



Submission to the Inquiry into the Early Childhood Education and Care sector Victoria

November 2025



ECIA VIC/TAS acknowledges the traditional custodians of the lands and pays respect to elders past and present. We pay respects to Aboriginal and Torres Strait Islander children, their families, and we commit to creating a future where every child is valued, safe and an empowered member of their community.



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About us

Early Childhood Intervention Australia Victoria/Tasmania (ECIA VIC/TAS) welcomes the opportunity to provide input into the Inquiry into the Early Childhood Education and Care Sector in Victoria. We represent the Early Childhood Intervention Sector (ECI) with over 480 members supporting children 0-9 years with developmental delay, concerns or disability.

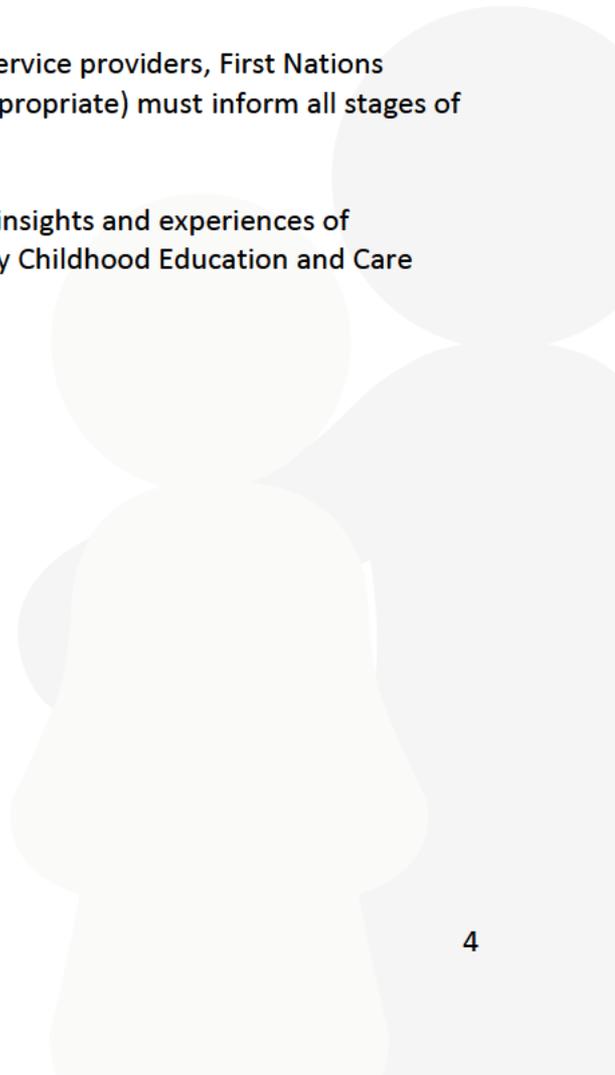
With a diverse membership drawn from Early Childhood Intervention, Early Childhood Education and Care, Pre-School Field Officers, students, and parents/carers/kin we advocate for equitable inclusion and participation in education, family and community life for all children.

ECIA VIC/TAS are members of the Australian Child and Family Supports Alliance (ACaFSA) and chair the Victorian Child and Family Supports Alliance (VCaFSA) working to support the design and implementation of Thriving Kids.

ECIA VIC/TAS are committed to an ecosystem of supports wrapping around a child and family, comprising education, health and disability portfolios. This ecosystem should be interconnected and aligned with evidence-informed practices, to deliver lifelong outcomes for children and families.

ECIA VIC/TAS strongly advocates that co-design with families, service providers, First Nations communities, CALD groups, and children themselves (where appropriate) must inform all stages of program design, implementation, and evaluation.

We are pleased to put forward this submission drawing on the insights and experiences of members currently working with children, families and the Early Childhood Education and Care (ECEC) sector.



Executive Summary

The time to act is now. We can no longer ignore what the data is telling us. Victorian children are struggling and suffering.

