

# Victorian Government Inquiry into Early Childhood Education and Care Sector in Victoria

MAV Submission November 2025





No one understands the challenges and opportunities facing Victoria in the 21st century better than local councils. From rapidly evolving technology to social changes, shifting economies to environmental pressures, our local communities and the governments that represent them—are at the forefront of multiple transformations happening simultaneously.

As the peak body for the Victorian local government sector, the Municipal Association of Victoria (MAV) offers councils a one-stop shop of services and support to help them serve their communities.

#### **ACKNOWLEDGEMENT OF COUNTRY**

We acknowledge the traditional custodians of the land on which we live. We recognise their continuing connection to land, waters and culture and pay our respects to their Elders past, present and emerging.

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# Executive Summary

Every child in Australia deserves to be safe, and all children attending education and care services must have the safeguards necessary to protect them. Local government in Victoria has a long and proud history of supporting children and families and plays a pivotal role in safeguarding their wellbeing.

As the level of government closest to communities, councils are key stewards of child safety and early years development. They plan for, enable access to, and often deliver essential services, helping families navigate the early childhood system and fostering child-friendly, supportive environments. While state and federal governments set policy directions, contribute funding, and drive systemic reforms, collaboration across all levels of government is crucial to ensuring children's safety and wellbeing. A coordinated approach, including strong regulation under the National Quality Framework (NQF), is essential to supporting children's growth, development, and protection.

At the heart of this submission is a shared commitment to protecting children not only within education and care settings but as valued members of our communities. Within the sector, there is a strong and genuine commitment to providing high-quality and safe care; however, any risk to children's safety is unacceptable and must be addressed through a combination of regulatory and non-regulatory measures.

In responding to the *Inquiry into the Early Childhood Education and Care Sector in Victoria*, the Municipal Association of Victoria (MAV) makes several recommendations to strengthen child safety, accessibility, affordability, and quality across the sector. Councils already invest significantly in supporting access to and delivery of early childhood education and care, ensuring good outcomes for children and families. The MAV is clear that adequate funding must accompany any reforms arising from this Inquiry to support implementation and sustain quality services.

## Summary of Recommendations

Our recommendations focus on strengthening the safety, quality, and sustainability of Victoria's early childhood education and care system. Specifically, we recommend:

- Completing the implementation of recommendations from the Rapid Child Safety Review and establishing an independent regulator and workforce register to strengthen quality and safety standards.
- Embedding child safeguarding principles in all training and qualifications, including mandatory Working with Children Checks before pre-service study.
- Strengthening provider responsibilities for recruitment, reporting, workforce record-keeping, and supervision, supported by clear infrastructure design and the "Four Eyes on Children" approach.
- Addressing systemic challenges in a predominantly privatised system by improving workforce conditions, staffing ratios, and sustainable funding for local government workforce plans and enterprise agreements.
- Enhancing regulatory powers, introducing a National Code of Conduct, and ensuring consistent national approaches to workforce registration and information sharing.
- Supporting community-based child safeguarding initiatives through parent empowerment and dedicated child safety positions within councils.
- That feedback from councils is that CCTV should not be installed inside the rooms of early childhood services. Instead, CCTV should be strategically positioned to deter crime or observe who enters and exits the building.

Together, these recommendations reflect our commitment to ensuring all Victorian children can access safe, high-quality early childhood education and care. They emphasise the importance of strong regulation, effective workforce practices, and community-led safeguarding while supporting continuous improvement across the sector.

To achieve these outcomes, adequate funding must be provided to support any implementation costs arising from this Inquiry.

By acting on these recommendations, we can strengthen the stewardship role of local government, empower families, and build an early years system that is accessible, equitable, and responsive to every child's needs.

# Introduction

In Victoria local government plays a vital role in building strong, equitable and connected communities. Councils are deeply trusted public institutions that understand local needs and work closely with families to ensure every child has the best possible start in life. Through their place-based leadership, councils help shape communities where children can learn, grow and thrive.

