

INQUIRY INTO EARLY CHILDHOOD EDUCATION AND CARE SECTOR IN VICTORIA

Submission Prepared by The Parenthood

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About The Parenthood

The Parenthood is Australia's largest advocacy organisation representing parents and carers. We advocate for policies that help children, families and communities thrive, including universal access to high-quality early childhood education and care.

We launched in 2013 and have since built a community of over 80,000 mums, dads and carers. We come from every state and territory across Australia, and we are not-for-profit and independent.

We are a community working together to make Australia the best place in the world to be a parent and raise a child. When parents and carers are supported, children can thrive.

Acknowledgment of Country

The Parenthood acknowledges Aboriginal and Torres Strait Islander peoples as the Traditional Owners of Country throughout Australia and their continuing connection to both their land and seas. We pay our respects to Elders past and present, and recognise that universal access to early childhood education and care must include First Nations-led solutions for First Nations families. This submission was predominantly written on the land of the Wurundjeri people, in Naarm/Melbourne.



Executive Summary

The Parenthood welcomes the opportunity to contribute to the Inquiry into the Early Childhood Education and Care (ECEC) Sector in Victoria. Our supporters, who include Victorian parents, carers and families, have been deeply affected by the recent allegations of abuse, neglect and mistreatment occurring in early childhood education and care settings. These revelations of serious breaches of safety and quality have revealed profound systemic failures. The early learning system is in desperate need of reform.

Families need to trust the system designed to care for, and support the needs of, their children. They want transparency, strong oversight and a guarantee that every service places the safety and wellbeing of children as the paramount principle, ahead of financial incentives or operational pressures.

Right now, Victoria's ECEC system is failing too many children and families. While the majority of educators and services work tirelessly to provide high-quality education and care, the system meant to protect children is not fit for purpose. This is due to policy settings that have allowed weak regulation, inconsistent training quality, unclear governance, lack of stewardship over the entire ECEC workforce and a federal funding model that incentivises profit over children's wellbeing.

The Parenthood's position is clear: the safety, wellbeing and development of children must be at the heart of the Victorian, and national, ECEC system.

The overwhelming evidence from families, educators and experts shows that:

- Children's safety is compromised by inconsistent quality standards, inadequate enforcement powers, variable educator training and staffing pressures.
- Workforce shortages and poor conditions fuel burnout, turnover and reliance on inexperienced or temporary educators.
- Privatisation has created uneven quality and access, with the strongest safety outcomes found in not-for-profit and community-run services.
- Parents are losing trust in a system meant to support them, particularly after recent high-profile allegations of abuse and mistreatment and regulatory failures.
- Government oversight is fragmented, reactive rather than preventative and not designed to address systemic risks across a rapidly growing sector.

These issues are not isolated events - they are symptoms of structural failure.

On 2 July 2025, the Victorian Government announced a six-week review into child safety in early learning services, following the horrific allegations of abuse within the sector. The *Rapid Child Safety Review* outlined 22 recommendations to strengthen safety, which the Victorian Government accepted and agreed to implement.

The Parenthood welcomes the Victorian Government's commitment to all 22 recommendations. Victoria now has the chance to lead the nation in building an early

learning system that honours the right of children to participate in high-quality, safe early learning environments.

The task ahead is to match the implementation of these recommendations with consistent, practical action, supported by adequate funding and resourcing, so that child safety and wellbeing is embedded in every decision, practice and accountability mechanism across the system. This submission outlines a suite of recommendations for the Victorian Government to further bolster safety and quality within the early childhood education sector.

Responses to the Terms of Reference

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

The ECEC regulatory system is fundamentally fragmented and under-resourced across the country, including in Victoria. Oversight varies between states and territories, creating inconsistent enforcement of our National Quality Standards (NQS). Long gaps between Assessment and Rating visits - which in Victoria currently average 3.5 years¹ - mean that services cannot be upheld to high standards and low performing providers can slip under the radar.

