



**NGAWEYAN  
MAAR-OO**  
Closing The Gap Partnership Forum

# Submission on the Early Childhood Education and Care Sector in Victoria

November 2025

**We proudly acknowledge Victoria’s Aboriginal communities and their rich culture and pay respect to their Elders past and present.**

**We acknowledge Aboriginal people as Australia’s First Peoples and as the Traditional Owners and custodians of the land and water on which we rely.**

**We recognise and value the ongoing contribution of Aboriginal people and communities to Victorian life and how this enriches us.**

**We embrace the spirit of reconciliation, working towards the equality of outcomes and ensuring an equal voice.**

To receive this publication in an accessible format, [email the secretariat <secretariat@ngaweeyanmaar-oo.org.au>](mailto:secretariat@ngaweeyanmaar-oo.org.au).

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In this document, ‘Aboriginal’ refers to both Aboriginal and Torres Strait Islander people. ‘Indigenous’ or ‘Koori/Koorie’ is retained when part of the title of a report, program or quotation.

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## Introduction

Early childhood is a critical part of a person's life, shaping their future and building their identities. However, in Victoria the mainstream early childhood education and care system does not consistently deliver safety, belonging or continuity for Aboriginal children and families. This submission highlights the distinctive features and needs of the Aboriginal early years sector in Victoria, including clarifying complex regulatory environments and brings together experience from Aboriginal communities and ACCO, practice evidence from Aboriginal early years services and outcome data, including the Australian Early Development Census (AEDC) and the Closing the Gap Dashboard to make several recommendations to this Inquiry.

The National Agreement on Closing the Gap (National Agreement) sets out four priority reform areas: Priority Reform 1, formal partnerships and shared decision-making; Priority Reform 2, building the Aboriginal community-controlled sector; Priority Reform 3, transforming mainstream government organisations; and Priority Reform 4, shared access to data and information. These priority reforms and their interconnectedness with achieving the targets in the National Agreement form the basis of the submission.

Early years systems have their roots in the structural dispossession and erasure of Aboriginal peoples' identities. Early years institutions were often used to separate children from their families, language, and culture, which still impacts trust and participation in these services. Victorian data indicates persistent developmental vulnerability at school entry and continued over-representation in child protection, so culture, stability and accountability must be built into how services are designed, funded and overseen. To recognise the systemic barriers faced by Aboriginal children, the Aboriginal early years sector should not focus on reactive support but must be designed as a system that connects and uplifts young people – positioned as early prevention and not as Out of home care or crisis pathways.

The message from Community is clear. Families want services that recognise them as first teachers, keep children connected to culture and Country, and above all, are safe. ACCO leadership must be embedded throughout the design and evaluation process. Cultural safety should be a universal expectation among providers, and information should be clear and publicly available so that families can compare services. Training and jobs require visible pathways with paid placements, recognition of prior learning and supports that fit community and place, and investment must be long-term and focused on capacity-building.

Together, these reforms deliver the National Agreement in a domain that sets life trajectories. They are practical, ready to implement, and direct public investment to what works for children, families, and communities, while supporting measurable progress against Closing the Gap targets.

### **About Closing the Gap and the National Agreement**

The National Agreement on Closing the Gap (National Agreement) was co-designed by the Coalition of Aboriginal and Torres Strait Islander Peak Organisations (Coalition of Peaks) and the Australian government and aims to enhance government collaboration with Aboriginal people. The signing of the National Agreement on 27 July 2020 by all Australian governments and the Coalition of Peaks further strengthened the commitment to a new way of working, to achieve what previous agreements could not.

The National Agreement is structured around four Priority Reform areas and 17 socio-economic outcome areas, with clear commitments to develop implementation plans, supported by a range of accountability and oversight measures for shared monitoring and implementation tracking.

### Priority Reform areas

The four Priority Reform areas are central to the achieving the systemic and structural transformation of how governments work with Aboriginal and Torres Strait Islander people. The four reforms are:

- Priority Reform 1      Formal partnerships and shared decision-making
- Priority Reform 2      Building the community-controlled sector
- Priority Reform 3      Transforming government organisations
- Priority Reform 4      Shared access to data and information at a regional level

### Outcomes and targets

The National Agreement on Closing the Gap has 19 socio-economic targets across 17 socio-economic outcome areas. The Productivity Commission reports on the progress against the targets to assist all parties (signatories) in monitoring and tracking efforts.

The outcome areas capture the desired result for Aboriginal and Torres Strait Islander people, whilst the targets are the specific goals that governments are publicly accountable for and are used to measure progress against the outcomes. Each target is also supported by a range of indicators that provide important contextual information or are considered drivers impacting progress against a target.

The outcome areas are as follows:

Outcome 1: Aboriginal and Torres Strait Islander people enjoy long and healthy lives.