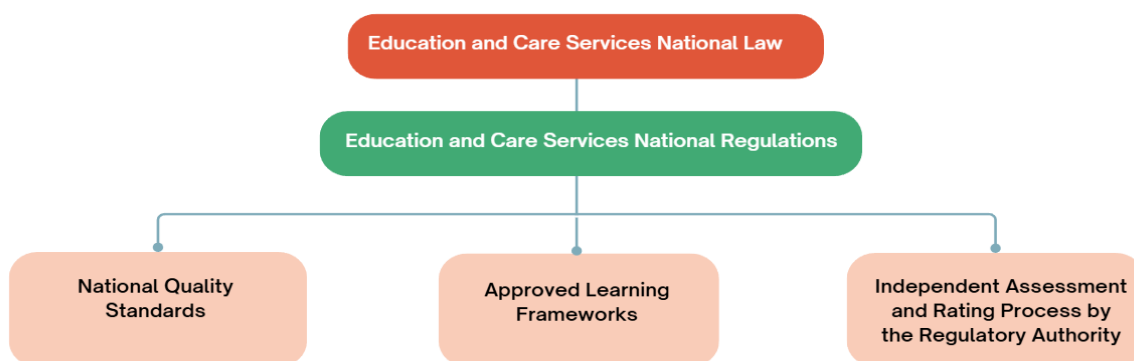
The Municipal Association of Victoria (MAV) is the peak representative and advocacy body for Victoria's 79 councils. Formed in 1879, and formally recognised under the *Municipal Association Act 1907*, the MAV is the official voice of local government in Victoria. Today, the MAV continues to drive a strong and strategically positioned local government sector, representing council interests, strengthening their capacity, facilitating collaboration, and providing essential support, advice and insurance services.

A strong, place-based education and care system is essential for Australia's future. Local governments are integral to this system, ensuring that early childhood education and care (ECEC) services remain accessible, affordable and of the highest quality, particularly in rural, remote and growth areas where private or community providers may not operate. Councils' deep local knowledge and community connections enable them to design and deliver services that respond to the needs of families and support workforce participation.

Almost two-thirds of Victorian councils (50 councils / 63%) deliver one or more ECEC services regulated under the National Quality Framework (NQF) with the other 29 councils participating in a stewardship capacity. Many rural councils are the primary provider in their municipality.

According to the Australian Children's Education and Care Quality Authority (ACECQA), an estimate is that not for profit and local government-managed services are the highest rated for quality, with 40 per cent rated as *Exceeding* compared with 11 per cent of private-for-profit services<sup>1</sup>. This demonstrates that councils not only provide accessible and affordable services but also deliver high-quality outcomes for children across the state.

**Figure: The Current National Quality Framework**



<sup>1</sup> ACECQA Q2 Snapshot 2025 <https://www.acecqa.gov.au/sites/default/files/2025-08/NQFSnapshotQ22025.pdf>

# Response to Terms of Reference

This section presents the MAV's response to the Inquiry's Terms of Reference. It draws on councils' deep experience in early childhood service delivery and oversight to identify the key reforms needed to improve safety, quality and trust across the ECEC sector.

## Adequacy of current quality and safety standards across all ECEC service types

### The challenge of striking a balance to ensure child safety

Recent alleged breaches in quality and safety standards rightly call their adequacy into question. Yet, as with any regulatory system, it is not the standards themselves but the vigilance with which they are implemented, monitored, and enforced that determines their effectiveness. The failure to protect children in some instances shows that we must do better, beginning with a thorough review of how existing frameworks are applied in practice.

While the National Quality Framework (NQF) provides a solid foundation, it is not sufficient on its own. The system must evolve to address contemporary and emerging risks, including those arising from new technologies, and to embed a consistent, organisation-wide culture that places child safety above all else.

The ECEC system has grown increasingly complex, with layers of legislation, regulation, and reporting obligations at both state and federal levels. These have strengthened requirements over time but also risk creating confusion or inconsistency in implementation. Unless standards are clearly understood and rigorously applied by approved providers, service leaders and educators, they may reduce, but cannot eliminate, the risk to children.

The MAV acknowledges and supports the Victorian Government's response to the [Rapid Child Safety Review](#), including the establishment of an independent regulator. We recommend that this work be completed in full, and that once implemented, the Victorian Government undertake a comprehensive to identify any remaining gaps in the application and enforcement of child safety standards.

## 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.

### Working with Children Checks

Working with Children Checks (WWCCs) are often viewed as a safeguard against harm, yet many reviews have highlighted the danger of over-reliance on them as a sole indicator of child safety. A WWCC can only be effective as part of a broader, end-to-end employment and screening process. Approved providers must implement complementary and robust measures for recruitment, supervision, and continuous monitoring to genuinely uphold child safety.

### From The Conversation: Working with Children Checks

'In Victoria, it involves a simple application and proof of identity. There is no cost if it is for a voluntary position (for example, coaching your child's soccer team) and a small fee if you are doing it as paid work (for example, as an early childhood educator or school teacher).

It will then look at:

- your criminal record in all Australian states and territories, including any charges, regardless of the outcome
- your professional conduct as determined by groups such as the state's institute of teaching
- whether you're required to report under sex offender legislation.

#### **But does it work?**

Regulation of the working with children check system is poor. Once you get your card, it lasts five years. There are no interim measures to check whether an offence has emerged in the meantime. So people can fly under the radar.