This fragmentation has real consequences. Currently, there's no single national body ensuring every centre meets basic safety and quality requirements, and no clear settlement of responsibilities between Commonwealth and state governments.

The National Quality Framework (NQF) provides a strong foundation, and national leadership on quality and safety is imperative in the pursuit of universal ECEC. However, in practice:

- Standards are not applied consistently across services or service types.
- Approved providers can operate dozens, even hundreds, of services with varying quality and oversight.
- Serious incidents are increasing in frequency, particularly in highly commercialised pockets of the sector.

Quality in ECEC is uneven and closely tied to provider structure, workforce stability and funding model. While quality has been steadily improving in Victoria², there is still considerable variability across the ECEC sector, particularly among for-profit services. Not-for-profit services are more likely to deliver higher quality, while for-profits show greater variation. This highlights the need for intergovernmental collaboration and stronger system stewardship to ensure greater consistency across all service provision.

The Victorian Government's commitment to inject \$42 million into the sector and establish an independent regulator which will double the number of compliance checks will strengthen and support quality, particularly across long daycare services. However, accountability

¹ *Rapid Child Safety Review*, Weatherill, J. & White, P., 2025, page 52.

² *Inquiry into the Early Childhood Education and Care Sector in Victoria*, The Front Project Submission, 2025.

remains split between national and state responsibilities, as the oversight of ECEC falls across ACECQA, state and territory regulators and the various systems for Working With Children Checks and reportable conduct.

The Productivity Commission and the *Rapid Child Safety Review* have both recommended a National Early Childhood Commission to address this fragmentation and outline clear responsibilities and roles for all levels of government. The Parenthood welcomes the Victorian Government's commitment to push the Commonwealth Government for a Commission, following the *Rapid Child Safety Review*. A Commission is imperative to achieve the universal, high-quality early learning system Australian children and families deserve, with consistent regulation and oversight.

A key gap in Australia's ECEC system is the absence of a shared national data architecture for regulatory information, quality trends, educator status, reportable conduct and enforcement actions. A National Early Childhood Commission must lead the creation of integrated national data systems to support early identification of risks, inform proactive regulation and enable national visibility of provider behaviour.

Recommendation 1: Work with the Commonwealth Government to establish an independent National Early Childhood Commission with powers to oversee, monitor and enforce nationally consistent quality and safety standards, coordinate between jurisdictions, and be responsible for developing a universal system. Restore and maintain adequate Commonwealth funding for regulatory capacity scaled to sector growth and complexity.

Recommendation 2: Establish an independent ECEC Regulator in Victoria with appropriate, ongoing funding and resourcing. Make publicly available the plan for improved regulatory function and oversight, and share relevant data nationally to support the establishment of similar bodies in other jurisdictions. The ECEC Regulator should conduct visits more regularly, prioritising services with repeat Working Towards ratings.

(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;

Victoria's current systems for educator training, qualification oversight and child safety screening are not sufficient to guarantee children's safety or high-quality learning. The regulatory framework assumes consistency and reliability across training institutions and safety checks, yet this is not always the case.

In Victoria, there is:

- Wide variability in the quality of Registered Training Organisation (RTO)-delivered qualifications.
- Insufficient supervision and assessment during placements.
- Limited alignment between training content and real-world practice.

- Inconsistent access to ongoing professional learning once educators enter the workforce.
- New educators being placed in high-responsibility roles without adequate mentoring or induction.

Victoria's ability to influence the quality of training is most visible in its kindergarten programs, where the state directly funds two years of learning for three- and four-year-olds. Through funding agreements, the Kindergarten Funding Guide and its *Best Start, Best Life workforce* initiatives, the Victorian Government sets expectations for program delivery, staffing and professional practice. Victoria has shown leadership through university partnerships, regional training initiatives and investment in benchmark enterprise agreements that lift pay and conditions for staff in kindergartens. However, access to high-quality professional development remains uneven. Educators in sessional kindergarten programs often have stronger access to structured learning, mentoring and time-release provisions, while those in long daycare frequently rely on their provider's discretion, leaving many without the support they need to grow and remain in the sector.

