



**National
Survivors
Foundation**



Friday 28 November 2025

About National Survivors Foundation

National Survivors Foundation (NSF) is a national charity and Redress Support Service working with and on behalf of institutional and sexual abuse survivors, their families, carers and communities. Our case management and advocacy services provide wrap around support to individuals, assisting them to voice their concerns and sustaining them as they navigate justice, redress and recovery pathways. We also undertake systemic advocacy focused on prevention of future abuses and promoting methodology for improving the wellbeing and access to justice for survivors.

The work of NSF is informed by advocacy and support services provided throughout the Victorian Parliamentary Inquiry into the Handling of Child Abuse by Religious and other Non-Government Organisations (2012-2013); the Royal Commission into Institutional Responses to Child Sexual Abuse (2013-2017); the national support service input to the establishment of the National Redress Scheme (July 2018 ongoing); and the Joint Standing Committee on Implementation of the National Redress Scheme.

We also facilitate a community development forum called The Victorian Survivors' Collective that has been meeting for nearly two decades focused on strategic information and education sharing for survivors, their carers and support professionals such as advocates, therapeutic care, and law and justice representatives. Over the last 28 years, NSF has advocated for hundreds of clients, almost half of whom suffered their initial abuse within Victoria.



Introduction

Our submission focuses on strengthening child-safety in Early Childhood Education and Care (ECEC) through enhanced screening processes, stronger independent reporting mechanisms, and improved training for both educators and children in recognising predatory behaviours. These recommendations directly align with the Inquiry's Terms of Reference relating to safety standards, professional training and qualifications, and sector oversight.

Early childhood settings rely heavily on trust. Trust that the adults within these environments are safe, supported, and appropriately supervised. However, the current landscape of workforce shortages, high turnover, and increasing casualisation creates structural vulnerabilities that can be exploited.

Existing systems, including Working With Children Checks (WWCC), primarily prevent individuals with known risks or prior convictions from entering the sector. They do not prevent individuals who have exhibited concerning behaviour (but have not yet been formally sanctioned) from continuing to work with children. Additionally, complaints made by staff, parents, or other adults are often handled internally, giving rise to conflicts of interest and creating pathways for minimisation or concealment.

To address these gaps, we recommend a coordinated, national approach to screening, reporting, and education, supported by an independent body responsible for complaint handling, oversight, and sector-wide safety assurance.



Key Areas of Concern

1. Inadequate Screening Processes and the Need for a National Register

The current WWC Check system is limited by state boundaries and relies heavily on recorded offences, meaning that individuals who display concerning behaviour can resign, relocate or move between services without any formal record following them. This creates an environment where problematic conduct may remain undetected or unreported, placing children at risk.

To address this, we recommend establishing a National ECEC Safety Register that captures substantiated concerns, sanctions, and relevant employment outcomes across all jurisdictions. Such a register should apply not only to permanent staff but also to casual educators, volunteers, contractors and any external service providers who work within ECEC settings.

Alongside this, stronger monitoring systems are needed to ensure that all casual and volunteer workers have their individual contact with children accurately logged, allowing for full transparency, accountability and timely identification of risks.

2. Strengthening Identity Logging and Contact-Tracing

In many ECEC services, casual educators and volunteers often use shared logins, which undermines accountability and makes it difficult to investigate concerns when they arise.

To strengthen child-safety safeguards, every person entering an ECEC environment should be required to use an individualised and unique login, ensuring their presence, movements and interactions are traceable. Developing a national login system would further support consistent identity tracking across all Australian ECEC settings and reduce discrepancies between services. Services should also be required to maintain detailed records of each person's contact with children, including the time, duration and location of interactions, so that any future investigations can be thorough, timely and accurately reconstructed.



3. Mandatory Educator Training and Age-Appropriate Child Safety Education

Early childhood educators often do not receive adequate training to recognise grooming, boundary-testing or subtle predatory behaviours, and children themselves rarely receive structured learning that teaches them about bodies, boundaries or how to disclose unsafe experiences.

A mandatory national child-safety training requirement would ensure all ECEC educators can confidently identify grooming behaviours, respond safely to disclosures and utilise trauma-informed approaches that support children's wellbeing.

Complementing this, age-appropriate safety education should be embedded into early childhood programs so that children learn to distinguish safe from unsafe touch, understand who trusted adults are, and develop language that enables them to seek help. These measures should be supported by evidence-based resources, including trauma-informed training tools and child-friendly books or learning materials designed to promote personal safety in a developmentally appropriate way.

4. Independent Reporting, Oversight and Whistleblower Protections

ECEC services may minimise, internally manage or dismiss complaints due to reputational concerns or internal conflicts of interest, leaving both staff and children unprotected. Employees who raise concerns often face isolation, retaliation or professional risk, which discourages reporting and allows harmful behaviours to continue unchecked.

Establishing a fully independent ECEC Safety Authority would ensure that complaints, anonymous reports, whistleblower disclosures and cross-service corroboration of allegations are handled externally, transparently and without bias.

This should be supported by legally protected whistleblower pathways for all ECEC workers, frequent unannounced inspections, and publicly accessible reporting on safety-related breaches. Stronger penalties for repeated non-compliance (including licence suspension or closure) would reinforce accountability and help shift the sector toward a culture of prioritising child safety over organisational reputation.



5. Approach to CCTV in Childcare Settings

Although CCTV is sometimes introduced as a protective measure within ECEC settings, poorly governed systems, third-party access and misuse can create new child-safety vulnerabilities.

Where CCTV is used, it must be governed by strict access controls, robust privacy protections and clear prohibitions against misuse to ensure the technology does not introduce additional risks. Any third-party providers involved in CCTV installation or monitoring should be subject to the same WWC Checks, National Register requirements and regular audits as ECEC staff themselves.

There also needs to be strict regulatory provisions that govern how the CCTV is hosted to prevent data being accessed or breached by external parties and clear regulatory standards for how the CCTV data is stored, accessed, and the time period that the data is required to be retained on record.

Importantly, CCTV should never be viewed as a replacement for high-quality staffing, safe supervision practices or improved educator-to-child ratios. Surveillance may support safety, but it cannot replicate the protective value of well-trained, adequately supported educators who maintain attentive, relational supervision

Implementation Pathways

To ensure reforms are practical and achievable, we propose phased implementation:

Short-Term Priorities

- Introduce the National Register.
- Strengthen screening measures and identity-logging requirements for all staff.
- Issue guidance for centres on minimum reporting standards pending establishment of an independent body.

Medium-to-Long-Term Priorities

- Roll out national training modules for ECEC educators.
- Embed child-appropriate safety education across ECEC programs.



- Establish and adequately resource the independent reporting and oversight body.
- Consider structural improvements, including:
 - increased staffing
 - improved educator-to-child ratios
 - national login system rollout

Conclusion

Improving the safety and wellbeing of children in ECEC settings requires more than basic compliance with existing frameworks; it demands a system that identifies risks early, ensures accountability at every level, empowers educators to act with confidence, protects whistleblowers who raise concerns, and supports children to recognise and disclose unsafe behaviour.

By strengthening screening processes, enhancing training, establishing independent reporting mechanisms, and embedding robust governance structures, Victoria has the opportunity to lead national reform and create childcare environments that are safer, more transparent, and more resilient for all children.



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National Survivors Foundation