Outcome 2: Aboriginal and Torres Strait Islander children are born healthy and strong.

Outcome 3: Aboriginal and Torres Strait Islander children are engaged in high-quality, culturally appropriate early childhood education in their early years.

Outcome 4: Aboriginal and Torres Strait Islander children thrive in their early years.

Outcome 5: Aboriginal and Torres Strait Islander students achieve their full learning potential.

Outcome 6: Aboriginal and Torres Strait Islander students reach their full potential through further education pathways.

Outcome 7: Aboriginal and Torres Strait Islander youth are engaged in employment or education.

Outcome 8: Strong economic participation and development of Aboriginal and Torres Strait Islander people and communities.

Outcome 9: Aboriginal and Torres Strait Islander people secure appropriate, affordable housing that is aligned with their priorities and need.

Outcome 10: Aboriginal and Torres Strait Islander people are not overrepresented in the criminal justice system.

Outcome 11: Aboriginal and Torres Strait Islander young people are not overrepresented in the criminal justice system.

Outcome 12: Aboriginal and Torres Strait Islander children are not overrepresented in the child protection system.

Outcome 13: Aboriginal and Torres Strait Islander families and households are safe

Outcome 14: Aboriginal and Torres Strait Islander people enjoy high levels of social and emotional wellbeing.

Outcome 15 – Aboriginal and Torres Strait Islander people maintain a distinctive cultural, spiritual, physical and economic relationship with their land and waters.

Outcome 16: Aboriginal and Torres Strait Islander cultures and languages are strong, supported and flourishing.

Outcome 17: Aboriginal and Torres Strait Islander people have access to information and services enabling participation in informed decision-making regarding their own lives.

### **About Ngaweeyan Maar-oo**

Ngaweeyan Maar-oo, meaning “Voice of and from the people” in Gunditjmara dialect, is the Victorian Government’s implementation partner and shared-decision-making body under the National Agreement on Closing the Gap.

We are also a member of the Coalition of Peaks, the recognised lead partner with the Commonwealth Government, comprised of over 80 Aboriginal and Torres Strait Islander community-controlled peak and member organisations across Australia, that represent over 800 individual organisations.

Our membership is made up of 13 Aboriginal Community-Controlled Organisation (ACCO) representatives and 9 Aboriginal Governance Forum delegates. The membership has extensive expertise, cultural knowledge and experience informed by their longstanding commitment to the Aboriginal community.

## Context

The early years system sits within a history where services and schooling were used to separate children from their families, language, and culture. Policies of removal and assimilation made many early years settings places of surveillance rather than safety for Aboriginal people, and that legacy still shapes how services are viewed and experienced today.

These system settings also intersect with other drivers of disadvantage. Housing instability and homelessness disrupt routines and attendance. Family violence fractures safety and makes continuity of care difficult. Poor physical and mental health, disability and the demands of caring require flexible supports that are not always available. Poverty constrains transport, food and digital access, and limits the time families can spend navigating services. When these pressures meet services that are not culturally safe, families are at higher risk of disengagement. Disengagement initially shows as lower participation and inconsistent attendance, which drastically impacts a child's development and life trajectory.

Victoria's own data reflects these pathways. Aboriginal children remain over-represented in child protection and are more likely to be developmentally vulnerable at school entry, pointing to service settings and systemic barriers rather than any deficit in families.<sup>1</sup> Progress toward early childhood development targets under Closing the Gap is slower than required in Victoria, reinforcing that current settings and funding structures are not yet delivering safety, belonging and continuity at scale<sup>2</sup>. Recent reforms have begun to address this but disparate arrangements across all levels of government increase funding insecurity, regulatory risk and governance issues at a structural level, impacting the feasibility and sustainability of Aboriginal early years services.

The insecurity experienced by the system amplifies these risks for children when responsibility is fragmented across government agencies and service delivery is subject to short-term funding arrangements. The roots of colonial policy still persist across services today, with little accountability for racism and cultural harm, and service models that fail to recognise family, language and identity as protective. Clear expectations for cultural safety, consistent oversight and ACCO leadership are needed so that wherever a child enrolls, culture and wellbeing are treated as core to quality and safety.

### Victorian Aboriginal Early Years Summit

In June 2024, the Victorian Aboriginal Early Years Summit was held on Dja Dja Wurrung Country, bringing together ACCO, mainstream services and government to set the strategic agenda for Aboriginal early years.

Participants described a system split across portfolios and levels of government, where short funding cycles, different rules and unclear decision rights take time away from families and pull support toward crisis rather than prevention. Families experience inconsistent cultural safety. Child Safe Standard 1 exists, yet application varies across settings; responses to racism and cultural harm are slow or invisible; and too much depends on individual champions rather than system settings. This

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<sup>1</sup> Australian Government Department of Education. (2024). *Australian Early Development Census: National report 2024*; Department of Education Victoria. (2024). *Early childhood education and care: Quality and regulation overview*.