Working with Children Checks (WWCCs) also remain a vital part of the child-safety framework, but they are not designed to capture early warning signs such as boundary violations or patterns of concerning behaviour. The *Rapid Child Safety Review* highlighted the lack of coordination between WWCC systems, reportable conduct frameworks and ECEC regulatory oversight. Fragmentation leads to delays in information-sharing and increases the risk of harm. The move toward a nationally consistent WWCC system and the introduction of a live National Educator Register, integrated with state regulatory systems, are essential reforms that will strengthen safety and support early intervention.

Victoria's WWCC system still requires urgent reform to ensure individuals under investigation for serious allegations are prevented from continuing to work in ECEC settings. We support Goodstart's recommendation to shift the responsibility of linking a person's WWCC to an organisation from the employee to the employer³. This would close critical gaps identified by the *Rapid Child Safety Review* and strengthen early identification of risk.

A well-trained, well-supported workforce is the cornerstone of child safety and high-quality practice. Victoria has made important progress, particularly in its kindergarten reforms, but a more consistent, better-resourced system of training, qualifications and professional development, backed by stronger national coordination, remains essential to ensuring every child participates in a safe and high-quality environment.

The Parenthood strongly supports strengthening regulatory oversight of RTOs, ensuring qualifications are delivered with integrity and providing funded professional development time. While training and qualifications are generally overseen nationally, the Victorian Government should seek national coordination and collaboration with the Commonwealth Government to deliver workforce reform. High-quality training is one of the strongest safeguards for children.

³ *Goodstart Early Learning: Submission to the Victorian Parliamentary Inquiry into Early Childhood Education and Care*, Goodstart, 2025.

Recommendation 3: The Victorian Government should strengthen workforce pathways and retention by expanding scholarships, traineeships and targeted training in areas of greatest need, supporting paid induction and mentoring for new educators and service leaders, and continuing to use kindergarten funding agreements and benchmark EBAs to maintain above-award wages, planning time and professional development. The Victorian Government should strengthen regulation of RTOs issuing ECEC qualifications and introduce a statewide professional development framework.

Recommendation 4: Strengthen safeguarding systems through automatic cross-agency information sharing, 'push model' notifications to providers and integrated data systems that link WWCC, reportable conduct, enforcement actions and the National Educator Register. Support strong national leadership to move toward a nationally consistent WWCC and a fully integrated educator safety system.

(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;

In Victoria, the kindergarten sector is overwhelmingly run by government and not-for-profits, while the long daycare sector is dominated by for-profit providers. 69.4 per cent of long daycare services are for-profit and 30.6 per cent are not-for-profit, and 99.6 per cent of standalone kindergartens are operated by not-for-profit providers⁴.

The rise in for-profit provision can create risks when it leads to unsafe environments for children. The sector's rapid privatisation has created perverse incentives where profit motives can override safety considerations, as commercial pressures have demonstrable impacts on quality and safety.

While exceptional for-profit services do exist, across the board they are more likely to be rated Working Towards the National Quality Standard, including in Quality Area 2 (child health and safety). In not-for-profit services, educator turnover is lower, which stabilises relationships, deepens pedagogical practice and supports safer environments for children.

For-profits are nearly twice as likely to be rated below standard. They also tend to cluster in wealthier metropolitan areas where families can afford higher fees, leaving lower-socioeconomic and regional, rural and remote communities underserved. Private providers, particularly large chains, are more likely to operate on minimum ratios and lean staffing models, which can increase safety risks. Affordability also remains a major barrier under a privatised system, as for-profit providers have higher average daily fees.

Evidence shows profit incentives can compromise:

- Staffing levels through casualisation and "under the roofline" arrangements (see pages 9-10).
- Training and development investment.

⁴ *Rapid Child Safety Review*, Weatherill, J. & White, P., 2025.

- Quality improvement, focusing instead on expansion.
- Service location, based on profitability rather than community need.