There is also a high threshold for issues to come to the surface. It might be possible for someone to have complaints made against them, that don't reach the level of charges laid. These would not necessarily show up in a police check.

Source: <https://theconversation.com/what-are-working-with-children-checks-why-arent-they-keeping-kids-safe-at-daycare-260209>

In Victoria all employees with direct contact with children in funded kindergarten programs are required to be registered on the Early Childhood Workforce Register. At the national level ACECQA in partnership with states and territories is developing a national workforce register to improve visibility of the early childhood workforce and strengthen child safety. It is intended to become a national system that can be linked to existing state-based registers, including Victoria's providing a consistent and comprehensive approach to workforce oversight. The MAV strongly supports this initiative and continues to contribute through state and national consultations.

### **Quality and Oversight of educator training, professional development and qualifications**

Feedback from our members over many years highlights concerns about the readiness of educators upon completing their qualifications. Many new graduates require additional support and training from councils to meet the standards needed for effective practice in early childhood education and care, reflecting ongoing gaps in pre-service preparation and workforce readiness. Councils continue to make additional investment in their staff and in place-based workforce development strategies. The following are some examples of the work councils are doing.

### **Small rural shire councils**

#### **Enhancing Early Career Retention through Connection, Collaboration, and Communication.**

This program responds to educator wellbeing and provides strategies to manage the administrative burden and emotional fatigue often experienced by beginning educators. The program includes personal and professional development through collaborative conversations with an intentional focus on team connections.

#### **Small rural shire Council**

Council engaged a local not-for-profit service to provide up to 35 teachers and educators across the LGA access to short courses (through Federation University) covering mental health and wellbeing, adaptability, teamwork, career development and leadership. Will support retention of teachers and educators at Ararat and District services.

#### **Regional council**

Council launched an onboarding and career-development program across 25 services, supported by mentoring partnerships. Early-career teachers and educators will benefit from regular professional development workshops, peer collaboration, observation and feedback sessions, and wellbeing support.

#### **Regional council**

Council strategy developed to recognise the importance of developing and retaining newly emerged educators and teachers who have been in the sector less than 5 years by using a clinical supervision model.

It should also be noted that at the national level a review being undertaken by HumanAbility will inform the [Early Childhood Education and Care Qualification Review](#), examining the Certificate III and Diploma to improve training products, processes and outcomes. Further it needs to be acknowledged that the Department of Education has also invested a range of programs to support the workforce.

### **Impacts of privatised ECEC system including a comparison with public, not-for-profit and cooperative models in terms of accessibility, affordability, safety and outcomes**

Local government early childhood services consistently outperform for-profit services, with an estimated 40% of not for profit and council-run services rated as Exceeding, compared to just 11% of for-profit services. MAV has long argued that council-run ECEC services are not only higher quality but also more affordable, accessible, safer, and more trusted by families.

While direct fee comparisons are complex, council services generally reinvest any surplus back into the service and community, whereas for-profit services may charge higher fees to generate profit. Across different service types, council-owned, not-for-profit, and community owned services tend to charge lower fees, while for-profit providers often charge more.

The 2023 ACCC Childcare Inquiry Report shows that across all geographic and socio-economic areas, for-profit centre-based service providers generally charge higher average hourly fees than not-for-profits, with larger centres charging more than small to medium centres. Fee difference by quality rating are small in centre-based care and minimal in family day care or outside hours school care.<sup>2</sup>

Since 2023, the Victorian Government has made kindergarten free, meaning all council-run stand-alone or sessional kindergarten services no longer charge families fees. Council-run long day care fees are generally lower than for-profit alternatives. Councils are at the forefront of child safeguarding, and their ECEC services are highly regarded and sought after, with strong community trust sometimes leading to demand exceeding supply.

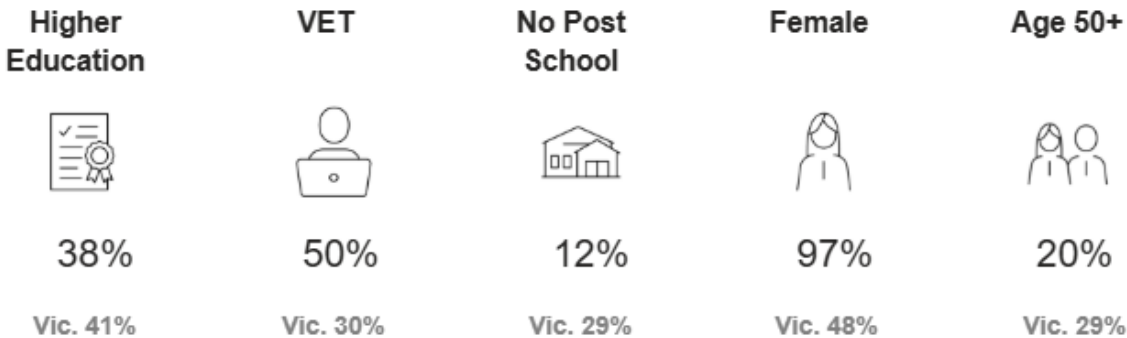
### Impact of Workforce conditions on educator wellbeing, retention and service quality

