

The Senate

Education and Employment
References Committee

Quality and safety of Australia's early
childhood education and care system

March 2026

© Commonwealth of Australia 2026

ISBN 978-1-76093-909-0 (Printed version)

ISBN 978-1-76093-909-0 (HTML version)

This work is licensed under the Creative Commons Attribution-NonCommercial-NoDerivs 4.0 International License.



The details of this licence are available on the Creative Commons website:

<https://creativecommons.org/licenses/by-nc-nd/4.0/>.

Printed by the Senate Printing Unit, Parliament House, Canberra.

Members

Chair

Senator Maria Kovacic LP, NSW

Deputy Chair

Senator Marielle Smith ALP, SA

Members

Senator Josh Dolega ALP, TAS

Senator Mehreen Faruqi AG, NSW

Senator Jacinta Nampijinpa Price LP, NT

(from 20 January 2026)

Senator Matt O'Sullivan LP, WA

(from 3 March 2026)

Substitute Member

Senator Steph Hodgins-May AG, VIC

(for Senator Faruqi from 27 August 2025)

Participating Members

Senator the Hon Jonathon Duniam LP, TAS

Senator Corinne Mulholland ALP, QLD

Senator David Pocock IND, ACT

Former Members

Senator Leah Blyth LP, SA

(until 3 March 2026)

Senator Dave Sharma LP, NSW

(until 20 January 2026)

Secretariat

Gerry McNally, Committee Secretary
Ros Hewett, Principal Research Officer
Aysha Osborne, Principal Research Officer
Michael Perks, Senior Research Officer
Jason See, Senior Research Officer
Ben Veal, Senior Research Officer
Aisha Bottrill, Research Officer
Jamison Eddington, A/g Research Officer
Grace Caddaye, Administrative Officer
Matthew Townsend, Administrative Officer

PO Box 6100
Parliament House
Canberra ACT 2600

T: (02) 6277 3521
E: eec.sen@aph.gov.au
W: www.aph.gov.au/senate_eec

Contents

Members	iii
Abbreviations and acronyms	ix
Terms of reference	xi
List of recommendations	xiii
Chapter 1 – Introduction and background	1
Conduct of the inquiry	1
Acknowledgements	2
Structure of the report	2
Background to this inquiry	2
Overview of early childhood education and care	5
Child Care Subsidy-approved services	7
Dedicated preschool services	8
Regulatory framework	9
National Quality Framework	9
Family Assistance Law	11
Governance and oversight of the early childhood education and care system	12
Australia-wide oversight and governance	12
Funding for early childhood education and care	13
Requirements for providers and staff	15
Requirements for staff to work in the sector	16
Working with Children Checks	17
Previous inquiries	18
Royal Commission into Institutional Responses to Child Sexual Abuse (2012–2017) ..	18
National Child Safety Review	19
Other relevant federal inquiries	21
State inquiries	22
Chapter 2 – Safety in childcare	25
The broader child safety environment	25
National reporting and safety indicators	27
What the data shows	28

What the data does not show	28
Safeguards in the ECEC system	31
Workforce safeguards	31
Supervision safeguards	36
Technological safeguards	38
Safeguards for children with additional needs.....	41
Allergy management.....	41
Diabetes management.....	43
Chapter 3 – Workplaces and employment.....	45
Pace of recent industrial relations changes in the sector	46
Overarching government workforce strategy	47
Recruitment practices	48
Vacancies, high staff turnover and understaffing	51
Staffing waivers	52
‘Under the roof’ ratios	53
Workforce composition	54
Proposed reforms.....	56
Qualifications and training.....	56
Proposed reforms.....	60
Wages.....	62
Worker Retention Payment	65
Proposed reforms.....	67
Workforce conditions	68
Proposed reforms.....	69
Chapter 4 – Effectiveness of the current regulatory system.....	71
Division of responsibilities	72
Overregulation and regulatory burden	73
Tick-box approach to compliance.....	76
Assessment and Rating process	77
Proposed reforms.....	79
Delays by regulators.....	80
Inconsistencies.....	81

Proposed reforms.....	82
Funding and resourcing for regulators.....	83
Data, information sharing and transparency	84
Issues raised in evidence.....	85
Proposed reforms.....	87
Enforcement.....	88
Support for services to improve quality ratings.....	89
An independent ECEC body	90
Is the NQF fit-for-purpose?	92
Other issues related to the regulatory system.....	97
Chapter 5 – Funding for early childhood education and care	99
Different funding types.....	101
Needs-based funding	101
Supply-side funding.....	105
For-profit versus not-for-profit providers	108
Proposed reforms.....	113
Rental fees	113
Licence fees	114
Flexibility and choice.....	114
Limitations of existing options.....	116
Infants.....	118
Subsidised options.....	120
Expanded Paid Parental Leave	123
Chapter 6 – Committee view.....	125
Safety in childcare	127
Timeframes for Regulatory Response	131
Strengthening Pre-Employment Screening.....	132
Strengthening Safeguards in Law and Training.....	132
Managing Allergies and Diabetes in Early Childhood Settings.....	134
Workforce Conditions and Regulatory Oversight	135
Workforce stability, staffing levels and worker retention.....	135
Tax Reform to Support Staff Retention.....	137

Training Quality and Workforce Development.....	137
Regulatory burden.....	138
Implementation of the Professional Development Subsidy	140
Quality Improvement and Provider Accountability.....	142
Scope and Purpose of an Independent ECEC Commission.....	143
Funding for early childhood education and care	144
Access to ECEC in Underserved Communities	146
Rental Costs and Licence Fees.....	147
Flexibility and choice.....	148
System Design, Affordability and Access.....	151
Ratios in Outside School Hours Care.....	152
Labor Senators' dissenting report	155
Australian Greens' dissenting report	165
Appendix 1 – Submissions and additional information	173
Appendix 2 – Public hearings and witnesses	181

Abbreviations and acronyms

ACA	Australian Childcare Alliance
ACCC	Australian Competition and Consumer Commission
ACCO	Aboriginal Community Controlled Organisation
ACECQA	Australian Children's Education and Care Quality Authority
AFP	Australian Federal Police
A&R	Assessment and Rating
ASIC	Australian Securities and Investment Commission
ASU	Australian Services Union
CCTV	Closed-Circuit Television
CIS	Centre for Independent Studies
ECEC	Early Childhood Education and Care
ELACCA	Early Learning and Care Council of Australia
Federation of P&Cs	Federation of Parents & Citizens Associations of New South Wales
ISP	Inclusion Support Program
ISPAD	International Society for Pediatric and Adolescent Diabetes
NOSHSA	National Outside School Hours Services Alliance
NQF	National Quality Framework
NQS	National Quality Standard
OSHC	Outside School Hours Care
RPL	Recognition of Prior Learning
T1D	Type 1 Diabetes
UWU	United Workers Union
WWCC	Working with Children Check
WWVPC	Working with Vulnerable People Check

Terms of reference

The quality and safety of Australia's early childhood education and care system, with particular reference to:

- (a) the health and safety of children in childcare services across the country;
- (b) the effectiveness of Australia's childcare regulatory system, including the performance and resourcing of state and territory regulators and the Australian Children's Education and Care Quality Authority, in maintaining and improving quality;
- (c) early learning providers' compliance with quality standards and legislative requirements, including compliance with workplace laws and regulations;
- (d) the impact of childcare providers' employment practices on quality and safety;
- (e) the role of worker compensation and pay on childcare quality and safety;
- (f) the role of private for-profit incentives and their impact on childcare quality and safety;
- (g) transparency within the early childhood education and care system, including access to information and data;
- (h) the suitability and flexibility of the funding of early education and care across Australia;
- (i) the choice of care options available to parents and families; and
- (j) any related matters.

List of recommendations

Recommendation 1

6.33 The committee recommends that the Government prioritise the closer integration of law enforcement into current child safety reforms, to allow a more joined-up approach to child safety. Specifically, the committee recommends the government consider:

- as a priority—closer integration of the WWCC register, the National Educator Register and police/regulator intelligence;
- reforms to allow the use of facial recognition tools for the purpose of rapid victim identification by police in cases of child sexual assault, subject to appropriate legislative guardrails and oversight mechanisms commensurate with the sensitivity of the technology and the privacy interests engaged, and noting its status as an emerging technology;
- establishing appropriate mechanisms, whether operational, structural or otherwise, to allow regular two-way feedback between police and regulators in relation to sub-threshold matters; and
- establishing clear guidance on the preservation of CCTV footage and other records for evidentiary purposes in cases involving alleged child sexual abuse, including appropriate retention periods, access protocols, and safeguards to ensure that any such requirements do not result in the surveillance of children beyond what is necessary for child protection purposes.

Recommendation 2

6.34 The committee recommends that the Australian Government refer to the Australian Law Reform Commission the question of whether existing sentencing frameworks for serious child sexual abuse offences adequately serve as a deterrent and protect children from individuals who pose an ongoing risk. The referral should consider whether current sentencing provisions, including for repeat offenders, are commensurate with the gravity of these offences, and what reforms may be appropriate to ensure that those who abuse, exploit or prey upon children do not remain a threat to child safety.

Recommendation 3

6.36 The committee recommends that the Australian Government with the state and territory governments develop clear, consistent timeframes for regulators to respond to allegations of concerning behaviour and breaches of the National Law and regulations.

Recommendation 4

6.38 The committee recommends that the Australian Government, in consultation with state and territory governments, consider expanding access to the National Early Childhood Worker Register to enable prospective employers to undertake appropriate pre-employment checks.

This should include consideration of mechanisms to allow employers to access relevant information relating to an individual's regulatory history, including any prohibition notices, suspensions, or substantiated breaches of workplace health and safety or service-level policies, subject to appropriate privacy and procedural safeguards.

Recommendation 5

6.45 The committee recommends that the Australian Government amend the Fair Work Act 2009 to ensure that employment settings appropriately reflect the safeguarding requirements of child-facing workplaces, including early childhood education and care, and protect employers who, in good faith and on reasonable grounds, take adverse employment action (including suspension, role reassignment, or termination) due to concerns about a worker's potential risk to children.

Recommendation 6

6.46 The committee recommends that the Australian Government review how national child safety training is delivered and assessed in early childhood education and care sector to ensure it drives genuine engagement with safeguarding.

This should include strengthening assessment requirements so that participants demonstrate a clear understanding of the material, and examining whether current settings adequately require engagement and robust evaluation, with ongoing monitoring incorporated into regular audit processes. The review should ensure the training functions as a real safeguard that builds capability and awareness, rather than a procedural exercise.

Recommendation 7

6.50 The committee recommends that the Australian Children's Education and Care Quality Authority, in consultation with relevant peak bodies, develop and implement guidelines for anaphylaxis prevention and management for children with allergies; and guidelines for the appropriate safety and care of children with type 1 diabetes.

Recommendation 8

6.52 The committee recommends that, as part of its rapid review, the Australian Children’s Education and Care Quality Authority recommend that all jurisdictions amend their regulatory framework to:

- Ensure the practice of active rather than passive supervision, to minimise opportunities for unsafe behaviours; and
- Address the underlying operational and regulatory pressures that are contributing to reduced educator-to-child ratios during sleep and rest periods in early childhood education and care services.

Recommendation 9

6.53 The committee recommends the Australian Government through Education Minister Meetings or through a request to ACECQA, increase the frequency of authorised officer spot check visits to early childhood education and care services, and ensure that authorised officers receive appropriate training, including in early childhood and care practice. To strengthen oversight, the policy should incorporate minimum targets, such as a minimum of four unannounced spot checks per year. The committee notes this may necessitate a resource commitment from states and territories.

Recommendation 10

6.58 The committee recommends that the Australian Government publicly announce whether it intends to continue or cease the Worker Retention Payment as soon as possible to provide the early childhood education and care sector with certainty.

Recommendation 11

6.60 The committee recommends that the Australian Government consider tax concessions for the cohort of the early childhood education and care workforce for Public Benevolent Institutions that is currently unable to access salary packaging concessions to encourage staff retention and reduce turnover.

Recommendation 12

6.63 The committee recommends that the Australian Government work with the regulators of both vocational education and training and higher education to ensure high-quality educators and early learning teachers are entering the profession.

Recommendation 13

6.76 The committee recommends that the Australian Government with the state and territory governments urgently commission an independent review of the National Quality Framework, focusing on how services are assessed against the National Quality Standard and how assessments can be made more accurate, transparent and consistent.

Recommendation 14

6.84 The committee recommends that the Australian Government, as a matter of urgency:

- Publish grant guidelines and confirm the application opening date for the professional development subsidy ahead of the commencement of mandatory national child safety training obligations for new staff on 14 August 2026;
- Provide clear public guidance on the total funding available under the subsidy, the allocation methodology, and the treatment of training costs incurred by providers prior to the opening of applications;
- Ensure that the subsidy administration process does not disadvantage providers (particularly small and medium operators and not-for-profit services,) who incur upfront training costs for new staff before applications open, and consider mechanisms to allow retrospective claims for eligible costs incurred from the commencement of mandatory training obligations; and
- Review whether the subsidy adequately accounts for the full range of costs associated with mandatory compliance, including out-of-pocket expenses such as payments to casual staff completing training outside rostered hours, and the administrative burden placed on providers, particularly not-for-profit services, in managing grant applications and acquittals, recognising that for not-for-profit providers, unsubsidised compliance costs are borne directly by the communities and children they serve.

Recommendation 15

6.87 The committee recommends that regulatory authorities provide clear, timely and actionable feedback to services following assessment and rating processes, to support continuous improvement and greater transparency.

Recommendation 16

6.88 The committee recommends that the Australian Government, in consultation with state and territory governments, introduce regulatory mechanisms to prohibit early childhood education and care providers from expanding or establishing additional services where they are not consistently meeting the

National Quality Standard across their existing services. In implementing this measure, governments should consider clear thresholds and criteria to ensure that expansion is contingent on demonstrated and sustained compliance with quality and safety requirements.

Recommendation 17

6.100 The committee recommends that the Australian Government as a matter of urgency, review its support for children with additional needs, including the existing Inclusion Support Program and the impacts of the Thriving Kids program, with a view to providing funding certainty for families and early childhood education and care providers.

Recommendation 18

6.105 The committee recommends that the Australian Government ensure that the Community Child Care Fund is sufficiently funded to meet existing demand for services in childcare deserts and consider models better suited to thin markets.

Recommendation 19

6.109 The committee recommends that the Australian Government together with the state and territory governments discuss the matter of inflated rental fees and license fees, including those charged by public primary schools, for early childhood education and care services at a future Education Ministers Meeting and consider potential measures to address this issue.

Recommendation 20

6.127 The committee recommends that future policy development includes, as a general principle, consultation with parents so that support for families considers flexibility and choice for parents, as well as early childhood development outcomes for children in their early years.

Recommendation 21

6.134 The committee recommends that the Australian Government improve accessibility and clarity of information regarding the Child Care Subsidy, including through the development of a user-friendly calculator on Service Australia's website to address the difficulties families experience in understanding their eligibility and entitlements.

Recommendation 22

6.137 The committee recommends that the Australian Government, in consultation with state and territory governments, review educator-to-child ratio requirements in Outside School Hours Care to ensure they are calibrated to

the developmental and supervision needs of school-aged children. The review should consider the differing needs of younger and older primary school-aged children, whether activity-based or age-differentiated staffing arrangements are appropriate across different Outside School Hours Care settings and transitions, and how ratio settings can maintain child safety while supporting the viability of services, particularly in regional, remote and smaller school communities.

Recommendation 23

6.138 The committee recommends that the Australian Government, in consultation with state and territory governments, undertake a comprehensive review of the appropriateness of the National Quality Framework as it applies to Outside School Hours Care, with a view to developing a fit-for-purpose regulatory framework that reflects the distinct nature of school-aged care.

Chapter 1

Introduction and background

1.1 On 25 August 2025, the Senate referred the following matter to the Senate Education and Employment References Committee, for inquiry and report by 10 March 2026:

The quality and safety of Australia’s early childhood education and care system, with particular reference to:

- (a) the health and safety of children in childcare services across the country;
- (b) the effectiveness of Australia’s childcare regulatory system, including the performance and resourcing of state and territory regulators and the Australian Children’s Education and Care Quality Authority, in maintaining and improving quality;
- (c) early learning providers’ compliance with quality standards and legislative requirements, including compliance with workplace laws and regulations;
- (d) the impact of childcare providers’ employment practices on quality and safety;
- (e) the role of worker compensation and pay on childcare quality and safety;
- (f) the role of private for-profit incentives and their impact on childcare quality and safety;
- (g) transparency within the early childhood education and care system, including access to information and data;
- (h) the suitability and flexibility of the funding of early education and care across Australia;
- (i) the choice of care options available to parents and families; and
- (j) any related matters.

1.2 On 3 February 2026, the committee was granted an extension of time to report until 31 March 2026.

Conduct of the inquiry

1.3 The committee advertised the inquiry on its website and invited submissions from a range of relevant stakeholders, by 3 October 2025. The committee received 129 submissions, which are listed at Appendix 1.

1.4 The committee held six public hearings for the inquiry:

- Canberra – 19 November 2025;
- Sydney – 10 December 2025;
- Melbourne – 17 February 2026;
- Brisbane – 23 February 2026;
- Canberra – 24 February 2026; and
- Canberra – 24 March 2026.

- 1.5 A list of witnesses who appeared at these hearings is available at Appendix 2.
- 1.6 Links to public submissions, Hansard transcripts of evidence and other information published by the committee for this inquiry are available on the committee's [website](#).

Acknowledgements

- 1.7 The committee thanks the individuals and organisations who contributed to this inquiry by providing submissions and giving evidence at public hearings.
- 1.8 In addition, the committee particularly wishes to recognise the bravery of individuals providing personal accounts of alleged issues with quality and safety in particular childcare centres.

Structure of the report

- 1.9 This report comprises six chapters:
- This chapter, which provides the background to the inquiry, an overview of the system and the regulatory framework, and recent federal and state inquiries into the sector;
 - Chapter two, which examines child safety issues;
 - Chapter three, which canvasses issues raised in evidence relating to employment and workplace conditions;
 - Chapter four, which examines the effectiveness of the current regulatory system;
 - Chapter five, which discusses funding the sector; and
 - Chapter six, which provides the committee's view and recommendations.

Background to this inquiry

- 1.10 Media reporting on issues with quality and safety in early childhood education and care (ECEC) has been extensive and includes two episodes of the ABC's Four Corners program in March and October 2025.¹ The March 2025 episode noted the following:
- an increase of 27 per cent over the three years to 2024 in 'serious incidents' reported;
 - every day at least seven children go missing or are locked out of centres, a 49 per cent increase in three years; and
 - more than 3000 babies and toddlers are sent to hospital each year with injuries sustained in childcare.²
- 1.11 The October 2025 episode identified 148 alleged or convicted perpetrators of child sexual abuse or inappropriate conduct in early childhood education and

¹ ABC Four Corners, *Betrayal of Trust*, March 2025; ABC Four Corners, *Hunting Ground*, October 2025.

² ABC Four Corners, *Betrayal of Trust*, March 2025.

care services, with 88 per cent of that offending occurred at for-profit, long daycare centres. Four Corners noted that base salaries of the CEOs of for-profit providers can be in the mid-six figures. ‘Floating staff’ may move between centres and are not supervised or managed by one person, potentially creating the conditions in which quality and safety issues can more easily arise.³

1.12 The investigation also found in New South Wales more than seven hundred cases of missing, expired or unverified Working With Children Checks, with the relevant regulator in most cases giving centres weeks or months to resolve the issue. The Federal Minister for Early Childhood Education, Senator the Hon. Dr Jess Walsh, ‘declined a sit-down interview... In a written response, she sidesteps several questions, instead pointing to the reforms already announced’. Further, the ACT and Victorian governments ‘are fighting to keep childcare files secret, terrified of what full transparency might reveal’.⁴

1.13 Other media reports of alleged abuse in childcare centres include the following:

- August 2023: A joint media release from the AFP, Queensland Police Service and New South Wales Police Force confirmed that a man, later identified as Ashley Paul Griffith, had been arrested in August 2022 and was being charged with extensive child abuse offences. Subsequent investigations revealed more than 300 child exploitation offences connected to his employment across not-for-profit and for-profit childcare centres in Brisbane and Sydney. In November 2024, Griffith was sentenced to life imprisonment after pleading guilty to more than 300 offences against almost 70 girls aged between one and seven over a period spanning 19 years.⁵
- July 2025: Widespread reporting emerged regarding charges against Joshua Dale Brown, a childcare worker employed across a range of centres in Melbourne. As of December 2025, Mr Brown is facing more than 150 charges. The scale of the alleged offending prompted a substantial public health response, with approximately 2,000 children advised to undergo health screening following his arrest.⁶
- October 2025: *The Guardian* reported that there was an increase of 32 per cent on the previous year of reportable allegations in the childcare sector in

³ ABC Four Corners, *Hunting Ground*, October 2025.

⁴ ABC Four Corners, *Hunting Ground*, October 2025.

⁵ Australian Federal Police, Queensland Police Service and New South Wales Police Force, [‘Man charged with rape and sexual assaults at childcare centres’](#), *Media Release*, 1 August 2023 (accessed 24 March 2026).

⁶ For example, Molly Magennis, [‘Childcare worker charged with sexual assault offences against youngsters in Melbourne, 1200 children to test for diseases’](#), *7News*, 1 July 2025 (accessed 14 January 2025).

Victoria (with reportable allegations including physical violence, neglect, sexual misconduct and sexual offences).⁷

- October 2025: *ABC* reported that over the five years to 2025, around 70 per cent of investigations into allegations of child sexual or physical abuse at childcare centres in New South Wales resulted in ‘no further action’.⁸
- January 2026: *ABC* reported on more than 2,400 documents tabled in the ACT Legislative Assembly on the work of the territory’s childcare regulator addressing allegations of sexual abuse, inappropriate discipline, sexualised behaviour between children and children missing from childcare centres.⁹

1.14 In light of media reporting over the past few years uncovering concerning allegations of issues with quality and safety in the early childhood and care system, in March 2025, the National Children’s Commissioner called for a national response to issues revealed about dangerous practices and regulatory failings in Australia’s childcare sector. She argued that putting ‘babies, toddlers and young kids at risk because of regulatory failings is unacceptable and we need urgent government action across our federation to address these dangerous gaps in how we protect children in this country’. Further, by ‘not making child safety and wellbeing a priority for National Cabinet, we’re allowing our youngest citizens to fall into these gaps... [O]ur whole approach to child safety and wellbeing in this country is in desperate need of systemic reform’.¹⁰

1.15 The Royal Commission into Institutional Responses to Child Sexual Abuse found that abuse of children in institutional settings can have profound and lasting impacts, including deep and complex trauma, a range of physical and mental health effects across an individual’s life and issues with interpersonal relationships, and impact individuals’ education, employment and economic security across their lifespan.¹¹

⁷ Andrew Messenger, ‘[Allegations of violence, abuse and neglect in Victorian childcares jumped in 2024–25](#)’, *The Guardian*, 29 October 2025 (accessed 14 January 2026).

⁸ Amy Greenbank, Emily Baker, Jade Toomey and Briana Fiore, ‘[Stark new figures reveal outcomes of alleged childcare abuse investigations](#)’, *ABC*, 30 October 2025 (accessed 14 January 2026).

⁹ Jade Toomey, ‘[Thousands of ACT childcare documents show behind the scenes of embattled industry](#)’, *ABC*, 13 January 2026 (accessed 14 January 2026).

¹⁰ Australian Human Rights Commission, ‘[National Children’s Commissioner calls for urgent action to safeguard children in early learning and care](#)’, *Media Release*, March 2025 (accessed 14 January 2026).

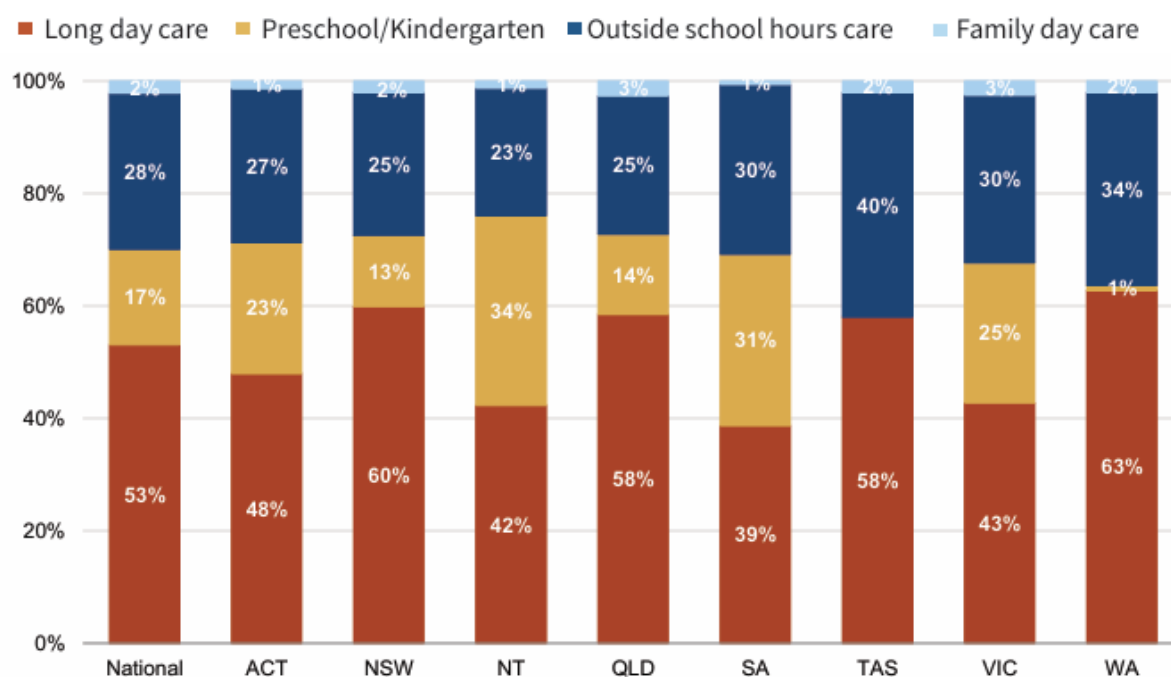
¹¹ Royal Commission into Institutional Responses to Child Sexual Abuse, [Volume 3, Impacts – Summary](#), December 2017 (accessed 14 January 2026).

Overview of early childhood education and care

1.16 Australia's early childhood education and care system comprises Child Care Subsidy-approved services, for children aged 0–12, and dedicated preschool services, for children in the year or two years before school.¹²

1.17 According to the most recent data from the Australian Children's Education & Care Quality Authority (ACECQA) from quarter four 2025, there are 18 027 approved ECEC services nationally, including 17 639 centre-based services and 388 family day care services.¹³ Nationally, 53 per cent of services are approved long day care services, 28 per cent are outside school hours care, two per cent are family day care, and 17 per cent are preschool or kindergartens, as set out below in Figure 1.1.

Figure 1.1 Proportion of services by service type and jurisdiction



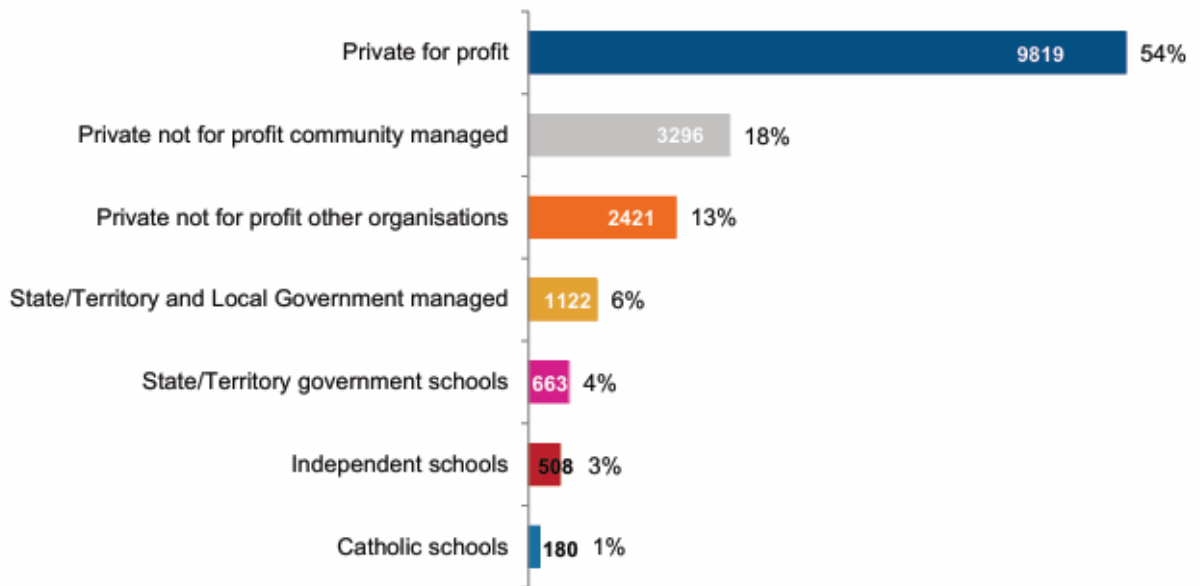
Source: Australian Children's Education & Care Quality Authority, [NQF Snapshot: State of the sector, February 2026](#) (accessed 23 March 2026).

1.18 Services are provided by for-profit organisations, private not-for-profit organisations, state/territory and local governments, government schools, independent schools and Catholic schools, as set out in Figure 1.2.

¹² Department of Education, *Submission 77*, p. 4.

¹³ Australian Children's Education & Care Quality Authority, [NQF Snapshot: State of the sector, February 2026](#) (accessed 23 March 2026). A centre-based service is an education and care service other than a family day care service, including most long day care, preschool and outside school hours care services that are delivered at a centre. A family day care service is an education and care service delivered through a network of educators operating from residences and other approved venues.

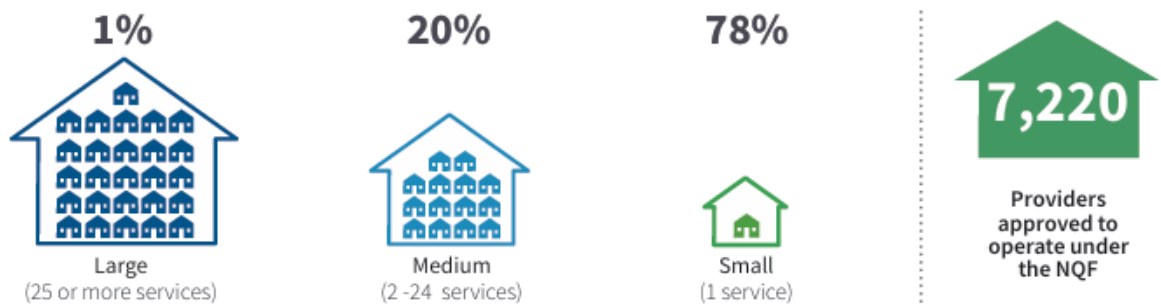
Figure 1.2 Number and proportion of services by provider management type



Source: Australian Children's Education & Care Quality Authority, [NQF Snapshot: State of the sector, February 2026](#) (accessed 23 March 2026).

1.19 There are 7,220 providers approved to operate under the National Quality Framework (NQF), and most providers of approved childcare services are small providers. Seventy-eight percent of approved providers are small providers that operate a single service, 20 per cent are medium-sized providers operating 2–24 services, and just one percent of providers operate more than 25 services, as set out below in Figure 1.3.