However, this isn't simply about ownership type - it's about how incentives shape provider behaviour. Many for-profit providers deliver high-quality services, just as some not-for-profits fall short.

The issue is systematic: when financial incentives run counter to quality and safety requirements, children suffer. Children who attend services rated Exceeding NQS show consistently lower rates of developmental vulnerability than those attending Meeting or Working Towards services⁵. The United Workers Union's report *Unsafe and Non-Compliant* revealed that for-profit providers dominate non-compliance activity⁶.

The Commonwealth Government's *Early Childhood Legislation Amendment (Child Safety) Bill 2025* is a strong step in the right direction, by giving regulators the power to suspend or cancel Child Care Subsidy payments to providers who breach safety standards. However, further reforms are necessary to ensure market settings prioritise child safety.

Recommendation 5: Implement stricter oversight of for-profit providers through enhanced transparency requirements, including public reporting on quality, governance and workforce investment. Work with the Commonwealth Government to use funding levers through contracts and grants to reward providers demonstrating strong performance on safety and quality. Expand public and community-managed services, particularly in underserved areas, to provide genuine choice for families.

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

The early childhood education workforce is central to child safety. Without a strong, stable early education workforce, child safety and high-quality service provision is compromised. High staff turnover and reliance on casual and agency staff undermine continuity of relationships for children, increase pressure on permanent educators and weaken regulatory compliance. Workforce conditions, including pay, job security, workload and recognition, are paramount to ensure high recruitment and retention rates of quality staff.

There is a direct correlation between educator pay and service quality. The *Rapid Child Safety Review* found that higher quality services paid staff higher wages, and large not-for-profit providers, which often pay above award rates, had fewer vacancies, less turnover and higher proportions of full-time staff⁷. Services that pay higher staff wages deliver stronger outcomes for children through safe, high-quality learning environments.

Pay increases *do* improve both recruitment and retention. The Worker Retention Payment (WRP), which delivered a 15 per cent wage increase for many educators, has been widely

⁵ *The NQF Works! Policy Explainer*, The Front Project, 2024.

⁶ *Unsafe and Non-compliant: Profits above Safety in Australia's early learning sector*, United Workers Union, 2021.

⁷ *Rapid Child Safety Review*, Weatherill, J. & White, P., 2025.

taken up, with around 85 per cent of eligible workers and 60 per cent of eligible services applying by May 2025. Data from Goodstart in January 2025 showed that vacancies for early childhood educators and teachers fell 22 per cent by the end of 2024 following the announcement of the WRP⁸.

More services have joined the Multi-Employer Agreement, giving 494 providers access to above-award wages and conditions they could not secure alone. These are positive steps, but they are temporary fixes. Long-term, structural reform is still needed to ensure educators are paid in line with their skills and responsibilities and that high-quality, safe services can be sustained across the sector.

Early childhood education and care is highly skilled work and physically, cognitively and emotionally intense. Educators and teachers manage the educational, social and emotional needs of multiple children, with increasing workloads, unpaid overtime and little support or recognition.

Educator burnout is a significant risk. Educators are increasingly expected to do more with less, managing large workloads, complex family needs and high emotional demands without sufficient support or resources. Many educators report feeling disrespected, overworked and emotionally exhausted. Rising stress levels, insecure work and limited recognition are pushing passionate, skilled professionals out of the sector, many of whom say they love the work, but simply can't continue under the current conditions.

The safety and quality of early learning depends on the people who deliver it. If the Victorian Government wants to ensure every child has access to high-quality early education, early childhood educators must be supported with fair pay, professional respect and sustainable conditions.

Recommendation 6: Urge the Commonwealth Government to make the Worker Retention Payment 15 per cent wage increase permanent and commit to further increases that recognise early childhood educators as qualified professionals. Develop a long-term professional wage structure linked to teacher salary scales. Ensure pay and conditions are recognised in service pricing to support structural, sustainable reform that reflects the safety-critical nature of the role.