The MAV and councils recognise the importance of providing supportive and professional working environments for their ECEC workforce. Currently, the MAV is the bargaining representative for a replacement agreement to the Early Educators Employees Agreement (EEEA). This is a major workforce attraction and retention strategy as it aims to improve the pay and conditions of council employees working in the ECEC sector.

In 2024, 58 councils completed Workforce Plans for their municipality which were submitted to the Department of Education with 21 other councils not taking up the option. However, no additional funding has been provided to support the implementation and delivery of these place-based strategies, representing a missed opportunity. The MAV strongly recommends that the Department of Education provide adequate resourcing to enable councils to implement their workforce plans and support the objectives of the Best Start Best Life reforms.

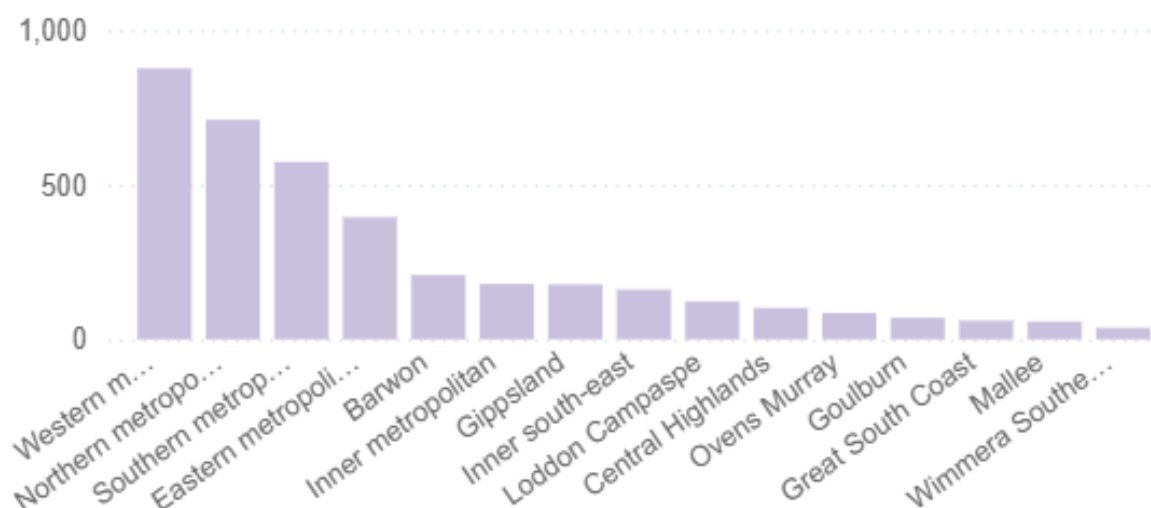
The workforce data below highlights emerging challenges that require proactive planning. For example, 20% of the current workforce is over 50, indicating that retention strategies and succession planning must be prioritised to manage the transition of experienced educators as they retire.

#### Child carers profile



<sup>2</sup> [https://www.accc.gov.au/system/files/childcare-inquiry-final%20report-december-2023\\_0.pdf](https://www.accc.gov.au/system/files/childcare-inquiry-final%20report-december-2023_0.pdf)

## New workers expected by region



By region (Melbourne)	New workers expected
Western metropolitan	877
Southern metropolitan	574
Northern metropolitan	710
Eastern metropolitan	395
Inner metropolitan	179
<b>Total</b>	<b>2,735</b>

Source: Victorian Skills Authority

## Adequacy of staff-to-child ratio regulations, including ratios being averaged across entire services rather than applied per room

### What is the “under the roof” ratio rule

In broad terms, the phrase “under the roof” is used in the sector to describe a way of calculating educator-to-child ratios across the *whole service* (i.e. the entire centre) rather than by each individual room or group. According to ACECQA, the relevant regulation (Regulation 122) says an educator must be *working directly with children* to be counted towards the ratio. The term “under the roof” is **not** explicitly defined in the national law or regulations. The rationale for allowing ratios to be calculated across the service (rather than per room) is flexibility so that providers can allocate educators across age-groups or rooms in response to children’s needs.<sup>3</sup>

