obvious need to invest in early childhood professionals working in sector, but if our student and trainee educators are not engaged in high quality pre-service qualifications, gaps in knowledge and practice are potentially compounded. Consideration of how qualifications for early childhood professionals are accredited should be considered, with particular attention to the rigor that is applied to qualifications for teaching in schools.

Currently, there is a wide variance in the quality of early childhood qualification programs – they have different durations, programs of study, course format and mode of delivery. We hear frustration from providers that qualified graduates are not ‘job ready’ and that more support is needed for different cohorts of educators engaged in upskilling. The importance of knowledgeable and expert academic teams, research-informed programs of study and training packages, and strong connection to practice, is known to better prepare graduates for the work of an early childhood professional. ECA believes that a comprehensive research study, in partnership with the sector, would be of high value to explore how variance in the delivery and provision of early childhood qualifications plays out in the quality and preparedness of graduates.

*“At the university level, [qualification training] is very good. I cannot speak to the VET sector. Consistent qualification requirements for ECT registration around the country would be excellent and are much needed to support ECT mobility and consistency of quality” Survey respondent (Dec, 2025)*

Members told us how challenging taking on student educators can be and how a lack of support from the training or academic provider often compounds workload, particularly where student educators require significant support or are at risk of failure. We hear from early childhood colleagues that some RTOs and universities did not or were not likely to visit at all – and that services found it difficult to fail student educators even when they felt that this was necessary. Where student educators are poorly prepared, they themselves can feel under pressure – with some choosing not to continue. Where effective and skilled mentors are in place within a supportive learning environment, student and graduate educators were said to be more positive about their work and to build capability within the setting – what is lacking clarity is how this could be more systematic and resourced. When trainee and student educators enter into an early childhood setting, they are effectively also entering into the early childhood sector – their experiences, how they are treated, their feelings of self-efficacy and -confidence can very well determine whether they persist and choose to remain in the profession.

*“Not having qualified educators working with children and allowing training on the job, results in inappropriate interactions taking place AND places too much additional workload onto already stretched qualified service leaders & teachers to provide the support required. ALSO, Early Childhood Teachers are becoming qualified on paper but lack the knowledge of how to deal with the everyday events that they're going to experience when they commence in the workplace. Often what is being taught is not relevant in practice” Survey respondent (Dec, 2025)*

ECA has heard particular concerns around the Graduate Diploma –that graduates through no fault of their own can graduate unready to fulfil the role of an early childhood teacher and to assume responsibilities that can also entail



supervising a team of experienced educators. Exploring further what these courses cover, and what is reasonable to expect of graduates of the graduate diploma to be ready to assume in services was thought to be relevant to conversations around child, safeguarding and quality.

*The quality of staff coming through from recent qualifications is very poor. The Graduate Diploma and "fast tracked" qualifications need to be eliminated - our children deserve better. Survey respondent, (Dec 2025)*

ECA members described a difference between what universities expected of student educators, and what was actually required or desired by early childhood services (such as understanding and applying the National Law and Regulations, dynamic supervision, appropriate and respectful practice with infants and young children etc.). Managing also the expectations of prospective students and graduates was thought to be important where at times the ethic of work appeared different - where leadership roles were desired and sought early. Accelerated courses also were thought to be worthy of consideration as to the quality of graduates, and whether these courses were giving graduates what they needed to be successful in-sector.

We know that there are differences between RTOs. We have heard from members about the impacts of this in early childhood services. Strong graduates were usually ready to assume responsibilities as their role required, though still learning as they went about their work. We were told that graduates from lower quality RTOs needed to be taught while 'on the job'. This not the fault of the graduate, but nevertheless this outcome requires more from already stretched early childhood leaders and colleagues to bring them up to speed. In high quality services, this was easier, but where services were of low quality they were unable, ill-equipped or were not able to bridge this gap. It makes sense that we need graduates to be of the highest quality so as not to further compound workforce training and professional learning needs of the professional early childhood workforce.