Recommendation 7: Strengthen workforce conditions for kindergarten teachers and staff to reduce workload burdens. Advocate to the Commonwealth Government to improve employment conditions for early childhood educators and foster secure, stable employment and workplace cultures that value wellbeing and reduce burnout.

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

⁸ Early childhood workforce vacancies plunge 22% after wages subsidy announcement, Goodstart, 2025.

Current ratio regulations - particularly the practice of ratio averaging across entire services or the “under the roofline” loophole - are sometimes placing children at risk, intensifying staff stress and undermining the quality and safety standards families rely on. When ratios are averaged, a service can legally comply on paper while individual rooms remain significantly understaffed.

The “under the roofline” practice was intended to support services to continue the delivery of high-quality care in certain circumstances, but is being exploited at times by unscrupulous providers. This is a loophole that places children in harm’s way by:

- Making it harder for regulators to identify risk.
- Creating inconsistent supervision environments.
- Unfairly shifting pressure onto educators who are already overstretched.

In a 2025 United Workers Union survey⁹ of 3,000 educators, 77 per cent of educators said they were operating below minimum staffing levels in their rooms at least weekly, and 42 per cent said it was occurring daily, indicating widespread misuse of the “under the roofline” ratios. In the same survey, 83 per cent of educators strongly agreed this practice compromises children’s safety and wellbeing.¹⁰

Safety is compromised when:

- Children don’t see familiar faces due to constant staff turnover.
- Experienced staff leave for better-paid sectors, taking expertise with them.
- Services rely on inadequately trained staff to fill shortages.
- Educators are stressed about their own job security and working conditions.

This also highlights the workforce challenges driving recruitment and retention pressures, with many services struggling to meet required ratios because they do not have enough staff. Any changes to mandated ratios must be accompanied by supports, as well as federal funding reform so that the associated costs with hiring more staff are not passed on to families through increased fees.

Recommendation 8: Mandate minimum ratios of permanently employed educators and limit use of agency staff to ensure relationship continuity for children. Promote the “four-eyes” principle (continuous two-staff supervision) as best practice through policy guidance, training and compliance oversight, and require services to develop explicit risk-management plans wherever this cannot be maintained. Provide comprehensive training to centre leaders on what constitutes adequate supervision.

Recommendation 9: Amend the “under the roofline” loophole by requiring adequate supervision in each room, not just across the service, and collaborate with the Commonwealth Government on workforce growth strategies and funding reform to support improved supervision in services. Strengthen workforce data collection linking quality ratings, workforce stability and child outcomes.

⁹ *Safer staffing action plan for a stronger early childhood education sector*, United Workers Union, 2025, page 9.

¹⁰ Ibid.

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

Strong, independent oversight is essential to ensuring Victorian children are safe and supported in early learning. While the Victorian Department of Education is formally accountable to the Minister and Parliament through existing reporting and audit mechanisms, these processes alone are not sufficient to guarantee transparency or protect children from harm.

The Quality Assessment and Regulation Division (QARD), the regulatory arm of the Department, is responsible for monitoring compliance, undertaking assessment and rating visits, conducting investigations and issuing sanctions. However, because QARD sits within the same Department that also funds, stewards and directly operates early learning programs, there is an inherent conflict of interest. Families must be confident that regulation is impartial, especially when the Department regulates services it also provides.

The *Rapid Child Safety Review* recognised this risk and recommended establishing an independent regulator. The Government's commitment to do so, and conduct more frequent compliance checks and update regulatory tools is welcome, but additional clarity and coordination are needed.

Oversight of early childhood education is currently split between state and Commonwealth responsibilities, creating gaps in accountability and limiting visibility of system-wide risks. To strengthen safety and quality, Victoria's reforms must be paired with clearer national accountability and stronger cooperation across jurisdictions.

A safe, high-quality system requires:

- Independent regulation free from structural conflicts of interest.
- Transparent and consistent oversight.
- Shared national and state responsibility for safety, quality and workforce capability.