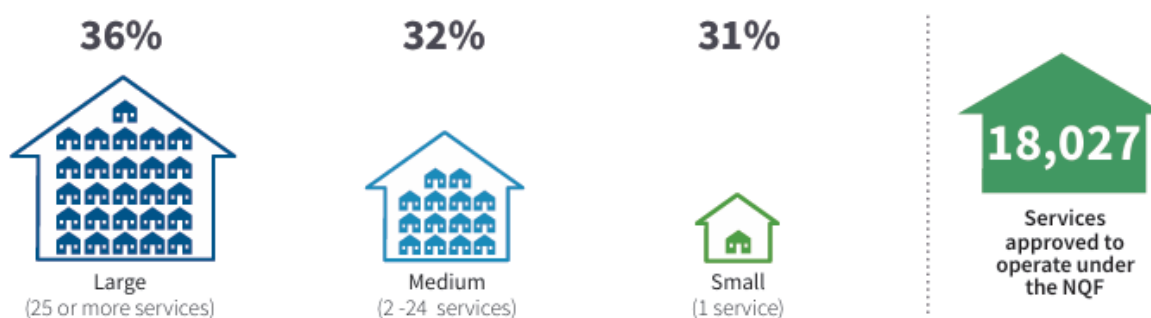
Figure 1.3 Proportion of approved providers by size



Source: Australian Children's Education & Care Quality Authority, [NQF Snapshot Q4 2025: 1 January 2026](#) (accessed 21 March 2026).

1.20 There are 18 027 services approved to operate under the NQF, with the majority, (63 per cent) being provided by small or medium providers. Thirty-one per cent of services are operated by small providers, while 32 per cent are operated by medium providers. Thirty-six per cent of providers are large providers that operate 25 or more services, as set out below in Figure 1.4.

Figure 1.4 Proportion of approved services by provider size



Source: Australian Children's Education & Care Quality Authority, [NQF Snapshot Q4 2025: 1 January 2026](#) (accessed 21 March 2026).

- 1.21 According to data from the Department of Education, nationally, 1 437 520 children were in care. Of these, 58.8 per cent, or 845 190 children, attended centre-based day care, 38.4 per cent, or 552 020 children, attended outside school hours care, and 4.7 per cent, or 67 190 children, attended family day care. New South Wales accounted for the largest share of children attending approved care, at 31.8 per cent or 456 840 children. While child attendance numbers remained largely unchanged in Victoria, all other states recorded declines compared with the same quarter in the previous year.¹⁴
- 1.22 On average, children attended 27.6 hours of care per week, representing an increase of 0.7 per cent from the December quarter 2024. Among centre-based day care services, the Northern Territory recorded the highest average weekly attendance at 38.9 hours, while Tasmania recorded the lowest at 28 hours.¹⁵

Child Care Subsidy-approved services

- 1.23 The following types of early childhood education and care services are eligible for the Child Care Subsidy:¹⁶
- Centre-based day care, which provides care typically in centres approved by state/territory regulators with qualified educators, that primarily provide care to children under school age;
 - Providers must be approved by both the Australian Government and the state/territory government;¹⁷

¹⁴ Department of Education, [Child Care Subsidy data report – December quarter 2025](#) (accessed 23 March 2026).

¹⁵ Department of Education, [Child Care Subsidy data report – December quarter 2025](#) (accessed 23 March 2026).

¹⁶ Department of Education, [Service types](#) (accessed 15 January 2026).

¹⁷ Department of Education, [Centre Based Day Care](#) (accessed 15 January 2026); Department of Education, [About the approval process](#) (accessed 15 January 2026).

- Family day care, which is usually provided to small groups of children in the home of an educator or at an agreed venue;
 - Providers are approved under the National Law, and may be required to hold other relevant approvals under state/territory law;
 - Providers must notify the Department of Education of new educators, declare that the required background checks for them are complete, and show evidence of the checks if asked, and providers are required to provide Working With Children Check details on educators to the Department of Education;¹⁸
 - Outside School Hours Care (OSHC), which provides care in centres primarily for school or preschool children before and after school, and during the day when schools are not operating (typically during school holidays);¹⁹ and
 - In-home care, which is restricted to families unable to access other forms of early childhood care, often because of non-standard hours of work, geographic isolation or complex or challenging needs, with:
 - In home care places capped at 3,200 places nationally.²⁰
- 1.24 As of the December quarter 2025, there were 15 271 government-approved early childhood education and care services, attended by 1 437 520 children.²¹
- 1.25 The estimated cost of Childcare Subsidy to the Australian Government in 2024–25 was \$15.4 billion, and it is projected to cost \$16.2 billion in 2025–26.²²

Dedicated preschool services

- 1.26 Dedicated preschool services exclusively deliver preschool programs to children in the year or two years before school. These services usually operate for shorter hours and observe school holidays.²³
- 1.27 Between 2022 and 2025, the Australian Government provided \$1.9 billion under the Preschool Reform Agreement to support all children to access 15 hours of preschool a week, the year before commencing school. The funding supported around 342 000 children a year.²⁴

¹⁸ Department of Education, [Family Day Care](#) (accessed 15 January 2026).

¹⁹ Department of Education, [Outside School Hours Care](#) (accessed 15 January 2026).

²⁰ Department of Education, [In Home Care](#) (accessed 15 January 2026).

²¹ Department of Education, [Child Care Subsidy data report – December quarter 2025](#) (accessed 23 March 2026).

²² Department of Education, *Submission 77*, p. 5.

²³ Department of Education, *Submission 77*, p. 4.

²⁴ Department of Education, *Submission 77*, p. 4.

Regulatory framework

1.28 The legislative and regulatory framework for the early childhood education and care system includes:

- The National Quality Framework, including:
 - The National Law and Regulations;
 - The National Quality Standard; and
- The Family Assistance Law.²⁵

National Quality Framework

1.29 The National Quality Framework (often abbreviated to the NQF) is a nationally consistent framework for ECEC, introduced in 2012. It comprises:

- National Law and National Regulations;
- The National Quality Standard;
- The assessment and quality rating process; and
- National learning frameworks.²⁶

1.30 The NQF is jointly administered by the Australian Government and state and territory governments, and supported by ACECQA.²⁷ State and territory regulatory bodies are responsible for monitoring and enforcing compliance with the National Law and Regulations.²⁸

1.31 The National Law is state and territory law.²⁹ The National Law and the Regulations operate under an applied law system, under which the same law is applied in each state and territory, with some variations according to the needs of each state or territory. Victoria passed the *Education and Care Services National Law Act 2010*, and other jurisdictions followed by adopting that law through an application act or passed corresponding legislation.

1.32 All education ministers must agree to changes to the National Law. The Victorian Government then drafts changes in collaboration with the other states and territories, and the Victorian Parliament passes the amended National Law on behalf of all governments. Other jurisdictions enact legislation to apply the

²⁵ Department of Education, *Submission 77*, p. 6.

²⁶ ACECQA, [What is the NQF?](#) (accessed 16 January 2026).

²⁷ ACECQA, *Review of Child Safety Arrangements under the National Quality Framework: Final Report – Findings and Recommendations for the NQF and Inter-related Child Safety Mechanisms*, December 2023, p. 4.

²⁸ ACECQA, [Section 5: Regulatory authority powers](#) (accessed 16 January 2026).

²⁹ Department of Education, *Submission 77*, p. 6.

National Law in their own jurisdiction or, in the case of Western Australia, passing a corresponding law.³⁰

1.33 The Education and Care Services National Regulations (abbreviated to the National Regulations) provide details on particular operational requirements for education and care services, including:

- The National Quality Standard (below);
- Application processes for provider and service approvals;
- The rating scales;
- The process for the rating and assessment of services against the National Quality Standard;
- Minimum requirements for the operation of education and care services, organised around each of the seven quality areas;
- Staffing arrangements and qualifications;
- Fees for a range of transactions; and
- Jurisdiction-specific provisions.³¹

National Quality Standard

1.34 The National Quality Standard (NQS) is set out in the National Regulations. It sets a national benchmark for early childhood education and care, in seven areas:

- Educational program and practice;
- Children’s health and safety;
- Physical environment;
- Staffing arrangements;
- Relationships with children;
- Collaborative partnerships with families and communities; and
- Governance and leadership.³²

1.35 Early childhood education and care services are assessed against the NQS and rated by state or territory regulatory authorities. The assessment processes include ongoing self-assessments, including strengths and areas for improvement; site visits from regulatory authorities or conversations for partial assessments; information gathering; a draft report that the provider can provide feedback on; and a final report and notice of final ratings. Approved providers

³⁰ Department of Education, *Submission 77*, p. 6.

³¹ ACECQA, [National Regulations](#) (accessed 16 January 2026). The National Regulations are published on the [NSW Legislation website](#).

³² ACECQA, [National Quality Standard](#) (accessed 20 January 2026).

can apply for a review of final ratings within a set review period. Once this period has ended, ratings are published on national registers.³³

- 1.36 Members of the public can search for individual centres' ratings, via the ACECQA website and the Starting Blocks website.³⁴ The Starting Blocks website also includes information on when a state or territory regulator last visited the service, and conditions that regulator may have placed on the provider or service.³⁵
- 1.37 Providers not meeting the NQS over several years may be subject to compliance action, including:
- Suspension or cancellation of their Child Care Subsidy approval; and
 - Having further conditions placed on their Child Care Subsidy approval.³⁶

Family Assistance Law

- 1.38 The Family Assistance Law sets the rules for providers administering the Child Care Subsidy to eligible families using the service. The Family Assistance Law is an umbrella term encompassing the following pieces of legislation:
- *A New Tax System (Family Assistance) Act 1999*;
 - *A New Tax System (Family Assistance) (Administration) Act 1999*;
 - *Family Assistance Legislation Amendment (Jobs for Families Child Care Package) Act 2017*;
 - *Family Assistance Legislation Amendment (Cheaper Child Care) Act 2022*;
 - *Child Care Subsidy Minister's Rules 2017*; and
 - *Child Care Subsidy Secretary's Rules 2017*.³⁷
- 1.39 Recent federal legislative changes to Family Assistance Law include:
- *Early Childhood Education and Care (Three Day Guarantee) Act 2025*; and
 - *Early Childhood Education and Care (Strengthening Regulation of Early Education) Act 2025*.

³³ ACECQA, [Assessment and rating process](#) (accessed 20 January 2026); ACECQA, [National registers](#) (accessed 20 January 2026).

³⁴ See ACECWA, [Service search](#) (accessed 16 January 2026); Australian Government, [StartingBlocks.gov.au](#) (accessed 26 March 2026).

³⁵ The Hon Jason Clare MP, Minister for Education, and Senator the Hon Dr Jess Walsh, Minister for Early Childhood Education and Minister for Youth, '[More information for parents on their children's child care centres](#)', 1 September 2025 (accessed 22 January 2026).

³⁶ Department of Education, [Notice given to early childhood education and care services not meeting standards](#), 15 August 2025 (accessed 20 January 2026).

³⁷ Department of Education, [Early childhood education and care laws](#) (accessed 20 January 2026).

Governance and oversight of the early childhood education and care system

- 1.40 Governance and oversight arrangements for the early childhood education and care system include Australian Government bodies responsible for national decisions, policies and programs, and child safety. The Australian Children's Education and Care Quality Authority (ACECQA) publishes the NQF and NQS and helps the Australian Government and state and territory regulators administer the Framework, while state and territory regulators administer the Framework and approve providers and services.
- 1.41 Oversight of ACECQA and, to some extent, the state and territory regulators is handled by the National Education & Care Services FOI & Privacy Commissioners & Ombudsman, which handles complaints about the bodies responsible for implementing Australia's early childhood education and care regulatory system. Its functions include:
- Ombudsman oversight of the administrative actions taken by ACECQA; and
 - Privacy and freedom of information oversight of ACECQA and the eight state and territory early childhood regulatory authorities.³⁸
- 1.42 State and territory regulators administer the NQF in their jurisdictions and are usually the first point of contact for providers. They grant provider and service approvals, provide assessments and rating services against the NQS, and work with ACECQA to promote continuous quality improvement and educate the sector and the community about the NQF. State and territory regulators include:
- Australian Capital Territory: Children's Education and Care Assurance;
 - New South Wales: NSW Early Learning Commission;
 - Northern Territory: Quality Education and Care NT;
 - Queensland: Early Childhood Regulatory Authority;
 - South Australia: Education Standards Board;
 - Tasmania: Department for Education, Children and Young People;
 - Victoria: Victorian Early Childhood Regulatory Authority; and
 - Western Australia: Department of Communities, Education and Care Regulatory Unit.³⁹

Australia-wide oversight and governance

- 1.43 The Education Ministers' Meeting, comprising education and early childhood ministers from the Australian, state and territory governments, discusses national cooperation on early childhood education and care and shared

³⁸ National Education & Care Services FOI & Privacy Commissioners & Ombudsman, [About us](#) (accessed 20 January 2026).

³⁹ ACECQA, [Contact your regulatory authority](#) (accessed 20 January 2026).

actions.⁴⁰ The Education Ministers' Meeting is supported by the Australian Education Senior Officials Committee, a group of senior officials responsible for early childhood education (and other education areas) who implement the Meeting's decisions.⁴¹

- 1.44 The Australian Government Department of Education leads the development and implementation of ECEC policies and programs, and collaborates with other agencies, including Services Australia (which manages the assessment and payment of Child Care Subsidy entitlements) and the Department of Social Services, which is responsible for overseeing a range of early childhood development policies.⁴²
- 1.45 While not directly focused on the ECEC system, the National Office for Child Safety leads the development and implementation of several relevant national priorities recommended by the Royal Commission into Institutional Responses to Child Sexual Abuse, including:
- The National Strategy to Prevent and Respond to Child Sexual Abuse;
 - The National Principles for Child Safe Organisations; and
 - The Commonwealth Child Safe Framework.⁴³

Funding for early childhood education and care

- 1.46 The Australian Government subsidises the cost of childcare for families with children enrolled in a service approved by a state or territory regulator for Child Care Subsidy. Child Care Subsidy is only available to Australian citizens, permanent visa holders, and holders of a small number of other visa types.⁴⁴ Children must meet minimum immunisation requirements to be eligible for the subsidy.⁴⁵
- 1.47 Child Care Subsidy is calculated based on family income, how much parents and carers work, study and volunteer, and the number of children parents are caring for.⁴⁶ As of 5 January 2026, all families receiving Child Care Subsidy are eligible for at least three days of subsidised care per week, with further hours

⁴⁰ Department of Education, *Submission 77*, p. 5.

⁴¹ Department of Education, *Submission 77*, p. 5.

⁴² Department of Education, *Submission 77*, pp. 5–6.

⁴³ National Office for Child Safety, [What we do](#) (accessed 20 January 2026).

⁴⁴ Services Australia, [Residence rules](#) (accessed 20 January 2026).

⁴⁵ Services Australia, [Immunisation requirements](#) (accessed 20 January 2026).

⁴⁶ Services Australia, [How much you can get](#) (accessed 20 January 2026).

subject to how many hours parents or carers engage in approved activities, like employment and study.⁴⁷

- 1.48 The Australian Government sets hourly rate caps, with families paying remaining out-of-pocket fees if their centre charges above the cap.⁴⁸ Table 1.1 sets out hourly caps for children below school age, as at March 2026.

Table 1.1 Hourly rate cap – Children below school age

Type of childcare	Hourly rate cap
Centre based day care – long day care and occasional care	\$14.63
Family day care	\$13.56
Outside school hours care – before, after and vacation care	\$14.63
In home care	\$39.80 per family

Source: Services Australia, [The type of child care you use affects it](#), (accessed 26 March 2026)

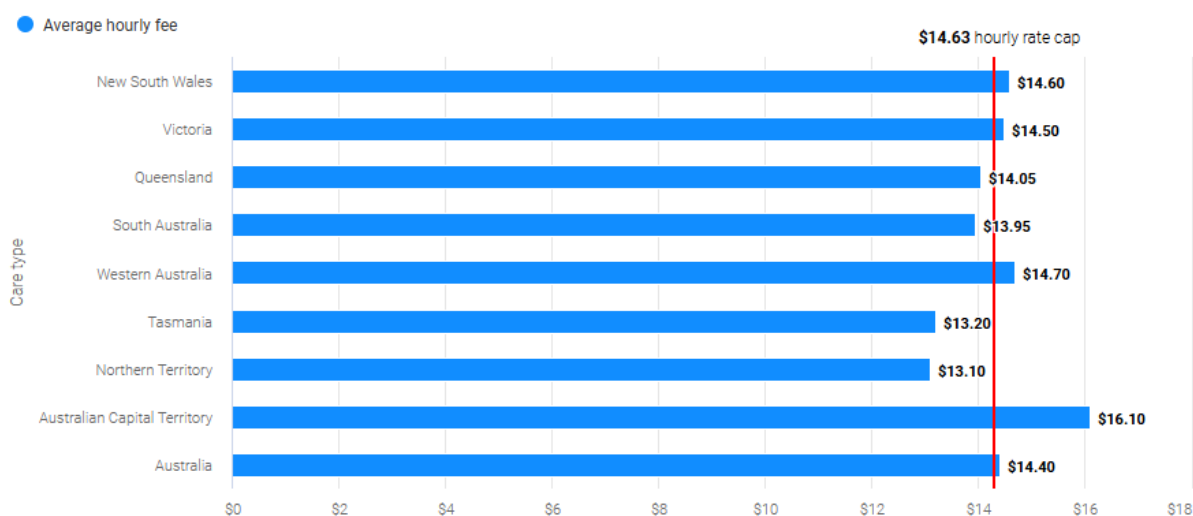
- 1.49 As of the December quarter 2025, the average hourly fee for ECEC (including centre-based day care, family day care and outside of schools hours care, but excluding in home care) across Australia was \$13.75. However, this varied between states, with services in the Australian Capital Territory charging, on average, the most, at \$15.55, and services in the Northern Territory charging the least, at \$12.45 per hour.⁴⁹

⁴⁷ Department of Education, [3 Day Guarantee](#) (accessed 21 January 2026).

⁴⁸ Services Australia, [The type of child care you use affects it](#) (accessed 24 March 2026).

⁴⁹ Department of Education, [Child Care Subsidy data report – December quarter 2025](#) (accessed 23 March 2026).

Figure 1.5 Average hourly fee by care type – December quarter 2025



Source: Department of Education, [Child Care Subsidy data report – December quarter 2025](#) (accessed 23 March 2026).

- 1.50 The Australian Government, through Services Australia, pays Child Care Subsidy directly to approved providers, who then pass the subsidy on to eligible families through fee reductions.⁵⁰ Child Care Subsidy is classed as a direct income support payment to families, and not categorised as government spending for education.⁵¹
- 1.51 The Australian Government has also provided funding to the states and territories under the Preschool Reform Agreement (2022–2027) to support preschool access.⁵²

Requirements for providers and staff

- 1.52 Registration of a service involves applying for both provider approval (which is recognised nationally and allows a provider to apply for service approvals) and service approval to operate an education and care service.⁵³

⁵⁰ Australian National Audit Office, [Auditor-General Report No. 42 of 2024–25: Management and Oversight of Compliance Activities within the Child Care Subsidy Program](#), 16 June 2025 (accessed 16 January 2026).

⁵¹ Australian Government, *Intergenerational Report 2023: Australia's Future to 2063*, 2023, p. 185.

⁵² Department of Education, *Submission 77*, p. 5; Department of Education, [Preschool Reform Agreement](#) (accessed 20 January 2026).

⁵³ ACECQA, [Opening a new service](#) (accessed 21 January 2026).

- 1.53 Provider and service approvals begin with the state and territory governments, which deems a provider and service suitable to ensure the health, safety and wellbeing of children. Providers are required to demonstrate their understanding of their obligations under the National Law and Regulations.⁵⁴
- 1.54 Providers must then obtain provider and service approval from the Australian Government, deeming them suitable to administer the Child Care Subsidy under the Family Assistance Law. Those applying for the Child Care Subsidy approval must demonstrate their understanding of their obligations under the Family Assistance Law.⁵⁵
- 1.55 Approval processes from the Australian Government (the National Law and Child Care Subsidy) may involve an online multiple-choice knowledge assessment and/or an interview in which the applicant is required to prove their understanding of the requirements under the National Law and Family Assistance Law. The Department of Education recommends, but does not require, applicants complete the National Law & Child Care Subsidy Approval Course before applying to become an approved provider.⁵⁶
- 1.56 From 27 February 2026, all persons with management and control, nominated supervisors, persons in day-to-day charge, staff and volunteers have been required to complete mandatory national child safety training.⁵⁷ The training is intended to establish a national minimum standard of child safety understanding and practice, strengthen preventative practices within services, and build capacity across the sector to identify and respond to potential risks or concerns in a timely, appropriate and child-centred way.⁵⁸

Requirements for staff to work in the sector

- 1.57 Different service types are required to employ staff with different minimum qualification levels. In some instances, these vary according to jurisdiction. For centre-based services with children preschool age or under:
- At least 50 per cent of educators must be diploma-level qualified or higher, or be actively working towards this qualification;
 - All other educators must be certificate III level qualified, or be actively working towards an approved certificate III level qualification; and
 - Services must engage or have access to an early childhood teacher, based on the number of children in attendance, with a second early childhood

⁵⁴ ACECQA, [Opening a new service](#) (accessed 21 January 2026).

⁵⁵ ACECQA, [Opening a new service](#) (accessed 21 January 2026).

⁵⁶ ACECQA, [Opening a new service](#) (accessed 21 January 2026).

⁵⁷ Department of Education, [Early childhood](#) (accessed 21 January 2026).

⁵⁸ Adelaide University, [National child safety training for the early childhood education and care sector](#) (accessed 21 January 2026).

teacher, or a suitably qualified person, when the service has 60 or more children preschool age or under.⁵⁹

1.58 Providers of centre-based services must also ensure that the following qualified people are in attendance at all times and immediately available in an emergency:

- At least one staff member or one nominated supervisor of the service who holds a current approved first aid qualification;
- At least one staff member or one nominated supervisor of the service who has undertaken current approved anaphylaxis management training; and
- At least one staff member or one nominated supervisor of the service who has undertaken current approved emergency asthma management training.⁶⁰

1.59 For family day care services:

- Educators must hold an approved certificate III level qualification at a minimum before commencing and cannot be actively working towards a qualification; and
- Family day care coordinators must hold an approved diploma level education and care qualification.⁶¹

1.60 Approved providers of family day care services must ensure that each educator and educator assistant engaged by or registered with the service holds a current approved first aid qualification, has undertaken current approved anaphylaxis management training, and has undertaken current approved emergency asthma management training.⁶²

1.61 There are no national minimum qualification requirements for educators at outside school hours care services. However, state and territory-specific qualifications apply in all states except New South Wales and Tasmania.⁶³

Working with Children Checks

1.62 Broadly, anyone working with children in an approved service must have a current Working with Children Check (WWCC) or, in some jurisdictions, a Working with Vulnerable People Check (WWVPC). The states and territories have different requirements about who must have a WWCC, with some

⁵⁹ ACECQA, [Qualifications for centre-based services with children preschool age or under](#) (accessed 21 January 2026).

⁶⁰ ACECQA, [First aid qualifications & training](#) (accessed 21 January 2026).

⁶¹ ACECQA, [Qualifications for family day care services](#) (accessed 21 January 2026).

⁶² ACECQA, [First aid qualifications & training](#) (accessed 21 January 2026).

⁶³ ACECQA, [Qualifications for working in OSHC services](#) (accessed 21 January 2026).

jurisdictions requiring people with management or control to have a WWCC even if they do not have direct contact with children.⁶⁴

- 1.63 Providers are required under Family Assistant Law to ensure that any person required under state or territory law to hold a WWCC has a current check, keep records of all checks and provide them to the Department of Education on request, and notify some checks and changes to checks in the Child Care Subsidy System within specific timeframes.⁶⁵
- 1.64 Sessions of care are only eligible for Child Care Subsidy if the educator who provided the care holds a current WWCC. For family day care and in home care, sessions of care are only eligible for Child Care Subsidy if the provider has notified the Department of Education about the educator's WWCC.⁶⁶
- 1.65 The Federal Attorney-General announced in August 2025 that Attorneys-Generals had 'agreed to urgently work towards implementing mutual national recognition of negative WWCC decisions... by the end of 2025'. This would mean that if a person in one jurisdiction is rejected for a WWCC, they would be rejected in other jurisdictions. She also announced that the Australian Government had 'committed to progressing National Continuous Checking Capability, to provide continuous, near-real time monitoring of national changes to criminal history information of WWCC holders'.⁶⁷ On 14 November 2025, the Standing Council of Attorneys-General endorsed an Agreement to Deliver National Working with Children Check Reform, which will see consistency and harmonisation over the next several years.⁶⁸

Previous inquiries

- 1.66 The sheer number of inquiries relevant to early childhood education and care over recent years, at both the federal and state/territory levels, indicates the level of concern about quality and safety. This section covers the major inquiries only.

Royal Commission into Institutional Responses to Child Sexual Abuse (2012–2017)

- 1.67 At a high level, concern about abuse in childcare settings began with the Royal Commission into Institutional Responses to Child Sexual Abuse. Despite multiple volumes of the Royal Commission's Final Report focusing on

⁶⁴ ACECQA, [Working with children checks](#) (accessed 21 January 2026).

⁶⁵ ACECQA, [Working with children checks](#) (accessed 21 January 2026).

⁶⁶ ACECQA, [Working with children checks](#) (accessed 21 January 2026).

⁶⁷ The Hon Michelle Rowland MP, Attorney-General, '[Delivering urgent reform of Working with Children Checks](#)', 15 August 2025 (accessed 22 January 2026).

⁶⁸ National Office for Child Safety, [Working with children check reform](#) (accessed 27 February 2026); Standing Council of Attorneys-General, [Agreement to Deliver National Working with Children Check Reform](#), 14 November 2025 (accessed 27 February 2026).

particular types of institutions, it did not dedicate a volume to childcare. Of individuals who shared stories of their abuse with the Royal Commission in private sessions, 0.5 per cent reported they had been abused in a childcare centre (32 survivors). Twenty-eight childcare institutions were named, of a total of 3,100 institutions (0.9 per cent of institutions reported to the Royal Commission).⁶⁹

- 1.68 The Final Report noted that it was possible that the rate of abuse of victims aged under five ‘may be higher than that identified, due in part to the more limited ability of very young children to understand, recall or disclose sexual abuse’. However, it also acknowledged that ‘childcare and preschool providers often include supervision by multiple adults in open, secure settings, which reduces the situational risk they are exposed to’.⁷⁰
- 1.69 Relevant recommendations from the Child Abuse Royal Commission aimed at the Australian Government that have since been implemented include:
- Develop and implement a national strategy to prevent child sexual abuse (Recommendation 6.1); and
 - Establish a National Office for Child Safety (Recommendation 6.16).⁷¹

National Child Safety Review

- 1.70 The Australian Government commissioned ACECQA to review child safety arrangements under the National Quality Framework (NQF), with the report published in December 2023. The final report found:
- The ‘NQF is a robust regulatory scheme with a strong focus on continuous quality improvement to ensure children are safe, healthy and thriving in approved education and care services’;
 - However, monitoring the NQF’s effectiveness ‘will always require constant vigilance to respond to rapidly evolving societal change’; and
 - The ‘NQF exists in the context of a broader, inter-related child protection landscape with numerous child safety mechanisms... that can result in overlap and be confusing to navigate’.⁷²

⁶⁹ Childcare was defined as ‘centre-based and family-based care, as well as preschool and out-of-school-hours care’. Royal Commission into Institutional Responses to Child Sexual Abuse, [Final Report: Volume 2, Nature and Cause](#), December 2017, pp. 114, 279, 281.

⁷⁰ Royal Commission into Institutional Responses to Child Sexual Abuse, [Final Report: Volume 2, Nature and Cause](#), December 2017, p. 184.

⁷¹ Royal Commission into Institutional Responses to Child Sexual Abuse, [Final Report Recommendations](#), December 2017, pp. 6, 13.

⁷² ACECQA, *Review of Child Safety Arrangements under the National Quality Framework: Final Report – Findings and Recommendations for the NQF and Inter-related Child Safety Mechanisms*, December 2023, pp. 4–6.

1.71 Relevant recommendations for this inquiry from the final report included proposed amendments to the National Regulations to:

- Remove waivers, except in exceptional circumstances, from the requirement for the provider to ensure premises are designed and maintained in a way that facilitates the supervision of children at all times;
- Mandate that only service-issued/approved devices may be used in centre-based services when taking images or videos of children;
- Prohibit anyone working or engaged in a centre-based service in any capacity from having personal electronic devices that can take images or video on their person while with children;
- Require parental authority to record children and clearly state the purpose for which images and recordings are to be used;
- Require a provider to have a policy and procedure in place if intending to use CCTV to inform families of its use, explain data storage, security and how data are accessed, and ensure timely access to CCTV footage to authorised officers and other authorised persons such as police, when requested;
- Reduce notification reporting timeframes for any physical and sexual abuse complaints, allegations or incidents from seven days to 24 hours; and
- Require family day care providers during the initial assessment of the residence/venue and all subsequent annual visits to conduct an assessment and approvals of all areas of the residence and place, not just the area being used for the approved service.⁷³

1.72 Other relevant recommendations included:

- Amending the WWCC regimes to clarify ‘beyond doubt’ that a provider ‘cannot allow a person to commence work... without a current WWCC or confirmed teacher registration/accreditation’;
- Explore ‘the requirement for mandatory training... as part of the application process for a WWCC’; and
- Enable information sharing and streamline reporting within jurisdictions and nationally, and explore:
 - nationally consistent WWCC schemes;
 - aligning thresholds for what constitutes reportable conduct, mandatory reporting and information sharing, and harmonising each of these reporting schemes; and

⁷³ ACECQA, *Review of Child Safety Arrangements under the National Quality Framework: Final Report – Findings and Recommendations for the NQF and Inter-related Child Safety Mechanisms*, December 2023, pp. 8–9.

- links between relevant agencies to support information sharing and to enhance risk assessment (such as a national, centralised mechanism to record and share national intelligence/record keeping).⁷⁴

1.73 Reforms the Australian Government announced in June 2025 in response to the Review's recommendations included:

- New requirements for the safe use of digital technologies and online environments;
- 24-hour notification for abuse incidents and allegations (reduced from seven days);
- Prohibiting the use of digital devices in services;
- Child safety and child protection training for all staff;
- Regulatory authorities being allowed to proactively share the identity of prohibited individuals and individuals subject to enforceable undertakings with approved providers;
- The requirement that staff must hold an approved and valid WWCC prior to commencing work;
- Changes to service waivers related to the requirement for premises to be designed to facilitate supervision;
- Expansion of the powers of regulatory authorities to gather and share information with and from recruitment agencies; and
- Assessments of family day care residences to include areas near the residence that may be accessible to children.⁷⁵

Other relevant federal inquiries

1.74 While not explicitly focused on quality and safety in early childhood education and care, several recent federal inquiries into the sector have examined issues similar to this inquiry's terms of reference:

- 2025: Performance Audit Report from the Australian National Audit Office into management and oversight of compliance activities within the Child Care Subsidy program.⁷⁶

⁷⁴ ACECQA, *Review of Child Safety Arrangements under the National Quality Framework: Final Report – Findings and Recommendations for the NQF and Inter-related Child Safety Mechanisms*, December 2023, pp. 11–12.

⁷⁵ Department of Education, [National Child Safety Review – new sector guidance](#), 19 June 2025 (accessed 16 January 2026); ACECQA, [Child safety – What is changing?](#) (accessed 16 January 2026).

⁷⁶ Australian National Audit Office, [Auditor-General Report No. 42 of 2024–25: Management and Oversight of Compliance Activities within the Child Care Subsidy Program](#), 16 June 2025 (accessed 16 January 2026).