The need for responsiveness in qualifications, professional learning and training is important, to reflect the contexts that early childhood professionals work into every day. We know early childhood settings are increasingly pressurised, and that the knowledge and skill base on entry needs to high to meet the needs of an increasingly diverse child and family cohort, and the dynamic and quickly changing environment.

Challenges around the delivery of training and professional learning include the associated costs, lack of backfill (and resourcing), difficulties in releasing teams or whole of service, limited opportunities to revisit and embed training and professional learning. Where quality practice is not in place, or embedded across education teams, there is a risk to trainees, student educators and graduates that they are working into early childhood settings that are not supportive of their developing knowledge and skills as pre- and in-service early childhood professionals.

*"Inability for staff to be released for training. No replacement staff. Poor services with poor practice setting new graduates up to fail" Survey respondent (Dec, 2025)*

ECA has long advocated for greater robustness and consistency in the Working with Children Check (WWCC) across the country. ECA believes that with changes to the WWCC, it will be important to provide educative guidance to early childhood providers and services about how the WWCC works and their explicit obligations as child safe champions. Child safety and safeguarding is everyone's business and it is important that these processes are understood by education teams (with operational understanding relevant to their role). We must start demystifying the National Law and Regulations, and child safe practice for those in the workforce who are unsure. This is important work towards establishing and/or maintaining a culture of safety in early childhood settings, and



working across the early childhood ecosystem to strengthen child safety and safeguarding, privileging children's safety, rights and best interests.

*"I think we are already very well aware of the limitations of this system. We should also consider the extent to which services are actually checking WWCCs. People are not checking the status of peoples' WWCC number - the card appears to be the green light. It isn't." Survey respondent (Dec, 2025)*

We heard from members that when their WWCC has been provided to services, there can be an absence of process that sees these not verified. This is obviously hugely problematic and creates opportunities for nefarious individuals to potentially provide incorrect WWCC numbers in place of an actual current WWCC. Guidance and comms to services on what their obligations are here is needed as a priority. It cannot be assumed that changes to WWCC will flow down organically to effective application in practice without such an educative piece of work.

*"I go in and out of many services and more often than not I put in my VIT/WWCC number but it is never checked – I think it has only been checked online twice in the last year" Survey respondent (Dec, 2025)*

**Recommendations:**

6. Commission a comprehensive research study, in partnership with the sector to explore how variance in the delivery and provision of early childhood qualifications plays out in the quality and preparedness of graduates.
7. Better understand how qualifications for early childhood professionals are accredited whether similar rigor is applied as by AITSL for the schools space (or dual accredited Birth – 8 or Birth – 12 degrees).
8. Assess and better understand the quality of training packages.
9. Develop educative guidance around the WWCC would about how the WWCC works and the explicit obligations for providers, services and early childhood professionals.

(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

ECA firmly believes in strengthening safety and quality across provider and service types, that every part of the early childhood ecosystem where children and families attend should provide safe, high quality early childhood education and care that privileges children's rights and best interests.

We have heard of examples where education teams are better supported, such as where early childhood services are co-located and integrated with school sites, such as Best Start Best Life – that sees kindergarten on school sites. Or where early years cluster managers provide management support to community managed services with volunteer committees of management.

The early childhood ecosystem is made up of provider and service types of varying quality. ECA has done some work around a potential mechanism to support the translation of the paramountcy of children's safety, rights and best interests into practice, and a potential renegotiation of the sector by government to determine who might then be invited into the new early childhood system. ECA's draft provider commitments set out a set of potential



commitments which quality providers could commit to remain in or enter into the provision of early childhood educations and care. ECA would be happy to speak to these.

*"Instead of a culture of blame to private companies in general, identify the centres that are experiencing difficulties and help them. Provide funding/training/support not blame and censure" Survey respondent (Dec, 2025)*

**Recommendations:**

- 10. Consider the early childhood ecosystem in Victoria of various provider and service types with a view to map and understand tenuous provision that impacts accessibility, affordability, safety and outcomes.**
- 11. Consider the development of a provider commitment as a potential mechanism to support the translation of the paramountcy of children's safety, rights and best interests into practice, and a potential renegotiation of the sector by government to determine who might then remain or enter the early childhood system.**

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

Workforce conditions continue to detract from the recruitment of prospective early childhood professionals, the retention of knowledgeable and experienced early childhood professionals and the potential return of those who may have left the sector.