<sup>2</sup> Productivity Commission. (2025). *Closing the Gap Dashboard (Victoria view; SETs and targets)*.

inconsistency drives disengagement and undermines trust. Across the two days, participants also progressed the development of key sector elements.

Workforce strain was a consistent theme. Services report churn and burnout that disrupt attachment and learning. Aboriginal staff carry cultural guidance, family obligations, Sorry Business and the labour of responding to racism, often without time or pay recognition, while thin career pathways and insecure funding make retention hard. Reporting and accountability rarely focus on what families say matters. Data shows compliance, not whether cultural safety risks are closed or whether teams are stable enough to provide continuity. Families cannot easily compare services on cultural safety, staff stability or complaints resolution in plain language. Language, identity and family are protective, yet they sit at the edges of program funding and are often treated as add-ons rather than core to quality and safety. Funding silos and program rules can also pit services against each other, when collaboration and ACCO leadership should be the default. Participants were clear that Treaty is essential as a structural reform but not a reason to wait. Children and families need services that are safe, stable and culturally strong now. Across the two days, participants also progressed the development of key sector elements, identifying eight components that are necessary to make up the ACCEYEDS.

The Summit located these barriers within the National Agreement on Closing the Gap. Priority Reform 1 (formal partnerships and shared decision-making) was identified as the mechanism to clarify roles, decision rights, and escalation pathways, with ACCO leadership embedded in design, delivery, and oversight. Priority Reform 2 (building the Aboriginal community-controlled sector) was emphasised as the way to sustain culture in daily practice through ACCO-led governance, workforce and training, not as a short-term project. Priority Reform 4 (shared access to data and accountability) was highlighted to ensure communities govern the data that affects them and that families can see clear signals about cultural safety, workforce stability and how complaints are resolved. These themes also mirror what families and services report: that transparent oversight, stable funding and practical workforce supports are prerequisites for safety and quality in early childhood settings.

Summit participants asked for immediate steps that sit within Victoria's control, examples include:

- Recognising and resourcing the Aboriginal Community-Controlled Early Years Education and Development Sector
- Consistent application and auditing of Child Safe Standard 1 for Aboriginal children
- Clearer provider accountability with time-bound improvement actions and public follow up
- Multi-year funding that recognises cultural load and enables paid learning time with backfill ACCO-led training pathways linked to local jobs
- Service-level information that families can compare in plain and clear language

These are practical changes that align with the National Agreement's Priority Reforms and can be implemented now, while Treaty processes progress. They set expectations that culture is foundational, not optional, and that public investment should be transparent, auditable and tied to outcomes that matter to children, families and community.

Privatised models prioritise profit over care. In a profit-driven market, costs keep climbing while subsidies often fail to reach families who need them most. Community and not-for-profit services reinvest in quality and stability, while for-profit organisations face pressure to reduce costs and maximise returns. Because early childhood education and care depend on people, those pressures affect staffing, leading to more turnover, casual roles and less time for training and cultural safety.

The broader care economy shows the same pattern. Market-first approaches rarely work where safety, trust and continuity are essential. In early childhood, this means that rapid growth has outpaced oversight, leaving gaps in auditing, complaint handling and accountability for racism or cultural harm. There is also limited transparency about ownership, profit margins and reinvestment, making it difficult to see whether public funding genuinely benefits families.

Stronger public stewardship is needed to balance market incentives with community outcomes. Victoria needs ACCO leadership, consistent expectations for Child Safe Standard 1, and reliable auditing so that culture, quality, and children's safety remain at the centre of the system. This submission's recommendations address the realities of this system and aim to ensure that Aboriginal kids in the early years sector receive the best possible care, and ample opportunities to grow and develop both personally and culturally.



### Summit Recommendations

1. Support and fund an Aboriginal-led working group under Ngaweeyan Maar-oo for monitoring and implementing recommendations, guided by a Terms of Reference.
2. Support ongoing and regular sector wide gatherings and summits to enable solidarity, collaboration, networking, and unity across the sector.
3. Recognise and resource the strong and interconnected key components that comprise the ACCEYEDS including:
  - a. Aboriginal-led: self-determination is respected and supported
  - b. Strengths-based and potential focused settings and approaches which include AEYS long day-cares and kindergartens.
  - c. Family-centred services and approaches
  - d. Identity Strengthening
  - e. Language learning and language revitalisation
  - f. Embedding Country, Culture, Community
  - g. Integrated health and wellbeing to support overall development and learning potential
  - h. Strong and supported Aboriginal workforce
4. Determine and commit to adequate resourcing to fund Bubup Wilam Aboriginal Child and Family Centre in its entirety, to test and pilot integrated funding approaches for the sector (as identified in recommendation 7).
5. The Victorian Aboriginal Community develop definitions of success and design new strengths-based targets for Aboriginal Early Years in Victoria to inform and direct governments.
6. Adequately resource Aboriginal Language Revitalisation to be embedded in AEYS as directed by the relevant local community.