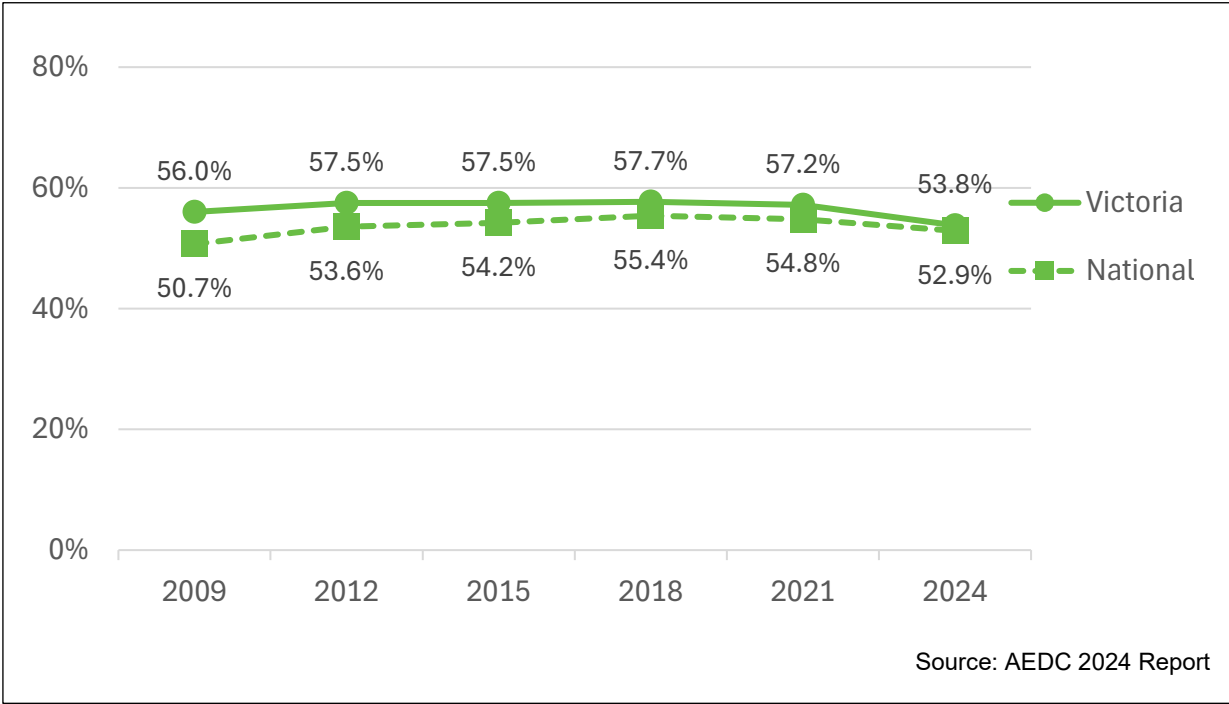
<sup>3</sup> <https://www.abc.net.au/news/2024-03-06/under-the-roof-loophole-childcare-centres-called-out>

This approach does not remove the need for adequate supervision to be the primary focus and the protection from harm and hazard must always be maintained. However, there has been much recent commentary around how some services apply this concept. The NQF specifies legal minimums for ratios and requires that services use their own experience, judgement and discretion to determine if the ratios are adequate for the specific groups of children, which may require increasing the number of educators beyond the minimum.<sup>4</sup>

Our councils report they may staff above ratio due to the complexity of the cohort attending kindergarten. A number of growth councils can in some groups at their services have up to 40% of children participating requiring additional support due to vulnerability, being from a priority cohort or presenting with complex behaviours that require additional support. Staffing above ratio and/or adopting a team-teaching approach means councils are effectively filling funding gaps to support quality education and care for children.

Since these ratios were set back in 2012, there are many factors now at play that may point to them no longer being adequate. For example, COVID-19 greatly impacted children; the Department of Education Best Start Best Life reform now sees 70,000+ 3 yr old children in kindergarten settings; and more children from priority cohorts that may experience vulnerability are attending kindergarten. Additionally, there has been a significant increase since 2019 in children entering school with one or more developmental delays. This is evidenced by the AEDC<sup>5</sup> which should sound alarm bells across the ECEC and broader education setting. In the three years since 2021 more children are in ECEC than ever, yet developmental outcomes have declined over that time.