- 2023–24: Productivity Commission inquiry into early childhood education and care, which examined what a universal early childhood education and care system would look like, and the reforms required to achieve it.⁷⁷
- 2023: Australian Competition & Consumer Commission inquiry into the market for the supply of childcare services, which examined the costs and availability of labour.⁷⁸
- 2013–15: Productivity Commission inquiry into child care and early childhood learning, which examined options for childcare and early childhood learning with a focus on developing a system to support workforce participation and address children’s learning and development needs.⁷⁹

State inquiries

1.75 Recent state inquiries into the early childhood education and care sector include:

- 2025: Independent Review into the NSW Early Childhood Education and Care Regulatory Authority, which considered the Regulatory Authority’s activities in accordance with the National Law and Regulations and the National Quality Framework, and reported in May 2025;⁸⁰
- 2025: Victorian Rapid Child Safety Review, which identified actions for the Victorian Government to improve child safety and to accelerate child safety reforms being considered nationally, and reported in August 2025;⁸¹
- 2024–25: Queensland Review into System Responses to Child Sexual Abuse, which focused on the early childhood education and care sector, police services and the blue card system (Queensland’s WWCC system), and recommended better information sharing, a central point of accountability for intelligence sharing, strengthened obligations on organisations, increased worker and community awareness, and improved responses to survivors and their families;⁸²

⁷⁷ Productivity Commission, [Early childhood education and care](#) (accessed 16 January 2026); Productivity Commission, *A Path to Universal Early Childhood Education and Care: Volume 2, Supporting Papers*, September 2024, p. 585.

⁷⁸ Australian Competition & Consumer Commission, [Childcare inquiry 2023](#) (accessed 16 January 2026); Australian Competition & Consumer Commission, *Childcare Inquiry: Final Report*, December 2023, pp. 16, 84, 111.

⁷⁹ Productivity Commission, [Childcare and early childhood learning](#), 20 February 2015 (accessed 24 March 2026).

⁸⁰ NSW Department of Education, [Independent review into the NSW Early Childhood Education and Care Regulatory Authority](#) (accessed 16 January 2026).

⁸¹ Victorian Government, [Rapid Child Safety Review](#) (accessed 16 January 2026).

⁸² Queensland Family & Child Commission, [In Plain Sight report released](#), 8 December 2025 (accessed 16 January 2026); Queensland Family & Child Commission, [System responses to child sexual abuse](#), 6 January 2026 (accessed 16 January 2026).

-
- 2022–23: South Australian Royal Commission into Early Childhood Education & Care, which ‘did not look back at the problems of the past’ but instead focused on proposing ‘new solutions’ and providing ‘advice to the [South Australian] government on delivering a high-quality early years system that is fit for the future’;⁸³ and
 - 2025–26 NSW Parliamentary inquiry into the early childhood education and care sector in New South Wales, due to report by 31 March 2026, which is examining similar matters to this inquiry, as well as:
 - the effectiveness of the NSW Regulatory Authority;
 - the collection, evaluation and publication of reliable data and the level of public knowledge and access to information made available about each service;
 - the availability and affordability of quality training institutions for early childhood education qualifications; and
 - the experiences of children with disability and their parents and carers in early childhood education and care services.⁸⁴

⁸³ Royal Commission into Early Childhood Education & Care, [What is the Royal Commission?](#) (accessed 16 January 2026).

⁸⁴ Parliament of New South Wales, [Early childhood education and care sector in New South Wales](#) (accessed 16 January 2026).

Chapter 2

Safety in childcare

- 2.1 As outlined in Chapter One, recent incidents and investigations involving early childhood education and care (ECEC) services have raised serious concerns about the safety of children and shaken public confidence in the sector.
- 2.2 Evidence to the inquiry indicated that these cases cannot be viewed solely as failures within individual services. Concerning behaviour by adults who seek access to children may emerge and escalate before a person enters an ECEC setting, making it necessary to understand how the broader system identifies and responds to these risks.
- 2.3 This chapter therefore begins by considering the broader child safety context and role of law enforcement in identifying and responding to child exploitation. It then examines how safety in the ECEC sector is monitored, including national compliance data and regulatory indicators. The chapter then outlines the key practical safeguards that operate together to keep children safe in ECEC, including workforce screening and reporting mechanisms, supervision practices and technological measures. It concludes by examining additional safety considerations for children with additional needs in ECEC settings.

The broader child safety environment

- 2.4 The committee heard that law enforcement agencies are dealing with a growing volume of child sexual exploitation, particularly online. Mr Ian McCartney, Deputy Commissioner of the Australian Federal Police (AFP), told the committee that online child sexual exploitation ‘is not getting better; it’s getting worse’. He explained the need for communities to be informed about the reality of the threat to children, stating ‘if it used to take a village to raise a child, because of advances in technology, it now takes a country to keep them safe’.¹
- 2.5 Ms Helen Schneider, also of the AFP, explained that AFP involvement in ECEC-related offending typically begins when investigators identify child abuse material online and trace activity back to individuals in Australia. She noted that such investigations can reveal that individuals involved in offending work in roles that provide access to children.²
- 2.6 However, Ms Schneider emphasised that reactive investigations alone cannot provide an adequate safeguard for children. She told the committee that law

¹ Mr Ian McCartney, Deputy Commissioner, Crime, Australian Federal Police, *Committee Hansard*, 19 November 2025, pp. 1–2.

² Ms Helen Schneider, Commander, Human Exploitation, Australian Federal Police, *Committee Hansard*, 19 November 2025, p. 9.

enforcement ‘can’t keep playing whack-a-mole with the numbers that we’re receiving’ and stressed the need for ‘targeted and deliberate prevention’ measures that directly counter ‘specific methodologies offenders are using’.³

- 2.7 The committee heard evidence that some individuals who sexually offend against children deliberately seek employment in child-focused roles in order to facilitate access and grooming.⁴
- 2.8 Professor Michael Salter of the Childlight East Asia and Pacific Hub told the committee that individuals who sexually offend against children may pursue employment that provides opportunities for access and grooming.⁵ Similarly, Professor John Rouse told the committee that child sex offenders will ‘always gravitate towards employment that provides them with access to children’.⁶
- 2.9 In their submission, the Childlight East Asia and Pacific Hub cited research from a national survey that found that of almost 2,000 Australian men, 9.4 per cent admitted to some form of sexual offence against a child, including 3.2 per cent who reported sexual contact with a minor while they were over the age of 18. These individuals were more likely to minimise or justify sexual abuse, while concealing their online activities through encrypted platforms and the dark web. Further, offenders who present a ‘superficially prosocial façade’ are unlikely to be detected abusing children for many years, if they are detected at all.⁷
- 2.10 While the committee heard that most contact sexual offending against children does not occur in childcare settings, witnesses emphasised that offending in these environments is particularly serious because of the young age and vulnerability of the children involved. Ms Schneider told the committee that contact offending ‘rarely is in childcare settings’, but when it occurs in these ‘high-harm settings’, it is ‘hugely confrontational, abhorrent and heinous’.⁸
- 2.11 The Childlight East Asia and Pacific Hub submitted that several recent high-profile cases involving offending in ECEC settings revealed significant failures in safeguarding and oversight. They argued that these cases involving ‘hundreds of victims and thousands of images’ demonstrate the need for

³ Ms Helen Schneider, Commander, Human Exploitation, Australian Federal Police, *Committee Hansard*, 19 November 2025, p. 6.

⁴ See Dr Michael Salter, Director, Childlight East Asia and Pacific Hub, University of New South Wales, *Committee Hansard*, 19 November 2025, p. 45; and Professor Jon Rouse, *Committee Hansard*, 19 November 2025, p. 36.

⁵ Dr Michael Salter, Director, Childlight East Asia and Pacific Hub, University of New South Wales, *Committee Hansard*, 19 November 2025, p. 45.

⁶ Professor Jon Rouse, *Committee Hansard*, 19 November 2025, p. 36.

⁷ Childlight East Asia and Pacific Hub, *Submission 12*, p. 3.

⁸ Ms Helen Schneider, Commander, Human Exploitation, Australian Federal Police, *Committee Hansard*, 19 November 2025, p. 10.

stronger preventative measures to stop offenders from entering the sector and to ensure concerns about staff behaviour are escalated and investigated promptly.⁹

- 2.12 Ms Sarah Davies, the Chief Executive Officer of the Alannah and Madeline Foundation, emphasised that when considering the safety of children, it is ‘dangerous’ to categorise sectors of the industry by profit or not-for-profit. Ms Davies told the committee about small private providers whose intent, focus and motivation ‘is as professional and as ethical as any non-profit’.¹⁰

National reporting and safety indicators

- 2.13 The evidence outlined above highlights the seriousness of risks facing children more broadly. To understand safety within the ECEC sector, it is useful to examine the national data and regulatory indicators reported across the sector.
- 2.14 Under the National Quality Framework (NQF), early childhood services must meet safety, quality and governance requirements. State and territory regulators assess and rate services against the National Quality Standard (NQS), which includes a quality standard for children’s health, wellbeing and safety.¹¹
- 2.15 The Australian Children’s Education and Care Quality Authority (ACECQA) publishes national data each year on how the system is performing. It reports on all quality areas, but the three main types of information related to safety are:
- quality ratings assigned through assessment and rating visits;¹²
 - serious incident notifications, which providers are legally required to report when certain events occur (for example, a child is injured and requires medical treatment or hospital attendance); and,
 - confirmed breaches.¹³

⁹ Childlight East Asia and Pacific Hub, *Submission 12*, p. 3.

¹⁰ Ms Sarah Davies, Chief Executive Officer, Alannah & Madeline Foundation, *Committee Hansard*, 19 November 2025, p. 29.

¹¹ Department of Education, [National Quality Framework](#), 17 September 2025 (accessed 9 March 2026). The rating report provides the service with a detailed assessment of its quality including strengths and areas for improvement, against each of the 15 standards within the NQS. It also provides a rating for each quality area and an overall rating for the service. See Chapter One for further detail on the NQS.

¹² Services are assessed and rated by their regulatory authority against the NQS, and given a rating for each of the seven quality areas and an overall rating based on these results. See, for information: Australian Children’s Education and Care Quality Authority, [Guide to the NQF Section 3: National Quality Standard and Assessment and Rating](#), January 2026, p. 106.

¹³ Australian Children’s Education and Care Quality Authority, [NQF Annual Performance Report](#), December 2025, pp. 21, 24 & 27.

What the data shows

- 2.16 ACECQA's latest report from 2025 shows that ECEC services are consistently being rated highly against the quality ratings. Overall, 91 per cent of services with a published rating were assessed as Meeting NQS or above, and between 94 and 99 per cent met this benchmark across the individual quality areas. For children's health and safety specifically, 95 per cent of services met or exceeded the standard – the highest since the NQF began.¹⁴
- 2.17 However, the number of serious incidents reported to regulators has been increasing. In 2024–25, services reported 160 serious incidents per 100 approved services, up from 148 in 2023–24 and 139 in 2022–23.¹⁵ Most serious incidents relate to injuries, trauma or illness affecting a child (77.7 per cent of all serious incidents), followed by incidents where emergency services were sought or ought reasonably to have been sought (11.5 per cent).¹⁶
- 2.18 ACECQA also reported more confirmed breaches. The rate rose from 201 per 100 approved services in 2023–24 to 222 in 2024–25. These breaches cover a wide range of issues, but the most common categories were: protection from harm and hazards; supervision; emergency and evacuation procedures; and upkeep of premises and equipment.¹⁷

What the data does not show

- 2.19 Evidence to the committee raised concerns about the limitations of the data reported on by ACECQA.
- 2.20 The Front Project pointed to a disconnect between improving ratings and rising incident reporting, stating:

The paradox is clear: overall ratings are improving steadily and are at their highest point since the NQF began, yet serious incidents are rising, and systemic weaknesses remain in supervision, health practices, and emergency preparedness. This signals growing systemic challenges that may not be captured in high-level quality ratings alone.¹⁸

¹⁴ Australian Children's Education and Care Quality Authority, [NQF Annual Performance Report Summary 2025](#), December 2025, p. 2.

¹⁵ Australian Children's Education and Care Quality Authority, [NQF Annual Performance Report Summary 2025](#), December 2025, p. 2.

¹⁶ Australian Children's Education and Care Quality Authority, [NQF Annual Performance Report](#), December 2025, p. 21.

¹⁷ Australian Children's Education and Care Quality Authority, [NQF Annual Performance Report](#), December 2025, pp. 24 & 27.

¹⁸ The Front Project, *Submission 9*, pp. 7–9.

- 2.21 Without more frequent and comprehensive monitoring, the Front Project argued that ‘policymakers and families alike cannot be confident that everyday practices consistently meet the standard of safety that children deserve’.¹⁹
- 2.22 Similarly, the Parenthood submitted that despite improvements in overall ratings, gaps remain in some safety-critical practices. They drew attention to the fact that supervision requirements were not met in 3.4 per cent of services, health practices in 3.2 per cent, and incident management procedures in 2.0 per cent of services.²⁰
- 2.23 Social Ventures Australia argued that the quality ratings are ‘not a perfect measure’, noting that lengthy periods between assessments mean the system may not capture changes in safety practice that occur between assessment and rating visits.²¹
- 2.24 A recent report published by the Queensland Family and Child Commission, *In Plain Sight*, highlighted the limits in using quality ratings to assess safety. In a specific case concerning a convicted child sex abuser, it found that 74 per cent of the centres the offender worked in were rated as Exceeding or Meeting the National Quality Standards.²²
- 2.25 In response, ACECQA’s Chief Executive Officer, Mrs Gabrielle Sinclair, emphasised that ratings represent only a snapshot in time. She explained that:
- Given the fact that an assessment and rating is a point in time, we don’t know whether the assessment and rating happened while he was there. But the assessment and rating is just one point of information. Because he moved very quickly, we would imagine that he didn’t stay in a service—and the report does point to the fact that, in really good services that had that really strong culture of every child is safe and there are four eyes on every child, he didn’t offend at all.²³
- 2.26 While these explanations are relevant, the evidence received by the committee suggests that an over-reliance on quality ratings risks obscuring the lived experience of families and the practical realities within services. Submitters emphasised that compliance with the National Quality Standard, while important, does not necessarily reflect whether children are consistently safe in day-to-day practice.²⁴ In particular, evidence highlighted that staffing ratios can

¹⁹ The Front Project, *Submission 9*, pp. 7–9.

²⁰ The Parenthood, *Submission 41*, p. [2].

²¹ Social Ventures Australia, *Submission 78*, p. 6.

²² Queensland Family and Child Commission, [In Plain Sight, Review into System Responses to Child Sexual Abuse](#), November 2025, p. 175.

²³ Mrs Gabrielle Sinclair, Chief Executive Officer, Australian Children’s Education and Care Quality Authority, *Committee Hansard*, 10 December 2025, p. 55.

²⁴ The Front Project, *Submission 9*, p. 8.

be technically met while still resulting in inadequate supervision, especially where educators are not actively positioned or engaged in a way that mitigates risk.²⁵ This disconnect between regulatory compliance and operational reality raises questions about whether the current framework is sufficiently focused on outcomes rather than inputs.

- 2.27 Lady Gowrie QLD drew attention to the system's reliance on providers to self-report incidents to regulators and said that some providers may under-report incidents 'to avoid triggering regulatory intervention'.²⁶
- 2.28 On the other hand, other submitters told the committee that increases in serious incident notifications or breaches should not automatically be interpreted as a decline in safety. Affinity Education Group pointed to findings from the Productivity Commission indicating that data can be influenced by factors unrelated to poor safety performance. They explained:
- Higher rates of reported breaches or serious incidents can reflect improved reporting practices, more proactive regulatory oversight, or the increased size and complexity of services, rather than a decline in standards. For example, services rated as Exceeding the National Quality Standard often report more serious incidents not due to lower quality, but because of stronger internal processes and a greater likelihood to report. Similarly, increased regulatory visits and broader definitions of breaches can inflate the data, making it an unreliable sole indicator of service quality.²⁷
- 2.29 Guardian Childcare and Education made a similar point, drawing on research by the University of Sydney's Erin Harper who said that higher-quality providers can show higher incident reporting because 'they have clearer processes, more experienced or qualified educators, or higher ratios of educators to children'. They submitted that, for these reasons, 'regulators need to be careful not to judge operators based on the raw data'.²⁸
- 2.30 Likewise, the Australian Childcare Alliance (ACA) noted that services supporting higher numbers of children with additional needs may 'naturally record more incidents or receive more notifications'. They argued that public reporting can make such services appear higher risk, even though they may in fact be 'doing critical inclusion work'.²⁹
- 2.31 ACECQA itself noted in its annual report that 'most reported serious incidents result in no formal compliance action being required by state or territory regulators' and that higher reporting rates may reflect factors such as improved

²⁵ For example, United Workers Union, *Submission 80*, p. 7.

²⁶ Lady Gowrie Qld, *Submission 45*, p. [6].

²⁷ Affinity Education Group, *Submission 31*, pp. [16–17].

²⁸ Guardian Childcare and Education, *Submission 72*, p. 5.

²⁹ Australian Childcare Alliance, *Submission 54*, p. 13.

reporting practices, overly cautious reporting procedures, or particular service circumstances.³⁰

Safeguards in the ECEC system

2.32 As discussed above, national reporting and quality ratings provide only a partial picture of safety within ECEC services. While these indicators offer insight into incidents and compliance, they do not capture the day-to-day safeguards operating within services to protect children. Evidence to the committee therefore examined the practical safeguards used within ECEC services to keep children safe. The main areas raised in evidence were:

- workforce screening and reporting schemes;
- supervision practices; and
- technological safeguards.

2.33 On 22 August 2025, federal, state and territory education ministers agreed to a package of reforms intended to strengthen safety across the sector, including:

- implementing a national educator register;
- mandatory national child safety training for all ECEC staff;
- a nationwide assessment of closed-circuit television (CCTV) use in ECEC services;
- banning or restricting the use of personal mobile phones or digital devices while working directly with children;
- joint compliance and monitoring activities with states and territories to improve data exchange;
- a rapid assessment of the operational application of educator-to-child ratios and practices;
- more regular assessment and rating visits to ECEC services; and
- other measures designed to improve transparency for parents.³¹

2.34 As these reforms were announced shortly before the inquiry commenced, most submitters did not comment on them in detail. Evidence therefore focused primarily on the safeguards as they currently operate within ECEC services and the areas where stakeholders considered improvements are needed, with proposed reforms noted where relevant.

Workforce safeguards

2.35 Evidence to the inquiry focused on three main workforce safeguards: the proposed national educator register, Working With Children Checks (WWCCs), and reportable conduct schemes.

³⁰ Australian Children's Education and Care Quality Authority, [NQF Annual Performance Report](#), December 2025, p. 24.

³¹ Department of Education, *Submission 77*, p. 15.

National educator register

- 2.36 As part of the August 2025 reforms, education ministers agreed to establish a national educator register to ‘give regulators clear visibility of who is working in the sector and where’.³² The register was designed by ACECQA in partnership with all states and territories and will collect and maintain information about all staff working in ECEC, including their identity, training and qualifications, and WWCCs.³³
- 2.37 Submitters welcomed the decision,³⁴ but emphasised that the register’s effectiveness will depend significantly on its design. The Early Learning and Care Council of Australia put the underlying principle plainly, submitting that ‘the most powerful means of protecting children from “bad actors” in the workforce is to erect every possible obstacle to recruiting them’.³⁵ Evidence before the committee reflected this view, and in particular, that the register must be structured to give employers, not only regulators, meaningful access to information at the point of hiring.
- 2.38 The Australian Childcare Alliance (ACA) submitted that the register must give employers real-time verification of qualifications, WWCC status, employment history, and any record of misconduct or disciplinary action. The ACA noted that current employment decisions are constrained by reliance on resumes and self-reported information, reference checks limited by privacy and legislative barriers, and an assumption that WWCCs alone are sufficient to identify unsuitable workers. The ACA specifically flagged that current discussions include options involving a one-way flow of information from employers to regulators only, and submitted that this approach would do ‘nothing to empower employers to make wise recruiting decisions’.³⁶
- 2.39 Y Australia supported a comprehensive register, submitting that it should include details of all educators, support staff and volunteers, with real-time updates including automatic alerts when a person is disqualified, investigated or sanctioned, integration with police, child protection and interstate databases,

³² Department of Education, *Submission 77*, p. 8.

³³ Department of Education, [Joint action on strengthening the safety and quality of early childhood education and care across Australia](#), 22 August 2025 (accessed 9 March 2026).

³⁴ See, for example, ACT Government, *Submission 21*, p. 5; Human Rights Commission, *Submission 35*, p. 4; Y Australia, *Submission 40*, p. [11]; G8 Education, *Submission 43*, p. 3; Australian Childcare Alliance, *Submission 65*, p. 13; United Workers Union, *Submission 80*, p. 5; Early Childhood Australia, *Submission 89*, p. 5; and Ms Josie King, Chief Legal Quality and Risk Officer, G8 Education, *Proof Committee Hansard*, 24 February 2026, p. 2.

³⁵ Early Learning and Care Council of Australia, *Submission 91*, p. 4.

³⁶ Australian Childcare Alliance, *Submission 65*, p. 13.

and strong privacy protections to ensure information is accurate and shared appropriately.³⁷

- 2.40 Guardian Childcare and Education and the Early Learning and Care Council of Australia (ELACCA) both emphasised the importance of including risk-related information on the register. Guardian submitted that the register should capture substantiated allegations of child harm or serious misconduct and allow employers to record when a person resigns while under investigation.³⁸ ELACCA submitted that the register should contain sufficient detail to identify red flags or potentially risky behaviour, which may not have triggered formal investigative processes or findings.³⁹

Working With Children Checks (WWCCs)

- 2.41 Working with Children Checks (WWCCs), also known as Working with Vulnerable People Checks in the ACT, are a key safeguard intended to prevent unsuitable individuals from undertaking child-related work. Individuals who work directly with children must hold a valid WWCC confirming they are suitable to undertake child-related work. The process to obtain a WWCC varies significantly between jurisdictions in relation to screening processes, eligibility thresholds and information-sharing arrangements.⁴⁰
- 2.42 Goodstart Early Learning described some differences in how WWCC arrangements operate across jurisdictions, for example that:
- A clearance may only be reassessed or suspended after a person has been formally charged or a reportable conduct finding has been substantiated, allowing individuals under investigation to continue working with children;
 - Individual educators are responsible for linking their WWCC to their employer, meaning organisations may not be notified if a worker's clearance status changes; and
 - Individuals may commence child-related work after lodging a WWCC application but before background screening has been completed.⁴¹
- 2.43 In a recent opinion piece, Mr Noel Macnamara, Director of the Centre for Excellence in Therapeutic Care at the Australian Childhood Foundation, discussed the implications of these jurisdictional differences. He described the current WWCC framework as fractured 'across eight separate state and territory schemes, each with its own laws, standards, and processes', creating 'gaps that

³⁷ Y Australia, *Submission 40*, p. [11].

³⁸ Guardian Childcare and Education, *Submission 72*, p. 5.

³⁹ Early Learning and Care Council of Australia, *Submission 91*, p. 4.

⁴⁰ Department of Education, *Submission 77*, p. 22.

⁴¹ Goodstart Early Learning, *Submission 83*, p. 15.

allow offenders to slip between jurisdictions'. Mr Macnamara used recent cases to illustrate the consequences of these gaps:

Even more disturbing are the cases where individuals accused, or even charged, with serious sexual offences have continued to work with children while holding valid WWCCs. The recent case of Joshua Brown, charged with more than 70 sexual offences while employed in childcare, is only one example. Another is David Neil Tuck, who allegedly abused children while licensed. In many instances, mobility between states and employers is enabled by inconsistent standards and a lack of real-time alerts.⁴²

- 2.44 The committee also heard about the practical difficulties current WWCC arrangements create for services and staff. Ms Jessica Baker of the Ngaanyatjarra Pitjantjatjara Yankunytjatjara Women's Council explained that operating across the Northern Territory, South Australia and Western Australia involves navigating three different legislative schemes, which can be a barrier for Anangu educators who move regularly between communities. Ms Baker said that obtaining multiple checks and meeting differing requirements can delay employment and disrupt continuity of care, and expressed support for a single federal WWCC to reduce these barriers.⁴³
- 2.45 Other submitters also called for a nationally consistent approach to screening individuals who work with children.⁴⁴
- 2.46 As noted, governments have recently agreed to reforms aimed at strengthening national coordination. These include mutual recognition of refusals and cancellations, which would prevent a person denied a WWCC in one jurisdiction from holding one in another, as well as improved assessment frameworks and better information-sharing between authorities.⁴⁵
- 2.47 However, some stakeholders argued that reform needs to go further. Submitters proposed a number of reforms to strengthen WWCCs, including:
- Lowering the threshold for revoking or suspending a WWCC, so that substantiated allegations of child harm or regulatory findings automatically trigger revocation or are formally recorded on a person's clearance;⁴⁶

⁴² Noel Macnamara, '[When "complicated" becomes costly: Australia's working with children check system in crisis](#)', *Australian Childhood Foundation*, August 2025 (accessed 9 March 2026).

⁴³ Ms Jessica Baker, Manager, Research and Policy, Ngaanyatjarra Pitjantjatjara Yankunytjatjara Women's Council, *Proof Committee Hansard*, 24 February 2026, pp. 24–25.

⁴⁴ Early Learning and Care Council of Australia, *Submission 91*, p. 2. See also Guardian Childcare and Education, *Submission 72*, p. 5; Goodstart Early Learning, *Submission 83*, p. 15.

⁴⁵ Department of Education, *Submission 77*, p. 8.

⁴⁶ See Guardian Childcare and Education, *Submission 72*, p. 5; and Goodstart Early Learning, *Submission 83*, p. 15.

- Integrating WWCCs with reportable conduct schemes, with both functions administered by the same authority to ensure early identification of concerning behaviour and a more coordinated response to risk;⁴⁷
- Embedding mandatory child-abuse prevention training into the WWCC process, ensuring all card holders are trained and assessed in foundational knowledge on preventing and responding to child sexual abuse;⁴⁸ and
- Using artificial intelligence to support WWCC screening, including analysing an applicant's online presence to identify concerning behaviour that may not otherwise be detected.⁴⁹

Reportable conduct

- 2.48 Some evidence concerned the operation of reportable conduct schemes for ECEC. These schemes are legislated frameworks requiring institutions that provide services to, or work with, children to report and investigate allegations or concerns about child-related misconduct by employees. Currently, all jurisdictions except for South Australia and the Northern Territory have operating reportable conduct schemes for ECEC.⁵⁰
- 2.49 Busy Bees Early Learning submitted that the reportable conduct requirements across jurisdictions are inconsistent, with different thresholds for what constitutes a reportable allegation, different reporting bodies, and varying timeframes for notification. Busy Bees expressed that this creates confusion as staff become uncertain which jurisdictional standard applies, increases administration and does not result in a 'corresponding uplift in child safety outcomes'.⁵¹
- 2.50 Ms Samantha Page of Early Childhood Australia told the committee these inconsistencies across jurisdictions mean the same concerning behaviour may or may not trigger a reportable conduct response. She explained that behaviours such as pushing professional boundaries, isolating a child, or 'what would be considered grooming of the family relationships' would meet the threshold of a reportable conduct scheme in some states, but not in others.⁵²

⁴⁷ Dr Michael Salter, Childlight East Asia and Pacific Hub, University of New South Wales, *Committee Hansard*, 19 November 2025, p. 42.

⁴⁸ Australian Childhood Foundation, *Submission 37*, p. 17.

⁴⁹ Fivecast, *Submission 121*, p. 2.

⁵⁰ Australian Human Rights Commission, *Submission 35*, pp. 15–16.

⁵¹ Busy Bees Early Learning, *Submission 59*, p. 4.

⁵² Ms Samantha Page, Chief Executive Officer, Early Childhood Australia, *Committee Hansard*, 10 December 2025, p. 12.

- 2.51 Arguments about the benefits of a nationally consistent reportable conduct scheme are not new. The Australian Human Rights Commission noted that the Royal Commission into Institutional Responses to Child Sexual Abuse in 2015 considered reportable conduct schemes as a ‘best practice model for cross-sector oversight of institutional handling of employee related child protection matters’. The Royal Commission recommended that nationally consistent legislative schemes be established in each state and territory. Further, in October 2024, states and territories collectively recognised ‘the benefits of nationally consistent legislative reportable conduct schemes’.⁵³
- 2.52 Busy Bees recommended establishing such a scheme with harmonised thresholds, processes and timeframes, arguing that this would reduce duplication and ‘support a common culture of safety’.⁵⁴ Similarly, Knowmore recommended that the Australian Government should ‘lead work ... to implement nationally consistent reportable conduct schemes, reflecting best practice standards’.⁵⁵

Supervision safeguards

- 2.53 The committee heard consistently that supervision is one of the most important practical safeguards in early childhood education and care.⁵⁶ For example, Dr Michael Salter said that ensuring line of sight on children at all times has been ‘critical in reducing opportunities for abuse’, especially when caring for very young children without the ability to speak yet.⁵⁷
- 2.54 The Education and Care Services National Law and National Regulations require that all children being educated and cared for at an approved service are adequately supervised at all times and are protected from harm and hazards.⁵⁸
- 2.55 Evidence to the committee suggested that current regulatory settings can allow services to comply with minimum staffing ratios while still exposing children to avoidable risks. Submitters described the use of ‘under the roof’ ratios, whereby educators are counted as present for compliance purposes but are not deployed

⁵³ Human Rights Commission, *Submission 35*, pp. 15–16.

⁵⁴ Busy Bees Early Learning, *Submission 59*, p. 4. See also Goodstart Early Learning, *Submission 83*, p. 16.

⁵⁵ Knowmore, *Submission 74*, p. 29.

⁵⁶ See, for example, Victorian State Government, *Submission 95*, p. 14; Australian Childhood Foundation, *Submission 37*, p. 13; Y Australia, *Submission 40*, p. [6]; and Ms Tania Porter, Deputy Director-General, Early Childhood, Regulation and Communication, Department of Education, Queensland, *Proof Committee Hansard*, 23 February 2026, p. 51.

⁵⁷ Dr Michael Salter, Childlight East Asia and Pacific Hub, University of New South Wales, *Committee Hansard*, 19 November 2025, p. 42.

⁵⁸ Australian Children’s Education and Care Quality Authority, [National Quality Standard, Information Sheet, Quality Area 2](#), February 2018 (accessed 10 March 2026).

in a way that ensures active supervision across all areas. This can result in 'passive supervision', where risks are observed but not proactively mitigated.⁵⁹ Stakeholders argued that a shift toward dynamic, risk-based supervision, where educators are deliberately positioned and actively engaged, would better reflect the intent of the regulatory framework and improve safety outcomes.⁶⁰

- 2.56 The National Regulations also prescribe the minimum number of educators required to educate and care for children, which vary based on children's ages and the type of service.⁶¹ As noted, ACECQA has undertaken a rapid review of the educator-to-child ratio and practices that improve the safeguarding and supervision of children in ECEC services, which is discussed in detail in Chapter Three.⁶²
- 2.57 Despite these requirements, submitters argued that minimum ratios do not always provide sufficient protection, particularly when an educator is working alone or caring for children with higher needs.⁶³ The Independent Education Union of Australia said this is particularly the case when 'a significant proportion of ... children have medical, developmental and/or serious behavioural needs'.⁶⁴
- 2.58 Concerns were also raised about the practical limitations of current ratios in outside-school-hours care. Mrs Margaret Harrison of the United Services Union described situations where a single educator may be responsible for up to fifteen children aged between four and twelve, many with additional needs, creating risks for children and considerable stress for staff.⁶⁵

⁵⁹ The Front Project, *Submission 9*, p. 16.

⁶⁰ See, for example, BubbaDesk, *Submission 36*, p. 20; Lady Gowrie Queensland, *Submission 45*, p. [1]; and Community Early Learning Australia & It Takes a Village, *Submission 47*, p. 11.

⁶¹ Department of Education, *Submission 77*, p. 15. For example, under the National Regulations, centre-based services must maintain minimum ratios of one educator for every four children aged under two years, one educator for every five children aged two to three years, and one educator for every eleven children aged three years to school age.