ECA continues advocate for the profession – that the work of early childhood professionals is highly specialised and important work. There is work to do to lift the status of the profession amongst the general public, decision and policy makers, other parts of the education sector, the early childhood sector itself, and families with young children. ECA's *How to talk early childhood education and care* encourage the use of respectful and inclusive language, with accompanying posters for in-service.

Inconsistencies in pay and conditions across different parts of the sector remains problematic, and further contribute to workforce churn. The Workforce Retention Grant and the Gender Undervaluation Review were mentioned by members. Concerns around complexity and inconsistency in pay and conditions across the early childhood workforce were again raised, with differences found between, and within, provider and service types. This thought to create a sense of those with and those without fair remuneration and working condition effectively creating a chasm and influencing who is attracted, retained and lost to different pockets of the sector. Workforce churn creates a real problem, undermining child safety, safeguarding and quality.

Changes with compliance have added to the administrative burden at provider and service level, with early childhood leaders and educators particularly affected. We heard from early childhood colleagues how a lack of knowledge and understanding of industrial relations, the National Law and Regulations has been noted in some early childhood services – that these can be misunderstood and misinterpreted, yet still applied quite dogmatically.

ECA is particularly interested in better defining expectations, obligations and responsibilities for different career stages, and particularly where we recognise likely vulnerability in specific cohorts, such as trainees, student educators, educators who are Working Towards their qualifications, yet still required to fulfil the responsibilities



and obligations of a qualified peer, new graduates, and early childhood professionals working and/or living with complexity. We believe this is an important piece of work to be undertaken to better define what is reasonable at different career stages, beginning to address where educators may be, or feel compelled, to operate beyond their current knowledge and skills in early childhood settings.

**Recommendations:**

- 12. Evaluate initiatives in recruitment of prospective early childhood professionals, the retention of knowledgeable and experienced early childhood professionals and the potential return of those who may have left the sector.**
- 13. Define expectations, obligations and responsibilities for different career stages, and particularly where we recognise likely vulnerability in specific cohorts.**
- 14. Explore how changes with compliance have added to the administrative burden at provider and service level.**

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

As above, it is ECA's view that the National Quality Framework and its minimum ratios were never intended to be a staffing formula – instead they are a baseline. Unfortunately, what we have seen is that where bare minimum of ratio is applied in services, this can open the door to bad actors. Addressing how under roof ratios are applied and whether they are maintained in the National Quality Framework, should continue to be a live conversation.

For regional, rural, remote and small services generally, covering breaks can be problematic. Where Directors/Managers and auxiliary staff are available, they often cover such periods. We did hear also of some services where Directors and off the floor staff may be included in the under-roof ratio, even though they are not actively working with children. Clarity is absolutely needed as this should not be considered as reasonable or acceptable practice.

In high quality services, a strong understanding of supervision and active supervision is evident – with education teams working closely together, effectively communicating and collaborating with one another to meet the needs of children. There is work to do to build the capability of education teams in ECEC services where this is not embedded in practice – a culture of safety relies upon an effective and collaborative education team focussed on the children's safety, rights and best interests. ECA agrees that wherever possible four eyes on a child should be the norm, however we do understand that there are circumstances where this is not possible (e.g. non-centre-based service types, where buildings do not accommodate this, in very small rural and remote services). We suggest that practical guidance for ethical and principled practice would be highly useful for services where four eyes on a child cannot be met. Where two educators work alongside each other, there is greater safety for the child and the educator. We need to be talking about what high quality practice that keeps children safe looks like, daily vigilance, and provide examples of practice to be illustrative and educative to the sector, and affirming where such practice already is in place.