**Figure: Summary indicators – On track in all 5 Domains**



<sup>4</sup> <https://idfm.org.au/uploads/main/idfm/IDFM-Resources/The-ISP-Guidelines-Series-No-1-Educator-to-Child-Ratios-Supervision.pdf>

<sup>5</sup> <https://www.vic.gov.au/australian-early-development-census-victoria>

Considering the recent challenges identified in ECEC services, both the Victorian and Commonwealth governments have identified review work on child to staff ratios. The MAV recommends that this work is seen through to completion and that State and Federal government engage with local government to ensure the best possible approach is adopted.

For example, the Victorian Government response to the Rapid Review highlights instead of only service-level calculations (“whole service”), enforce that each room/group meets ratio requirements according to the age group present, rather than relying on cross-room pooling of educators. The “roofline” rule is currently under review.<sup>6</sup>

At the Commonwealth level, improvements could include publishing more data on compliance breaches and enforcement actions, making services’ staffing and supervision practices more transparent to regulators, families, and the public, and directing ACECQA to run a rapid assessment into safeguarding practices, including how services apply the “under the roof” approach.

## Is there sufficient oversight of the Department of Education and the role it plays in monitoring and maintaining child safety?

By its own evidence, the Victorian State Government in response to the *Rapid Child Safety Review 2025* acknowledged this. The multi-strategy approach proposed suggests a need for an end-to-end approach to oversight of the sector, including a rethink of the ECEC system to be led by the Commonwealth<sup>7</sup>.

The reliance on government to oversee this complex, multiplayer system is increasingly unrealistic, and a prevention-focussed approach is needed. It starts with the quality of training for employees entering the system and the rigour of providers to ensure they implement robust checks and balances before employing staff. With a 60% increase<sup>8</sup> in the for-profit sector and no significant and commensurate increase in the regulatory resources the system no longer has the capacity to know what is happening in services.

The MAV and local government have long recommended a tri-partite joint government approach for the ECEC sector.<sup>9</sup> In Victoria councils act as stewards for their communities, ensuring provision and access to ECEC services. Councils invest significantly in infrastructure, provide Central Registration and Enrolment Schemes to make kindergarten more accessible, deliver Maternal and Child Health services often at the frontline of protecting children, and employ CALD Outreach staff to support culturally and linguistically diverse communities.

Further to support infrastructure and service planning as part of the Kindergarten Expansion Reforms the MAV and the Department of Education agreed to implement Kindergarten Infrastructure and Service Plans (KISPs). These are strategic documents that map current and future kindergarten demand against supply at a local level. They are jointly agreed between a council and the Department of Education and provide local context and local data to guide infrastructure development and service planning, which includes increasing access to Three-Year-Old Kindergarten and transitioning four-year-old

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<sup>6</sup> <https://www.vic.gov.au/rapid-child-safety-review-2025/chapter-6-improve-centre-environment>

<sup>7</sup> <https://www.vic.gov.au/rapid-child-safety-review-2025/executive-summary#introduction>

<sup>8</sup> <https://www.vic.gov.au/rapid-child-safety-review-2025/executive-summary#part-1-governments-to-take-greater-responsibility-for-running-the-ecec-system>

<sup>9</sup> [Submission to Productivity Commission Inquiry into Child Care and Early Childhood Learning](#)

kindergarten to 'Pre-Prep'. These plans help identify "unmet demand" and inform how to accommodate growth through new centres or expanded facilities.

## Any other matter in relation to the adequacy, implementation, compliance and/or enforcement of child safety standards and regulations in the ECEC sector

### CCTV

After consulting with our members their feedback was that CCTV is not placed into the rooms of early childhood services. Strategic placement of CCTV to deter crime such as outward facing from a building or internally to observe who enters and leaves the building is usually the main purpose for councils installing CCTV. We offer the following for your consideration based on practical experience and advice from councils.

#### Summary of councils' feedback on CCTV

- **Child-Centred Principles:** Children's rights, agency, and privacy must remain paramount, as surveillance risks undermining trust, autonomy, and the relational environments critical to early development.
- **No Evidence Base for CCTV in Rooms:** The introduction of CCTV into children's activity rooms is widely considered an overreaction. It lacks evidentiary support and does not address root causes of risk.
- **Councils Do Not Support Surveillance in Child-Facing Spaces:** Victorian councils oppose CCTV installation in children's rooms, asserting that the risks far outweigh any perceived benefit.
- **Existing Expertise in Responsible CCTV Use:** Councils have robust governance frameworks for CCTV use in public spaces like foyers and car parks. These could guide more appropriate approaches but not justify extending surveillance into learning environments.
- **Technology Is Not the Solution:** CCTV is a limited tool. Stronger safeguards lie in proven strategies: improved child-staff ratios, staff capability uplift, safe environments, and relational culture.
- **Resource Allocation Matters:** Investment should prioritise interventions with demonstrated outcomes. Surveillance diverts funds from foundational safety and wellbeing measures.
- **Community Sentiment Is Mixed:** Some families are actively choosing council-run services over those relying on CCTV, perceiving surveillance as insufficient and impersonal.
- **Data Governance and Safety Risks:** The potential for footage misuse and ongoing data security threats must not be underestimated in environments involving vulnerable populations.
- **Families** do not necessarily feel that CCTV alone will safeguard their children.