⁶² Department of Education, *Submission 77*, p. 15.

⁶³ Mr Julian Smart, Acting Chief Executive Officer, Lady Gowrie Queensland, *Proof Committee Hansard*, 23 February 2026, p. 1.

⁶⁴ Independent Education Union of Australia, *Submission 17*, p. 16.

⁶⁵ Mrs Margaret Harrison, Union Delegate, Campbelltown City Council, and Coordinator, Outside School Hours Care Service, United Services Union, *Proof Committee Hansard*, 24 February 2026, p. 42.

- 2.59 The United Services Union therefore called for an ‘urgent review’ of the ratios, arguing that they are ‘too high’ to ensure safety under current operating conditions.⁶⁶
- 2.60 Submitters also identified particular moments of heightened risk. In some jurisdictions, services may operate at reduced ratios during sleep and rest periods, when educators often undertake administrative tasks. The Queensland Department of Education advised that reduced-ratio provisions have recently been removed in Queensland, following findings that rest periods are a ‘risk time for children’ and that maintaining full ratios is ‘critical’ for safety.⁶⁷
- 2.61 Many organisations also supported strengthened supervision in other high-risk situations, such as toileting or intimate care.⁶⁸ A commonly suggested measure was the ‘four-eyes’ approach, under which two adults remain within line of sight of each other while supervising.⁶⁹ Y Australia described this as ‘the single most effective reform’ to protect children in ECEC services.⁷⁰
- 2.62 While supporting enhanced supervision, ELACCA cautioned that mandating a two-adult or ‘four-eyes’ requirement in all circumstances could worsen educator shortages and increase service costs.⁷¹

Technological safeguards

- 2.63 Some stakeholders also discussed technological safeguards that may support supervision in ECEC services. Most evidence focused on the use of CCTV in certain areas of a service, although a small number of submitters also briefly raised the potential role of mobile-device restrictions and emerging tools such as AI.⁷²

⁶⁶ Ms Valentina Olivares, Early Childhood Education and Care Organiser, United Services Union, *Proof Committee Hansard*, 24 February 2026, p. 41.

⁶⁷ Ms Tania Porter, Deputy Director-General, Early Childhood, Regulation and Communication, Department of Education, Queensland, *Proof Committee Hansard*, 24 February 2025, p. 54.

⁶⁸ See, for example, Knowmore, *Submission 74*, p. 39.

⁶⁹ UNSW Sydney, *Submission 12*, p. 5. See also Victorian Government, *Submission 95*, p. 4; Professor Jon Rouse, *Committee Hansard*, 19 November 2026, p. 37.

⁷⁰ Y Australia, *Submission 40*, p. [6].

⁷¹ Early Learning & Care Council of Australia, *Submission 91*, pp. 4–5.

⁷² See, for example, Laureate Professor Karen Thorpe, ARC Laureate Professor, University of Queensland, *Proof Committee Hansard*, 23 February 2026, p. 20; Michael Salter, Childlight East Asia and Pacific Hub, University of New South Wales, *Committee Hansard*, 19 November 2025, p. 45.

Closed-circuit television (CCTV)

2.64 The committee heard mixed views about the use of CCTV in ECEC settings. Some submitters supported the use of CCTV as part of broader safety measures.⁷³ For example, Dr Michael Salter of the University of New South Wales told the committee that he supported the use of CCTV as ‘part of the safety equation’, particularly ‘where kids are sleeping and also in environments where children are being provided with intimate care’.⁷⁴

2.65 Professor John Rouse said that using CCTV may reduce opportunities for misconduct or assist in identifying abuse after it occurs:

It’s one of a raft of tools that should be in place... [C]onsideration of the placement of CCTV in such a way that we are target-hardening against offenders’ behaviour ... has to be considered ... because, ultimately, it may be the only evidence we have sometimes to determine whether a child was physically abused.⁷⁵

2.66 Despite their endorsement of CCTV, both Dr Salter and Professor Rouse held concerns about the privacy and data-security implications of using it. Professor Rouse said:

I think there are significant concerns around that from the privacy sector, because you wouldn’t just be viewing your child; you’d be viewing all the children, and the people during their working day. Where are those cameras placed? What are people able to see? How is that captured? Can parents also screen-capture and record this stream? Where does that end up? What’s their access, and how do they access? Knowing child sex offenders the way I do, they will be seeking access to these systems to watch children.⁷⁶

2.67 Similarly, one submitter who worked in the Victorian Child Protection system said that CCTV can ‘foster a false sense of security’, shifting attention away from safety practices, staff conduct, and incident response. The submitter recommended that any use of CCTV in ECEC services be supported by clear protocols on how footage is viewed, training for staff, and proper communication with families. The submitter also encouraged that CCTV be

⁷³ See, for example: Professor Jon Rouse, *Committee Hansard*, 19 November 2026, p. 37; Dr Michael Salter, Childlight East Asia and Pacific Hub, University of New South Wales, *Committee Hansard*, 19 November 2025, p. 42.

⁷⁴ Dr Michael Salter, Childlight East Asia and Pacific Hub, University of New South Wales, *Committee Hansard*, 19 November 2025, p. 42.

⁷⁵ Professor Jon Rouse, *Committee Hansard*, 19 November 2026, pp. 34, 37.

⁷⁶ Professor Jon Rouse, *Committee Hansard*, 19 November 2026, p. 37. See also Dr Michael Salter, Childlight East Asia and Pacific Hub, University of New South Wales, *Committee Hansard*, 19 November 2026, p. 42.

accompanied by ‘quality assurance mechanisms such as unannounced site visits, regular staff appraisals, and transparent complaints procedures’.⁷⁷

- 2.68 Mr Luke Twyford, Principal Commissioner of the Queensland Family and Child Commission, said that CCTV may suit some centres more than others, and that each centre needs to develop ‘its own specific plan’. He explained:

If you are in far western Queensland in a place like Longreach where you have two staff and an old, ageing facility—this is hypothetical, of course—and numbers that are not high enough to give you a profit to invest into a new building then maybe you should think about CCTV and how it fits into the plan and your staff supervision ratios, whereas if you’re a brand new east coast multimillion-dollar early childcare provider then your reliance on CCTV should be less, because you have better access to workers.⁷⁸

- 2.69 Some large childcare providers told the committee that they had already implemented CCTV in some of their centres. For example, Affinity Education Group noted that it is currently fast-tracking the installation of CCTV across all its centres to ‘enhance supervision and safety’.⁷⁹

- 2.70 However, other submitters were concerned about the use of CCTV in ECEC.⁸⁰ For example, St Kilda & Balaclava Kindergarten submitted that CCTV should not be a substitute for quality care from workers:

Cameras cannot build secure relationships, comfort a child in distress, or notice the subtle early signs of emotional harm. Investing in workforce conditions—better pay, more training, improved ratios—is what truly keeps children safe.⁸¹

- 2.71 Lady Gowrie Queensland held a similar view, submitting that the best way to ensure child safety in ECEC settings is to have qualified and sufficient staff members with established relationships with children and parents. They argued that this approach ‘provides a more protective, responsive and diligent safeguarding approach for children’s safety and wellbeing’.⁸²

⁷⁷ Name Withheld, *Submission 111*, p. [6].

⁷⁸ Mr Luke Twyford, Principal Commissioner, Queensland Family and Child Commission, *Proof Committee Hansard*, 23 February 2026, p. 46.

⁷⁹ Affinity Education Group, *Submission 31*, p. [9].

⁸⁰ See United Workers Union, *Submission 80 – Attachment 1*, p. 8; and Laureate Professor Karen Thorpe, ARC Laureate Professor, University of Queensland, *Proof Committee Hansard*, 23 February 2026, p. 19.

⁸¹ St Kilda & Balaclava Kindergarten, *Submission 106*, p. [3].

⁸² Lady Gowrie Queensland, *Submission 45*, p. [16]. See also University of Queensland, *Submission 24*, p. 5.

2.72 Some submitters commented on the Australian Government's recent commitment to undertake a national assessment of the use of CCTV in early childhood services, which will involve up to 300 ECEC services across Australia.⁸³ Ms Samantha Page, Chief Executive Officer of Early Childhood Australia, told the committee that, while they had some concerns about it, they were 'pleased' CCTV was going to be 'properly evaluated'.⁸⁴ The NSW Advocate for Children and Young People said that children's rights must be considered as part of the trial and that 'strict privacy provisions must be put in place regarding both the review and storage of any footage'.⁸⁵

Safeguards for children with additional needs

2.73 The committee heard that existing safeguards do not always reflect the needs of children who require additional support in ECEC settings. Evidence indicated that growing numbers of children attending services have severe allergies, type 1 diabetes and other medical conditions, and current arrangements are not always designed to manage the complexity of these needs.

Allergy management

2.74 Evidence to the inquiry highlighted significant concern about allergy management in ECEC services. Submitters noted that allergic reactions in care are common, that many children experience their first food-related allergic reaction while attending ECEC, and that failures in prevention or recognition can have serious consequences.⁸⁶

2.75 Allergy & Anaphylaxis Australia submitted that families 'frequently report incidents' where children were served food containing their known allergens or where early signs of a reaction were not recognised. It provided a specific example of a child who experienced two episodes of anaphylaxis in a single day while attending an ECEC service. According to the child's mother, staff 'did not recognise that he was having anaphylaxis', and that adrenaline was not administered until she arrived to collect him. The child subsequently had a short stay in hospital.⁸⁷

⁸³ Department of Education, [National CCTV assessment](#), 10 February 2026 (accessed 2 March 2026). See also Australian Human Rights Commission, *Submission 35*, p. 4.

⁸⁴ Ms Samantha Page, Chief Executive Officer, Early Childhood Australia, *Committee Hansard*, 10 December 2025, p. 9.

⁸⁵ NSW Advocate for Children and Young People, *Submission 18* p. [4].

⁸⁶ National Allergy Council, *Submission 22*, p. 3.

⁸⁷ Allergy & Anaphylaxis Australia, *Submission 39*, p. [5].

- 2.76 The National Allergy Council said such incidents cause significant distress for families, with some parents delaying enrolment or returning to work because they lack confidence that services can manage their child's allergy safely.⁸⁸
- 2.77 Submitters identified current training requirements as a major contributor to accidental allergen exposure. Under the National Regulations, only one staff member on duty must hold approved anaphylaxis management training, and there is no requirement for training in general allergy management.⁸⁹
- 2.78 Some submitters raised concerns about these requirements. Allergy & Anaphylaxis Australia noted that the trained staff member may not be present when a reaction occurs, while Dr Peter Goss of the Australian Paediatric Society described the requirement as 'grossly inadequate' and having led to some 'near disasters'.⁹⁰
- 2.79 To address these issues, submitters commonly recommended that all educators be required to complete training in both anaphylaxis management and general allergen management.⁹¹
- 2.80 The National Allergy Council advised that its Best Practice Guidelines for Anaphylaxis Prevention and Management provide a nationally consistent, evidence-based framework developed through consultation with key stakeholders, including ACECQA. It recommended that the guidelines be formally adopted and embedded across the sector.⁹² This proposal was strongly supported by other submitters.⁹³
- 2.81 Other recommendations aimed at improving allergy and anaphylaxis management in ECEC services included:
- Mandatory food-allergen management training for all staff involved in ordering, storing, preparing, serving or supervising food, through the National Allergy Council's All About Allergens for Children's Education and Care program;⁹⁴

⁸⁸ National Allergy Council, *Submission 22*, p. 5.

⁸⁹ National Allergy Council, *Submission 22*, pp. 6 & 11.

⁹⁰ See Allergy & Anaphylaxis Australia, *Submission 39*, p. [7]; and Dr Peter Goss, Chair, Diabetes and Allergy, Australian Paediatric Society, *Proof Committee Hansard*, 24 February 2026, p. 32.

⁹¹ See, for example, Allergy & Anaphylaxis Australia, *Submission 39*, p. [11]; Dr Peter Goss, Chair, Diabetes and Allergy, Australian Paediatric Society, *Proof Committee Hansard*, 24 February 2026, p. 32.

⁹² National Allergy Council, *Submission 22*, p. 3.

⁹³ See, for example, Allergy & Anaphylaxis Australia, *Submission 39*, p. [10]; and Dr Peter Goss, Chair, Diabetes and Allergy, Australian Paediatric Society, *Proof Committee Hansard*, 24 February 2026, p. 32.

⁹⁴ National Allergy Council, *Submission 22*, p. 5.

- Improved post allergy-incident reporting systems, recommended by the NSW Anaphylaxis Education Program;⁹⁵ and
- Annual communication and age-appropriate education for children, families, volunteers and the broader community about food allergies and anaphylaxis.⁹⁶

Diabetes management

- 2.82 Evidence to the inquiry indicated that supporting young children with type 1 diabetes (T1D) in ECEC services is highly challenging, with submitters stressing that the condition requires constant monitoring and rapid responses. One parent described T1D as ‘relentless, around the clock’, with even small errors carrying ‘life-threatening consequences’.⁹⁷
- 2.83 Families reported that many ECEC services struggle to meet this level of care. A 2025 survey by the National Type 1 Diabetes Council, Type 1 Foundation, Type 1 Voice and Team Diabetes found that 78 per cent of families had difficulties with their child’s participation, 81 per cent said their ability to work was affected, and 86 per cent had kept their child home due to concerns about safety and diabetes management.⁹⁸
- 2.84 Type 1 Voice submitted that families are often ‘subjected to a choice between enduring a substandard system of care and safety for their child or withdrawing their child from these services’, noting that in some cases, services refuse to enrol children with T1D at all.⁹⁹
- 2.85 Some parents of children with T1D provided individual submissions to the inquiry, describing the impact when services cannot meet their child’s needs. One parent submitted that after their three-year-old was diagnosed with T1D, they attempted to re-enter him in childcare but ultimately withdrew him after seven months, saying his ‘life-threatening, regular and time-sensitive needs... far outweigh the capacity of any ECEC service that is unfunded and unsupported’.¹⁰⁰
- 2.86 Submitters said ECEC services struggle to support children with T1D because educators are not trained or authorised to provide the level of medical care required. The National Type 1 Diabetes Council said that staff are ‘unqualified and untrained’ to perform the emergency response and complex care needed to

⁹⁵ NSW Anaphylaxis Education, *Submission 64*, p. 11.

⁹⁶ Allergy & Anaphylaxis Australia, *Submission 39*, pp. [11–12]

⁹⁷ Name Withheld, *Submission 115*, pp. 1–3.

⁹⁸ Type 1 Voice, *Submission 90*, p. 3.

⁹⁹ Type 1 Voice, *Submission 90*, p. 3.

¹⁰⁰ Name Withheld, *Submission 113*, p. [1].

keep young children with T1D safe.¹⁰¹ They noted this is because there is no accredited training pathway to equip educators for these tasks, and that legal restrictions around administering insulin further limit what staff can do.¹⁰²

2.87 Submitters made a range of recommendations to address these issues, including:

- Establishing an accredited workplace training program delivered by a Registered Training Organisation to qualify ECEC educators to support children with T1D;¹⁰³
- Ensuring ECEC providers, staff and families receive clear advice regarding their roles and responsibilities under relevant legal and regulatory frameworks;¹⁰⁴
- Introducing a transition period, during which the government would pause enforcement of the new requirements to give organisations time to complete the required training and comply;¹⁰⁵
- Enabling state and territory governments to enact regulatory provisions that authorise educators with the requisite qualifications to administer insulin and carry out medical tasks;¹⁰⁶
- Implementing the International Society for Pediatric and Adolescent Diabetes (ISPAD) Position Statement on Type 1 Diabetes in Schools, which submitters noted has been legally validated for use in Australia;¹⁰⁷ and
- Requiring services enrolling children with T1D or severe allergy to demonstrate staffing sufficiency with respect to relevant National Quality Standard requirements.¹⁰⁸

¹⁰¹ National Type 1 Diabetes Council, *Submission 93*, p. 7.

¹⁰² National Type 1 Diabetes Council, *Submission 93*, p. 7. Insulin is classified as a Schedule 4 medication in the Poisons Standard, meaning it requires a prescription and is regulated by law.

¹⁰³ See National Type 1 Diabetes Council, *Submission 93*, p. 5; Type 1 Voice, *Submission 90*, p. 10; Australian Paediatric Society, *Submission 108*, p. 12.

¹⁰⁴ See National Type 1 Diabetes Council, *Submission 93*, p. 5; Type 1 Voice, *Submission 90*, p. 10; Australian Paediatric Society, *Submission 108*, p. 12.

¹⁰⁵ Type 1 Voice, *Submission 90*, p. 10.

¹⁰⁶ Type 1 Voice, *Submission 90*, p. 10;

¹⁰⁷ See National Type 1 Diabetes Council, *Submission 93*, p. 5; Type 1 Voice, *Submission 90*, p. 10; and Australian Paediatric Society, *Submission 108*, p. 4. The Position Statement outlines the training and qualification pathway for employees responsible for children in the ECEC and education sectors.

¹⁰⁸ Australian Paediatric Society, *Submission 108*, p. 12.

Chapter 3

Workplaces and employment

- 3.1 One of the most significant factors determining the quality and safety of care in the early childhood education and care (ECEC) sector is employment practices and conditions. Evidence to the inquiry noted that many educators and staff in the sector are hardworking, dedicated and passionate about their roles.¹ However, workforce instability and conditions, including staff ratios, qualifications and turnover, directly affect the safety and quality of services and children’s experience of early childhood education and care.²
- 3.2 According to data from Jobs and Skills Australia cited by the Department of Education, as of August 2025, the ECEC workforce comprised approximately 270 300 educators, early childhood teachers and centre managers.³ The majority of these work in urban centres, while regional and remote communities are often serviced by mobile services and services provided by Aboriginal Community Controlled Organisations.⁴
- 3.3 Previous modelling by HumanAbility and Jobs and Skills Australia indicated that in 2024 there was a shortfall of around 21 000 qualified ECEC professionals to meet existing demand, and with the expansion of universal and subsidised ECEC initiatives, Australia would require an additional 18 000 new staff in the coming years. For every advertised vacancy, there are only around 1.6 suitably qualified applicants (and this issue may be even more acute in some regional and remote areas). In short, evidence to the inquiry indicated that despite recent improvements, there are insufficient qualified ECEC professionals to meet existing demand, let alone support more sustainable working conditions.⁵

¹ For example, the Salvation Army Australia, *Submission 30*, p. 13; Affinity Education Group, *Submission 31*, p. 13.

² Independent Education Union, *Submission 17*, p. 13; Early Learning Association Australia, *Submission 19*, p. 10; the University of Queensland (Professor Karen Thorpe), *Submission 24*, p. 15; the Parenthood, *Submission 41*, p. 4. See also Productivity Commission, *Submission 44*, p. 5; Community Early Learning Australia & It Takes a Village, *Submission 47*, p. 17; Federation of Parents and Citizens Associations of New South Wales, *Submission 48*, p. 6; Brotherhood of St Laurence, *Submission 52*, p. 3; Goodstart Early Learning, *Submission 83*, p. 11; Childcare Stress Project, *Submission 88*, p. 3; Early Childhood Australia, *Submission 89*, p. 9; Northern Rivers Preschools Alliance, *Submission 98*, p. 2.

³ Department of Education, *Submission 77*, p. 26, citing Jobs and Skills Australia, [National occupation trend – August 2025 \[data set\]](#), 8 January 2026 (accessed 24 March 2026).

⁴ HumanAbility, *Submission 70*, pp. 4–5.

⁵ HumanAbility, *Submission 70*, p. 5.

- 3.4 While some stakeholders advocated for expansion towards a more universal model of early childhood education and care, the committee notes that evidence before it raises serious questions about the system's capacity to safely sustain such expansion in its current form. The Productivity Commission cautioned that reform must be staged 'to avoid overwhelming the system through expansion that is not well planned or coordinated, crowding out the children and families who need ECEC the most and delivering poor quality services'. The Productivity Commission also noted that 'the availability of a suitably qualified workforce should be a key determinate' of reform timing.⁶ Proceeding with rapid expansion in the context of an already constrained workforce, fragmented regulatory oversight, and declining public trust risks compounding, rather than resolving, the structural issues identified throughout this inquiry.⁷
- 3.5 The committee learned that some employment practices can increase the risk of quality and safety issues, such as high reliance on transient or unvetted staff, and lack of supervision or performance management. On the other hand, good practices, such as thorough pre-employment screening, ongoing training and supportive oversight, significantly enhance child safety.⁸ This chapter provides an overview of issues raised about ECEC workplaces and employment, focusing on:
- The impact of the pace of recent changes to industrial relations;
 - Government workforce strategy;
 - Recruitment practices;
 - Vacancies, high turnover and understaffing;
 - Qualifications and training;
 - Wages; and
 - Workforce conditions.

Pace of recent industrial relations changes in the sector

- 3.6 Some evidence concerned the impact of the rapid pace of industrial relations changes in the sector. For example, the Australian Industry Group (Ai Group) stated that since 2022, providers 'have been subject to rapid and extensive change in the workplace relations framework'. Further, 'many of these changes have been the catalyst for [Fair Work Commission] proceedings which have had a direct and significant bearing on the ECEC sector'. Employers have also entered workplace instruments to access the Worker Retention Payment. Ai

⁶ Productivity Commission, *A Path to Universal Early Childhood Education and Care, Inquiry Report – Volume 1*, June 2024, p. 53.

⁷ Productivity Commission, *A Path to Universal Early Childhood Education and Care, Inquiry Report – Volume 1*, June 2024, p. 53.

⁸ Australian Childhood Foundation, *Submission 37*, p. 15.

Group noted that these developments ‘have necessarily demanded a significant amount of employers’ time and resources’.⁹

- 3.7 Ai Group submitted that it ‘is important for the committee to recognise the considerable tension and strain this presents for the ECEC sector, in the context of quality and safety regulation and outcomes’.¹⁰

Overarching government workforce strategy

- 3.8 The Australian Government’s *National Children’s Education and Care Workforce Strategy 2022–2031* focuses on the following six areas for the next decade:

- Professional recognition;
- Data and evidence;
- Qualifications and career pathways;
- Attraction and retention;
- Leadership and capability; and
- Wellbeing.¹¹

- 3.9 The committee received mixed views on the strategy. Professor Karen Thorpe was critical of it, describing it as having ‘limited vision’ and focusing ‘on working within the poor work conditions’ of the sector ‘rather than recognising the need for drastically improved conditions’.¹²

- 3.10 The South Australian Government noted that the strategy is unfunded, arguing that much ‘of the Australian Government’s effort is on the National Teacher Workforce Action Plan which does not extend to ECEC, further exacerbating the gap between early childhood educators and the broader teaching workforce’.¹³ The Australian Education Union also considered that the strategy ‘provides a pathway towards increasing the recruitment and retention of early childhood educators in the long term’. However, ‘there has been limited resourcing attached to the implementation of the strategy compared to urgent and rapid response and generous incentives provided to address the teacher shortages in schools’. The Union called for additional funds to ensure that the ‘... strategy is

⁹ Ai Group, *Submission 33*, pp. 2–4.

¹⁰ Ai Group, *Submission 33*, p. 6.

¹¹ Australian Government, *Shaping Our Future: A Ten-Year Strategy to Ensure a Sustainable, High-Quality Children’s Education and Care Workforce 2022–2031*, September 2021, p. 8.

¹² The University of Queensland (Professor Karen Thorpe), *Submission 24*, p. 15.

¹³ Government of South Australia, *Submission 69*, p. 4. See also Victorian State Government, *Submission 95*, p. 10, which called for funding for current and future actions under the strategy.

implemented to support the recruitment of the 16,000 educators and 8,000 teachers that the strategy identifies as being required'.¹⁴

3.11 Other issues raised concerning overarching government strategy for the ECEC workforce included the following:

- No record of National Cabinet considering ECEC workforce issues between December 2022 and around October 2025.¹⁵
- A call for the Australian Government to develop and implement an Aboriginal and Torres Strait Islander Early Years Workforce Strategy with the aim of achieving full workforce parity in remuneration and employment.¹⁶

Recruitment practices

3.12 While submitters and witnesses acknowledged the importance of Working With Children Checks (WWCCs), evidence argued that recruitment practices overly rely on them. The Early Learning and Care Council of Australia pointed to 'very variable recruitment practices and perhaps an overreliance on the working-with-children checks'. Their Chief Executive Officer argued that even if WWCCs become more consistent nationally, they do not 'actually assess your suitability to care for children... The expectation would be that we need all providers to do much more rigorous recruitment'.¹⁷

3.13 The Australian Childhood Foundation noted the importance of proper recruitment processes, arguing that 'lapses in hiring diligence have occurred. There have been cases where educators who had reg flags in past employment... were hired by another service that did not thoroughly check references or was not informed of the circumstances'. The Foundation argued that 'if every provider rigorously checks at least the last two employers and inquires specifically about any child safety concerns, it becomes much harder for an offender to hide'. They called for 'regulators to embed expectations' of practices like values-based interviewing techniques and recruitment training.¹⁸

3.14 The Chief Executive Officer and Founder of BubbaDesk told the committee that they believe in preventing people who may impact child safety from working 'before they even get into our environment. It's at the hiring process. I believe it

¹⁴ Australian Education Union, *Submission 34*, pp. 8–9, 22. See also National Foundation for Australian Women, *Submission 49*, p. 5, which argued 'employment practices... still need to be addressed through a properly funded National Workforce Strategy'.

¹⁵ Early Learning Association Australia, *Submission 19*, p. 12.

¹⁶ SNAICC—National Voice for Our Children, *Submission 46*, p. 7.

¹⁷ Ms Anne Hollonds, Chief Executive Officer, Early Learning and Care Council of Australia, *Committee Hansard*, 10 December 2025, pp. 32–33.

¹⁸ Australian Childhood Foundation, *Submission 37*, p. 15.

should be at the moment when people are trying to enter and gain access to even do a cert III'. She further emphasised the importance of 'a rigorous interview process'.¹⁹

- 3.15 Y Australia called for legislated rigorous recruitment and probation processes, including screening, onboarding and monitored reviews, and cited the United Kingdom's Early Years Foundation Stage statutory framework, which includes new requirements on job references, as an example.²⁰
- 3.16 A recurring theme in evidence before the committee was the structural tension between employment law protections and the child safety obligations of ECEC providers, a tension that, in practice, operates to the detriment of children.
- 3.17 Mr Luke Twyford, Principal Commissioner of the Queensland Family and Child Commission, told the committee that Australian legal structures have created an environment in which the privacy rights of adults are afforded greater protection than children's right not to be sexually abused. The practical consequence for providers is stark—acting on a genuine but unsubstantiated concern about a worker exposes the employer to significant financial and reputational liability, and when providers are unwilling to bear that liability, it is children who absorb the risk. Mr Twyford drew a pointed contrast: a parent who feels uneasy about a person caring for their child is free to act on that instinct, while an ECEC provider bound by employment law is not.²¹
- 3.18 Ms Samantha Page, Chief Executive Officer of Early Childhood Australia, described the position of centre directors who observe behaviours of genuine concern (such as a worker pushing professional boundaries, isolating a child, or cultivating an inappropriately familiar relationship with a family) but where no direct evidence of harm exists. In some jurisdictions, these behaviours would meet the threshold of a reportable conduct scheme; in others, where no such scheme exists or the bar is set higher, they would not. The result, as Ms Page put it, is that providers need to be confident they can act on those red flags without being in breach of industrial relations law, and currently, many are not. She noted that even large and experienced providers had described the difficulty of exiting an employee where concerns were real but fell short of a demonstrable breach of conduct.²²

¹⁹ Mrs Lauren Perrett, Chief Executive Officer and Founder, BubbaDesk, *Committee Hansard*, 10 December 2025, p. 38.

²⁰ Y Australia, *Submission 40*, pp. 5, 11; Government of the United Kingdom, [Statutory guidance: Early years foundation stage \(EYFS\) statutory framework](#), 1 September 2025 (accessed 26 February 2026).

²¹ Mr Luke Twyford, Principal Commissioner, Queensland Family and Child Commission, *Proof Committee Hansard*, 23 February 2026, p. 43.

²² Ms Samantha Page, Chief Executive Officer, Early Childhood Australia, *Committee Hansard*, 10 December 2025, pp. 12–13.

- 3.19 The Queensland Child Death Review Board's *In Plain Sight* report identified a specific legislative gap that compounds this problem. Unlike the *Working with Children (Risk Management and Screening) Act 2000* (Qld), which explicitly provides that an employer must comply with its requirements to end a person's employment despite any other Act, law, industrial award or agreement, no equivalent provision exists in the Education and Care Services National Law. There is no mechanism within the National Law that places child safety obligations above industrial law, or that protects a provider who dismisses an educator on the basis of allegations of misconduct that have not been formally substantiated. The protection that exists in one child-facing legislative instrument has not been replicated in the one that governs the ECEC sector directly.²³
- 3.20 The *In Plain Sight* report into the offending of Ashley Paul Griffith found multiple instances in which his employment at various centres was ceased through termination, redundancy, failed probation, or requests not to return, but where almost no information was recorded or communicated as to why. The Board concluded this was potentially indicative of a pattern of centres moving a problem on rather than confronting it, driven by fear of defamation liability, Fair Work exposure, and reputational risk.²⁴
- 3.21 The information-sharing dimension of this problem was brought before the committee by Mr Glen Hurley, Chief Executive Officer of Affinity Education Group, who confirmed that providers who hold genuine concerns about a worker, but in the absence of charges or formal findings, are legally unable to disclose those concerns to a prospective employer. He stated that 'We're not willingly holding back'.²⁵
- 3.22 Mrs Gabrielle Sinclair, Chief Executive Officer of the Australian Children's Education and Care Quality Authority (ACECQA), acknowledged this issue forms part of a broader framework requiring reform, and observed that the establishment of a comprehensive National Educator Register would create the conditions under which this challenge could begin to be addressed, by bringing transparency to workforce movements that are currently, in effect, invisible to prospective employers and regulators alike.²⁶

²³ Child Death Review Board, Queensland Family and Child Commission, *In Plain Sight: Review into System Responses to Child Sexual Abuse*, 2025, pp. 356–357.

²⁴ See Child Death Review Board, Queensland Family and Child Commission, *In Plain Sight: Review into System Responses to Child Sexual Abuse*, 2025, for example, p. 257.

²⁵ Mr Glen Hurley, Chief Executive Officer, Affinity Education Group Pty Ltd, *Proof Committee Hansard*, 23 February 2026, pp. 16–17.

²⁶ Ms Gabrielle Sinclair, Australian Children's Education and Care Quality Authority, *Proof Committee Hansard*, 10 December 2026, p. 55.

Vacancies, high staff turnover and understaffing

- 3.23 As noted, as of August 2025, there were approximately 270 300 educators, early childhood teachers and centre managers employed in Australia. The Department of Education reported that this represented an increase of 22 per cent (48 800 staff) since May 2022, while Vacancy Index data showed that job vacancies in the sector had decreased by 12.36 per cent year on year. The Department of Education argued that these ‘trends suggest that government measures ... are supporting retention and growth in the sector’.²⁷
- 3.24 Workforce instability is reported to have a direct impact on quality and safety in early childhood education and care. As the Front Project argued, workforce ‘instability is one of the most pressing risks to quality and safety’ in the sector. In particular, high staff ‘turnover, casualisation, and reliance on agency staff undermine continuity of relationships for children, increase pressure on permanent educators, and weaken regulatory compliance’. Constant staff turnover makes it more difficult for children to build secure attachments, and for staff to recognise concerning patterns of behaviour or harm in their colleagues.²⁸
- 3.25 Understaffing is linked to increased child safety issues and declining service quality, and may be correlated with increased behavioural incidents.²⁹ It can impact existing staff, who may be unable to take a lunch break, or be unwilling to take annual leave if other qualified employees are casuals, because they may be held responsible for what occurs on the premises even when not present.³⁰
- 3.26 Of note, many staff with degree level qualifications, according to Professor Karen Thorpe, ‘do not view centre-based childcare as their optimal employment destination, a finding not surprising given the shorter work hours, holiday conditions and pay levels in stand-alone preschool settings and the early years of school’.³¹
- 3.27 The Australian Childhood Foundation pointed to reports of ‘extremely high turnover’ in the sector, with the majority of workers considering leaving the

²⁷ Department of Education, *Submission 77*, pp. 26–27.