*"The standards and regulations are really clear about what is acceptable and what is not. Active supervision and staff ratios in programs are the main cause of child safety issues in centres. Many centres are working well, but those that are not bring us all down" Survey respondent (Dec, 2025)*

**Recommendations:**

- 15. Communicate messaging around the National Quality Framework and that its minimum ratios were never intended to be a staffing formula, instead they are a baseline.**
- 16. Understand and address how under roof ratios are applied and whether they are maintained in the National Quality Framework.**

**(f) whether there is sufficient oversight of the Department of Education and the role it plays in monitoring and maintaining child safety**

There are varied views of the sufficiency of oversight by the Department of Education. ECA is supportive of the establishment of an independent and well-resourced regulatory authority (as recommended within the Victorian Rapid Child Safety Review). ECA believes that regular and relational contact with the regulatory authority to be advantageous to strengthen quality and safety in early childhood services.

We know that there is a need to build capability within the early childhood workforce and that in fact there are cohorts within the workforce who may most benefit from high quality professional learning, coaching and guidance. Consideration could be worthwhile also of provider and service types that may be less supported (i.e. due to geographies, governance, funding and other considerations).

ECA believes that if quality and safety are to be strengthened across provider and service types, ascertaining need across the entire early childhood ecosystem is imperative. We know that the focus on child safety and safeguarding is widely supported by the sector, but also that the change process and associated workload is having an impact, particularly on early childhood leaders.

*"Personally I have worked myself into the ground this year which kicked off with assessment and rating in Term 1. Since June it has been relentless and most of the hours I have spent working on CSS and outcomes of the rapid review have been in my own time with next to no support from DE. I work an average of 50 hours per week at a minimum. Educators on the whole feel distrusted" Survey respondent (Dec, 2025)*

High quality and effective oversight from the regulatory authority is supported by ECA, but with this also support, professional learning and capability building across provider and service types. ECA continue to advocate for regular and relational touchpoints from the regulator with a focus firmly on children's safety, rights and best interests, but also to educate and enable the strengthening of safety and quality in real time. We welcome an independent regulatory authority, with particular early childhood expertise and knowledge across the provider and service types, and geographies, that make up the early childhood ecosystem in Victoria.



*"I support high quality oversight from the regulatory body. That support should include the free provision of high-level training and professional development as an expectation of all educators. It should be assessed as part of registration but should also be provided free of charge with backfill. If an educator is assessed to be not competent they should not be working in the sector" Survey respondent (Dec, 2025)*

We acknowledge the excellent work of the vast majority of early childhood professionals across Victoria who turn up for children and families every day, often in complex circumstances. We know that high quality early childhood education and care is important in the lives of young children and their families. Workforce shortages worsened by a continuing lack of parity for many early childhood professionals with colleagues working in other education settings (such as primary and secondary education), lack of professional recognition and a narrative that erodes the professional identity and confidence of even our most experienced early childhood educators and leaders; it is clear that more needs to be done or we may lose the very high quality educators we most need to retain.

ECA's members have been clear that thoughtfully investing in the early childhood workforce is the absolute best way to build a culture of safety and keep children safe. Varied views around the use of other tools, such as CCTV exist. We have moderated our position on the use of CCTV, previously being strongly opposed. We have heard from some early childhood providers and services who employ this technology and support its use, and as such, ECA is keen to learn more from the Australian Government's trial into CCTV use and will then respond accordingly. We are concerned around the safety, rights and best interests of children, and also for the rights of early childhood professionals. We do however understand that a suite of measures is being considered and should be robustly evaluated accordingly with a view to keeping children safe. What is clear to ECA from the outset, is that CCTV is not a solution in and of itself.

*"Cameras are not the answer - staffing supervision and effective management is the way to ensure child safety is a high priority" Survey respondent (Dec, 2025)*

#### **Recommendations:**

- 17. Commit to strengthening quality and safety across provider and safety types.**
- 18. Ascertain need across the entire early childhood ecosystem – particular consideration of provider and service types that may be less supported (i.e. due to geographies, governance, funding and other factors).**

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

We have heard from early childhood colleagues deep concern for children and families, and a sense of betrayal that children have been harmed in some early childhood settings – in places where children should have been safe and protected from harm. Educator wellbeing has been deeply affected as the reports of child harm, maltreatment and child sexual abuse have come to light.