#### Further strengthening child safeguarding

- **Embedding a culture of child safety in our communities:** Not just our early childhood education and care services by prioritising children's best interests. The MAV has put to the State Government the opportunity to recognise the unique leadership of local government in safeguarding children by investing in a dedicated child safety lead within councils. Embedding such a resource within councils ensures proximity to the early years system in their municipality and community needs that will

support driving best practice, fostering community and business engagement to enhance understanding and implementation of child safeguarding practices.

- **Engaging and empowering parents:** Particularly elevating cultural responsiveness and understanding of how they can be engaged in child safeguarding.
- **Having a universal Code of Conduct for all ECEC services:** Mandated as part of service approval, funding and regulatory processes.
- **Developing, linking and embedding systems:** Integration of the Working with Children Check, VIT, and Workforce Register into a unified system that can capture and track low-level concerns about staff. This system would identify patterns over time, ensuring that incidents which may not individually meet a reporting threshold are recognised when they occur cumulatively.

## Conclusion

The current landscape in which this Victorian Select Committee Inquiry takes place is one shaped by numerous inquiries over the past three years, many of which have explored similar themes including quality and safety, workforce, funding, privatisation, accessibility, and affordability.

Local government is uniquely positioned to provide broad support to the sector, helping to build capacity and meet responsibilities for child safeguarding. Many councils have already taken proactive steps, funding dedicated child safeguarding officers without financial assistance from state or federal governments.

All levels of government must actively engage, share information and data, and examine how funding and regulatory incentives influence behaviour across the sector. Strengthening governance, culture, and workforce capability is essential to ensuring that the ECEC workforce remains the primary protective factor in keeping children safe.

MAV strongly recommends that funding be provided to enable every council to employ a child safeguarding officer. This place-based approach would embed child safety and wellbeing across local communities, building on councils' close connections with children, families, and local services.

The ECEC sector faces significant governance challenges. Governance arrangements are diverse and complex, encompassing Boards, conglomerates, shareholders, Committees of Management, Early Years Managers, large not-for-profits such as Goodstart, and the State Government as a direct provider. It is essential that all governance bodies maintain a strong focus on child safety and are held accountable for employment practices, adherence to ratios (including the "four-eyes on a child" approach), and staff training and support.

Balancing supply with service performance remains critical. While the closure or reduction of underperforming services may sometimes be necessary, such actions must be weighed against families' ongoing needs for access to early childhood education and care.

To support this balance, MAV proposes establishing an Approved Provider Administrator model, drawing on the principles of Section 200 of the Local Government Act 2020. This model would provide an interim governance mechanism to ensure service continuity while addressing compliance or performance concerns.

By strengthening local government's capacity, improving governance, and embedding robust child safeguarding practices, Victoria can ensure that children access safe, high-quality, and accessible early childhood education and care.

### **Appetite for Advocacy**

All levels of government must actively engage, share information and data, and examine how funding and regulatory incentives influence behaviour across the sector. Strengthening governance, culture, and workforce capability is essential to ensuring that the ECEC workforce remains the primary protective factor in keeping children safe.

## Recommendations

Based on the evidence, feedback from councils, and the issues identified throughout this submission, the MAV makes the following recommendations to strengthen quality, safety, workforce, and governance in the Victorian ECEC sector.

### Adequacy of current quality and safety standards across all ECEC service types

The MAV acknowledges the work being done in Victoria regarding the response to the Rapid Child Safety Review, which aims to strengthen child safety. This includes establishing a new independent regulator and implementing the recently developed workforce register.

#### MAV recommends:

- That this work continues to completion.
- That the Victorian Government takes stock of the response, continues to identify gaps in the implementation of standards, and addresses them.
- That emerging risks, including those arising from technology, are considered and future-proofed within the regulatory framework.

### Quality of educator training, professional development, and qualifications, including Working with Children Checks and RTOs issuing early childhood qualifications

The quality and preparedness of the ECEC workforce is critical to child safety. Councils continue to report that graduates often require significant support to meet the expectations of the sector. The following recommendations aim to improve workforce capability, training, and oversight.