The data tells us:

- AECD¹ data shows more children are entering school with increasing levels of vulnerability
- Only half of children are on track, with a decrease between 2021 and 2024 from 54.8% to 52.9%.
- The levels of vulnerability are higher in disadvantaged communities
- Children living in rural and remote areas, First Nations children and those from CALD backgrounds are at a significantly higher risk.
- 7.4% of children aged 0–14 in Australia have a disability² (AIHW)
- 4% of children have a severe or profound disability
- Around 13–18% of children aged 0–5 experience developmental delay³(ARACY & early childhood prevalence modelling).
- Children with disability are twice as likely to experience developmental vulnerability (AEDC).
- Children with disability are more likely to experience restricted, delayed or denied enrolment in ECEC (documented in ARACY’s analysis of systemic inequality and PC 2024 submissions).
- Over 50% of parents of children with disability report that ECEC services “do not have the skills or capacity” to meet their child’s needs (ARACY & CYDA⁴ national survey).
- Around 40% of families in low-income, regional or remote areas have no access to high-quality ECEC (ARACY,⁵ PC 2024).
- In some rural areas, only 9% of services meet the National Quality Standard in educational program and practice.

¹ [2024 AEDC National Report](#)

² [Australia's children, Children with disability - Australian Institute of Health and Welfare](#)

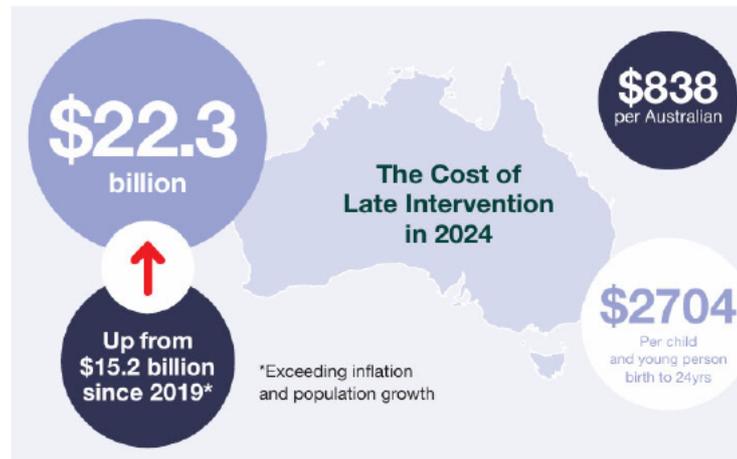
³ [UA-ARACY_SOAC25-Report_20251119-FINAL_LR.pdf](#)

⁴ [Disillusion and Delay: CYDA’s survey of the learning experiences of children and young people with disability in 2024 - CYDA](#)

⁵ [Inquiry Report - A path to universal early childhood education and care | Productivity Commission](#)



The Cost of Late Intervention⁶ report clearly demonstrates the financial cost associated by not stepping in, when children need intervention most, in their early years. There is both a moral and economic imperative for a review of the way we are educating and supporting Victoria’s children.



With a workforce that is increasingly less experienced and rapid turnover of staff, our children are at risk of not receiving the quality education programs they require with long lasting impacts into the future. The Early Childhood Intervention (ECI) sector has a long history of working collaboratively to build capacity and capability of teams within early childhood settings.

The Rapid Child Safety Review’s⁷ 22 recommendations identified key elements to strengthen the current system. With a focus on training, a move to national systems and increased regulatory oversight, these changes will support a quick response to the current challenges. However, a long term, well thought out plan is needed to ensure we move from a compliance only mindset to one of continuous improvement.

A disability perspective requires viewing inclusion not as an “additional” service, but as a universal design principle embedded across quality, workforce, governance and funding systems. This framing is consistent with the Productivity Commission (2024) universal access recommendations, the Victorian Rapid Review into Child Safety, the Disability Amendment Bills currently before Parliament, and the National Best Practice ECI Framework.