### Summit Recommendations (continued)

7. Government funding for Aboriginal Early Years Education is flexible, fit-for-purpose, sustainable and ongoing. Specifically:

- a. Funding is re-directed from tertiary end, crisis driven systems and responses to upstream, preventative initiatives.
- b. Government departments (state and federal) generate targeted funding for AEYS to achieve improved outcomes for Aboriginal children and families in Victoria.

8. Government is held accountable to targets and measures of success designed by the Victorian Aboriginal Community (as identified in recommendation 5) through transparent reporting to Victorian Aboriginal communities and organisations.

9. Mainstream settings and services are held accountable for their ongoing commitment to ensuring safe and equitable access for Aboriginal Children and Families. Priority focus should include: Early Childhood Education Centres, Long Day Care, Kindergartens, Maternal Child Health settings.

10. Government transfers money, power and resources to Victorian Aboriginal Communities through the Victorian Treaty process.

RECOMMENDATION:

## **A total overhaul of the sector is needed to address the needs of communities across the state**

The early years sector as it currently stands is failing to keep up with community needs and expectations. For Aboriginal children, families and communities, there are significant shortcomings in the provision of culturally led, safe and wraparound early years support outside of services delivered by ACCOs. Any reforms must be done in formal partnership with ACCOs and be fit for purpose.

### **Adopt the recommendations of the Early Years Summit, including the establishment of an Aboriginal Community-Controlled Early Years Education and Development Sector**

A self-determined sector is critical for supporting the social, emotional and cultural health and wellbeing of Aboriginal children and young people. During the Early Years Summit, attendees identified the following essential components for a new Aboriginal-led sector:

- a. Aboriginal-led: self-determination is respected and supported
- b. Strengths-based and potential focused settings and approaches which include AEYS long day-cares and kindergartens.
- c. Family-centred services and approaches
- d. Identity Strengthening
- e. Language learning and language revitalisation
- f. Embedding Country, Culture, Community
- g. Integrated health and wellbeing to support overall development and learning potential
- h. Strong and supported Aboriginal workforce

These components are fundamental and interconnected, and necessary to establish a strong and self-determined ACCEYEDS. The Final Report of the Early Years Summit makes several clear recommendations, which should be adopted to address the critical needs of Aboriginal children and families. This Report has been endorsed by the Partnership Forum and efforts are being made to ensure that the recommendations are implemented through the next Closing the Gap Implementation Plan. However, there is a significant resourcing barrier to their implementation, and consequently,

This recommendation centralises Priority Reform one, shared decision making and Priority Reform two, building the ACCO sector in the early years space. It is aimed at prevention and belonging rather than reaction and remediation, with families recognised as the first teachers and as the constant in a child's life. When services strengthen families' confidence, cultural connection and access to support, children thrive.

The evidence of over-representation in out-of-home care indicates that current settings are not working for families, and that early experiences in services are shaping later contact with statutory systems<sup>34</sup>. Changing the approach to focus on Aboriginal leadership, family involvement, and building on strengths helps improve outcomes for children when they start school. This approach also makes children safer and supports important areas like participation in early learning and staying engaged in education over the long term. Victoria's own reporting shows the scale and direction of risk. Aboriginal children continue to be placed in care at many times the rate of non-Aboriginal children,<sup>5</sup> signalling that families are not experiencing services as safe, respectful or culturally strong. This pattern does not begin at the point of removal. It reflects earlier interactions where a deficit narrative shapes expectations and behaviour. When services treat a child or family as a problem to be managed, people disengage. Disengagement in the early years often manifests later as SEWB risk, contact with statutory systems, and removal. The link from narrative to outcome is not abstract. It is evident in participation and attendance, and in developmental vulnerability reported through early childhood and schooling measures.<sup>6</sup>

ACCEYEDS starts with family and provides a practical starting point, it is:

- Aboriginal-led
- Centred on family Identity and language
- Embeds Country, Culture, and Community in daily practice
- Integrates health and wellbeing to support learning
- Built on a strong Aboriginal workforce.

Recognising ACCEYEDS as a distinct sector clarifies roles alongside mainstream services and builds consistent, family-held pathways from pre-birth to childhood, so supports travel with the family rather than only with the service. Recognition must be matched by multi-year, flexible funding co-designed with ACCOs so that investment follows community priorities rather than program silos. Evaluation should prioritise community-defined measures of success alongside standard quality metrics. This locks in PR1 and PR2 and gives government and the sector a clear place to plan and grow early years responses that keep children connected to culture and community.