*"Educators are shattered, exhausted and overwhelmed. They don't feel supported or heard" Survey respondent (Dec, 2025)*



Coverage of safety issues in the media and on social media platforms have compounded a sense amongst early childhood professionals that ethical, principled work in the sector is not seen, nor valued.

*"It is a very difficult time for all. More media highlighting the high quality that exists in the sector and the dedication and care of many teachers and educators is needed to support and uplift teacher and educator wellbeing" Survey respondent (Dec, 2025)*

Opportunities to demonstrate high quality practice will continue to be important while Australian governments, their agencies and the early childhood sector work to strengthen child safety and safeguarding and the prevention of child sexual abuse in early childhood settings. We know that there are many quality providers and that the overwhelmingly majority of early childhood professionals are dedicated to working with children and families every day. As sector, provider and service level changes take effect, and we continue to be vigilant around any potential bad actors entering in or hiding within the sector, genuine stories of quality early childhood education and care could assist in restoring public confidence and morale of the early childhood workforce.

*"Educator and teacher wellbeing continues to drop as we are all feeling tarnished by the same brush and then have to explain to families and management that this is not who we are" Survey respondent (Dec, 2025)*

We have heard from early childhood professionals from across the sector of how increasingly challenging their work is. We have heard stories of some Approved Providers, Directors and Managers moving quickly and beyond the advice of government and the regulatory authority, where inconsistent messaging has had a detrimental impact on the wellbeing of education teams (e.g. removal of service tablets). We have heard of early childhood professionals profoundly impacted by stories of child harm, maltreatment and sexual abuse, feeling a loss of trust in others, at times feeling dysregulated, or 'heavy'.

*"Significantly impacted. And their voices are near invisible...it's all about politicians and parents" Survey respondent (Dec, 2025)*

And early childhood professionals and leaders working to reassure families who themselves feel betrayed and devastated, and some who may feel unsure and concerned about the robustness of child safety and safeguarding arrangements.

*"Educator wellbeing has been ignored completely; there is no educator support in place" Survey respondent (Dec, 2025)*

Acknowledging how educator wellbeing has been affected is important. The early childhood workforce is essential in the strengthening of child safety and safeguarding, and the privileging of children's safety, rights and best interests. In fact, this work cannot happen without them. Investing in the profession and acknowledging the different starting points of our workforce is essential. Programs such as the Australian Government's Be You, mental health initiative, of which Early Childhood Australia is national delivery partner for prior to school settings, are already working closely with the sector to support the wellbeing and professional work of wellbeing teams.



Other complementary programs should also be considered, particularly those which have reach into parts of the sector where educator wellbeing may be most affected and/or where supports may be limited or not available.

**Recommendations:**

- 19. Communicate the importance of high-quality early childhood education and care and the early childhood profession.**
- 20. Promote initiatives such as Be You, and other high quality, complementary programs, particularly those which have reach into parts of the sector where educator wellbeing may be most affected and/or where supports may be limited or not available.**
- 21. Amplify genuine stories of quality early childhood education and care to assist in restoring public confidence and morale of the early childhood workforce.**



## Conclusion

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Early Childhood Australia remains deeply committed to every child thriving and learning. We believe that it is important that quality and safety in every part of the early childhood sector is strengthened and embedded. Policy, funding and regulatory arrangements create differences across provider and service types, that impact the provision of early childhood education and care, the work of early childhood professionals, and the everyday experiences of children and their families in early childhood settings. It is imperative that children are safe in every early childhood setting – that their families can rightly trust that their children are safe.

ECA as national peak body for early childhood will continue in our commitment towards a high-quality universal system through our work with the Australian and Victorian governments and the early childhood sector. Our national reach and breadth of activities as an organisation, is coupled with our excellent, dynamic and active Victorian Committee and members. We would welcome the opportunity to contribute further to the work taking place in Victoria.