Victoria’s ECEC system plays a fundamental role in laying the foundation for children’s wellbeing, learning and lifelong outcomes. For children with disability, developmental delay, health complexities, or those that have experienced adverse life experiences and trauma, ECEC settings are often the first point of engagement with the broader education and health systems. The quality, safety and inclusiveness of these environments therefore is paramount to their early education experiences.

⁶ [The Cost of Late Intervention](#)

⁷ [Rapid Child Safety Review | vic.gov.au](#)



Current quality and safety standards

Across Victoria, the National Quality Framework (NQF)⁸ provides strong indicators of how quality service can be delivered. ECIA VIC/TAS members report that implementation can be uneven. Inclusion of children with disability or developmental delay can be highly variable despite requirements under Quality Areas 1, 3 and 6.

Children with developmental delay/disability are one of the most vulnerable cohorts when it comes to safety. Child voice can look very different for this cohort and often it is their behaviour that can be misinterpreted, when this is the only communication tool they have to convey harm or feeling unsafe.

Children with disability are not part of the priority cohorts, yet they are over-represented in the priority cohorts named noting 41% of children in out of home care have a disability. They are often the in the cohort participating in Early Start Kinder with significant levels of vulnerability

The current Kindergarten Inclusion Support program does not meet the needs of children it is serving. The hours allocated to a child do not always cover the child's hours of attendance. The backbone to maintaining child safety is the people working with the children and the teams supporting them. Without a united approach, a team will become fragmented, compromising safety and outcomes. Without consistent approaches to building the capacity of the workforce through sequenced professional learning, children will not receive high quality education and care. Cultural safety is inconsistently practised, particularly for Aboriginal children and families and rural and remote services face persistent workforce shortages that compromise both quality and safety. Stronger enforcement of anti-discrimination obligations is required, alongside proactive monitoring of exclusionary practices.

Victoria needs to develop a culture of speaking up for all children, especially those who are developmentally vulnerable.

Case study – quote from an Early Childhood Teacher in Victoria

An autistic child in my group has a strong interest in water play. His favourite place to play is in the toilet bowl water. His KIS worker is not funded to be there for all the hours he is there, we have an hour in the morning and afternoon when she is not there. When she is not there it is very hard to keep him out of the bathroom and occupied with other activities. One staff member has to be with him the whole time which compromises the safety of all the other children.

⁸ [National Quality Framework | ACECQA](#)



Recommendations:

- Strengthen practical inclusion standards and practices by removing restrictions on hours of attendance, or conditional access based on the availability of extra support
- Fully fund Kindergarten Inclusion Support programs
- Expand priority cohorts to include children with developmental delay and disability
- Provide KIS funding for all the hours the child attends
- Continue to embed cultural safety in all aspects of ECEC
- Enhance and increase monitoring of service where quality variability
- Support the sector to understand their responsibilities around mandatory reporting with practical hands-on training, not online modules
- Centralise functions to the social services regulator to create one body overseeing all aspects of safety for children
- Long term plans to improve child safety practices not just band aid solutions
- Nationalise the Working With Children Check scheme to provide employers with up to date information on educators whose checks have been revoked
- Centralise compliance functions under the social services regulator to provide oversight across all the sectors children interact with
- Working with Children Checks must better integrate considerations of disability-related safety risks, including mechanical restraints, seclusion, and restrictive practices
- Transparent governance frameworks



Educator training, professional development and qualifications.

Choosing to enter the ECEC sector is a commitment to life-long learning. In the same way we aim to inspire children to become lifelong learners, we must commit to this as well.

Beginning with tertiary education, a planned approach to learning post tertiary training is essential. At present in Victoria there are many ways to access professional learning, through structures such as School Readiness Funding and independently sourced based on interest and needs. Training on inclusion of children with developmental delay or disability, can be fragmented and rely more on interest than being part of an essential learning approach, with the thinking that you only complete this training if you have a child in your group with additional needs. This takes us back to a compliance approach rather than a continuous improvement approach.

In our conversations with educators, they frequently tell us they would feel more confident to try new strategies if they could, 'see' it first. Much of our adult learning relies on completion of an online module. Whilst these can be effective in providing some useful information, they do not provide opportunities to contextualise to individual settings or children.