The evidence sits with Victoria. Over-representation in out-of-home care persists despite multiple rounds of mainstream reform.<sup>7</sup> Early development data show a pattern where Aboriginal children are more likely to be developmentally vulnerable on school entry measures.<sup>8</sup> Where Aboriginal-led models operate as designed, families report stronger belonging and continuity, and children's participation is more stable.<sup>9</sup> Formal recognition of ACCEYEDS, backed by funding and shared evaluation settings, makes those strengths the norm rather than the exception.

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<sup>3</sup> Victorian Government. (2024). Victorian Government Aboriginal Affairs Report 2024

<sup>4</sup> Productivity Commission. (2025). Closing the Gap Dashboard (Victoria view; SETs and targets)

<sup>5</sup> Victorian Government. (2024). Victorian Government Aboriginal Affairs Report 2024

<sup>6</sup> Australian Government Department of Education. (2024). Australian Early Development Census: National report 2024; Department of Education, Victoria. (2024). Australian Early Development Census 2024: Victoria summary report.

<sup>7</sup> Victorian Government. (2024). Victorian Government Aboriginal Affairs Report 2024; SNAICC - National Voice for our Children. (2024). Family Matters report 2024.

<sup>8</sup> Australian Government Department of Education. (2024). Australian Early Development Census: National report 2024

<sup>9</sup> Bubup Wilam Aboriginal Child and Family Centre Inc. (2024). Annual report and practice overview; SNAICC - National Voice for our Children. (2024). Family Matters report 2024.

This recommendation directly responds to the Inquiry's Terms of Reference. It sets a high standard focused on culture and community, and improving long-term outcomes for individuals and the wider

**Case Study:**

Bubup Wilam Aboriginal Child and Family Centre in Thomastown operates an Aboriginal-led, integrated early years model that centres identity, family and Country. It has been rated Exceeding the National Quality Standards, recognised nationally for excellence in education, and delivers a transition to school program that maintains an active partnership with families and local schools into the early primary years. Bubup Wilam also delivers cultural safety training and contributes to the development of the Aboriginal Child Safe Standards. These elements illustrate what ACCEYEDS looks like in practice and why formal recognition, and resourcing will scale what already works in Victoria.

community. The Committee should support recognising and funding ACCEYEDS as a key reform to enable a proud and sustainable community, which will help keep children safe and connected to their family and culture from the beginning.

## Building sustainable education and training pathways is critical to attract and retain a skilled workforce

This chapter addresses some of the main barriers and possible solutions to support education, training pathways and retention in the early years. There is however, a more comprehensive analysis and in-depth exploration of the context and broader barriers Aboriginal students face on their learning journey in Ngaweeyan Maar-oo's Inquiry into student pathways to in-demand industries submission.

For further reference, it is advised to review Ngaweeyan Maar-oo's response to student pathways alongside this submission.

### Better support and resource entry pathways and learner supports

There must be immediate investment in supporting pathways into the sector, especially for Aboriginal people in Aboriginal early years services. Enabling end-to-end support for Aboriginal students at all stages is pivotal to ensuring the early years sector has a sufficient supply of highly capable and motivated staff. The current picture is fragmented, entry requirements are complex, placements are often unpaid, and supports are uneven, with barriers falling hardest on Aboriginal learners and regional communities. When study competes with caring, work and cultural responsibilities, people step away, which shows up as workforce gaps, unstable staffing and reduced quality. Practical, end-to-end pathways and supports reduce drop-off, build confidence, and keep talent connected to the sector. Government must fund and resource these pathways and learner supports across the sector, collaborate with ACCOs, link schools to Certificate III, Diploma and degree programs, recognise prior learning and embed wraparounds to support completion of studies.

Pathways should be simple, supported, and culturally strong so families, schools, and services can see a clear line from interest to qualification to employment, with ACCOs shaping the design to fit culture, community, and place.

Paid placements, recognition of prior learning, and clear credit pathways are levers that lift completion and transition to work for priority cohorts, including Aboriginal learners.<sup>10</sup> Additionally, providing supports to learners to engage is critical. Whether it be laptops to access content, uniforms or special equipment, the cost outlay for people to enter training for these careers is expensive and a barrier. ACC-RTOs provide this support through their models, which are discussed in more detail in our submission to the *Inquiry into student pathways to in demand industries*. One of the three ACC-RTOs in Victoria, Bubup Wilam, specifically delivers the Certificate III and Diploma of Early Childhood Education and Care, to a significantly higher standard and completion rate than other organisations.