²⁸ The Front Project, *Submission 9*, p. 14. See also Dr Caroline Crosner-Barlow, Chief Executive Officer, the Front Project, *Proof Committee Hansard*, 17 February 2026, p. 36; Community Early Learning Australia & It Takes a Village, *Submission 47*, p. 14; Uniting NSW.ACT, *Submission 55*, p. 9; Ms Taj Al-Thifairy, Delegate Member, United Workers Union, *Committee Hansard*, 10 December 2025, p. 4; Dr Roslyn Baxter, Chief Executive Officer, Goodstart Early Learning, *Proof Committee Hansard*, 23 February 2026, p. 3; Mr Pejman Okhovat, Chief Executive Officer and Managing Director, G8 Education, *Proof Committee Hansard*, 24 February 2026, p. 7.

²⁹ Soroptomist International Brisbane, *Submission 16*, pp. 2, 3.

³⁰ Independent Education Union, *Submission 17*, p. 16.

³¹ The University of Queensland (Professor Karen Thorpe), *Submission 24*, p. 15.

profession, in large part because of ‘inadequate pay for the responsibilities shouldered’.³² The Australian Services Union reported that more than a third of ECEC workers are leaving their jobs each year, with turnover rates significantly higher in rural and remote areas.³³ While the committee did not seek to separately analyse outside school hours care from ECEC in the years before school, there are clearly important distinctions for these workforces. Outside School Hours Council of Australia reported that the average duration of employment among its members for an outside school hours care (OSHC) educator is just over 1.6 years.³⁴

Staffing waivers

3.28 A staffing or service waiver ‘allows an approved education and care service to be taken to comply with requirement/s of the prescribed National Regulations’.³⁵ The Department of Education informed the committee that the proportion of services with a staffing waiver declined by 9.2 per cent over the year from July 2024 to July 2025.³⁶ ECEC services can apply for staffing waivers for the following:

- Educators who are under 18 to be supervised (centre-based only);
- Educator to child ratios in centre-based services;
- Number of children who can be educated and cared for in family day care;
- General educator qualifications in centre-based services;
- Family day care educator and coordinator qualifications; and
- Requirements for the number of approved places per early childhood teacher in centre-based care.³⁷

3.29 The Department of Education gave evidence at the Sydney hearing on 10 December 2025 that waivers are granted ‘by state and territory regulators, who clearly monitor what they’re giving them for, and child safety and quality is at the heart of the original decision’. Most waivers relate to early childhood teachers.³⁸

3.30 The Front Project acknowledged recent reductions in the proportion of services with a staffing waiver, but noted that ‘waiver rates remain disproportionately high in certain jurisdictions and service types, particularly in long day care and

³² Australian Childhood Foundation, *Submission 37*, p. 20.

³³ Australian Services Union, *Submission 78*, p. 7.

³⁴ Outside School Hours Council of Australia, *Submission 82*, p. 9.

³⁵ ACECQA, [4.1 Application for service waiver](#) (accessed 5 March 2026).

³⁶ Department of Education, *Submission 77*, p. 23.

³⁷ ACECQA, [4.1 Application for service waiver](#) (accessed 26 February 2026).

³⁸ Ms Kylie Crane, Deputy Secretary, Early Childhood, Department of Education, *Committee Hansard*, 10 December 2025, p. 65f.

in rural and remote communities, where attracting and retaining qualified educators ... continues to be a significant challenge'.³⁹

- 3.31 The United Workers Union (UWU) argued that staffing 'waivers continue to be at unacceptable levels for child safety and quality of early education', given rates are particularly high in some jurisdictions. The UWU contended that the 'waiver rate is more than double what it was ten years ago... [I]n the second quarter of 2025 it is 7.4%. Whilst it is an improvement from a high of 10% in 2023, this should still be considered unacceptable'. The UWU considered that staffing 'waivers should only be a last resort and strictly time limited'.⁴⁰
- 3.32 The UWU also revealed that according to a survey it conducted in June and July 2025, 77 per cent of more than 3,000 early childhood educators reported that their centre was operating below minimum staffing requirements at least weekly, with 42 per cent reporting that it was happening daily. Respondents reported impacts to the quality of early learning, emotional support and an increase in the number of children hurting themselves or others.⁴¹
- 3.33 Longreach Regional Council called for 'targeted incentives and support for regional providers to attract and retain qualified early childhood educators, including support for professional development and career progression'.⁴²

'Under the roof' ratios

- 3.34 A further issue related to understaffing raised concerned 'under the roof' ratios, in which staff ratios are calculated based on the total number of staff on the premises, rather than in a room. The UWU reported that some providers are using "under the roof ratios" to move educators between rooms, and even count educators not on the floor, towards their minimum staffing requirements'. As a result, there is 'immense pressure on those educators in the room to supervise, deliver early learning, complete documentation and paperwork requirements, even clean... [This] is contributing to child safety risks and educator stress and burn out'.⁴³

³⁹ The Front Project, *Submission 9*, p. 15.

⁴⁰ United Workers Union, *Submission 80*, pp. 6–7.

⁴¹ United Workers Union, *Submission 80*, p. 7. Minderoo Foundation/Thrive by Five (*Submission 85*, p. 8) also noted issues with staffing ratios.

⁴² Longreach Regional Council, *Submission 103*, p. 2.

⁴³ United Workers Union, *Submission 80*, p. 7. See also Ms Natalie Dabarera, Research Coordinator, United Workers Union, *Committee Hansard*, 10 December 2025, p. 4; and Ms Georgie Dent, Chief Executive Officer, The Parenthood, *Proof Committee Hansard*, 24 February 2026, p. 55. The Front Project pointed to the same survey, noting eighty-three per cent of educators surveyed strongly agreed that the 'under the roofline' loophole compromises the wellbeing and safety of children (The Front Project, *Submission 9*, p. 16).

- 3.35 The Victorian Government called for a national review of staffing arrangements in ECEC services, to include consideration of:
- A ‘four eyes’ rule requiring two adults visible to each other while present with children;
 - Removing or amending the ‘roofline’ rule; and
 - Tightening rules permitting ‘working towards qualification’ staff so that there are more qualified eyes on children at any one time.⁴⁴
- 3.36 On 27 February 2026, the Australian Government released the December 2025 report of ACECQA’s *Rapid Assessment of Child Safe Practices*. The report found:
- There is ‘significant variability in how educator to child ratios are interpreted and applied across service types, with a particular focus on the use of what is colloquially called ‘under the roof’ ratio calculations and the risk this has on child safety’;
 - There has been ‘a misinterpretation of what is required, at a minimum, for quality child and educator interactions as was expected and designed by the [National Quality Framework] for an effective education sector’;
 - Practices have emerged ‘where a single educator or teacher is solely responsible for children without another educator or teacher being able to see or hear the children and the educator or teacher’; and
 - Some approved providers have applied pressure on and/or offered incentives to staff to only plan and implement ratios ‘across the service’.⁴⁵
- 3.37 The report called for changes to the National Law and the National Quality Standard, and for the government to clarify ‘that “across the service” ratios should be used in exceptional circumstances only’.⁴⁶ The Minister for Early Childhood Education announced the same day the report was released that the Australian Government had accepted the report’s recommendations and would be ‘banning the unsafe practice of misuse of under-the-roofline ratios. And we will also accept their recommendation to better define adequate supervision’.⁴⁷

Workforce composition

- 3.38 The early childhood education and care workforce is overwhelmingly female (90.7 per cent according to the 2024 National Workforce Census). It has a greater representation of First Nations individuals and people born overseas relative to all occupations. Around two-thirds are in permanent employment. Almost a

⁴⁴ Victorian State Government, *Submission 95*, p. 4.

⁴⁵ ACECQA, *Rapid Assessment of Child Safe Practices*, December 2025, p. 8.

⁴⁶ ACECQA, *Rapid Assessment of Child Safe Practices*, December 2025, p. 10.

⁴⁷ The Hon. Jason Clare MP, Minister for Education, and Senator the Hon. Dr Jess Walsh, Minister for Early Childhood Education and Minister for Youth, [Press conference—Narwee, NSW](#), 27 February 2026 (accessed 2 March 2026).

- third work full-time hours, 29.2 per cent work short part-time hours, and 37.1 per cent work long part-time hours (greater than 19 hours and up to 34 hours).⁴⁸
- 3.39 The Australian Childhood Foundation flagged a ‘concerning trend’ in the use of labour-hire firms to source educators, arguing that ‘while many are reputable, it adds a layer of complexity to vetting and accountability’.⁴⁹ Y Australia noted that services have full child-safety obligations under the National Law, while agencies are regulated mainly for workplace law compliance.⁵⁰
- 3.40 Lady Gowrie Qld submitted that when ‘profit margins are tight, some providers move to minimise staffing levels or rely heavily on casual and inexperienced workers’. This can increase the risk that younger, unqualified or under-mentored staff may lack the confidence or knowledge to identify hazards, manage incidents or respond to child needs.⁵¹
- 3.41 Evidence to the committee indicated that the use of labour hire and agency staff in the ECEC sector is, in many cases, a response to workforce shortages and operational requirements rather than a primary staffing model. Y Australia submitted Australian Competition & Consumer Commission evidence that providers, facing acute workforce shortages, are increasingly turning to casual and contract staff to fill gaps in staffing rosters.⁵²
- 3.42 Similarly, evidence highlighted that services require the capacity to backfill leave, respond to unplanned absences, and maintain required staffing levels to ensure continuity of care.⁵³ Lady Gowrie Qld noted that funding arrangements must support providers to meet these ‘real-world staffing requirements’, including the use of agency staff where necessary.⁵⁴ Evidence from participants also indicated that casual or relief staff may be deployed across services to cover short-term absences such as sick leave or unexpected vacancies.⁵⁵ These arrangements can play a role in maintaining service continuity, particularly in a sector experiencing persistent workforce pressures.

⁴⁸ Department of Education, *Submission 77*, pp. 23–24.

⁴⁹ Australian Childhood Foundation, *Submission 37*, p. 18. See also Victorian State Government, *Submission 95*, p. 10.

⁵⁰ Y Australia, *Submission 40*, p. 14.

⁵¹ Lady Gowrie Qld, *Submission 45*, p. 8.

⁵² Y Australia, *Submission 40*, p. 14.

⁵³ Mr Jarod Dobson, National Director, Y Australia, *Proof Committee Hansard*, 17 February 2026, p. 6, Lady Gowrie, *Submission 45*, [p. 14].

⁵⁴ Lady Gowrie Queensland, *Submission 45*, [p. 13].

⁵⁵ Mr Glen Hurley, Chief Executive Officer, Affinity Education, *Proof Committee Hansard*, 23 February 2026, p. 12, Australian Childhood Foundation, *Submission 37*, p. 18,

- 3.43 The United Workers Union argued that reducing ‘churn and casualisation is not just a workforce issue; it’s a safety issue’.⁵⁶
- 3.44 However, the Australian Childcare Alliance pointed to ‘a persistent perception that ECEC is highly casualised’ despite data suggesting ‘that most staff are employed on a permanent full-time or permanent part-time basis in centre-based daycare. Casualisation is more pronounced in Outside School Hours Care’. In particular, they argued that casualisation ‘is less than 15% in centre-based daycare’, and ‘overstating casualisation ... risks undermining public trust and misdirecting policy’.⁵⁷

Proposed reforms

- 3.45 Proposed reforms to ensure that safety is an utmost priority within casual workforces and among agency staff included the following:
- Initiatives to promote permanent and ongoing employment arrangements;⁵⁸ and
 - With regards to using labour hire agencies:
 - Extend child-safety, qualification, and training obligations to staffing agencies;
 - Accredited and monitor agencies, making them legally responsible for screening, induction and compliance;
 - Allow regulators to share prohibition and safety information with agencies;
 - Require agencies to meet the National Principles for Child Safe Organisations and state/territory child safe standards;
 - Monitor and prevent over-reliance on agency staff to protect continuity of care;⁵⁹ and
 - Restrict the use of agency staff to ensure relationship continuity for children.⁶⁰

⁵⁶ United Workers Union, *Submission 80*, p. 12.

⁵⁷ Australian Childcare Alliance, *Submission 65*, p. 13.

⁵⁸ National Outside School Hours Services Alliance, *Submission 38*, p. 4; Australian Education Union, *Submission 34*, p. 22; the Parenthood, *Submission 41*, p. 4.

⁵⁹ Y Australia, *Submission 40*, p. 14.

⁶⁰ The Parenthood, *Submission 41*, p. 4.

Qualifications and training

- 3.46 Submitters argued one of the biggest contributors to high quality in ECEC services is the education and training of ECEC staff.⁶¹ As the Productivity Commission noted, ‘effective qualification and career pathways are vital for building and maintaining an ECEC workforce’ so that they are able to deliver quality and safe services to families and children, and to ensure that talented and dedicated staff are attracted to (and retained in) the sector.⁶²
- 3.47 The most common education, training and qualification pathways for people entering the ECEC workforce are the Certificate III in Early Childhood Education and Care, the Diploma of Early Childhood Education and Care, the Diploma of School Age Education and Care, and the Bachelor and Master of Education (in Early Childhood or Early Childhood and Primary).⁶³
- 3.48 The Australian Government has introduced mandatory national child safety training for all persons with management or control, nominated supervisors, persons in day-to-day charge, family day care educators and other staff, volunteers and students in the ECEC sector, from 27 February 2026.⁶⁴
- 3.49 However, according to evidence received, particular barriers are preventing potential workers from completing qualifications, including the complexity and length of the qualifications, and issues with finding suitable and flexible placements that balance students’ study and life responsibilities.⁶⁵ Further, despite teacher registration requiring minimum professional development to be completed annually, early childhood educators and directors of services are not required to complete regular professional development. Lack of paid time release for staff professional development may be a significant barrier for staff to access such programs.⁶⁶
- 3.50 In regional and remote areas, there may also be limited access and options for training placements, given travel and accommodation costs and complex

⁶¹ Early Learning and Care Council of Australia, *Submission 91*, p. 4; Northern Rivers Preschools Alliance, *Submission 98*, p. 2.

⁶² Productivity Commission, *Submission 44*, p. 6.

⁶³ HumanAbility, *Submission 70*, p. 6.

⁶⁴ Department of Education, [Mandatory national child safety training](#) (accessed 26 February 2026).

⁶⁵ HumanAbility, *Submission 70*, p. 7. See also Ms Angela Cochrane, Founder, the Future Care Foundation, *Proof Committee Hansard*, 23 February 2026, p. 29, who argued that there has been ‘a mass exodus of people who have been providing family daycare for decades... that have been forced out because they didn’t have the time, space or capacity to go back and complete a certificate III and do 160 hours of placement’.

⁶⁶ Community Early Learning Australia & It Takes a Village, *Submission 47*, p. 14.

logistics, and limited opportunities for local mentoring, for educators wishing to work in the family day care and in-home care sector.⁶⁷

- 3.51 ACECQA approves early childhood education and care qualifications under the National Quality Framework, including Certificate III, Diploma and Early Childhood Teacher level programs. It also maintains a public list of approved qualifications and decides whether programs meet national standards, including requirements around delivery, content and professional experience. Graduates of non-approved programs are not eligible to work as qualified educators or teachers in early childhood education and care services.⁶⁸ The Australian Skills Quality Authority (ASQA) also regulates a number of training providers that offer the Certificate III and Diploma of Early Childhood Education and Care.⁶⁹
- 3.52 Early Learning Association Australia submitted that ‘the combination of staffing requirements and the scale and structure of the funding system make it challenging for employers to find the time and funding to release staff to undertake professional development’. Further, the scale and scope of existing professional development support from the Commonwealth for Child Care Subsidy-funded services ‘are insufficient for the scale of the ECEC system’. The Association expressed its support for the recommendation from the Productivity Commission for governments to provide financial support for the workforce to undertake professional development.⁷⁰
- 3.53 The Productivity Commission reported concerns about the quality and work readiness of graduates of existing qualifications required for entry into the sector.⁷¹ Early Learning Association similarly reported ‘significant concerns from its members about the impacts of low-quality training providers, and programs that are run too quickly to cover what is needed’. As a result, new

⁶⁷ Remote Area Planning & Development Board, *Submission 124*, p. 3.

⁶⁸ Department of Education, *Submission 77*, pp. 24–25; Australian Skills Quality Authority, *Submission 68*, p. 2.

⁶⁹ Australian Skills Quality Authority, *Submission 68*, p. 2.

⁷⁰ Early Learning Association Australia, *Submission 19*, p. 13.

⁷¹ Productivity Commission, *Submission 44*, p. 7. See also Victorian State Government, *Submission 95*, p. 17; Tasmanian Government, *Submission 96*, p. 2; and Integricare, *Submission 61*, pp. 3, 5, which argued that some ‘fast-tracked private courses and university degrees lack a sufficient emphasis on early years development. Furthermore, there have been problems recognised with an unregulated Registered Training Organisation (RTO) sector where unscrupulous providers compound this problem ... The quality of educator training is a major concern, as the rapid increase in private, fast-track programs has led to poor practical experiences for trainees. Body Safety Australia cites evidence that this poor training leaves staff ill-equipped to identify grooming behaviours or respond appropriately to disclosures of child sexual abuse’. Integricare also pointed to ‘low-quality practicums’.

staff may require significant additional support once commencing employment.⁷²

- 3.54 One early childhood educator flagged a range of concerning issues regarding training, including:
- One student being offered cash to work while on placement at a private centre, meaning her supervising educator was rarely present;
 - Another student in a fast-track degree was sent on placement without completing any core study on early childhood development; and
 - A teenager with only a basic Certificate III qualification was tasked with training other educators across multiple for-profit services.⁷³
- 3.55 The Chief Executive Officer of SNAICC—National Voice for our Children told the committee at the Melbourne hearing of instances where Aboriginal people had been working and studying for more than 10 years ‘and didn’t have a single qualification. That was because the service providers would go up and go down ... and the qualifications would adjust’. She further flagged the challenges around studying ‘because there aren’t enough people on the floor, so there’s no backfill’.⁷⁴
- 3.56 SNAICC argued that in its current form, ‘the vocational system is not capable of supporting development of the Aboriginal and Torres Strait Islander ECEC workforce at levels capable of meeting demand’. SNAICC argued that innovation ‘funds ... may go some way to both alleviating the pressures that childcare deserts are creating for Aboriginal and Torres Strait Islander communities’.⁷⁵
- 3.57 ASQA acknowledged that it ‘has observed specific vulnerabilities across our regulatory risk priorities’ in relation to early childhood education and care. It reported that its ‘intelligence suggests non-genuine providers utilise Recognition of Prior Learning (RPL), and shortened duration inappropriately and are exploiting skills shortages in the sector’. ASQA informed the committee

⁷² Early Learning Association Australia, *Submission 19*, p. 14. See also Ms Saxon Rice, Chief Executive Officer, Australian Skills Quality Authority, *Proof Committee Hansard*, 24 February 2026, p. 49, who informed the committee that one issue ASQA has identified is ‘the inappropriate or inconsistent use of digital recordings as the primary assessment evidence without the assurance or without sufficient assurance of authenticity or competence’.

⁷³ Name Withheld, *Submission 117*, pp. 4–5.

⁷⁴ Ms Catherine Liddle, Chief Executive Officer, SNAICC—National Voice for our Children, *Proof Committee Hansard*, 17 February 2026, p. 55.

⁷⁵ SNAICC—National Voice for Our Children, *Submission 46*, pp. 19, 21. See also National Aboriginal and Torres Strait Islander Education Corporation, *Submission 57*, p. 2, which argued ‘long-term investment is needed in First Nations workforce development, with more traineeships, more community-based roles, and clearly mapped [professional] growth and leadership pathways specific for First Nations people’.

that it is ‘closely monitoring the performance of training providers who deliver early childhood qualifications’ as a result. More than 4,000 early childhood education and care qualifications have been cancelled since October 2024, with ASQA cancelling the training providers’ registration.⁷⁶

- 3.58 While many submitters were in favour of support for increased training and professional development, the Future Care Project argued that the requirement for new educators to complete 120 placement hours as part of their Certificate III is ‘a significant barrier. For prospective [family day care] educators, the requirement is unaffordable, logistically difficult in rural areas, and deters many from entering the sector’. As a result, they contended, the requirement has ‘unintentionally stifled workforce growth’ in family day care.⁷⁷
- 3.59 While HumanAbility acknowledged the importance of training in leadership, mentoring and other forms of upskilling, it also noted that given ‘existing workload pressures for many in the sector, such developments must also strike the balance between the urgent need to safeguard children and not adding undue time or financial pressures on workers’, as well as maintaining adequate staffing levels.⁷⁸
- 3.60 The Victorian Government noted that under ‘the National Law there is no general limit on the number or proportion of staff that can be “actively working towards” their qualifications’. They argued that ‘this measure can be misused by services to lower staff costs, to the detriment of child safety and education quality’.⁷⁹

Proposed reforms

- 3.61 The committee received a multitude of recommendations for reform related to qualifications and training. While submitters outlined opportunities for professional development, the committee understood the underpinning necessity is for all higher education providers, especially publicly funded universities, VET providers, and publicly funded TAFEs, to provide evidenced-based and high-quality courses.
- 3.62 For example, the ACT Government called for a new version of the Professional Support Coordinators program, which was funded by the Australian Government until 2016, for free, high-quality and contextual professional learning and development in each state and territory.⁸⁰ The Salvation Army proposed a similar initiative to a Victorian Department of Health initiative

⁷⁶ Australian Skills and Quality Authority, *Submission 68*, pp. 4, 7.

⁷⁷ The Future Care Project, *Submission 60*, p. 4.

⁷⁸ HumanAbility, *Submission 70*, p. 8.

⁷⁹ Victorian State Government, *Submission 95*, pp. 14–15.

⁸⁰ ACT Government, *Submission 21*, p. 7.

whereby free training, degrees and upskilling was provided for nurses and midwives from 2023 to 2024.⁸¹ Other proposals in this area included structured induction and funding for mentoring for new staff,⁸² scholarships,⁸³ supported trainee pathways,⁸⁴ and funding for travel and other costs associated with centre closure or backfill because of staff attending training.⁸⁵

- 3.63 In the area of the quality of education and training courses, the Front Project proposed a minimum evidence base be established for professional development.⁸⁶ Several submitters proposed increased monitoring, oversight and transparency of Registered Training Organisations offering early childhood education and care qualifications,⁸⁷ while the Victorian Government suggested stronger Australian Skills Quality Authority powers to address poor quality registered training organisations and to focus on training outcomes that better prepare students for working in the sector.⁸⁸
- 3.64 On the matter of minimum training and qualification requirements, the National Outside School Hours Services Alliance proposed minimum onboarding and ongoing training and development for all educators.⁸⁹
- 3.65 Busy Bees Early Learning Australia recommended that national core workforce standards be developed for early childhood education and care educators, modelled on the disability sector's approach,⁹⁰ and the Federation of Parents and Citizens Associations of New South Wales called for mandatory training for all outside schools hours staff on shift to be completed within the first three months of employment, with current First Aid, CPR, asthma and anaphylaxis and child

⁸¹ The Salvation Army Australia, *Submission 30*, p. 13.

⁸² The Front Project, *Submission 9*, p. 30. See also Lake Macquarie City Council, *Submission 29*, p. 6, which called for investment in workforce development, including mentorship programs, leadership development and opportunities for career progression.

⁸³ The Front Project, *Submission 9*, p. 30; United Services Union NSW, *Submission 128*, p. 10. See also Soroptomist International Brisbane, *Submission 16*, p. 5, which called for the development of 'transparent career pathways through scholarships, leadership programs, and recognition of prior learning to attract and retain talent'.

⁸⁴ The Front Project, *Submission 9*, p. 30.

⁸⁵ Body Safety Australia, *Submission 97*, p. 10; Remote Area Planning & Development Board, *Submission 124*, p. 5.

⁸⁶ Body Safety Australia, *Submission 97*, p. 11.

⁸⁷ G8 Education, *Submission 42*, p. 5; NSW Advocate for Children and Young People, *Submission 18*, p. 4.

⁸⁸ Victorian State Government, *Submission 95*, p. 4.

⁸⁹ National Outside School Hours Services Alliance, *Submission 38*, p. 4.

⁹⁰ Busy Bees Early Learning Australia, *Submission 59*, p. 7.

protection/mandatory reporting training delivered via a new accredited model for the outside school hours care sector.⁹¹

- 3.66 On the matter of minimum qualifications, the Remote Area Planning & Development Board called for consideration of alternative, staged training and qualification pathways for ECEC staff, including the use of a general Certificate II-level ECEC qualification, to allow educators to enter the workforce sooner under appropriate supervision, while progressively working towards a full Certificate III.⁹²
- 3.67 The Victorian Government recommended the Australian Government review current rules for the proportion of qualifications required for a service to operate (given there is no general limit in the National Law on the number or proportion of staff who can be ‘actively working towards’ their qualifications).⁹³

Wages

- 3.68 The committee was informed that wages and conditions for staff employed in the sector are key to addressing the attraction and retention crisis.⁹⁴ Of note, the Fair Work Commission in early 2026 announced changes to the Children’s Services Award, including a new classification structure and changes to minimum rates of pay.⁹⁵
- 3.69 Evidence suggests that there is a direct link between wages and service quality – with services with higher quality ratings typically paying staff higher wages.⁹⁶ The Australian Childhood Foundation explained this link in further detail:

Despite the critical importance of their work, early childhood staff have historically been among the lowest-paid professionals in Australia. This reality has far-reaching consequences: difficulties in attracting and retaining skilled educators, elevated stress, and burnout levels among staff, and ultimately a negative impact on the consistency and quality of care children receive... When educators are undervalued and under-resourced, children’s wellbeing is put at risk through high turnover, understaffed rooms, and distracted or fatigued caregivers. Conversely, improving pay and

⁹¹ Federation of Parents and Citizens Associations of New South Wales, *Submission 48*, p. 9.

⁹² Remote Area Planning & Development Board, *Submission 124*, pp. 3–4.

⁹³ Victorian State Government, *Submission 95*, pp. 14–15.

⁹⁴ Independent Education Union, *Submission 17*, p. 14.

⁹⁵ Fair Work Ombudsman, [Changes to the Children’s Services Award](#), 26 February 2026 (accessed 26 February 2026).

⁹⁶ For example, the Front Project, *Submission 9*, pp. 17, 18–19; Independent Education Union, *Submission 17*, p. 3; Integricare, *Submission 61*, p. 6; Dr Karina Davis, Chief Executive Officer, Early Learning Association Australia, *Proof Committee Hansard*, 17 February 2026, p. 18.

conditions is likely to yield a more stable, qualified, and attentive workforce, directly benefiting children's safety and development.⁹⁷

- 3.70 Many qualified educators leave the sector for roles in schools, retail, disability support and other sectors where pay is equal or better, and working conditions may be less demanding.⁹⁸ As the Network of Community Activities noted, entry-level outside school hours care (OSHC) educators at Level 1.1 earn around \$24.95 an hour, compared to entry-level construction labourers under the Building and Construction General On-Side Award, who earn around \$27–28 per hour, with no qualification requirements beyond a White Card. The Network noted that it 'is difficult to sustain stable teams, induction programs, and mentoring when staff can leave for higher pay in roles with fewer legal responsibilities'. In addition, in the ECEC sector, 'wage progression is minimal. Educators see little improvement without gaining formal qualifications, even if they take on the same responsibilities'.⁹⁹
- 3.71 According to the Productivity Commission, a range of factors may contribute to low wages in the sector, including:
- The market-based nature of the services, which can incentivise services to compete on price rather than quality;
 - A general reliance on awards to set pay and conditions;
 - Limited capacity of services to fund wage increases; and
 - Preconceptions about the nature and value of work in the sector.¹⁰⁰
- 3.72 Workforce is generally the largest cost in the delivery of early childhood education and care services. For local government providers, labour costs can comprise more than 80 per cent of service expenses.¹⁰¹ Outside School Hours Council of Australia reported that labour comprises 69 per cent of the total costs for centre-based day care services and 77 per cent of total costs for OSHC services.¹⁰²
- 3.73 The Australian Childcare Alliance argued that there 'is clear evidence that many providers in the sector already heavily invest in their workforce', with 42.1 per cent of staff across the workforce receiving pay above the award rate. More than half of staff at centre-based long daycare are paid above the award rate.¹⁰³

⁹⁷ Australian Childhood Foundation, *Submission 37*, p. 20.

⁹⁸ Lady Gowrie Qld, *Submission 45*, p. 9; Name Withheld, *Submission 117*, p. 4.

⁹⁹ Network of Community Activities, *Submission 42*, p. 5.

¹⁰⁰ Productivity Commission, *Submission 44*, p. 6.

¹⁰¹ Australian Local Government Association, *Submission 50*, p. 5 (also *Attachment 1*, p. 4).

¹⁰² Outside School Hours Council of Australia, *Submission 82*, p. 9.

¹⁰³ Australian Childcare Alliance, *Submission 65*, p. 15.

3.74 Issues raised about wages for the ECEC sector included the following:

- Despite the recent pay rise, there is still not parity of pay with other education sectors, and small 'changes in income are likely not sufficient to improve financial stress';¹⁰⁴
- Remuneration in the early childhood education and care sector 'is relatively low even when compared with sectors that require no formal qualifications, despite the significant training and responsibility expected of early educators';¹⁰⁵
- Reforms to increase pay 'must be built upon with longer-term, structural reform to ensure educators' pay reflects their skills and responsibilities';¹⁰⁶
- There 'is no recognition of the specialised and complex role of nominated supervisors in the early childhood sector', with wages not reflecting the role's 'high level of responsibility and liability for children's safety';¹⁰⁷
- A considerable gap in average pay differences between not-for-profit and for-profit providers;¹⁰⁸
- Staff not being paid for non-contact hours spent on compulsory documentation;¹⁰⁹ and
- Services employing educators working towards their diploma to meet diploma ratio requirements, but paying the educators at a lower rate and, once they have completed their diploma, terminating the educator because their wages will need to be increased.¹¹⁰

¹⁰⁴ The University of Queensland (Professor Karen Thorpe), *Submission 24*, p. 15. See also Early Childhood Australia, *Submission 89*, p. 10; Northern Rivers Preschools Alliance, *Submission 98*, pp. 2, 3.

¹⁰⁵ The Front Project, *Submission 9*, p. 19.

¹⁰⁶ The Front Project, *Submission 9*, p. 19.

¹⁰⁷ Northern Rivers Preschools Alliance, *Submission 98*, p. 3.

¹⁰⁸ For example, the Federation of Parents and Citizens Associations of New South Wales argued that community outside school hours care 'services tend to invest more in staff pay and development, whereas some large providers ... keep wages at the minimum and rely on a churn of casual staff' (Federation of Parents and Citizens Associations of New South Wales, *Submission 48*, p. 8). Conversely, Guardian Childcare & Education, *Submission 72*, pp. 1, 3, argued that 'Governments need to avoid being caught up in a concerted, invalid and counter-productive campaign against for-profit centres. If this misleading narrative continues to be perpetrated unchecked, it could result in Australian families having fewer, quality childcare and education options ... All operators have been lumped together, and various studies have been framed on the basis that quality early learning is somehow a battle between not-for-profit and for-profit operators'.

¹⁰⁹ Independent Education Union, *Submission 17*, p. 13; United Workers Union, *Submission 80*, p. 13.