Educators share with us the challenges to being off the floor in order to complete professional learning such as the inability to secure other educators to backfill.

Case study – Quotes from a think tank held with Pre School Field Officers in 2025

- We are just working with teachers on the basics, how to run a group or set up an environment, we don't get to proper coaching
- There is no time for reflection currently
- Educators are keen to complete training but struggle to get people to backfill so they can attend
- School Readiness Funding is not well understood and utilised
- Educators are wanting coaching rather than completing hours of online modules
- Can you just come and show me what the strategy looks, like then I will feel confident to give it a go
- There is no time for teams planning together and setting goals together



Recommendations:

- Guidance on sequenced professional learning for early career educators to assist them to build solid foundations upon which to build year on year
- Coaching to embed learnings over time from a coach who will have long term involvement rather than a few sessions or one off
- New and innovative ways to provide guaranteed release time to attend professional learning
- Investigate the uptake of SRF programs and identify which programs contribute to building the capacity of educators
- Create a tiered approach to SRF content, with essential courses for early career educators and extension offerings for the more experienced
- Embed disability inclusion, trauma-informed practice and Aboriginal cultural safety in all early childhood qualifications
- Require higher-quality practicum experiences
- Training at the tertiary level on trauma informed and neuro-affirming practice for all, such as the Berry Street model of education being embedded in Deakin University pre-service training from 2026
- Introduce an inclusion lead role in centres or clusters of centres responsible for embedding inclusive practices
- Core disability content covering developmental trajectories, inclusive pedagogies, communication supports, behaviour as communication, trauma, and universal design must be mandatory in qualifications.
- Victorian legislation and funding should support Inclusion Leads within every service, as recommended by the Productivity Commission report.



Impacts of Victoria's predominantly privatised ECEC system

Victoria's reliance on a privatised market leads to substantial inequities in accessibility, affordability and inclusion. Private, for-profit providers often lack incentives to enrol children with additional support needs. Market-driven placement decisions result in gatekeeping or informal exclusion, particularly for children with disability or developmental delay.

Historically, the not-for-profit and community-led providers have often shouldered the responsibility for training of students and early career educators. We believe all providers should have equal responsibility for training of students and early career professionals. Rural and regional families face limited choice, with private operators rarely establishing services in low-profit areas.

Not-for-profit and community-run services consistently show higher quality and stronger inclusion outcomes (PC 2024). Not-for-profit and public models show stronger inclusion outcomes because they reinvest in workforce, environments and multidisciplinary support.

Recommendations:

- Increase investment in public, community, Aboriginal Community Controlled and cooperative ECEC models
- Fully fund children accessing Kindergarten Inclusion Support hours
- Require transparency and public reporting of inclusion practices across all service types
- Implement all recommendations from the Rapid Review into Child Safety
- Encourage cross-sector partnerships to promote collaborative work across the two areas
- Reduce the siloed approach and promote collaboration and partnerships
- Incentives—or mandates—for private providers to educate and care for children with developmental delay and disability equitably
- Funding loadings must reflect the true cost of inclusive practice, not rely on ad hoc NDIS involvement.

Impact of workforce conditions

A workforce shortage is often cited as the biggest challenge to quality services and positive outcomes for children. This is one significant measure, it's partner is workforce retention. The high turnover of staff across all areas of the sector is impacting educational and wellbeing outcomes for children. Both need equal consideration and planning. The cycle of bargaining for parity within the education ecosystem continues to erode the perception of early childhood as a desirable career path. At ECIA VIC/TAS we hear often of burnout and dissolution as reasons for leaving the sector along with low wages and insecure employment. This high turnover is disrupting children's attachment and access to consistent care. Educators supporting children with disability often report unmanageable workloads and insufficient training. Burnout is significant, particularly in rural and disadvantaged communities.