### Summary of recommendations

1. Support providers, services and early childhood professionals to meet and exceed their responsibilities and obligations under the National Law and Regulations.
2. Better understand the compliance workload, most particularly with the pace of change, and ascertain how this is borne across the sector, and if any supports available.
3. Ensure that child safety guidance for early childhood professionals speaks to all educators and is effective at improving child safety and safeguarding.
4. Clearly demonstrate what good practice in active supervision and ratios looks like in early childhood settings.
5. In-depth practice research on staffing practices that deliver on safety and quality.
6. Commission a comprehensive research study, in partnership with the sector to explore how variance in the delivery and provision of early childhood qualifications plays out in the quality and preparedness of graduates.
7. Better understand how qualifications for early childhood professionals are accredited whether similar rigor is applied as by AITSL for the schools space (or dual accredited Birth – 8 or Birth – 12 degrees).
8. Assess and better understand the quality of training packages.
9. Develop educative guidance around the WWCC would about how the WWCC works and the explicit obligations for providers, services and early childhood professionals.
10. Consider the early childhood ecosystem in Victoria of various provider and service types with a view to map and understand tenuous provision that impacts accessibility, affordability, safety and outcomes.



11. Consider the development of a provider commitment as a potential mechanism to support the translation of the paramountcy of children's safety, rights and best interests into practice, and a potential renegotiation of the sector by government to determine who might then remain or enter the early childhood system.
12. Evaluate initiatives in recruitment of prospective early childhood professionals, the retention of knowledgeable and experienced early childhood professionals and the potential return of those who may have left the sector.
13. Define expectations, obligations and responsibilities for different career stages, and particularly where we recognise likely vulnerability in specific cohorts.
14. Explore how changes with compliance have added to the administrative burden at provider and service level.
15. Communicate messaging around the National Quality Framework and that its minimum ratios were never intended to be a staffing formula, instead they are a baseline.
16. Understand and address how under roof ratios are applied and whether they are maintained in the National Quality Framework.
17. Commit to strengthening quality and safety across provider and safety types.
18. Ascertain need across the entire early childhood ecosystem – particular consideration of provider and service types that may be less supported (i.e. due to geographies, governance, funding and other factors).
19. Communicate the importance of high-quality early childhood education and care and the early childhood profession.
20. Promote initiatives such as Be You, and other high quality, complementary programs, particularly those which have reach into parts of the sector where educator wellbeing may be most affected and/or where supports may be limited or not available.
21. Amplify genuine stories of quality early childhood education and care to assist in restoring public confidence and morale of the early childhood workforce.



## Appendix

The survey canvassed views of professionals currently working in the sector.

Overall, this painted a picture of general limited to low satisfaction in areas covered by the Terms of Reference. While the sample size is relatively small (n = 35), it serves to sample the sentiment amongst members.

While the responses name specific issues and examples, read together the survey reflects the professions' (or respondents') shared commitment to [or concern with] high quality and safe ECEC, and the related safety and safeguarding focus. The responses signal a willingness to partner to improve quality and safety in ECEC and note a range of structural drivers (e.g. ratios, workforce training/qualification supports) that could support this change.

### **The adequacy of current quality and safety standards across all ECEC service types**

Very poor 0% | Poor 23% | Fair 46% | 23% | 9%

### **The quality and oversight of educator training, professional development and qualifications**

Very poor 3% | Poor 60% | Fair 23% | Good 9% | Very good 6%

### **The effectiveness of Working with Children Checks**

Very poor 20% | Poor 34% | Fair 43% | Good 0% | Very good 3%

### **The quality of Registered Training Organisations issuing early childhood certifications in Victoria**

Very poor 11% | Poor 34% | Fair 51% | Good 0% | Very good 3%

### **Accessibility, affordability, safety and outcomes in the current early childhood ecosystem**

Very poor 9% | Poor 26% | Fair 57% | Good 9% | Very good 0%

### **The current workforce conditions as an educator, including pay, job satisfaction, wellbeing, workload, recognition, and overall job satisfaction**

Very poor 37% | Poor 40% | Fair 17% | Good 3% | Very good 3%

### **The adequacy of staff-to-child ratio regulations, including ratios being averaged ratios across entire services rather than applied per room**

Very poor 46% | Poor 35% | Fair 11% | Good 6% | Very good 1%

### **Is there sufficient oversight of the Department of Education in monitoring and maintaining child safety?**

Yes 9% | No 62% | Unsure 30%



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