¹¹⁰ Australian Services Union, *Submission 78*, p. 7.

3.75 The Australian Childhood Foundation welcomed the ‘recent federal government initiative to boost wages through multi-employer bargaining in early childhood, supported by some state-funded interventions’. They stated that they:

... strongly [support] government investment in the workforce as an investment in children’s safety and development. For-profit providers must also be part of the solution; reinvesting a fair share of revenue into staff wages and training should be seen as a core responsibility, not an optional cost. One of the criticisms from the Victorian rapid review was that the market-driven model led some for-profit providers to prioritise profit margins at the expense of workforce support and quality. This cannot continue if we expect quality and safety to improve.¹¹¹

3.76 The Early Learning Association Australia acknowledged that their members wanted to invest more in the workforce, but ‘the reality is the money must come from somewhere. Either it comes from governments, or it comes from parents (in the form of fees)’.¹¹² Similarly, the Australian Childcare Alliance argued that the capacity of services ‘to raise wages is limited ... [S]ervices in thin markets or in areas of market saturation do not have the same discretionary funds to do so’.¹¹³

3.77 Integricare noted that childcare is generally not eligible to be classified as a Public Benevolent Institution, while aged care is. As a result, ECEC workers at not-for-profit providers are unable to access salary packaging concessions, which would mean they could receive take home pay equivalent to the aged care and disability workforce. Integricare argued that this would ‘attract further skilled and dedicated workers to the not-for-profit childcare sector’.¹¹⁴

Worker Retention Payment

3.78 The Department of Education reported that the ECEC Worker Retention Payment provides for a 15 per cent wage increase for ECEC workers over two years, for staff working in Child Care Subsidy-approved, centre-based day care and outside school hours care services, who are covered by the two primary modern awards, or predominantly undertake duties described under these awards. However, the wage increase is via an opt-in grant, and is conditional on providers limiting fee increases, and engaging workers under a compliant workplace instrument. The Department of Education reported that since

¹¹¹ Australian Childhood Foundation, *Submission 37*, p. 20.

¹¹² Early Learning Association Australia, *Submission 19*, p. 11.

¹¹³ Australian Childcare Alliance, *Submission 65*, p. 16.

¹¹⁴ Integricare, *Submission 61*, pp. 13–15.

applications opened for the Payment in October 2024, the coverage of workers under workplace instruments has increased dramatically.¹¹⁵

- 3.79 Goodstart Early Learning submitted that after the wage increase, staff ‘vacancies dropped dramatically. By April 2025, sector monthly vacancies dropped below 5,000 for the first time since 2021, down 28% on the previous April’. Since May 2025, vacancies have slowly increased ‘but remain well below the levels seen in [the] previous three years’.¹¹⁶
- 3.80 The committee received a range of evidence outlining issues about the Worker Retention Payment. For example, the Australian Education Union considered that it is ‘unlikely that this increase alone will be sufficient to attract the required numbers of additional educators to the sector’.¹¹⁷
- 3.81 Early Learning Association Australia noted the Australian Government has only committed to the Worker Retention Payment until November 2026, leading to uncertainty for service planning and for the workforce regarding their future pay.¹¹⁸
- 3.82 The committee also heard that because the Worker Retention Payment has mandated fee caps, services cannot adequately recover the costs of increased workers compensation insurance premiums,¹¹⁹ and some providers have spent hundreds of thousands of dollars in internal costs to implement the Payment.¹²⁰ Further, payments have taken significant time to be processed and are retrospective, creating cashflow pressures for services,¹²¹ and providers do not know how much they will receive until they receive it, because the funding formula or amount has not been disclosed.¹²²

¹¹⁵ Department of Education, *Submission 77*, p. 26.

¹¹⁶ Goodstart Early Learning, *Submission 83*, pp. 11–12. See also Dr Roslyn Baxter, Chief Executive Officer, Goodstart Early Learning, *Proof Committee Hansard*, 23 February 2026, pp. 6, 9; Ms Natalie Dabarera, Research Coordinator, and Ms Taj Al-Thifairy, Delegate Member, United Workers Union, *Committee Hansard*, 10 December 2025, p. 4.

¹¹⁷ Australian Education Union, *Submission 34*, p. 8.

¹¹⁸ Early Learning Association Australia, *Submission 19*, p. 3. See also Ms Valentina Olivares, Early Childhood Education and Care Organiser, United Services Union, *Proof Committee Hansard*, 24 February 2026, p. 44.

¹¹⁹ Integricare, *Submission 61*, p. 6.

¹²⁰ Outside School Hours Council of Australia, *Submission 82*, p. 10.

¹²¹ Early Learning Association Australia, *Submission 19*, p. 7. See also Early Childhood Australia, *Submission 89*, p. 11, which flagged a slow ‘approval process and lengthy application forms ... Many providers report significant delays in grant approvals ... The complexity and time-consuming nature of application paperwork has also placed additional administrative burdens on services’.

¹²² Early Learning Association Australia, *Submission 19*, p. 7.

- 3.83 Evidence provided by the Department of Education from Supplementary Budget Estimates 2025–26 identified that 77.5 per cent of outside school hours care and centre based day care providers are covered by a submitted Worker Retention Payment application.¹²³ Evidence from Early Childhood Australia at the public hearing in Sydney on 10 December indicated that some services have not signed up to the Worker Retention Payment ‘because they are concerned about the short-term nature of the grant and what might happen when that runs out, and whether wage increases will be built into’ either the Child Care Subsidy or a replacement financing mechanism. Early Childhood Australia also noted anxieties were present for providers who did apply for the grant as they got closer to the end of that grant.¹²⁴ Early Learning Association Australia expressed similar sentiments at the public hearing in Melbourne on 17 February 2026.¹²⁵
- 3.84 On the matter of the Worker Retention Payment, Family Day Care Australia noted that it had received a guarantee that a re-elected Labor Government would consider how the Payment could be extended to the family day care sector. Family Day Care Australia submitted that ‘it is exceptionally important’ that a decision is ‘expedited for both employees of family day care approved services and independent contractor educators’.¹²⁶

Proposed reforms

- 3.85 Recommendations from submitters to address issues with wages in the ECEC sector included that pay and conditions should be comparable to equivalent positions in primary schools,¹²⁷ and a call for further stakeholder consultation with the sector to establish wage structures reflecting the professional responsibilities and experience of educators in early childhood settings.¹²⁸

¹²³ Department of Education, *Question on Notice SQ25-000682*, Senate Education and Employment Legislation Committee Supplementary Budget Estimates 2025–26, p. 1.

¹²⁴ Ms Samantha Page, Chief Executive Officer, Early Childhood Australia, *Committee Hansard*, 10 December 2025, p. 8.

¹²⁵ Dr Karina Davis, Chief Executive Officer, Early Learning Association Australia, *Proof Committee Hansard*, 17 February 2026, pp. 19–20.

¹²⁶ Family Day Care Australia, *Submission 73*, p. 13.

¹²⁷ Independent Education Union, *Submission 17*, pp. 4, 14. See also Soroptomist International Brisbane, *Submission 16*, pp. 4, 5; Early Childhood Australia, *Submission 89*, p. 10; Early Learning and Care Council of Australia, *Submission 91*, p. 5. See also the Parenthood, *Submission 41*, p. 5, which proposed ‘a long-term professional wage structure linked to teacher salary scales’.

¹²⁸ Catholic Social Services Australia, *Submission 54*, p. 10.

Workforce conditions

- 3.86 Sustainable work conditions include manageable workloads, adequate staffing levels and access for staff to resources and support.¹²⁹ The committee learned that services that invest in good employment conditions and impose reasonable workloads and rostering enable educators to focus on the care of children, rather than prioritising administrative tasks. Further, psychological safety – if staff feel comfortable raising concerns without fear of reprisal – can directly impact the reporting of incidents and suspected harm to children.¹³⁰
- 3.87 However, the committee was informed that often, employment conditions ‘are not commensurate with the significant role’ that early childhood education and care ‘plays in founding our children’s futures’ at the ‘most significant time in human brain development’.¹³¹
- 3.88 The committee learned that, according to one study, more than 70 per cent of educators engage in unpaid work each week, averaging 7–9 hours.¹³²
- 3.89 Of note, according to one submission, administration and documentation take up around 35 per cent of educators’ total work.¹³³ Other evidence flagged increased administrative and reform-driven workloads.¹³⁴
- 3.90 The Front Project submitted that early ‘childhood educators face some of the most hazardous working conditions of any comparable profession’, with injury and workers’ compensation data indicating the claim rate of ECEC workers is almost double the average across all industries—significantly higher than

¹²⁹ Centre for Policy Development, *Submission 11*, p. 16.

¹³⁰ Lady Gowrie Qld, *Submission 45*, pp. 8–9. See also Ms Tania Porter, Deputy Director-General, Early Childhood, Regulation and Communication, Department of Education, Queensland, *Proof Committee Hansard*, 23 February 2026, p. 53; Body Safety Australia, *Submission 97*, p. 9, which also noted the impact of a fear of consequences for reporting; and Dr Caroline Croser-Barlow, Chief Executive Officer, Front Project, *Proof Committee Hansard*, 17 February 2026, p. 29, who noted that ‘conditions are what allow educators and leaders to have the emotional regulation, the brain space, to do the kind of high quality relational work that we know is required for good early childhood education’.

¹³¹ The University of Queensland (Professor Karen Thorpe), *Submission 24*, p. 15.

¹³² Australian Parents Council, *Submission 4*, p. 2. See also Dr Karina Davis, Chief Executive Officer, Early Learning Association Australia, *Proof Committee Hansard*, 17 February 2026, p. 16, who said many staff ‘are working unpaid hours simply to keep up’.

¹³³ Name Withheld, *Submission 117*, p. 3.

¹³⁴ Early Learning Association Australia, *Submission 19*, p. 10. See also the University of Queensland (Professor Karen Thorpe), *Submission 24*, pp. 15–16, who noted that expectations that educators will undertake administrative work while children are asleep sees ‘escalating conflict between children and educators’.

claims from workers in the construction industry, machinery and equipment manufacturing industry, and preschool teachers and centre managers.¹³⁵

- 3.91 Other evidence highlighted unsustainable workloads, low job satisfaction,¹³⁶ and overtime being worked to meet ratios and service needs.¹³⁷ The Front Project reported services are increasingly relying on trainees, who must spend 20 per cent of their paid time in off-the-job learning, increasing pressure on services, along with significant time spent by experienced staff on recruitment, onboarding and supervising trainees.¹³⁸
- 3.92 The Australian Education Union considered that one of the challenges to improving wages and conditions for workers in the sector ‘is that employers and Government seek to deflect responsibility to each other’. The Union further contended that investing ‘in educators’ time and careers requires a funding model that does not encourage providers to manage costs by cutting over-ratio time and undervaluing planning, preparation, and supervision effort’.¹³⁹

Proposed reforms

- 3.93 Recommendations from submitters to address issues raised about workforce conditions included the following:
- Introduce mandatory Workload Impact Assessments (similar to Teacher Workload Impact Assessments contained in the National Teacher Workforce Action Plan) and a review of excessive documentation;¹⁴⁰
 - Training and clear advice and support to address violence in the workplace, including violence by young children;¹⁴¹
 - A minimum of five hours of non-contact time allocated per educator per week to enable quality program planning and collaborative practice;¹⁴²
 - Permanent relief educators to maintain ratios, provide breaks and support programming time;¹⁴³ and
 - Additional sick leave entitlements.¹⁴⁴

¹³⁵ The Front Project, *Submission 9*, pp. 16–17.

¹³⁶ Independent Education Union, *Submission 17*, pp. 13–15.

¹³⁷ The Front Project, *Submission 9*, pp. 14–15.

¹³⁸ The Front Project, *Submission 9*, pp. 14–15.

¹³⁹ Australian Education Union, *Submission 34*, pp. 9, 22–23.

¹⁴⁰ Independent Education Union, *Submission 17*, p. 4.

¹⁴¹ Independent Education Union, *Submission 17*, p. 4.

¹⁴² United Services Union NSW, *Submission 128*, p. 9.

¹⁴³ United Services Union NSW, *Submission 128*, p. 9.

¹⁴⁴ United Services Union NSW, *Submission 128*, p. 9.

Chapter 4

Effectiveness of the current regulatory system

- 4.1 This chapter provides an overview of the most common issues raised in evidence concerning the effectiveness of the current regulatory system. The chapter does not focus on issues raised in evidence that have largely been superseded by recent announcements, such as the requirement that all staff must have an approved Working With Children Check before commencing work in an ECEC service, the recent implementation of the National Early Childhood Worker Register, more funding for more unannounced visits by regulators, and the Commonwealth’s national trial of CCTV.¹
- 4.2 The publication of the Ashley Paul Griffith case prompted the Review of Child Safety Arrangements under the National Quality Framework, undertaken by ACECQA. The committee understands some of the recommendations of this Review took a significant time to be implemented, including those relating to penalties and mobile phone use in childcare services.
- 4.3 Throughout the course of the inquiry, the committee learned that there are significant issues with the current regulatory system for the early childhood education and care (ECEC) sector, with the most significant weaknesses being that it is fragmented and under-resourced.² Further, current oversight mechanisms of the system are inadequate,³ and the system is often more reactive than proactive.⁴ The regulatory system involves multiple players, leading to inconsistencies.⁵ Even within the same jurisdiction multiple government agencies may be involved in oversight, monitoring and compliance. In addition, there may be limited understanding from governments about the practical

¹ Education Ministers Meeting, [Communique](#), 22 August 2025, p. 2 (accessed 3 March 2026); ACECQA, [National Early Childhood Worker Register](#) (accessed 4 March 2026).

² For example, the Parenthood, *Submission 41*, p. 2; Busy Bees Early Learning Australia, *Submission 59*, p. 3; Social Ventures Australia, *Submission 78*, pp. 2, 9; Goodstart Early Learning, *Submission 83*, p. 18; Minderoo Foundation/Thrive by Five, *Submission 85*, p. 4; ChildAware, *Submission 87*, p. 6; Early Learning and Care Council of Australia, *Submission 91*, p. 2.

³ Soroptimist International Brisbane, *Submission 16*, p. 2. The NSW Advocate for Children and Young People (*Submission 18*, p. 2) argued that a ‘surge in for-profit providers combined with a permissive regulatory system has resulted in concerns over the quality and safety of early childhood education and care services’.

⁴ Ms Lisa Bryant, *Submission 25*, p. 3; The Parenthood, *Submission 41*, p. 3; Lady Gowrie Qld, *Submission 45*, p. 6.

⁵ Australian Childhood Foundation, *Submission 37*, p. 9.

implications of system-wide reforms, and limited support and information from governments to understand reforms and changes.⁶

- 4.4 There are ongoing questions regarding the effectiveness of current regulators, including, for example, the effectiveness of the Commonwealth Department of Education's compliance activities and governance arrangements for providers receiving the Child Care Subsidy.⁷ Ms Hetty Johnston AM, a key child advocate, argued that government 'is solely to blame for most of the incidents we have seen in the media' because of regulatory failures that 'have been raised in almost every inquiry report ever written. Yet, here we are decades later... The system is in crisis largely because of government failures—not ECEC'.⁸

Division of responsibilities

- 4.5 Some evidence noted that there is no clear division of responsibilities between Commonwealth and state/territory governments.⁹ Other evidence highlighted overlapping 'and conflicting roles and responsibilities' that 'result in differing systems between jurisdictions'.¹⁰
- 4.6 The Front Project argued that with 'no clear settlement of responsibilities between the Commonwealth and the states and territories, oversight is stretched and inconsistent'. They called for national clarity on 'roles and responsibilities between the Commonwealth, states, and territories to provide clarity, to support and shepherd reform implementation, and ensure shared accountability for outcomes'.¹¹
- 4.7 Similarly, the Centre for Policy Development called for agreement on the different roles and responsibilities between levels of government. Further,

⁶ Early Learning Association Australia, *Submission 19*, p. 6.

⁷ Australian National Audit Office, *Submission 81*, pp. 3, 4; Ms Peta Lane, Group Executive Director, Australian National Audit Office, *Committee Hansard*, 10 December 2025, p. 27. The Department of Education informed the committee that the Department had 'taken proactive steps towards remediating or acting' on the ANAO's seven recommendations. Mr Brendan Moon, First Assistant Secretary, Child Care Division, Department of Education, *Committee Hansard*, 10 December 2025, p. 60.

⁸ See Safeguarding People Australia, *Submission 7*, p. 4.

⁹ The Parenthood, *Submission 41*, p. 3. See also Ms Katherine Osborne, Program Director, Social Services, Centre for Policy Development, *Proof Committee Hansard*, 17 February 2026, p. 37, who noted that 'one of the challenges that we have is that there are a mix of roles and responsibilities across Commonwealth and state governments and across providers'.

¹⁰ Brotherhood of St. Laurence, *Submission 52*, p. 2.

¹¹ The Front Project, *Submission 9*, pp. 11, 29.

‘governments need to take greater responsibility for the system and the outcomes it achieves—as system stewards’.¹²

- 4.8 At the public hearing in Melbourne, the Centre for Policy Development proposed that the Commonwealth Government take primary responsibility for funding and funding entitlement, with the states and territory to have a greater role in the management and support of service delivery.¹³
- 4.9 While several submissions raised this theme, there are many other policy areas where such a division of Commonwealth and state and territory responsibilities is also prominent in the governance framework. It was not feasible within the committee’s Terms of Reference to consider the division of responsibilities in ECEC compared to other areas of public policy.

Overregulation and regulatory burden

- 4.10 Some evidence pointed to an increasing administrative burden for providers and staff demanded by the current regulatory system.¹⁴ For example, Integricare contended that the current ‘system creates an overwhelming administrative burden’, pointing to research suggesting that non-contact tasks comprise 37 per cent of educators’ workload, and the highly-qualified educators with degrees spend only 30 per cent of their paid time in undistracted and uninterrupted time with children.¹⁵
- 4.11 Laureate Professor Karen Thorpe told the committee that educators are ‘under extreme pressure’ to complete administrative work, explaining that:

From mealtimes through to sleep-rest times, educators are pressed to get the children to bed so that they can do all the programming work that they don’t have time to do elsewhere. In centres that are cutting costs, they don’t have a cleaner, so they’re doing all the cleaning. It was just the pressure on their time that meant that, instead of mealtimes being nice, social events—we even had one centre recently. I was there. They said, ‘We don’t talk to the children at mealtimes so that we can get through them quickly and get them to bed so we can get our paperwork done.’ They call it ‘paperwork, paperwork, paperwork’.¹⁶

¹² Centre for Policy Development, *Submission 11*, p. 14.

¹³ Ms Katherine Osborne, Program Director, Social Services, Centre for Policy Development, *Proof Committee Hansard*, 17 February 2026, p. 38.

¹⁴ For example, Dr Karina Davis, Chief Executive Officer, Early Learning Association Australia, *Proof Committee Hansard*, 17 February 2026, p. 18; Ms Trisha Jha, Research Fellow, Education Program, Centre for Independent Studies, *Proof Committee Hansard*, 24 February 2026, pp. 38–39.

¹⁵ Integricare, *Submission 61*, pp. 4–5.

¹⁶ Laureate Professor Karen Thorpe, ARC Laureate Professor, University of Queensland, *Proof Committee Hansard*, 23 February 2026, p. 21.

- 4.12 Professor Thorpe said that the quality of care and safety of children both go down due to this pressure, as mealtimes and sleep-times are both ‘danger zones’, saying ‘we see much lower quality in that time, but we also see mishandling in that time, and there’s a lot of conflict for educators at that time’.¹⁷
- 4.13 Similarly, the Northern Rivers Preschool Alliance argued that the current system imposes an ‘excessive regulatory burden’ on educators and ‘leads to burnout and the loss of many excellent teachers, leaders and advocates for children in the high performing centres’, while in lower performing centres, ‘one-fits-all templates are often used, negating any real reflection and possibility of improvement’. They pointed out that teachers are not required to demonstrate ongoing proficiency to an external assessor.¹⁸
- 4.14 The Independent Education Union pointed to the complexity of national requirements, arguing that:
- Regulation in the sector is extremely complex with the:
- more than 400 individual National Regulations
 - 7 NQS quality areas containing 40 individual quality elements
 - Guide to the NQF of 686 pages
 - Self-Assessment Tool of 81 pages
 - Educational Leader Resource of 155 pages
 - Early Years Learning Framework of 70 pages
 - the National Principles for Child Safe Organisations of 20 pages.
- This documentation needs to be substantially reduced. Teachers and educators do not have time to read, reflect on, and implement over 1000 pages of information. With the extensive amount of documentation teachers and educators are expected to comprehend and complete, it is little wonder they report that they do not have adequate time for interacting with children...¹⁹
- 4.15 The Australian Childhood Foundation suggested that one ‘weakness of the current regulatory system is the overly complex reporting framework’. In particular, when a provider identifies a safeguarding concern, they may need to notify the state regulatory authority, ACECQA, the police, child protection, and sometimes separate departmental oversight bodies.²⁰ The Early Learning Association Australia also pointed to duplication between state and national regulation.²¹

¹⁷ Laureate Professor Karen Thorpe, ARC Laureate Professor, University of Queensland, *Proof Committee Hansard*, 23 February 2026, p. 21.

¹⁸ Northern Rivers Preschool Alliance, *Submission 98*, p. 4.

¹⁹ Independent Education Union, *Submission 17*, p. 12.

²⁰ Australian Childhood Foundation, *Submission 37*, p. 11.

²¹ Dr Karina Davis, Chief Executive Officer, Early Learning Association Australia, *Proof Committee Hansard*, 17 February 2026, p. 20. See also Mr Andrew Paterson, Chief Executive Officer, Family

- 4.16 The Foundation pointed to the United Kingdom, where each local authority employs a Local Authority Designated Officer, who is a trained safeguarding professional responsible for receiving allegations against staff and volunteers, convening multi-agency strategy meetings, and coordinating responses. Providers report to the Officer, who then ensures that all authorities are informed and working together, and responses can be timely. The Foundation argued that a 'national equivalent in Australia would bring much-needed clarity'.²²
- 4.17 Guardian Childcare & Education noted that the ECEC industry 'is a highly regulated industry, for good reason. However, there is also a danger of over-regulation to a point where the well-being of children is compromised by... non-prioritised or subjective compliance actions or – even worse – ad hoc regulatory actions'.²³
- 4.18 Early Learning Association Australia informed the committee that 'the early childhood system is under enormous pressure. Reforms are welcome and necessary, but... layered on a foundational administrative burden caused by cross-jurisdictional differences that are poorly considered and not clearly understood by governments... [I]t's becoming increasingly challenging, at the service level, and there is, I think, broad fatigue across all parts of the sector'.²⁴
- 4.19 Early Learning Association Australia noted that single-service and small providers 'generally do not have large, back-office teams providing help to manage changes to regulatory requirements... They do not have specific expertise in regulatory compliance or dedicated resources to develop new organisational policies'.²⁵ One early childhood teacher argued that 'mountains of administrative and compliance demands consistently pull us away from our most important work, forcing us to complete tasks during our breaks or, more often, on our own unpaid time'.²⁶

Day Care Australia, *Proof Committee Hansard*, 24 February 2026, p. 9. Ms Jessica Baker, Manager, Research and Policy, Ngaanyatjarra Pitjantatjara Yankunytjatjara Women's Council, *Proof Committee Hansard*, 24 February 2026, pp. 24–25, also pointed to the challenges of operating across three different jurisdictions with differing regulatory requirements.

²² Australian Childhood Foundation, *Submission 37*, p. 11.

²³ Guardian Childcare & Education, *Submission 72*, p. 2.

²⁴ Dr Karina Davis, Chief Executive Officer, Early Learning Association Australia, *Proof Committee Hansard*, 17 February 2026, pp. 16, 18.

²⁵ Early Learning Association Australia, *Submission 19*, p. 6.

²⁶ Name Withheld, *Submission 117*, p. 3.

- 4.20 The Victorian Government called for the Commonwealth to commission ACECQA and the Australian Securities and Investment Commission (ASIC) ‘to investigate ways to address the complex legal structures and arrangements being used in the ECEC sector’.²⁷
- 4.21 Family Day Care Australia argued that the ‘growing complexity and volume of regulatory obligations in early ECEC is placing an unsustainable burden on family day care services and educators’ and impacting their ability to both meet compliance requirements and deliver high-quality education and care. In particular, ‘the intensifying administrative burden is one of the most significant factors driving educators to exit the sector’. Family Day Care Australia argued that ‘the regulatory load is outpacing the capacity of legitimate providers to manage it sustainably’. Without a change in approach, the result may be ‘a loss of a flexible, community-based, and often culturally responsive model of care’.²⁸
- 4.22 The Local Government Association of Queensland suggested that compliance ‘requirements designed for large metropolitan centres often impose disproportionate costs on small rural services’.²⁹

Tick-box approach to compliance

- 4.23 Some evidence argued that parts ‘of the regulatory system have leaned too heavily on a tick-box approach to compliance, rather than fostering a culture of continuous improvement’.³⁰ For example, Busy Bees Learning Australia argued that the current system channels ‘provider effort toward documentation, form filling and procedural compliance’.³¹
- 4.24 Body Safety Australia highlighted ‘regulatory ritualism’, arguing children’s ‘safety must not be viewed as a tick box exercise, as this sets a low bar’. An ‘overreliance on compliance... creates unsafe environments for children. Relationship building in early childhood education and care is integral to child sexual abuse primary prevention approaches’.³²

²⁷ Victorian State Government, *Submission 95*, p. 4.

²⁸ Family Day Care Australia, *Submission 73*, pp. 5–6. See also Mr Andrew Paterson, Chief Executive Officer, Family Day Care Australia, *Proof Committee Hansard*, 24 February 2026, pp. 8–9, 11, who informed the committee that educators are often spending ‘nights and weekends fulfilling their compliance and regulatory obligations and documenting learning’. He suggested ‘a more adequately funded system’ would allow educators to ‘accommodate some of that compliance and regulatory load. I think an overall increase in efficiencies of the administrative burden... is critical’.

²⁹ Local Government Association of Queensland, *Submission 104*, p. 1.

³⁰ The Front Project, *Submission 9*, p. 11; Australian Childhood Foundation, *Submission 37*, p. 13; Federation of Parents and Citizens Associations of New South Wales, *Submission 48*, p. 4.

³¹ Busy Bees Early Learning Australia, *Submission 59*, p. 3.

³² Body Safety Australia, *Submission 97*, pp. 2, 4, 6.

- 4.25 The Federation of Parents and Citizens Associations of New South Wales, for example, reported that providers in the OSHC sector have described ‘achieving a Meeting rating as a “box-ticking exercise” rather than a true mark of quality’. The Federation argued that volunteer-managed services ‘faced with a choice between spending scarce hours on children or on perfect paperwork, they often choose the former and then suffer in the ratings’. The Federation argued that the ‘regulatory framework’s inflexibility thus risks... advantaging large operators with dedicated compliance staff’.³³
- 4.26 Catholic Social Services Australia suggested that more frequent visits from regulators should focus on child health and safety as a priority over ‘tick the box’ administrative compliance. They argued that this approach would support ‘a regulatory culture that prioritises constructive engagement and continuous quality improvement’.³⁴

Assessment and Rating process

- 4.27 State and territory regulators assess ECEC services against the NQS under the Assessment and Rating (A&R) process.³⁵
- 4.28 However, the committee learned that there are serious issues with the A&R process. These included long gaps between Assessment and Rating visits, averaging 3.5 years, and in some cases in South Australia 8–10 years, meaning that regulators are not providing timely oversight and instead rely heavily on complaints rather than proactive monitoring, and staff previously assessed are unlikely to be those currently working at the centre.³⁶ Further, services that repeatedly failed to meet minimum standards were still permitted to operate, sometimes for more than a decade.³⁷

³³ Federation of Parents and Citizens Associations of New South Wales, *Submission 48*, pp. 3, 4.

³⁴ Catholic Social Services Australia, *Submission 54*, p. 15.

³⁵ ACECQA, [Assessment and rating process](#) (accessed 4 March 2026).

³⁶ The Front Project, *Submission 9*, p. 10; Ms Samantha Page, Chief Executive Officer, Early Childhood Australia, *Committee Hansard*, 10 December 2025, p. 13; Productivity Commission, *Submission 44*, p. 4; The University of Queensland, *Submission 24*, p. 10; The Parenthood, *Submission 41*, p. 2; Lady Gowrie Qld, *Submission 45*, p. 3; Australian Local Government Association, *Submission 50*, p. 4. Affinity Education argued that ‘there is a clear need for more consistent and frequent assessment and monitoring of ECEC services across Australia by state and territory regulatory authorities’, given a gap of ‘four to five years or longer between Assessment and Rating visits’. Affinity Education Group, *Submission 31*, p. 5. See also Uniting NSW.ACT, *Submission 55*, p. 6; Northern Rivers Preschool Alliance, *Submission 98*, p. 5.

³⁷ Community Early Learning Australia & It Takes a Village, *Submission 47*, p. 9.

- 4.29 The Front Project submitted that different A&R practices in different jurisdictions are impacting consistency in decision-making.³⁸ The Early Learning and Care Council of Australia reported inconsistent advice from different authorised officers from the same regulator—with inconsistencies within and between states being ‘a daily occurrence’.³⁹ Further discussion of inconsistencies is provided later in this chapter.
- 4.30 Lady Gowrie Qld argued that partial A&Rs may have helped regulators to manage their workloads but introduced risks and reduced opportunity for services to demonstrate they have progressed from Meeting to Exceeding requirements.⁴⁰
- 4.31 According to Professor Karen Thorpe from the University of Queensland, the scope of elements of assessment in NQS is ‘large’ and the ‘relative importance of each element is not equal in terms of research evidence linking these to child outcomes’. In particular, research has found that only ‘three of the seven quality areas of the NQS were the most consistent predictors of child outcomes at school entry’. In addition, there may be issues in equity in assessment and rating, with services scoring highly in quality assessments during the more challenging parts of the day, such as meals and sleep-rest times, being given higher quality across the day.⁴¹
- 4.32 Professor Thorpe also argued that low market demand, low socio-economic factors and high population complexity including disability, trauma and behavioural challenges limit the capacity of some centres to achieve the highest quality ratings, compared with services rated as Exceeding, which are more commonly attended by the most privileged children.⁴²
- 4.33 Some evidence contended the process is ‘difficult and time consuming’, requiring staff to provide documented evidence of each element and standard.⁴³ According to the Independent Education Union, the current expectation for services to document how a service is Exceeding the NQS ‘is both duplicative and excessive and takes valuable time and resources away from the supervision of, and interaction with, children’. In particular, the ‘resources and time devoted

³⁸ The Front Project, *Submission 9*, p. 13.

³⁹ Early Learning and Care Council of Australia—answers to questions taken on notice at a public hearing in Sydney on 10 December 2025 (received 21 January 2026), pp. 2–3.

⁴⁰ Lady Gowrie Qld, *Submission 45*, p. 4.

⁴¹ The University of Queensland, *Submission 24*, pp. 10–12. Professor Thorpe also pointed to issues with food quality and quantity in some centres. See Laureate Professor Karen Thorpe, ARC Laureate Professor, University of Queensland, *Proof Committee Hansard*, 23 February 2026, pp. 22–23.

⁴² The University of Queensland, *Submission 24*, pp. 11–12.

