

**Submission  
No 24**

## **INQUIRY INTO THE EARLY CHILDHOOD EDUCATION AND CARE SECTOR IN VICTORIA**

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**Submission Text:** Thank you for the opportunity to contribute to this Inquiry. I am making this submission as a Victorian parent with lived experience of significant shortcomings in the way childcare centres and their software vendors manage, protect, retain, and delete children's personal information.

In Victoria, over 400,000 children attend early childhood education and care services each year. Almost all of these services now rely on third-party digital platforms to manage enrolments, attendance, documentation, photos, observations, health records and communications with families. These platforms hold large volumes of sensitive personal and biometric information about children, often including images, videos, developmental notes, identity documents, legal documents, medical details and family data.

When families leave a service, this data can remain indefinitely, even when parents request its removal. Worryingly, my family has experienced many of these documents (including photos, incident reports and identity documents) sitting behind publicly accessible, unsecured web URLs.

Equally concerning is that, while centres request parents' consent for photography, some software vendors openly claim that photos are taken and uploaded to their platforms, regardless of whether families opt in or out. When parents opt out, the only action taken is that name tags aren't applied to the photos, and those photos do not appear in the family's feed. But the photos are still stored, and other families may still see images of children whose parents did not provide consent.

When requesting data removal, vendors often refuse to delete information, claiming only the centre can approve such requests. Centres, in turn, often do not respond, fail to appreciate the gravity of the request, or struggle to assign it appropriate priority. This leaves parents with no practical or enforceable way to have their child's data withdrawn, deleted, or minimised.

Our family's experience highlights a systemic governance gap that falls directly under several of the Committee's Terms of Reference:

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

Current safety standards do not adequately account for digital child safety, data minimisation, data protection, secure deletion, or the risks associated with long-term retention of sensitive information on private platforms.

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

There needs to be more departmental oversight of how childcare centres and software vendors manage children's data. No standards, audits or enforcement mechanisms exist to ensure safe data handling, storage, retention or deletion.

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

Data security is an urgent and, in my view, overlooked child-safety compliance gap. While physical safety is rightly emphasised today, digital child safety is equally critical. Current regulations do not require vendors to delete data, do not protect families when they withdraw consent, and do not ensure that images or documents are removed when children leave a service.

(c) The impacts of Victoria's predominantly privatised ECEC system

The ubiquity and dominance of commercial software platforms create strong incentives to retain data for as long as possible, with little transparency or accountability. Parents cannot meaningfully opt out without jeopardising their child's enrolment or access to information.

My family remains deeply concerned about the way our child's data is being managed by centres and their software vendor(s). We expect that our experience reflects a wider problem affecting thousands of Victorian families whose information is stored on these platforms.

I urge the Committee to consider our experiences with childcare management software and to examine ways to better govern, protect, and subject children's digital information to stronger oversight and enforceable deletion rights.