Furthermore, Best Start, Best Life identifies ongoing shortages across early childhood and the need to expand practical routes into Certificate III, Diploma and teaching qualifications,<sup>11</sup> and Australian Early Development Census (AEDC) results show persistent developmental vulnerability for Aboriginal children at school entry, which strengthens the case for a culturally strong workforce that provides

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<sup>10</sup> Ngaweeyan Maar-oo. (2025). Inquiry into student pathways to in-demand industries: Submission by Ngaweeyan Maar-oo

<sup>11</sup> Department of Education Victoria. (2023). Best Start, Best Life: Workforce strategy

continuity and belonging from the earliest years.<sup>12</sup> This is further reinforced by the Closing the Gap reporting for Victoria, which indicates slower progress than required against early childhood development targets, underscoring the need for pathways that lift participation, completion, and job outcomes.<sup>13</sup> Victorian workforce planning documents continue to flag shortages across educator and teacher roles, which well-designed pathways can directly address.<sup>14</sup>

Further professionalisation must not exclude the existing workforce; recognition of prior learning and structured transition supports should allow current educators to convert experience into credit, bridge gaps with targeted modules and remain in roles while they upgrade, with backfill funding enabling study in work time.

### **Develop minimum workforce standards for retention, progression and well-being**

Burnout and staff turnover undermine safety, trust and continuity for children and families. Stable teams are a safety strategy in themselves, and higher turnover correlates with poorer continuity of care and weaker learning outcomes, particularly for children.<sup>15</sup> Minimum workforce standards co-designed with ACCOs and tied to funding and licensing are a clear tool that can ensure Aboriginal staff feel supported and motivated in the workplace, enabling safety, trust and continuity for the children and families that they work with.

This recommendation addresses Priority Reform one, shared decision-making, and Priority Reform two, sector strengthening, and aligns with the Inquiry's Terms of Reference on quality, regulation, and safety. With pathways and delivery in place, clear minimum standards are required to ensure staff can maintain a high and stable service capability.

Cultural load is real work. This includes family obligations, cultural guidance, Sorry Business, and responding to racism and requires recognition in terms of time and pay. Where cultural load is invisible, staff absorb it informally and leave. Security and progression also matter; insecure funding and thin career ladders push experienced people out, whereas clear steps to coordination, pedagogy and leadership roles keep skills in the sector. Supervision and wellbeing supports, including cultural supervision, reflective practice and vicarious trauma supports, reduce churn and improve quality, but coverage is uneven.

Minimum workforce standards should therefore require:

- Role-specific cultural safety capability audited with ACCO leadership.
- Entitlements that recognise cultural load (paid cultural leave, Sorry Business and flexible observance) and funded time for cultural supervision and reflective practice.
- Paid learning time with backfill for mandatory training and upgrades.
- Minimum supervision coverage and access to vicarious trauma supports
- Sector career framework with clear steps to higher responsibility and pay.

These baselines help people stay in roles and shorten vacancy durations. Evidence from Victorian workforce materials and sector bodies links cultural leave, paid training time and supervision coverage

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<sup>12</sup> Department of Education Victoria. (2024). Early childhood education and care: Quality and regulation overview

<sup>13</sup> Productivity Commission. (2025). Closing the Gap Dashboard (Victoria view; SETs and targets)

<sup>14</sup> Department of Education Victoria. (2023). Best Start, Best Life: Workforce strategy

<sup>15</sup> Productivity Commission. (2025). Closing the Gap Dashboard (Victoria view; SETs and targets)

to higher retention in priority services.<sup>16</sup> Where qualification requirements are lifted, recognition of prior learning and structured transition supports should be mandatory, allowing current educators to convert their experience into credit, bridge gaps with targeted modules, and remain employed while they upgrade.

These minimums advance the Inquiry's goals on quality and equitable access by stabilising teams and making cultural safety visible in daily practice. Compliance should be signalled through public reporting on three quarterly indicators: annualised turnover, supervision coverage and the proportion of cultural safety improvement actions closed, so progress is visible.

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<sup>16</sup> Department of Education Victoria. (2023). Best Start, Best Life: Workforce strategy; Early Learning Association Australia. (2025). Addressing the skills shortage in early childhood education and care

## **Cultural safety is everyone's responsibility and must be embedded in non-Aboriginal institutions**

Cultural Safe Standard 1 (CSS1) aims to establish cultural safety for Aboriginal children as a baseline across early childhood services, rather than a discretionary extra. In practice, it is uneven, guidance is still too generic for early years settings, audit tools vary, and there is confusion between cultural awareness training and the broader organisational duties of cultural safety. Complaint pathways for racism are inconsistent, with limited feedback to families and weak visibility of whether actions are closed. Reform is needed to ensure CSS1 is genuinely implemented equitably across the sector. To achieve this, the government must fully implement Child Safe Standard 1 in ECEC through ACCO-led co-design and embed it in approvals, audits, and contracts across public, private, and not-for-profit services.