#### Quality of training:

#### MAV recommends:

- Greater emphasis on the child safeguarding responsibilities of adults working with children in all relevant training packages.
- Mandatory “four eyes on children” approach, ensuring at least two educators can observe each other while supervising children.
- All pre-service participants must hold a WWCC prior to commencing their qualification.
- Strengthening ongoing professional development and targeted support for new graduates to ensure they are equipped to work safely and effectively in the ECEC environment.

#### Responsibility of providers:

#### MAV recommends:

- Providers ensure staff understand their obligations and are provided with mandated child safeguarding training.
- Recruitment processes are robust, testing for child safeguarding suitability.
- Any potential or real breaches are reported immediately.
- Staff records are regularly checked and updated on the Workforce Register.

## Working with Children Checks:

### MAV recommends:

- Support for the Victorian and Commonwealth workforce register initiatives, with improved data and intelligence sharing between jurisdictions.
- Approved providers must demonstrate to the regulator that they have a suite of robust, end-to-end recruitment and employment processes.
- The Commonwealth Government implement a nationally consistent Workforce Register, akin to a “Medicare card” model, with interim monitoring to capture emerging risks between WWCC renewals.

## Impacts of a predominantly privatised ECEC system

Evidence shows that the increasing prevalence of for-profit providers has implications for affordability, quality, and safety. These recommendations are intended to guide policy and regulatory approaches that safeguard children while ensuring equitable access to high-quality services.

### MAV recommends:

- That the Select Committee review the available evidence on the impacts of a predominantly privatised ECEC system.
- Recognition that for-profit LDC services whilst an important part of the mixed market that delivers early childhood education and care do tend to charge more than not-for-profit services and we need to have a better understanding as to why and the correlation between fees and quality.
- Governments establish a multi-governmental taskforce to address market failures and implement meaningful reform.
- Greater powers for the Regulatory Authority to act against inappropriate conduct, with a clear definition of offences and a lowered threshold for reporting.
- Amendment of the National Law to introduce “inappropriate conduct” as an offence applicable to all approved providers, staff, volunteers, and family day care educators.
- Introduction of a National Code of Conduct under the NQF.
- That reforms consider accessibility and affordability, particularly for families in disadvantaged or remote areas.

## Impacts of workforce conditions

Workforce conditions directly affect staff wellbeing, retention, and the quality of education and care. The recommendations below aim to ensure the ECEC workforce is adequately supported, skilled, and retained.

### MAV recommends:

- State Government funding to implement the 58 Local Government Workforce Plans developed in response to the Best Start Best Life reforms.
- Adequate and sustainable funding for enterprise agreements covering ECEC workforce in Victoria.
- State government undertakes exploration of options for directly employing the ECEC workforce delivering kindergarten programs to improve quality, efficiency, and workforce stability.
- Planning for retention and succession of an ageing workforce, with proactive strategies for staff over 50+ and other vulnerable cohorts.

## Adequacy of staff-to-child ratios, including ratios averaged across entire services rather than applied per room

Staff-to-child ratios are a key protective factor for child safety. Recent reviews suggest that current approaches, including the ‘under the roof’ rule, may not adequately reflect the complexity and needs of children attending services. These recommendations aim to ensure ratios are applied in a way that genuinely protects children.

### MAV recommends:

- That State and Federal review work on staff-to-child ratios is completed and informed by local government input.
- Review of the “roofline rule” and guidance on service infrastructure to eliminate blind spots.
- Enforcement that each room/group meets ratio requirements according to age group, rather than relying on cross-room pooling.
- Always ensuring that, at least two sets of eyes are on each child (“Four Eyes, Not Two” campaign).
- Consideration of the needs of vulnerable and priority cohorts when determining adequate staffing levels.

## Oversight of the Department of Education

Effective monitoring and oversight by the State Government and the Department of Education is essential to maintaining child safety across the sector. The recommendations below focus on strengthening governance, accountability, and local engagement.

### MAV recommends:

- That oversight and monitoring of ECEC alone is insufficient; cultural change at the community level is required.
- State Government fund a child safeguarding officer in every council to strengthen community understanding of child safeguarding practices and empower parents, families, and children.
- Adoption of a multi-strategy, end-to-end approach to oversight, ensuring coordination across all levels of government and sectors.

## Other matters: CCTV and strengthening child safeguarding

Additional measures, beyond those already covered, can further enhance child safety and embed a culture of safeguarding at the local level.

### MAV recommends:

- CCTV is not installed in children’s activity rooms.
- Investment in strategies that embed child safeguarding across communities.
- Empowerment of parents and culturally responsive engagement to support child safety.
- Development, linking, and embedding of systems (WWCC, VIT, Workforce Register) to track low-level concerns and identify cumulative patterns.
- Strengthening data governance and privacy safeguards where surveillance or workforce data is involved.

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