In our conversations we have heard educators comment on:

- Increasing administration burden
- lack of planning time and time to collaborate with other professionals such as allied health professionals and community service workers
- the need for more professional learning to implement accommodations for children with additional needs
- Not enough time to implement new professional learning
- fatigue due to the ongoing reform agendas
- High stress when supporting children with complex needs without adequate training or staffing

Case study from a service leader.

We are struggling to get KIS workers for shorter hours when a child is not allocated the full amount of hours. They can go and get longer shifts funded by SRF or NDIS so are not prepared to work for shorter hours. Also, when they are sick there is no -one to cover for them or backfill so we have to just survive for the day. We put one educator inside and one outside and we just focus on safety of all the children, we aren't really teaching them much on those days.

Case study from a pedagogical leader

I was called into a room one afternoon as a child was very distressed and dysregulated. The teacher running the room was an early career professional and she froze. She didn't know what to do or how to respond to this child. I stepped in and offered co-regulation strategies to the child who slowly settled.

When I spoke with the teacher later in the day she spoke of feeling scared that she and others were going to be hurt. She said she didn't have enough training in how to support children when they are dysregulated or upset.

The leader reported she works across multiple centers and sees examples of educators without enough understanding of behaviour and how to implement strategies. A significant part of her work is coaching in this area, leaving little time for other areas of pedagogy.



Recommendations:

- Long term planning for workforce sustainability with specific planning for rural and remote areas where ECEC deserts exist
- Paid practicums and more scholarships to increase the number of students in courses
- Investment in ongoing professional development, supervision and mentoring in ways that allow educators time off the floor to participate
- Alignment all education award timing so they remain in sync whilst allowing flexibility to bargain for specific needs
- Time to embed reforms before moving onto the next change
- Nationalized systems such as WWCC and shared information for recruitment and employment.
- Pay parity with the school sector must be a disability inclusion strategy, not just an industrial reform.
- Expand funded inclusion support roles
- Embed reflective practice into all teams with opportunities to meet together as a team and plan together
- Incentivise rural workforce recruitment and retention.



Ratios

Current regulations allow ratios to be averaged across an entire service, masking unsafe room-level staffing. Toddlers and children with disability are disproportionately affected when individual rooms do not meet adequate staffing levels. This includes when Kindergarten Inclusion Support workers are employed at centres with no replacements when they are unwell and unable to work. In rural areas, “ratio waivers” or temporary staffing arrangements are sometimes used for extended periods, compromising safety and developmental support.

The roll out of Best Start Best Life reforms in 2026 with priority cohort children able to access increased hours in ECEC settings, provides an opportunity for a review of ratios and approaches to staffing. As we learn from the implementation of these changes, it will be essential to take an iterative approach and apply lessons learned quickly as the each tranche rolls out.

Case study from an educator

I have a child in my room that has KIS funding. When his KIS worker comes in, he has a great day and accesses so much of the program and we all have a great day. When she is sick, we can't get a replacement, so all we can do is keep him safe for the day. With ratios able to be under the roofline, I can't get anyone else into support him either.

Recommendations:

- Require room-level ratio compliance every day
- Lower the ratios to improve staffing levels, safety and developmental outcomes
- Increased monitoring of ratios
- Review of ratios where there are children with complex disabilities
- Lower ratios for rooms supporting children with disability or complex needs; and provide additional state funding for inclusion support workers that do not count towards the base ratio.
- Ratios must be room-based, with adjustments where children require additional support or where challenging environmental conditions exist.
- Smaller group sizes are evidence-based best practice for children with disability, yet the current system provides no mechanisms to enforce this.

Stewardship

This Inquiry presents an opportunity to review not just the current ECEC approach but more broadly the spaces where children live learn and play. A holistic approach is essential. Oversight of disability inclusion is scattered across multiple systems (ECEC, NDIS, child safety, and education), creating a siloed and fragmented approach to stewardship. Too often when issues are raised they are bounced between these systems or no-one is held accountable. There is limited capability and capacity within regulatory teams to identify and act upon discriminatory practices, until they become a child safety issue and a lack of targeted monitoring of outcomes for children with disability.