This recommendation is centred around Priority Reform one, shared decision-making, and Priority Reform three, transforming mainstream systems and services to reduce racism. Cultural safety is already a requirement in Victoria under Child Safe Standard 1. The current gap in early childhood is practical; guidance is not consistently tailored to ECEC settings, training is uneven, and complaint pathways are not always clear or accessible. Services report uncertainty about what constitutes acceptable evidence, leading to variable practice across provider types. Cultural safety must be defined and led by Aboriginal community, with ACCOs shaping what good practice looks like in daily routines, environments and family engagement.

The need is statewide, with approximately 65,500 Aboriginal and Torres Strait Islander people living in Victoria, with communities spread across Greater Melbourne, regional cities and many rural towns, a number that is increasing rapidly.<sup>17</sup> ACCO early years centres are concentrated in metro and selected regional hubs, so many families rely on local mainstream kindergartens and other early years services. With resource and funding constraints, ACCOs cannot scale up to meet demand. At the same time, kinder enrolment among eligible Aboriginal children is high, with many relying on government funded and private services, including those delivered by local government.<sup>18</sup> No matter which service a child goes to, cultural safety must be embedded consistently and across the board; from the curriculum, to staffing conduct and to the way services are delivered.

Services need short, practical tools co-designed by ACCOs, paired with local coaching, so teams can adapt practice respectfully. The regulator - Quality Assessment and Regulation Division (QARD) - should align approvals and audits with those materials and set time-bound improvement actions, developed with local ACCOs, for gaps identified. Professional learning should be ACCO-led, cover minimum standards alongside culture, history and social experience, and be funded with backfill so learning happens in work hours. Families and staff should have simple, safe ways to report racism, including anonymous routes, child-friendly signage and communications, and proportionate remedies that are explained and followed through. People who experience racism should be connected to appropriate social and emotional supports, including ACCO wellbeing services, without having to navigate complex pathways.

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<sup>17</sup> Australian Bureau of Statistics. (2022, July 1). Victoria: Aboriginal and Torres Strait Islander population summary. In Aboriginal and Torres Strait Islander people: Census, 2021

<sup>18</sup> Productivity Commission. (2025). Closing the Gap Dashboard (Victoria view; SETs and targets)

Implementation should be phased and supportive. Expectations are stated clearly in plain language, with room for local adaptation. Commissioning and contracts mirror the audit evidence, so providers know what is expected. QARD uses coaching and improvement notices first, with proportionate escalation where cultural safety requirements are repeatedly unmet. Partnerships with local ACCOs anchor practice change and provide families with a way to give ongoing feedback.

This recommendation responds directly to the Inquiry's Terms of Reference. It makes cultural safety visible, auditable and consistent in early childhood, led by ACCOs and experienced by families in everyday practice. The Committee should fully support implementing Child Safe Standard 1 in ECEC with ACCO leadership, embed expectations into approvals, audits, and contracts, fund ACCO-led professional learning and simple reporting, and ensure consistency across provider types so safety does not depend on where a family enrolls.



## The current system lacks adequate data sharing mechanisms to embed accountability

The current system is not sufficiently accountable to the public, government or families. Whilst centres have obligations under various legislation, true accountability on the quality and safety of services delivered relies heavily on service users and regulators identifying non-compliance. A shift towards proactive accountability is critical to ensure that incidents like those that have sparked this Inquiry are not the catalyst for reviewing, refreshing and regulating service providers.

### Develop an oversight framework to enable transparent and independent oversight

Current oversight is fragmented. Funding, regulation and quality sit across agencies at all levels of government with no single line of sight linking public money to outcomes for children. Families face different rules and unclear pathways for complaints and redress. Where racism or cultural harm is raised, responses are often slow or unseen. In a mixed market - with both private and public providers - this erodes confidence and leaves inequities unaddressed. The adoption of a single oversight framework that also embeds an independent assurance function, with clearly identified and defined roles across stakeholders that audits cultural safety and racism, sets time-bound improvement actions, and links findings to contracts and licences is a necessary step to ensure oversight is culturally safe and done efficiently and effectively.

This theme and recommendation give effect to Priority Reform one, formal partnerships and shared decision making, Priority Reform two building the community-controlled sector and Priority Reform four shared access to data and accountability, as well as respond to the Inquiry's Terms of Reference on regulation, oversight, the quality and safety of services, workforce capacity, funding arrangements and equitable access.