⁴³ Northern Rivers Preschool Alliance, *Submission 98*, p. 4.

to achieving and conferring Exceeding or Excellent ratings, both at the service and regulatory authority level, would be better devoted to improving centre practices'.⁴⁴

- 4.34 The committee was also informed that some 'regulatory assessments under the NQF... focus heavily on paperwork... while failing to assess whether staff can identify grooming behaviours',⁴⁵ and the process 'takes highly skilled staff away from their roles in educating and keeping children safe'.⁴⁶
- 4.35 Despite all this effort, the committee was told by the Northern Rivers Preschool Alliance that the 'Assessment and Rating system is meaningless to families—many don't trust or care about the rating system and don't use it to make decisions about where their child attends'.⁴⁷
- 4.36 The committee learned that some directors and/or their staff intend to leave the ECEC sector because of their experiences with centre accreditation, and directors 'report that teachers and educators have lost faith in the A&R process, and their confidence and sense of purpose have been eroded due to the inconsistency and subjectivity of accreditation decisions'. The Independent Education Union argued that the process is 'causing 'stress and burnout that causes the ECEC workforce, and teachers in particular, to leave the sector'.⁴⁸
- 4.37 Of note, in August 2025, Education Ministers announced that the states and territories would ensure all services are assessed on average every three years, with more frequent visits for those rated 'Working Towards' the NQS.⁴⁹

Proposed reforms

- 4.38 Proposals for change in this area from submitters included changing the current A&R process to 'a strength-based process that inspires services to improve the quality of their practice'.⁵⁰
- 4.39 The Independent Education Union called for clarity regarding what is expected in Assessment and Rating and increase consistency and transparency regarding ratings and reports. The Union called for a review of the A&R system to evaluate

⁴⁴ Independent Education Union, *Submission 17*, p. 5.

⁴⁵ Australian Childhood Foundation, *Submission 37*, p. 11.

⁴⁶ Northern Rivers Preschool Alliance, *Submission 98*, p. 3.

⁴⁷ Northern Rivers Preschool Alliance, *Submission 98*, p. 3.

⁴⁸ Independent Education Union, *Submission 17*, pp. 5, 11, 12.

⁴⁹ Education Ministers Meeting, [Communique](#), 22 August 2025, p. 2 (accessed 3 March 2026).

⁵⁰ Independent Education Union, *Submission 17*, p. 5.

whether Australia's NQS rating and regulatory systems are pulling educators' focus from children's education and safety.⁵¹

- 4.40 Some submitters called for a review of the Exceeding and Excellent ratings, with services instead to be assessed against a single high standard of meeting or not meeting the NQS, a system that would replicate the registration system in schools⁵² - or, alternatively, revise the rating system to a simpler 'Meeting' or 'Working Towards' model.⁵³ Lady Gowrie Qld proposed a review of the partial A&R process to ensure it does not disadvantage services striving for continuous improvement.⁵⁴
- 4.41 Further proposals included, from the University of Queensland, a more collaborative and transparent approach to assessments and monitoring visits, in which assessment and rating is targeted, frequent and captures everyday practice.⁵⁵
- 4.42 The Australian Childhood Foundation called for assessors to 'be trained and equipped to look beyond policies into practice', with questions to include, for example, whether staff know what to do if a child discloses abuse.⁵⁶

Delays by regulators

- 4.43 Besides delays in the Assessment and Rating process, the committee was also informed that in some instances, there are delays in follow-up by state and territory regulators that lead to risks being unaddressed.⁵⁷ For example, The National Foundation for Australian Women highlighted the 'slow process of reporting and investigating abuse cases and breaches of National Law and regulations... Some services have reported incidents and not had appropriate

⁵¹ Independent Education Union, *Submission 17*, pp. 5, 6.

⁵² Independent Education Union, *Submission 17*, p. 5. They argued that this would significantly reduce stress and burnout... Pressure from employers for directors to achieve a higher-level rating would also be alleviated'.

⁵³ Integricare, *Submission 61*, pp. 4, 10–11. Professor Thorpe argued that 'we actually really need a mega overhaul of the assessment, rating and regulation. We don't need more regulation; we need to do it better and more efficiently'. See Laureate Professor Karen Thorpe, ARC Laureate Professor, University of Queensland, *Proof Committee Hansard*, 23 February 2026, p. 23.

⁵⁴ Lady Gowrie Qld, *Submission 45*, p. 5.

⁵⁵ The University of Queensland, *Submission 24*, p. 12.

⁵⁶ Australian Childhood Foundation, *Submission 37*, p. 11.

⁵⁷ Catholic Social Services Australia, *Submission 54*, p. 15.

follow-up'.⁵⁸ Affinity Education argued such delays 'can undermine provider confidence and limit the ability of services to take prompt action'.⁵⁹

4.44 Lake Macquarie City Council called for 'consistent expectations across the sector regarding principles of notifications, reporting, complaint management and customer service responses' from regulatory authorities, given the issues with responses to complaints.⁶⁰

4.45 One submitter called for 'statutory deadlines... by which regulatory authorities must formally acknowledge and respond to complaints or safety notifications' and for 'a transparent escalation framework for unresolved or high-risk complaints'.⁶¹

Inconsistencies

4.46 Some evidence concerned inconsistent state and territory interpretation and application of the NQF.⁶² For example, Affinity Education pointed to 'variability in the experience and approach of individual Authorised Officers across jurisdictions', and gave the following example:

Guidance received in practice in NSW has required all allegations - regardless of context or substantiation - to be treated as complaints and reported accordingly... The core issue lies in the inconsistency with which breaches are recorded and reported across the sector. Services subject to more frequent regulatory visits are more likely to accumulate a record of minor technical breaches, while those visited less often may appear more compliant simply due to a lesser level of scrutiny.⁶³

4.47 The committee also learned that there can be inconsistencies between regulators at different levels of government. Catholic Social Services gave one example:

A recent investigation revealed that a childcare centre in New South Wales was rated as 'meeting' national safety standards under the publicly accessible NQF, yet simultaneously was classified as 'very high risk' within

⁵⁸ National Foundation for Australian Women, *Submission 49*, p. 4.

⁵⁹ Affinity Education Group, *Submission 31*, p. 6.

⁶⁰ Lake Macquarie City Council, *Submission 29*, p. 4.

⁶¹ Name withheld, *Submission 111*, p. 1.

⁶² For example, Network of Community Activities, *Submission 42*, pp. 2, 4; Lady Gowrie Qld, *Submission 45*, p. 3. See also Community Early Learning Australia & It Takes a Village, *Submission 47*, p. 9; Catholic Social Services Australia, *Submission 54*, p. 13; Australian Research Alliance for Children and Youth, *Submission 63*, p. 4; Australian Childcare Alliance, *Submission 65*, p. 9; Outside School Hours Council of Australia Ltd, *Submission 82*, p. 7; Early Learning and Care Council of Australia, *Submission 91*, pp. 2, 4.

⁶³ Affinity Education Group, *Submission 31*, pp. 5-6, 17. See also Australian Childcare Alliance, *Submission 65*, p. 10.

a secret Department of Education risk system following notifications of child neglect and injury, bullying of staff and understaffing of the service.

This discrepancy highlights a systemic gap between public quality assessments and the confidential risk assessment ratings used by State and Territory Regulatory Authorities which apply more dynamic risk assessment tools.⁶⁴

4.48 Y Australia argued that variation between NQS ratings across jurisdictions 'is unlikely to reflect genuine differences in quality; it highlights inconsistent interpretation and enforcement of standards'.⁶⁵

4.49 Guardian Childcare & Education reported that because of the recent move for providers to notify regulators within 24 hours of serious incidents and complaints alleging a serious incident,⁶⁶ they had seen 'an increase in inconsistent and at times nonsensical regulatory notices because Regulators don't have the time to properly consider the appropriate course of action'.⁶⁷

Proposed reforms

4.50 Reforms submitters proposed to address regulatory inconsistencies included increased funding for ongoing professional development for assessment officers to help ensure consistent approaches.⁶⁸

4.51 Lady Gowrie Qld suggested standardised assessment practices and clearer guidance on Exceeding themes,⁶⁹ while Affinity Education proposed more consistent, independently assured breach reporting systems and processes which distinguish between substantial breaches and minor procedural issues.⁷⁰ Busy Bees Early Learning called for 'one system, not eight versions', with standardised core regulatory expectations, information sharing and security settings nationally, and consistent paperwork requirements such as incident schemas, evidence packs and audit checklists.⁷¹

⁶⁴ Catholic Social Services Australia, *Submission 54*, p. 13.

⁶⁵ Y Australia, *Submission 40*, p. 9.

⁶⁶ See ACECQA, [Reporting requirements about children](#) (accessed 3 March 2026) for further detail.

⁶⁷ Guardian Childcare & Education, *Submission 72*, pp. 6–7.

⁶⁸ Lady Gowrie Qld, *Submission 45*, p. 5.

⁶⁹ Lady Gowrie Qld, *Submission 45*, p. 3.

⁷⁰ Affinity Education Group, *Submission 31*, pp. 6, 17. Guardian Childcare & Education, *Submission 72*, p. 9 also argued there 'seems little effort to differentiate between minor breaches of internal above-standard guidelines or documentation errors and breaches of a more serious nature'.

⁷¹ Busy Bees Early Learning Australia, *Submission 59*, pp. 2, 3.

Funding and resourcing for regulators

- 4.52 At present, state governments fund the regulation of Commonwealth-funded services.⁷² The Commonwealth Government funds ACECQA to support regulators to implement the NQF, and the Department of Education to oversee compliance with the Child Care Subsidy program.⁷³ Previously, significant Commonwealth funding supported state and territory regulators, until funding for the National Partnership on the National Quality Agenda for Early Childhood Education and Care was ended in 2018.⁷⁴ This coincided with significant reforms and additional Commonwealth funding directed into the Child Care Subsidy.
- 4.53 Serious concerns were expressed in evidence to the inquiry that regulators are under-resourced at a time of rapid sector growth, with Goodstart Early Learning, for example, arguing that the ‘biggest constraint on regulators has not been the powers under the National Law, but inadequate funding to properly and consistently apply them’.⁷⁵ As a result, there may be insufficient Authorised Officers to conduct assessments of services and follow-up in a timely manner.⁷⁶
- 4.54 The Australian National Audit Office informed the committee that regulator ‘best practice suggests that entities should continuously assess the data that they have about the market or sector that they are regulating and pivot and adjust the regulatory activity according to the risk that emerges through the analysis of that information’. They suggested that ‘if any regulator... has gaps in the confidence of the data that it holds, particularly the data that’s informing how it responds to or identifies noncompliance, then that’s certainly an area which inhibits the regulator’s ability to regulate effectively’.⁷⁷

⁷² Victorian State Government, *Submission 95*, p. 12.

⁷³ Ms Kylie Crane, Deputy Secretary, Early Childhood, and Mr Brendan Moon, First Assistant Secretary, Child Care Division, Department of Education, *Committee Hansard*, 10 December 2025, p. 62.

⁷⁴ Government of South Australia, *Submission 69*, p. 3; The Front Project, *Submission 9*, pp. 10–11; ACT Government, *Submission 21*, p. 6; The Parenthood, *Submission 41*, p. 3.

⁷⁵ Goodstart Early Learning, *Submission 83*, p. 16. See also, for example, The Parenthood, *Submission 41*, p. 3; Lady Gowrie Qld, *Submission 45*, pp. 3, 5; Australian Research Alliance for Children and Youth, *Submission 63*, p. 4; Australian Childcare Alliance, *Submission 65*, p. 9; Government of South Australia, *Submission 69*, p. 3; Knowmore Legal Service, *Submission 74*, p. 41; Minderoo Foundation/Thrive by Five, *Submission 85*, p. 7; Early Childhood Australia, *Submission 89*, p. 7; Early Childhood Australia, *Submission 89*, p. 7; Early Learning and Care Council of Australia, *Submission 91*, p. 2; Victorian State Government, *Submission 95*, p. 6; Name Withheld, *Submission 114*, p. 2.

⁷⁶ Lady Gowrie Qld, *Submission 45*, p. 4.

⁷⁷ See witnesses from Australian National Audit Office, *Committee Hansard*, 10 December 2025, pp. 29–31.

4.55 Many submitters called for increased regulator funding, including to support more visits and timely Assessments and Ratings.⁷⁸ Some called for long-term or ongoing funding for regulators.⁷⁹ The Productivity Commission argued that resourcing ‘should be addressed as a matter of priority’.⁸⁰ The Productivity Commission in its 2024 inquiry into Early Childhood Education and Care recommended that the Australian Government ensure ‘regulatory authorities are adequately resourced’ and ‘provide additional funding to the state and territory regulatory authorities’ that administer the NQF.⁸¹

Data, information sharing and transparency

4.56 The committee received a significant body of evidence outlining concerns about data, information sharing and transparency. Recent reforms have superseded much of this evidence.

4.57 For example, Education Ministers at their August 2025 meeting agreed to improved transparency for parents, with the Starting Blocks website to be upgraded to display information about conditions imposed on centres and regulator visits from September 2025, along with compliance breaches and enforcement actions from November 2025. The Commonwealth Government also announced at the same meeting that it was investing \$22 million for joint compliance work and monitoring with states and territories and to improve data exchange.⁸²

4.58 Education Ministers also agreed to enable regulators to proactively share the identities of prohibited individuals and individuals subject to enforceable undertakings with providers.⁸³ The Department of Education informed the committee that a further phase of reforms would ‘require services to provide meaningful information in a physical display at their services’, through changes to the National Law that were being developed as of December 2025. In addition, since July 2025, the Department had undertaken ‘significant work’ on

⁷⁸ For example, Goodstart Early Learning, *Submission 83*, p. 19; G8 Education, *Submission 43*, p. 4. See also Australian Local Government Association, *Submission 50*, p. 8; Catholic Social Services Australia, *Submission 54*, p. 13; Uniting NSW.ACT, *Submission 55*, p. 5; Government of South Australia, *Submission 69*, pp. 3–4; Social Ventures Australia, *Submission 78*, p. 2; Victorian State Government, *Submission 95*, pp. 6, 11; Name Withheld, *Submission 114*, p. 2.

⁷⁹ The Front Project, *Submission 9*, p. 31; Y Australia, *Submission 40*, p. 9; ACT Government, *Submission 21*, p. 6.

⁸⁰ Productivity Commission, *Submission 44*, p. 5.

⁸¹ Productivity Commission, *Early Childhood Education and Care – Volume 1, Inquiry Report*, June 2024, p. 90.

⁸² Education Ministers Meeting, [Communique](#), 22 August 2025, p. 2 (accessed 3 March 2026).

⁸³ Education Ministers Meeting, [Communique](#), 22 August 2025, p. 2 (accessed 3 March 2026).

their data holdings and analytical platform ‘to develop a new data framework to look at quality and safety’.⁸⁴

4.59 ACECQA informed the committee at the Sydney hearing that they had developed capacity to link up intelligence records about allegations to help regulators join the dots. As of November 2025, ACECQA has commenced publishing more information about enforcement actions as of November 2025. ACECQA also noted that providers have an obligation to maintain a compliance record, and every ‘parent or member of the community has a right to ask for that’.⁸⁵

4.60 ACECQA also informed the committee that as of late 2025, it had begun providing more information publicly about visits, conditions on providers and specific enforcement actions that have been taken by regulators. In addition, it has ‘been resourced by the Australian government to roll out a big communications campaign for families as well, which we’ll be getting started on shortly’.⁸⁶

Issues raised in evidence

4.61 Issues raised in evidence about data, information sharing and transparency included that although substantial data is already collected about ECEC quality, quantity and participation, data are held in separate system, which restricts their utility for decision-making, monitoring system performance or guiding service improvement.⁸⁷ Further, data are dispersed across multiple custodians and jurisdictions, which each have differing legislative interpretations, reporting obligations and publication practices.⁸⁸

4.62 In addition, evidence argued there is limited ECEC utilisation data to understand current and unmet demand’, flagging the following datasets:

- The National Workforce Census, which is conducted irregularly, with results slow, the most recent census not including preschools, and no information about educators’ linguistic and cultural backgrounds;⁸⁹

⁸⁴ Ms Kylie Crane, Deputy Secretary, Early Childhood, and Mr Brendan Moon, First Assistant Secretary, Child Care Division, Department of Education, *Committee Hansard*, 10 December 2025, p. 60.

⁸⁵ Mr Craig Bennett, General Manager, Policy and Regulatory Systems, Australian Children’s Education and Care Quality Authority, *Committee Hansard*, 10 December 2025, pp. 49, 53.

⁸⁶ Mr Craig Bennett, General Manager, Policy and Regulatory Systems, Australian Children’s Education and Care Quality Authority, *Committee Hansard*, 10 December 2025, p. 57.

⁸⁷ Social Ventures Australia, *Submission 78*, p. 11.

⁸⁸ Early Learning and Care Council of Australia, *Submission 91*, p. 6.

⁸⁹ Centre for Policy Development, *Submission 11*, pp. 9–10; the Social Policy Group, *Submission 23*, p. 6.

- The Australian Early Development Census, which is conducted triennially; and
 - The NQS, which provides important quality data, but services are not frequently re-rated, the data lacks granularity in key areas, parents themselves are not sufficiently aware of NQS ratings, and critical data not consistently shared between the Commonwealth and state/territory governments, such as attendance, enrolment, fees and subsidies.⁹⁰
- 4.63 Lady Gowrie Qld noted that different ‘states and territories vary in how much data they make public, limiting national comparability’.⁹¹ As the Federation of Parents and Citizens Associations of New South Wales argued, there are missed opportunities for linked data that can be analysed to identify trends.⁹²
- 4.64 The Australian Research Alliance for Children and Youth reported that regardless of the incident, the same data collection template is used for incidents relating to injury, trauma or illness, leading to data not accurately capturing the details of incidents.⁹³
- 4.65 Children and Young People with Disability Australia flagged a lack of national reporting on how many children with disability are refused enrolment in ECEC services or supported through the Inclusion Support Program.⁹⁴
- 4.66 The committee also learned that there may be limited information shared about concerning allegations. For example, one parent with children attending a service in regional New South Wales reported that after a male educator was arrested on-site and charged with aggravated sexual offences, parents were not notified for more than two days, despite media reporting occurring earlier. Further, the same educator had not reported ‘boundary-crossing behaviour by a colleague, triggering a Department of Education investigation. Parents were not informed of this breach until months later’. In addition, parents ‘were informed of past investigations and demotions only in vague or misleading terms, often long after decisions were made’.⁹⁵

⁹⁰ Centre for Policy Development, *Submission 11*, pp. 6, 9–10. Ms Olivia Hilton, General Manager, Restacking the Odds, Centre for Community Child Health, Murdoch Children’s Research Institute, (*Committee Hansard*, 10 December 2025, p. 24) also noted a gap in data linkages between state, federal and service-level data.

⁹¹ Lady Gowrie Qld, *Submission 45*, p. 12.

⁹² Federation of Parents and Citizens Associations of New South Wales, *Submission 48*, p. 13.

⁹³ Australian Research Alliance for Children and Youth, *Submission 63*, pp. 10–11.

⁹⁴ Children and Young People with Disability Australia, *Submission 84*, p. 13.

⁹⁵ Name Withheld, *Submission 123*, p. 1. Mr Luke Twyford, Principal Commissioner, Queensland Family and Child Commission, *Proof Committee Hansard*, 23 February 2027, pp. 42, 43, highlighted a recommendation from a Queensland review into the offending of Ashely Paul Griffith, which the review termed ‘the parent’s right to know: the requirement that when a concern, an allegation or

4.67 Notwithstanding the above, the Australian Childcare Alliance argued that services supporting a higher proportion of children with additional needs may record more incidents or receive more notifications. Without much-needed 'context, such services could appear riskier when, in fact, they are doing critical inclusion work'.⁹⁶

Proposed reforms

4.68 Reforms proposed by submitters to address issues raised about data, information sharing and transparency included, from the Australian Childhood Foundation, that ACECQA publish anonymised statistics on the number and types of incidents in the ECEC sector, the outcomes of regulatory actions (licences suspended/cancelled and number of substantiated cases of abuse), and progress on the implementation of safety reforms.⁹⁷

4.69 The Centre for Policy Development proposed that the Australian Government to establish a framework of, and regularly report on, outcomes and progress measures to monitor system performance.⁹⁸

4.70 Other suggestions to improve public reporting included an annual 'Child Safeguarding in Early Childhood' report that would collate data across jurisdictions,⁹⁹ and mechanisms for continued parliamentary oversight, such as periodic reports to Parliament on child safeguarding in ECEC, or a standing child safeguarding expert advisory group.¹⁰⁰

4.71 The Early Learning and Care Council of Australia suggested ACECQA work with regulators and providers to develop a 'taxonomy' of incidents and a framework for reporting – given at present, a child being transported in an ambulance because of an asthma attack is listed in the same category as a child who has fallen from a height without provision of soft fall.¹⁰¹

an investigation is underway in early child care all the parents in that centre are made aware and... organisations engage in risk discussions in a naturally open and transparent way'. He argued that 'in our legal structures, we've created an environment where adults have their privacy protected more than children have their right not to be sexually abused protected'.

⁹⁶ Australian Childcare Alliance, *Submission 65*, p. 20.

⁹⁷ Australian Childhood Foundation, *Submission 37*, p. 24. Early Learning and Care Council of Australia, *Submission 91*, p. 6 also called for improved 'public communication of rating outcomes, incidents and enforcement actions'.

⁹⁸ Centre for Policy Development, *Submission 11*, p. 17.

⁹⁹ Australian Childhood Foundation, *Submission 37*, p. 24.

¹⁰⁰ Australian Childhood Foundation, *Submission 37*, p. 28.

¹⁰¹ Early Learning and Care Council of Australia, *Submission 91*, p. 6.

- 4.72 One submitter called for anonymous reporting channels to regulators for ECEC staff to report misconduct or unsafe practices.¹⁰²
- 4.73 Submitters also proposed improved data on children who have experienced trauma or abuse, children living in out-of-home care or in unstable housing, children with disability or developmental delays, those from culturally and linguistically diverse backgrounds, and First Nations children¹⁰³ and an accessible data dashboard providing data on disability inclusion in ECEC services.¹⁰⁴

Enforcement

- 4.74 Some evidence called for stronger enforcement mechanisms.¹⁰⁵ One Early Education and Care Advocate argued that '[w]e don't need new regulations. We need better enforcement of the ones we already have, with a clear focus on risk-based oversight' that includes prioritising follow-up for services with persistent Working Towards ratings, and 'prompt and decisive action where concerns are raised'.¹⁰⁶
- 4.75 Community Early Learning Australia & It Takes a Village called for regulators to be empowered 'to remove consistently underperforming service providers by establishing new mechanisms for urgently intervening with services to ensure the safety of children, or with services that do not demonstrate improvement'.¹⁰⁷
- 4.76 Some evidence noted that services rated 'working towards' or 'significant improvement required' have been allowed to continue to operate, and providers of those centres allowed to open new centres. The Northern Rivers Preschool Alliance argued that services 'with these ratings should receive support and guidance from the regulatory authority and then be closed if unable to comply'.¹⁰⁸ Uniting NSW.ACT called for regulators to be allowed to weight a provider's history of compliance with the NQS when making licensing decisions for new or expanded services.¹⁰⁹
- 4.77 Conversely, the Early Learning and Care Council of Australia suggested that recent changes announced in August 2025 that saw the trebling of maximum

¹⁰² Name Withheld, *Submission 123*, p. 2.

¹⁰³ Catholic Social Services Australia, *Submission 54*, p. 17.

¹⁰⁴ Children and Young People with Disability Australia, *Submission 84*, p. 13.

¹⁰⁵ For example, ACT Government, *Submission 21*, p. 7.

¹⁰⁶ She also called for greater scrutiny of large-for-profit and private equity-owned providers. Ms Lisa Bryant, *Submission 25*, p. 4.

¹⁰⁷ Community Early Learning Australia & It Takes a Village, *Submission 47*, p. 9.

¹⁰⁸ Northern Rivers Preschool Alliance, *Submission 98*, p. 3.

¹⁰⁹ Uniting NSW.ACT, *Submission 55*, pp. 6–7.

finances for educators ‘could deter (good) people from entering the ECEC workforce’. They called for the additional changes to be subject to consultation with ECEC providers ‘to ensure we avoid any unintended consequences’.¹¹⁰

Support for services to improve quality ratings

4.78 The committee was informed that in the current system, there is no level of government or government agency responsible for working with centres to improve their quality.¹¹¹ For example, Social Ventures Australia noted ‘limited support from national and state and territory regulators to support continuous improvement processes’. They highlighted the risk of deprioritising efforts to support quality improvement in favour of enforcement action. Opportunities they flagged to increase support for quality improvement included more frequent assessments, guidance from peer-based assessors, more emphasis on relationships and practice quality, and a focus on strategies that would improve quality, not just a list of standards or outcomes.¹¹²

4.79 The Centre for Policy Development argued that ‘the current system is not structured’ to deliver incentives and investment in services that are rated Exceeding or above. They contended that ‘the decline in the proportion of high-quality services, which continues year to year, suggests that the system is not lifting enough services beyond the minimum threshold’.¹¹³

4.80 Submitters called for a changed approach to quality. For example:

- A ‘relational and educative approach with frequent touch points with ECEC services’;¹¹⁴
- Further support and investment in initiatives to help services improve and deliver an excellent standard;¹¹⁵ and
- Targeted assistance, such as resources or mentoring, to services to improve quality, particularly services that do not meet the NQS.¹¹⁶

¹¹⁰ Early Learning and Care Council of Australia, *Submission 91*, p. 2.

¹¹¹ Dr Caroline Croser-Barlow, Chief Executive Officer, Front Project, *Proof Committee Hansard*, 17 February 2026, p. 31. See also Dr Roslyn Baxter, Chief Executive Officer, Goodstart Early Learning, *Proof Committee Hansard*, 23 February 2026, p. 9.

¹¹² Social Ventures Australia, *Submission 78*, pp. 12–13.

¹¹³ Centre for Policy Development, *Submission 11*, pp. 4–5.

¹¹⁴ Early Childhood Australia, *Submission 89*, p. 7.

¹¹⁵ Ms Rosie Hodson, Director, Policy and Advocacy, Social Ventures Australia, *Committee Hansard*, 10 December 2025, p. 23.

¹¹⁶ Centre for Policy Development, *Submission 11*, p. 17.

4.81 The Productivity Commission proposed that state and territory governments facilitate a more consistent suite of supports for ECEC services, including more intensive programs for services not meeting the NQS.¹¹⁷

An independent ECEC body

4.82 The Productivity Commission in its 2024 inquiry into *Early childhood education and care* recommended that the Australian and state and territory governments establish in legislation an independent ECEC Commission, to, among other functions:

- Monitor and publicly report on the progress of governments on outcomes produced by the ECEC system;
- Provide independent advice to governments on how to coordinate and design policies to achieve effective outcomes for the system;
- Conduct or commission evaluations of government programs; and
- Act as a custodian over research and data and facilitate the better use and dissemination of ECEC data and research learnings.¹¹⁸

4.83 Multiple submitters and witnesses were in favour of a single, independent body to oversee the ECEC system, whether time-limited in the form of an Early Childhood Reform Commission, or permanent, in the form of an ECEC Commission.¹¹⁹ The Chief Executive Officer of the Early Learning Council

¹¹⁷ Productivity Commission, *Submission 44*, p. 5; Productivity Commission, *Early Childhood Education and Care – Volume 1*, June 2024, p. 91. The Victorian Government also called for the Australian Government to ‘invest in quality improvement programs for services to support service leaders and educators to improve their governance and educational programs’. See Victorian State Government, *Submission 95*, p. 13.

¹¹⁸ Productivity Commission, *Early Childhood Education and Care – Volume 1, Inquiry Report*, June 2024, pp. 52, 96.

¹¹⁹ For example, The Parenthood, *Submission 41*, p. 3; Productivity Commission, *Submission 44*, pp. 8–10; SNAICC – National Voice for Our Children, *Submission 46*, p. 8; Brotherhood of St. Laurence, *Submission 52*, p. 3; Women’s Electoral Lobby, *Submission 66*, p. 3; Social Ventures Australia, *Submission 78*, pp. 2, 9; Playgroup Australia, *Submission 32*, p. 4; Goodstart Early Learning, *Submission 83*, pp. 17, 19; Minderoo Foundation/Thrive by Five, *Submission 85*, p. 5; Dr Amy Graham, Senior Adviser, Valuing the Early Years, Minderoo Foundation and Thrive by Five, *Proof Committee Hansard*, 24 February 2026, pp. 29, 30; Victorian State Government, *Submission 95*, pp. 3–4, 6, 12–13; Name Withheld, *Submission 114*, p. 2; Mrs Mary Winkels, *Submission 125*, p. 7; Ms Skye Kakoschke-Moore, Chief Executive Officer, Children and Young People with Disability Australia, *Proof Committee Hansard*, 17 February 2026, p. 15; Dr Caroline Croser-Barlow, Chief Executive Officer, Front Project, *Proof Committee Hansard*, 17 February 2026, p. 29; Ms Catherine Liddle, Chief Executive Officer, SNAICC—National Voice for our Children, *Proof Committee Hansard*, 17 February 2026, p. 54; Ms Michele Carnegie, Chief Executive Officer, and Ms Laura Stevens, Director, Policy and Strategy, Community Early Learning Australia, *Committee Hansard*, 10 December 2025, p. 17; Ms Anne Hollonds, Chief Executive Officer, Early Learning and Care Council of Australia, *Committee Hansard*, 10 December 2025, pp. 32, 34; Ms Deborah Tsorbaris, National Children’s Commissioner, Australian Human Rights Commission, *Committee Hansard*, 10 December 2025, p. 45; Australian Childhood Foundation, *Submission 37*, p. 27; Early Learning and Care Council of

argued that ‘if any system needed a national oversight commission, this one does’.¹²⁰

- 4.84 Different submitters had different ideas about the role that such a body would take. For example, the Front Project argued that the current regulatory system ‘has left major gaps. No single body takes responsibility for the overall performance of the ECEC system’, with ‘many government entities operating across jurisdictions, but no dedicated body with a comprehensive national view of ECEC availability, quality, and outcomes’. As a result, there is ‘fragmented governance, reactive responses to crises, and an accountability vacuum’, leading to ‘short-sighted “quick fixes”’. They argued that an ECEC Commission ‘would be pivotal in ensuring consistent reform delivery, data coherence, and regulatory accountability across all jurisdictions’.¹²¹
- 4.85 The Front Project proposed a commission overseeing an agreement between the Commonwealth and the states and territories, analyses data, consults with stakeholders and provides ‘a scorecard of how well the states are doing in delivering what the Commonwealth has asked them to do on quality improvement’.¹²²
- 4.86 Affinity Education called for the Federal Government to ‘commence a coordinated, multi-jurisdictional effort to establish an Independent National Regulator’, arguing that this would lead to all compliance and enforcement responsibilities becoming the sole responsibility of the Federal Government.¹²³
- 4.87 Conversely, the National Foundation for Australian Women submitted that they were ‘not convinced’ that ‘greater coordination, collaboration and stewardship by all levels of government on matters related to the quality and safety of ECEC... would be achieved through the establishment of a proposed ECEC Commission’. In particular, the ‘funding needed to staff and manage an ECEC Commission could be used more appropriately to improve coordination, oversight, reporting and inspection mechanisms across state and territory governments and regulators, ACECQA and the federal Department of

Australia—answers to questions taken on notice at a public hearing in Sydney on 10 December 2025 (received 21 January 2026), pp. 5–6; Mr Martin Stokie, Commissioner, Productivity Commission, *Proof Committee Hansard*, 24 February 2026, p. 21; Ms Georgie Dent, Chief Executive Officer, The Parenthood, *Proof Committee Hansard*, 24 February 2026, pp. 51, 54.

¹²⁰ Ms Anne Hollonds, Chief Executive Officer, Early Learning and Care Council of Australia, *Committee Hansard*, 10 December 2025, p. 34.

¹²¹ The Front Project, *Submission 9*, pp. 6–7, 11–12.

¹²² Dr Caroline Croser-Barlow, Chief Executive Officer, Front Project, *Proof Committee Hansard*, 17 February 2026, p. 35.