Victorian families deserve absolute confidence that every service is held to the highest safety and quality standards, and that children are protected, no matter where they live or what type of service they attend.

The Parenthood reinforces our first recommendation of a National Early Childhood Commission (on page 5 of this submission) to provide sufficient oversight of both the Victorian Department of Education and the Federal Department of Education, and ensure both Departments and all regulatory bodies effectively monitor and maintain child safety in Victorian early learning services.

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

Parents need early childhood education and care they trust. Unfortunately, with the recent high profile allegations of abuse and neglect and mistreatment within the sector, that currently feel out of reach for many families. Child safety is the foundation of quality. Unless children are safe, they cannot learn, thrive or develop to their full potential.

Child safety is not yet embedded as a universal, non-negotiable standard. Victoria has made significant progress through the *Child Safe Standards* and the Government's commitment to accept and implement the *Rapid Child Safety Review*'s 22 recommendations, yet more is needed.

Reporting pathways in Victoria remain complex, duplicative and difficult for educators and families to navigate. Providers may be required to notify up to six agencies with varying thresholds and timelines. This complexity contributes to delays, confusion, under-reporting and over-reporting. We support the *Rapid Child Safety Review*'s recommendation for a streamlined, 'no wrong door' reporting system with clear triage, automatic parallel notifications and consistent guidance for educators and families.

Recommendation 10: Adopt a child-safety-first regulatory model. Make child safety the explicit, paramount objective of all regulatory decisions, quality ratings and compliance actions. Embed mandatory child-safety performance indicators for all services, in line with the *Rapid Child Safety Review* recommendation.

Recommendation 11: Strengthen the integration of compliance, investigation and quality assessment systems. Ensure complaint data, serious incident reports, staffing data and compliance actions are automatically factored into quality ratings. Trigger automatic re-assessments for services with repeated safety concerns.

Recommendation 12: Strengthen avenues for educators and families to report concerns safely. Create an independent child-safety reporting channel within the Victorian Department of Education. Guarantee confidentiality and non-victimisation for families and staff who raise concerns.

Conclusion

Victoria now stands at a turning point. The allegations and failures that prompted this Inquiry were not isolated incidents - they were the outcome of a system that has grown rapidly without the coordinated, safety-first architecture children deserve. Families need to know that when they entrust their children to early learning, every measure has been taken to ensure their safety, support their development and uphold their rights.

A truly safe system requires more than isolated reforms. It requires national coordination, a coherent regulatory framework and a shared understanding that children's safety must be

the paramount consideration in every decision. The establishment of a National Early Childhood Commission is the critical reform that will make this possible. It will provide the leadership, data visibility, regulatory consistency and independent oversight currently missing.

As the *Rapid Child Safety Review* stated, “*A new, time-limited, Early Childhood Reform Commission should be established and tasked by the Commonwealth and state and territory governments to support the fundamental reset of the sector. The Commission should be supported by a parent advisory group, so that the people who know what children need most inform the direction of the whole system.*”¹¹

Victoria can lead the nation by pairing its own reforms - including an independent regulator, improved quality oversight, stronger safeguards and better workforce conditions - with a national approach that aligns supervision, data, regulation and workforce pathways across jurisdictions.

Families and educators are calling for a system that is worthy of their trust. They want transparency, consistency and confidence that every early learning service is held to the same high standard. They want a workforce that is valued, supported and equipped to keep children safe. They want a system where unsafe practices, poor-quality providers and repeat non-compliance are not tolerated.

With courage and commitment, Victoria can drive a transformation that will strengthen safety, elevate quality and rebuild public confidence. Our children’s earliest years shape their entire lives. They deserve a system that reflects the seriousness of that responsibility.

The Parenthood stands ready to work with the Victorian Government, the Commonwealth Government, educators, families and the sector to build the safe, high-quality, nationally consistent early childhood education and care children in Australia deserve.

¹¹ *Rapid Child Safety Review*, Weatherill, J. & White, P., 2025, page 5.