A single, coordinated framework would establish who is responsible, what is measured, and how findings lead to action across complaints, incident response, licensing conditions, and funding decisions. Independence matters. The assurance function should sit at arm's length from program delivery, with capacity to audit for cultural safety, investigate racism and require time-bound improvements with public follow up. Leadership from experts, including ACCOs, should be built into governance, audit design and decision making. Cultural safety must be defined with Community and tested in practice, not treated as an optional add-on. Clear links to provider contracts and licences ensure findings have consequences where standards are not met.

Evidence supports this approach. Child Safe Standard 1 requires organisations to be safe for Aboriginal children, but application is uneven without clear audit tools and consequences.<sup>19</sup> *Best Start, Best Life* identifies persistent workforce and quality pressures; a single oversight map with defined escalation points reduces duplication and shortens time to remedy.<sup>20</sup> Closing the Gap reporting shows Victoria must accelerate outcomes for Aboriginal children to ensure targets are achieved by 2031.<sup>21</sup> Independent assurance with ACCO leadership is a lever within government control.

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<sup>19</sup> Commission for Children and Young People (Victoria). (2022). Child Safe Standards: Meeting the needs of Aboriginal children and young people (Standard 1)

<sup>20</sup> Department of Education Victoria. (2023). Best Start, Best Life: Workforce strategy

<sup>21</sup> Productivity Commission. (2025). Closing the Gap Dashboard (Victoria view; SETs and targets)

This approach complements practice change rather than duplicating it. Chapter 2 sets the supports that improve day-to-day practice. This Chapter ensures that oversight is consistent, independent and able to compel change when risk is identified. Practical examples include ACCO-led cultural safety audits attached to QARD assessments, CCYP oversight of racism complaints with time-bound actions, and government contracts that trigger licence conditions where improvement actions are not closed on time. A whole-of-government protocol could set standard steps and timeframes for cultural safety incidents, including immediate safety measures, notification pathways, investigation milestones and public reporting at closure. This mirrors the approach taken for other Child Safe Standards while recognising the specific requirements of Standard 1 for Aboriginal children and young people.

### **Provide accessible data to families to support informed decision-making**

Families need information they can trust to choose safe and culturally strong services, including clear signals that cultural safety risks are identified and resolved in a timely way. Current reporting focuses on administrative compliance and overall quality ratings but does not make visible the signals that matter for safety, stability and culture. Large private operators receive significant public funding, yet there is limited visibility on how money is used and whether it improves outcomes. Without clear data, the system cannot course correct and families cannot exercise informed choice. Mandating public, comparable service metrics and provider disclosure under Aboriginal data governance and publishing open datasets so that funding and outcomes are transparent and comparable, will enable families to make informed decisions about where they send their children.

Data rights make accountability practical. Public, plain-language service profiles should display comparable metrics on cultural safety, workforce stability and action on complaints alongside existing National Quality Standard (NQS) ratings. The Productivity Commission's Closing the Gap Dashboard highlights the importance of workforce stability, capability and culturally safe practice for achieving early childhood targets.<sup>22</sup> To make this practical in Victoria, three workforce indicators should be reported quarterly: annualised turnover, supervision coverage and the proportion of cultural safety improvement actions closed. Providers that receive public funding should disclose ownership structures, related party payments and the share of funding reinvested in quality. Where public money flows to large providers, disclosure is needed to link funding to outcomes and address related party risks.<sup>23</sup> Data on provider performance must be published open, accessible formats. It enables planning and research, links funding to outcomes, reduces opacity and supports continuous improvement. This aligns with Victoria's quality and regulation materials and can be added through standard templates in contracts and licensing<sup>24</sup>.

A practical example is a one-page profile for every funded service that shows the comparable indicators alongside NQS ratings, fees and vacancies. Profiles should be accessible in the same place families already look for information about services and should use plain language and consistent definitions, so comparisons are fair. Families should be able to see whether cultural safety actions are being closed, whether staff stability is improving, and how complaints are resolved. Government should be able to see patterns across regions and providers to target support and enforcement, highlight where improvement actions remain open and identify where additional support or intervention is required.

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<sup>22</sup> Productivity Commission. (2025). Closing the Gap Dashboard

<sup>23</sup> SNAICC - National Voice for our Children. (2024). Family Matters report 2024

<sup>24</sup> Department of Education Victoria. (2024). Early childhood education and care: Quality and regulation overview

## Conclusion

The events that have led to this Inquiry are catastrophic. The safety of children and young people must be paramount in any reform to ensure that these events do not repeat. This submission, whilst prepared through the lens of Closing the Gap, makes recommendations that can be applied to all centres, and all children.

For Aboriginal children and their families, early childhood services have long been causes of institutional harm and abuse. Any recommendations made from this Inquiry, and subsequent policy changes and reforms must acknowledge and address this reality. In doing so, there must be strengthening of ACCOs delivering these services and support to implement the recommendations of the Early Years Summit, to ensure that Aboriginal children are reaching their full potential.



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