The announcement of Thriving Kids as the foundational support for children 0-9yrs provides a unique opportunity to rethink the current systems for children through collaboration across departments. Now is the time to create the ecosystem of supports that families are calling for. This means that education, health and disability departments must come together to design new ways of working with children. The Department of Education must work jointly with NDIS Commission and the new state disability safety mechanisms outlined in the current Disability Amendment Bills to keep children in ECEC settings safe, every day they attend.

The Productivity Commission recommended a national ECEC Commission should embed disability inclusion within all planning and regulatory functions. An increase of government funding to regulatory authorities and a centralized approach to quality improvement and compliance is needed.

Recommendations:

- Oversight should be strengthened to include routine monitoring of:
 - enrolment refusals
 - exclusionary practices
 - use of restrictive practices
 - access to reasonable adjustments
- Establish an Independent Early Childhood Education and Care Commission to oversee system planning, funding, quality, and national consistency
- Move towards a universal, rights-based ECEC system rather than a labour-market-driven subsidy model
- Universal access only works if barriers to participation (disability, transport, cultural safety, workforce availability, cost) are addressed
- Embed place-based planning to ensure Aboriginal communities and remote communities have services that are culturally safe, locally governed, and adequately funded
- Embedding disability-inclusion measures in quality and safety standards
- Investing in workforce capability and secure employment as core disability supports
- Ensuring oversight bodies monitor disability discrimination and enforce compliance
- Guaranteeing inclusion funding for all services, regardless of provider type.
- Strengthening collaboration between ECEC, NDIS, Thriving Kids Early Childhood Intervention, and child protection systems



- Establishing an accountability framework to track participation and outcomes of children with disability.
- A shift from the measuring of outputs to measuring developmental outcomes for children and family wellbeing is needed
- Independent oversight ensuring quality and accountability must occur, that aligns with current frameworks and strategies.
- Aligning with current frameworks and strategies including:
 - The Victorian Early Years Learning and Development Framework⁹
 - The Early Years Learning Framework¹⁰ and Early Years Strategy¹¹
 - Australia’s Disability Strategy 2021–2031¹²
 - National Autism Strategy 2025-2031¹³
 - Child Safe Standards and the ECEC Review of Child Safety¹⁴
 - The National Best Practice Framework for Early Childhood Intervention¹⁵.
 - National Children’s Mental Health and Wellbeing Strategy¹⁶
 - Safe and Supported: The National Framework for Protecting Australia’s Children 2021-2031¹⁷
 - National Agreement on Closing the Gap¹⁸
 - Marrung Aboriginal Education Plan¹⁹

⁹ [Victorian Early Years Learning and Development Framework \(VEYLDF\) | vic.gov.au](https://www.vic.gov.au/victorian-early-years-learning-and-development-framework-veyldf)

¹⁰ <https://www.acecqa.gov.au/sites/default/files/2023-01/EYLF-2022-V2.0.pdf>

¹¹ <https://www.dss.gov.au/system/files/resources/early-years-strategy-2024-2034.pdf>

¹² <https://www.disabilitygateway.gov.au/ads/strategy#toc-australia-s-disability-strategy-2021-2031>

¹³ <https://www.health.gov.au/resources/publications/national-autism-strategy-2025-2031>

¹⁴ <https://oia.pmc.gov.au/published-impact-analyses-and-reports/child-safety-review>

¹⁵ [National Best Practice Framework for Early Childhood Intervention | Australian Government Department of Health, Disability and Ageing](https://www.health.gov.au/resources/publications/national-best-practice-framework-for-early-childhood-intervention)

¹⁶ <https://www.mentalhealthcommission.gov.au/projects/childrens-strategy>

¹⁷ <https://www.snaicc.org.au/our-work/child-and-family-wellbeing/safe-supported/>

¹⁸ <https://www.closingthegap.gov.au/national-agreement>

¹⁹ [Marrung | vic.gov.au](https://www.marrung.vic.gov.au)