¹²³ Affinity Education Group, *Submission 31*, pp. 5, 8.

Education’. The Foundation considered that the ‘regulatory system needs an overhaul, but let’s not reinvent it’.¹²⁴

Is the NQF fit-for-purpose?

- 4.88 ACECQA noted the NQF was designed to replace nine different regulatory systems, arguing that the NQF is ‘still highly regarded internationally. The design looked at the fundamentals for what would be safe and of high quality. Those fundamentals are not just Australian; they’re internationally recognised fundamentals’.¹²⁵
- 4.89 Some submitters expressed support for the NQF. The Minderoo Foundation/Thrive by Five argued that ‘there has been little critique of the standard from the ECEC sector, policymakers or researchers’.¹²⁶ The Early Learning and Care Council of Australia also expressed its strong support for the NQF, noting that while the complexity of the system can be challenging, ‘we caution against any kneejerk responses that would undermine the NQF’. In particular, they argued that while there is a need for additional investment, coordination and clarity, the existing regulatory framework, including the NQF, is ‘the best mechanism for ensuring consistent standards of safety, quality and accountability across the sector’.¹²⁷
- 4.90 However, the committee learned that while the NQF has helped to strengthen the ECEC sector, ‘its effectiveness is limited by inconsistent enforcement, uneven resourcing, and outdated systems’. As outlined earlier in this chapter, although the NQF was designed to provide a nationally consistent framework, there are ongoing challenges with variations in regulatory practice across jurisdictions.¹²⁸
- 4.91 Some evidence argued that the current NQF regulatory framework is not appropriately tailored to the needs of OSHC.¹²⁹ Other evidence argued that the

¹²⁴ National Foundation for Australian Women, *Submission 49*, p. 4.

¹²⁵ Mrs Gabrielle Sinclair, Chief Executive Officer, Australian Children’s Education and Care Quality Authority, *Committee Hansard*, 10 December 2025, p. 49.

¹²⁶ Minderoo Foundation/Thrive by Five, *Submission 85*, p. 7.

¹²⁷ Early Learning and Care Council of Australia, *Submission 91*, pp. 1, 2.

¹²⁸ Y Australia, *Submission 40*, p. 8.

¹²⁹ Outside School Hours Council of Australia Ltd, *Submission 82*, pp. 3, 6–9; Catholic Social Services Australia, *Submission 54*, p. 13; National Outside School Hours Services Alliance, *Submission 38*, p. 2; Mrs Melinda Crole, President, Outside School Hours Council of Australia, *Proof Committee Hansard*, 17 February 2026, p. 23; Outside School Hours Council of Australia Ltd, *Submission 82*, p. 3. In particular, according to the Alliance, among other issues, there ‘is a disconnect between the regulatory and quality frameworks, which appear to operate separately, often producing contradictory results. Services can receive high quality ratings while breaching regulations’, ‘health and safety concerns may not be adequately reflected in quality assessments’, state and territory

‘current regulatory system is heavily weighted toward centre-based care, leaving in-home arrangements under-regulated and under-recognised’.¹³⁰

- 4.92 Y Australia, at the public hearing in Melbourne on 17 February, flagged differences in ratings between jurisdictions, and questioned whether the current system is working:

In the ACT, there are 43 per cent of services exceeding standards; it’s four per cent in WA. Can that really be just factors like demographics? It seems unreal to us that it’s so different... When you look at ‘work towards’, here in Victoria it’s four per cent. Only four per cent are working towards, but, if you look across the border, in South Australia it’s 18 per cent. So why have we got those big disparities? A disaggregated system like what we have for that application of the regulatory environment can work. This one seems to be showing that it’s maybe not working at the moment. Now, that doesn’t mean that you throw out the system and go to another one, but it does mean that you need to seriously consider the status quo for alternatives.¹³¹

- 4.93 One submitter, an early childhood teacher, argued that there is no credible evidence indicating whether quality ratings ‘truly translate to better outcomes for all children and that despite all the investment, the sector is not consistently delivering the long-term benefits cited to justify public funding’. They argued that the ‘entire system has become a “game”, with there even being [professional development] sessions on how to play the game... It’s akin to cramming for an exam where the value of what is meant to be learnt is lost due to the assessment’. Further, ‘staff simply cannot continue to put in those unpaid hours. Most educators know of centres that have received an “Exceeding” rating and then immediately drop [their] standards, yet get to keep that valuable rating... until the next assessment’, while other centres that received a ‘Meeting’ rating have ‘since improved dramatically to an “Exceeding” level but are stuck with the “Meeting” rating for years’.¹³²
- 4.94 The same submitter argued that the ‘current Assessment and Rating process is too punitive. If the real goal is to genuinely improve all services across Australia, we need an approach that is supportive, not burdensome’. They called for a revision of the rating system, with two clear ratings of ‘Meeting’ or ‘Working Towards’, and annual, unannounced visits from an early childhood education

regulators have significant and competing resourcing constraints, and guidance ‘materials are long, confusing, and impractical for busy service leaders’.

¹³⁰ Australian Nanny Association, *Submission 94*, p. 3.

¹³¹ Mr Jarrod Dobson, National Director, Advocacy and Public Policy, Y Australia, *Proof Committee Hansard*, 17 February 2026, p. 3.

¹³² Name Withheld, *Submission 117*, p. 2.

authority to provide guidance and support to services to help them meet the standard.¹³³

- 4.95 Mrs Mary Winkels argued that while sustained high compliance rates within childcare may indicate system stability, ‘experienced from aged care reform suggests that prolonged high compliance can also indicate that standards are no longer stretching the sector toward further improvement’. She suggested that the inquiry consider whether the NQF ‘and associated standards remain sufficiently responsive to emerging safeguarding risks and evolving community expectations’, and called for a ‘new set of childcare quality standards’.¹³⁴
- 4.96 While not directly related to the NQF, the Victorian State Government called for the ‘Commonwealth to lead a rethink of the ECEC system... and set a 10-year reform strategy to fundamentally reform the ECEC system’. The Victorian Government proposed the rethink ‘set a clear definition of quality and how to measure it with challenging but realistic targets and measures, whilst having appropriate flexibility to account for the non-compulsory nature of the ECEC system’ and variations across states and territories.¹³⁵
- 4.97 The committee heard that the NQF is not appropriately tailored to the distinct operational context of Outside School Hours Care (OSHC). The National Outside School Hours Services Alliance (NOSHSA) affirmed this view in evidence provided at the Melbourne hearing, submitting that school-aged children require tailored safety measures, including supervision ratios that reflect their specific developmental needs.¹³⁶
- 4.98 The Federation of Parents and Citizens Associations of New South Wales (Federation of P&Cs) similarly submitted that the NQF was ‘originally designed with long day care and preschools in mind, and is not ideally calibrated to OSHC settings’. The Federation of P&Cs further submitted that OSHC has been accommodated within a framework that is misaligned with its part-time, play-focused nature, and that this misalignment is of particular concern given that OSHC serves older children whose needs differ materially from those of infants and toddlers. The Federation of P&Cs called for age-appropriate standards within a redesigned regulatory framework.¹³⁷
- 4.99 Evidence before the committee further indicated that a single regulatory approach may not adequately reflect the realities of school-aged care. At the

¹³³ Name Withheld, *Submission 117*, p. 2.

¹³⁴ Mrs Mary Winkels, *Submission 125*, pp. 2, 6.

¹³⁵ Victorian State Government, *Submission 95*, pp. 3, 8–9.

¹³⁶ Mrs Melinda Crole, President, Outside School Hours Council of Australia, *Proof Committee Hansard*, 17 February 2026, p. 23.

¹³⁷ Federation of Parents and Citizens Associations of New South Wales, *Submission 48*, p. 3.

Melbourne hearing, Mrs Melinda Crole, President of NOSHSA, told the committee that ‘within our cohort, you need to look at the five- to eight-year-olds and then possibly the eight- to 12-year-olds’, noting that these groups present ‘very different developmental needs’. Mrs Crole further emphasised that ‘school-age children from five to 12 ... have different developmental capabilities and requirements of them within their primary-school setting compared to the younger children’. In her view, what is required is ‘not a complete rewrite but ... nuancing to those age groups’.¹³⁸

- 4.100 The committee also heard evidence that the operation of OSHC is shaped by the physical environment and school infrastructure within which care is delivered. Mrs Crole told the committee that OSHC providers must often work within school spaces that children are permitted to use during the school day but not after school hours, observing ‘licensed spaces that have invisible lines to little minds are very difficult’. The committee heard that such constraints impose practical difficulties on providers and contribute to unnecessary administrative burden. It was further submitted that, given OSHC operates within primary education settings, the regulatory framework should be calibrated to reflect the particular needs and circumstances of services delivered in that context.¹³⁹
- 4.101 The committee also heard that the National Quality Standard requires healthy eating to be promoted and appropriate for each child. However, in practice, centres in poorer areas may provide no protein, despite the necessity of protein for children’s growth. Professor Karen Thorpe told the committee ‘we really need to sort out issues around food quantity and quality. That’s not in the National Quality Standard’.¹⁴⁰
- 4.102 Professor Thorpe also argued that Quality Area 2 also has no mention of emotional and psychological safety, arguing that ‘emotional security is a basic need’.¹⁴¹
- 4.103 At the public hearing in Melbourne, SNAICC—National Voice for our Children informed the committee that the NQF ‘has lifted standards overall, but it still does not grasp concepts like cultural safety in the way we understand it or invest in what it might mean for all children’. They noted that all of their services ‘would say that there is a space for the NQF... but they would still all say that

¹³⁸ Mrs Melinda Crole, President, Outside School Hours Council of Australia, *Proof Committee Hansard*, 17 February 2026, pp. 23, 24.

¹³⁹ Mrs Melinda Crole, President, Outside School Hours Council of Australia, *Proof Committee Hansard*, 17 February 2026, p. 24.

¹⁴⁰ Laureate Professor Karen Thorpe, ARC Laureate Professor, University of Queensland, *Proof Committee Hansard*, 23 February 2026, pp. 19, 22–23.

¹⁴¹ Laureate Professor Karen Thorpe, ARC Laureate Professor, University of Queensland, *Proof Committee Hansard*, 23 February 2026, p. 23.

it's a set of standards that were developed not by us and not for us and that are not quite fit for purpose'.¹⁴²

4.104 The National Aboriginal and Torres Strait Islander Education Corporation argued that the NQF fails to uphold and ensure cultural safety:

Families often do not see themselves, or what matters to them, reflected in assessments or the ratings. In addition to this, non-First Nations assessors dominate reviews, which often leads to a deficit view of First Nations practices - cultural safety should be embedded in regulation, and assessments should aim to capture the lived experiences of First Nations children.¹⁴³

4.105 Uniting NSW.ACT endorsed a recommendation from the Productivity Commission for an independent review of the NQF, with a focus on the way services are assessed under the NQS, and whether assessments can be made more accurate, consistent and efficient.¹⁴⁴

4.106 The Centre for Independent Studies (CIS) argued that implementation of the NQF 'has become one of the most significant drivers of cost escalation in the childcare sector', contending that there is 'little convincing evidence' that prescriptive staffing, qualification and documentation rules 'translate into better outcomes for children'. In particular:

The National Quality Framework (NQF) sought to harmonise standards across states but now functions as a major cost driver, with limited evidence that prescriptive staffing, qualification, or documentation rules improve outcomes beyond basic safety standards.¹⁴⁵

4.107 The CIS called for a 'simplified, proportionate NQF that retains essential safety and welfare provisions but reduces unnecessary documentation, qualification inflation, and uniform compliance burdens that drive up fees'. They proposed retaining 'a consistent national safety baseline but make the NQF proportionate and risk-based, focusing on measures that genuinely improve outcomes. Streamline staffing and qualification rules, reduce unnecessary documentation, and shift quality assessment toward observed educator-child interactions'.¹⁴⁶

4.108 The CIS considered that this would enable providers to 'redirect time and resources from compliance paperwork to the direct interactions that families value most'. Further, such reforms would 'reduce red tape, ease staff shortages,

¹⁴² Ms Catherine Liddle, Chief Executive Officer, SNAICC—National Voice for our Children, *Proof Committee Hansard*, 17 February 2026, pp. 51, 56.

¹⁴³ National Aboriginal and Torres Strait Islander Education Corporation, *Submission 57*, p. 1.

¹⁴⁴ Uniting NSW.ACT, *Submission 55*, p. 5; Productivity Commission, *Early Childhood Education and Care – Volume 1*, June 2024, p. 89.

¹⁴⁵ Centre for Independent Studies, *Submission 92*, pp. 2, 3, 14.

¹⁴⁶ Centre for Independent Studies, *Submission 92*, p. 3.

and slow fee inflation while maintaining the NQF's essential protections'. For 'governments, a simplified NQF would achieve better alignment between regulatory effort and measurable outcomes—protecting children without pricing their care out of reach'.¹⁴⁷

Other issues related to the regulatory system

4.109 A multitude of other issues related to the effectiveness of the current regulatory system were raised in evidence, including that the regulatory system is not suitable for particular cohorts or types of care. These are too extensive to list in detail here.

¹⁴⁷ Centre for Independent Studies, *Submission 92*, pp. 15–16.

Chapter 5

Funding for early childhood education and care

- 5.1 Throughout the course of the inquiry, the committee heard that the current funding model for the early childhood education and care (ECEC) sector is fragmented, complex and insufficiently tailored to the needs of particular children, families and communities.¹ Further, there is ‘a lack of coordination and stewardship compounding issues of supply and demand’, particularly in areas of over- and under-supply.² There are also questions about whether significant investments in ECEC have led to improved developmental outcomes for children.³
- 5.2 Current funding initiatives from the Australian Government for the ECEC sector include:
- Child Care Subsidy payments;
 - The Worker Retention Payment (discussed in Chapter Three);
 - The Building Early Education Fund, which provides capital funding to expand or build new ECEC services in areas of need, including capital funding to the states and territories for services on or near school sites, and \$500 million set aside for the Australian Government to build, own and lease ECEC services;⁴
 - The Community Child Care Fund, which provides grants to providers and services to address barriers to ECEC participation, particularly for regional and remote areas, Indigenous communities, and services in areas experiencing disadvantage;⁵ and

¹ For example, The Front Project, *Submission 9*, p. 24. See also Australian Local Government Association, *Submission 50*, p. 7; and Northern Rivers Preschool Alliance (*Submission 98*, p. 6), which argued that the fragmentation of funding between provider types and jurisdictions, along with ‘a great disparity in the resources available to different parts of the sector, and the way these resources can be spent’, as led to ‘unnecessary confusion and competition within the sector’. The Early Learning Association Australia highlighted the complexity of funding arrangements for different ECEC service types – including, for example, providers operating both kindergartens and long day care services (Early Learning Association Australia, *Submission 19*, pp. 5–6). See also The Parenthood, *Submission 41*, p. 7 and ACT Government, *Submission 21*, p. 8.

² Early Childhood Australia, *Submission 89*, p. 12.

³ Centre for Policy Development, *Submission 11*, p. 4.

⁴ Department of Education, [Building Early Education Fund](#), 24 February 2026 (accessed 5 March 2026).

⁵ Department of Education, [Community Child Care Fund](#), 27 February 2026 (accessed 5 March 2026).

- The Inclusion Support Program, which funds ECEC services to include children with additional needs.⁶
- 5.3 The Australian Government has also funded a review by Deloitte into the costs of delivering ECEC through the Early Education Service Delivery Prices project. The project is examining key areas required to deliver safe and quality ECEC, such as property costs and utilities; identifying additional costs of service delivery for higher-needs cohorts; and calculating the reasonable cost of providing safe and quality ECEC service delivery.⁷
- 5.4 A consistent theme in evidence to the committee was that, despite significant public investment in early childhood education and care, many families experience the system as rigid and limited in the types of care it supports. Several submitters argued that current policy settings overwhelmingly favour centre-based care, with other forms of care either unsupported or only available in limited circumstances.⁸ As a result, families whose needs are not well suited to centre-based models may face reduced workforce participation or be forced into arrangements that do not align with their child's needs or their family circumstances.
- 5.5 Childcare Choice submitted that, for many families, 'the current system presents a single viable pathway: centre-based childcare', and that where this model does not suit, 'the choice becomes stark: use the system, or leave the workforce'.⁹ Similarly, Parents Work Collective emphasised that a more flexible system should support a broader range of care arrangements, including in-home and individualised care, particularly for very young children, noting that the current system is 'rigid' and does not adequately reflect the diversity of family needs.¹⁰
- 5.6 The committee also heard evidence that some parents seek care models that allow greater proximity to their children, particularly in the first years of life. BubbaDesk submitted that many parents are not ready to be separated from infants and require care arrangements that support breastfeeding, attachment and flexibility, which are not readily accommodated within existing subsidy settings.¹¹

⁶ Department of Education, [Inclusion Support Program](#), 30 October 2025 (accessed 5 March 2026).

⁷ Department of Education, [Early Education Service Delivery Prices project](#), 20 February 2026 (accessed 5 March 2026).

⁸ Bubbadesk, *Submission 36*, [p. 3]; Parents Work Collective, *Submission 56*, p. 1; Childcare Choice, *Submission 126*, [p. 2]; For Parents, *Submission 75*, p. 4.

⁹ Childcare Choice, *Submission 126*, [p. 2].

¹⁰ Parents Work Collective, *Submission 56*, p. 1.

¹¹ BubbaDesk, *Submission 36*, [p. 3].

- 5.7 Lived experience evidence provided to the committee reinforced these structural concerns. One parent described being unable to continue shift work after losing access to informal care that was not supported by subsidies, while another reported withdrawing a child from centre-based care following safety concerns but being unable to afford alternative arrangements.¹² These examples highlight that the design of the system can have significant consequences for workforce participation, family wellbeing and perceptions of safety.
- 5.8 Taken together, this evidence suggests that, while centre-based care is appropriate and effective for many families, a system that predominantly supports a single model may not deliver genuine choice. A more flexible approach that recognises a broader range of care types may better support families, particularly those with non-standard work arrangements, very young children, or specific safety concerns.
- 5.9 This chapter examines the key issues raised in evidence about funding for, and choice within, the ECEC sector, including issues raised about:
- Different funding types, such as supply-side, needs-based and targeted funding for thin markets;
 - The Inclusion Support Fund;
 - Differences between for-profit and not-for-profit providers, and the role of rental fees; and
 - Flexibility and lack of choice, including proposals to broaden the current system, reform in home care and expand Paid Parental Leave.

Different funding types

- 5.10 Funding for the ECEC sector is both demand driven, based on children enrolling in a service, and supply driven, in areas with thin markets where further support is needed.¹³

Needs-based funding

- 5.11 The Productivity Commission in their inquiry into early childhood education and care recommended that the Australian Government develop and implement a new needs-based Early Childhood Education and Care Inclusion Fund by 2028, with a Disability and Complex Needs Inclusion Stream, a Mainstream Inclusion Stream, and a program for services to apply for support for upgrades to physical facilities so ensure all children can be included, regardless of their abilities.¹⁴

¹² Ms Cecilia Cobb, Co-Founder and Director, For Parents, *Proof Committee Hansard*, 23 February 2026, p. 25.

¹³ Early Childhood Australia, *Submission 89*, p. 12.

¹⁴ Productivity Commission, *A Path to Universal Early Childhood Education and Care: Inquiry Report – Volume 1*, Report no. 106 – 28 June 2024, p. 63.

- 5.12 Some evidence called for needs-based funding to take into account socio-economic differences, children with higher needs and remote communities.¹⁵ For example, Social Ventures Australia identified a gap for a needs-based funding model for ECEC, arguing that ‘there is no nationally consistent needs-based mechanism to address early childhood disadvantage across ECEC, particularly for children under age three’. They proposed that needs-based considerations be ‘built into funding of early years services to ensure adequate, flexible funding for the full operational cost of ECEC service provision (through both fees, subsidy and equity loadings)’. They suggested that reforming ‘the funding model to needs based funding from birth would have significant outcomes for children in those early years and see more thriving by the time they start school’.¹⁶
- 5.13 The Front Project told the committee that ‘the prospect of needs-based funding, of paying loadings for children with factors that require them to have a higher intensity of adult support or a more enriched environment.... will make it more attractive for providers to go into more disadvantaged areas’. Their Chief Executive Officer argued that ‘all public school systems invest more money in putting more staffing and more resourcing into schools experiencing disadvantage’ and there is ‘a recognition that it costs more’. Because we ‘don’t have a way of providing extra funding to our lowest income services... you see childcare deserts in our poorest areas and why provision in those lowest areas is predominantly not for profit’. She considered needs-based funding could be provided either through cash or actual supports, such as coaching.¹⁷

Inclusion Support Program (ISP)

- 5.14 The Inclusion Support Program (ISP) funds ECEC services to include children with additional needs.¹⁸
- 5.15 The committee received significant criticism concerning the adequacy of the Inclusion Support Program for children with disability, including that the process is too administratively burdensome and the ISP is underfunded.¹⁹

¹⁵ For example, Ms Adelajda Soltysik, Senior Adviser, Centre for Policy Development, *Proof Committee Hansard*, 17 February 2026, p. 39.

¹⁶ Social Ventures Australia, *Submission 78*, p. 6; Ms Rosie Hodson, Director, Policy and Advocacy, and Ms Emma Sydenham, Director, Early Childhood, Social Ventures Australia, *Committee Hansard*, 10 December 2025, p. 24.

¹⁷ Dr Caroline Croser-Barlow, Chief Executive Officer, Front Project, *Proof Committee Hansard*, 17 February 2026, pp. 33–34.

¹⁸ Department of Education, [Inclusion Support Program](#) (accessed 12 March 2026).

¹⁹ For example, Federation of Parents and Citizens Associations of New South Wales, *Submission 48*, p. 16. See also Brotherhood of St. Laurence, *Submission 52*, p. 4; Uniting NSW.ACT, *Submission 55*, p. 12; Australian Childcare Alliance, *Submission 65*, p. 21; Goodstart Early Learning, *Submission 83*, p. 25; Children and Young People with Disability Australia, *Submission 84*, p. 15; Early Learning

Further criticisms included that it is not meeting the needs of children, not supporting educators to deliver safe, high quality ECEC, there are long wait times, it does not cover the costs associated with inclusive early childhood education, and has not increased in line with CPI or minimum award rates for educators.²⁰ In addition, the program previously capped subsidies at 25 hours per week for an individual child, despite children being enrolled on average for longer hours.²¹

- 5.16 Ms Skye Kakoschke-Moore from Children and Young People with Disability Australia pointed to ‘debate and reform speculation’ about the ISP ‘for many years now’, arguing this ‘indicates that, while the program was designed in one way, it’s not achieving the outcomes that either the government or families were hoping for’. In particular, families often do not understand how the program can benefit their child ‘and it’s not clear to them whether or not the funds that the centre is receiving are being spent towards programs or adjustments or additional support that their child needs’. She called for greater ‘communication between centres and families about how the funding is being used and how that’s going to benefit the children there’.²²
- 5.17 Ms Natalie Dabarera from the United Workers Union noted that because the hourly rate for the ISP is less than the award rate, providers then have to use their own funding to pay for the additional educator. As a result, ‘sometimes for-profit providers may not want to provide that additional funding’. Ms Taj Al-Thifairy, also from the United Workers Union, noted that there are additional

and Care Council of Australia, *Submission 91*, p. 8; ACT Government, *Submission 21*, p. 8; Ms Stephanie Chiron, Victorian Early Childhood Education and Care Organiser, Victorian and Tasmanian Branch, Australian Services Union, *Proof Committee Hansard*, 24 February 2026, p. 45.

²⁰ For example, United Workers Union, *Submission 80*, p. 8; Australian Local Government Association, *Submission 50 – Attachment 1*, p. 8; Outside School Hours Council of Australia, *Submission 82*, p. 10. On the ISP not keeping pace with minimum award rates, see Early Learning and Care Council of Australia, *Submission 91*, p. 8. On delays, see Ms Stephanie Chiron, Victorian Early Childhood Education and Care Organiser, Victorian and Tasmanian Branch, Australian Services Union, *Proof Committee Hansard*, 24 February 2026, p. 45, who also noted that funding through the ISP is ‘quite often denied’. She also noted the challenge of getting a family ‘on board with that funding.... What they’re hearing is that something’s wrong with their child’. Evan Gray, Union Delegate, Early Childhood Educator, Inner West Council, United Services Union also argued that ‘services can’t be inclusive if you have a process whereby you have to wait to jump through those funding hoops’ (p. 46).

²¹ Goodstart Early Learning, *Submission 83*, p. 25.

²² Ms Skye Kakoschke-Moore, Chief Executive Officer, Children and Young People with Disability Australia, *Proof Committee Hansard*, 17 February 2026, p. 14.

hours educators put into liaising with families and external healthcare providers and creating resources, that the ISP does not cover.²³

- 5.18 Outside School Hours Council of Australia submitted that ‘the actual cost of an inclusion support educator is almost double the cost of the ISP funding subsidy as the cost of care has risen over time, while the funding has not been indexed’.²⁴ Lady Gowrie Qld argued that ‘current inclusion support funding is not keeping pace with demand’, pointing to the ‘increasing enrolment of children with additional needs’. They called for flexible funding to support additional inclusion educators if needed, and models to account for the intensity of need.²⁵
- 5.19 Some submitters considered that addressing the ISP is urgent and/or should be a priority for the Australian Government.²⁶ Outside School Hours Council of Australia urged ‘immediate action to address the insufficient ISP payment’ and action to address ‘the substantial delays in processing claims’, arguing that ‘the lack of funding for inclusion support is putting children and educators at risk and must be addressed with urgency’. They considered that the ‘childcare sector cannot wait for another review or broader reviews such as the Service Delivery Prices Project to take action or children will ultimately be put at risk’.²⁷
- 5.20 The Productivity Commission in their inquiry into ECEC recommended immediate changes to the Inclusion Support Program, including funding to increase the hourly subsidy rate, and removing limits on the weekly hours to align with the child’s attended hours. They also called for the Australian Government to investigate delays in processing applications. The Productivity Commission proposed the Australian Government develop and implement a new needs-based Early Childhood Education and Care Inclusion Fund by 2028, with one stream for children with high support needs.²⁸

²³ Ms Natalie Dabarera, Research Coordinator, United Workers Union, and Ms Taj Al-Thifairy, Delegate Member, United Workers Union, *Proof Committee Hansard*, 10 December 2025, p. 5.

²⁴ Outside School Hours Council of Australia, *Submission 82*, p. 10. Goodstart Early Learning, (*Submission 83*, p. 25) reported that the subsidy covered 87.6 per cent of the cost of employing inclusion workers in 2017 but ‘by 2025 it covered just 65 per cent of the cost with providers expected to make up the difference’.

²⁵ Lady Gowrie Qld, *Submission 45*, pp. 13–14.

²⁶ Early Learning and Care Council of Australia, *Submission 91*, p. 8; Goodstart Early Learning, *Submission 83*, p. 26.

²⁷ Outside School Hours Council of Australia, *Submission 82*, p. 11.

²⁸ Productivity Commission, *A Path to Universal Early Childhood Education and Care: Inquiry Report – Volume 1*, Report no. 106 – 28 June 2024, pp. 62–63.

Supply-side funding

5.21 The Australian Competition and Consumer Commission (ACCC) conducted an inquiry into the market for the supply of childcare services, with their final report presented in December 2023. The ACCC found:

- Market forces alone are not meeting the needs of all children and households;
- Historically when subsidies increase, out-of-pocket expenses decline initially but then tend to revert to higher levels;
- The design and implementation of the Child Care Subsidy (including its hourly rate cap) has had only limited effectiveness in placing downward pressure on fees and constraining the burden on taxpayers, whether for long day care, family day care, outside school hours care (OSHC) or in home care; and
- Policy initiatives that continue to apply a ‘one size fits all approach’ across the sector will leave some communities under-served, unserved or without sufficient and appropriate access to childcare services.²⁹

5.22 Minderoo Foundation/Thrive by Five suggested that ‘there are many benefits of supply-side funding models. Governments generally have better control over safety, quality, affordability and access than with demand-side funding models’.³⁰ The Centre for Policy Development noted some Australian states and territories require preschool providers not to increase fees more than is reasonably necessary, and, as a condition of supply-side funding, impose reporting and monitoring requirements.³¹

5.23 Some submitters expressed support for supply-side funding to address market issues in disadvantaged, underserved and regional, rural and remote communities, including, in some instances, by making this funding ongoing.³² Community Early Learning Australia pointed to areas in Australia with low supply of ECEC services or no supply at all, arguing that being ‘able to deliver small supply-side-funded services for, let’s say, 20 to 30 children would see an enormous difference, and that’s where a market won’t go’. They noted that the Australian Government has begun to move into this space through the Building Early Education Fund in terms of capital, but it then ‘requires the supply side

²⁹ Australian Competition & Consumer Commission, *Childcare Inquiry: Final Report*, December 2023, pp. 1–2.

³⁰ Minderoo Foundation/Thrive by Five, *Submission 85*, p. 9.

³¹ Centre for Policy Development, *Submission 11*, p. 9.

³² For example, The Front Project, *Submission 9*, p. 31; Family Day Care Australia, *Submission 73*, p. 12; Goodstart Early Learning, *Submission 83*, p. 24.

funding that enables that service to operate at a level of high quality in areas of low population'.³³

Targeted funding for thin markets

- 5.24 Related to this was evidence pointing to 'childcare deserts' in low-income, outer suburbs of major cities, and regional, rural and remote areas, on account of the current system providing no or very limited additional funding.³⁴
- 5.25 Lady Gowrie Qld argued that the Child Care Subsidy's focus on affordability for families leads to 'structural gaps' in regional and rural services. In particular, funding 'models that assume high enrolment numbers are unsuitable for small regional, rural, or remote services where lower population density makes economies of scale impossible'.³⁵ Outside School Hours Council of Australia noted that 'there are some federal government grants available' for rural and remote settings, but these 'are not necessarily fit-for-purpose, designed largely to facilitate access to ECEC rather than OSHC services, and offering grant funding largely for capital works... rather than for staffing and resource costs'.³⁶
- 5.26 Longreach Regional Council considered that the 'funding landscape for regional childcare has been marked by uncertainty and short-termism', with the current model, reliant on grants, not providing 'the stability required for effective long-term planning'. The Council called for longer-term, recurrent funding arrangements of 'ideally five years or more' to 'enable effective planning and service continuity'.³⁷ The Local Government Association of Queensland also flagged a lack of access for local governments to 'stable, long-term funding to maintain services', and called for ongoing 'operational and capital support through direct block grants to sustain services despite fluctuating demand'. They also called for funding to 'reflect the true cost of service delivery in remote areas, where small and variable enrolments make services financially unviable under current models'.³⁸
- 5.27 Some evidence noted increased competition for the Community Child Care Fund, with a number of providers who relied on the funding missing out in the

³³ Ms Michele Carnegie, Chief Executive Officer, Community Early Learning Australia, *Committee Hansard*, 10 December 2025, p. 18.

³⁴ Brotherhood of St. Laurence, *Submission 52*, p. 5. See also Ms Georgie Dent, Chief Executive Officer, The Parenthood, *Proof Committee Hansard*, 24 February 2026, p. 51.

³⁵ Lady Gowrie Qld, *Submission 45*, p. 13.

³⁶ Outside School Hours Council of Australia, *Submission 82*, p. 11.

³⁷ Longreach Regional Council, *Submission 103*, pp. 1, 2.

³⁸ Local Government Association of Queensland, *Submission 104*, pp. 1–2.

- July 2024–June 2026 round.³⁹ The Remote Area Planning and Development Board called for consideration for ‘an increase in the value of the funding pool’.⁴⁰
- 5.28 Proposals to address issues with thin markets included place-based adjustments to the Child Care Subsidy,⁴¹ tiered loadings for regional, rural and remote settings,⁴² support for the Productivity Commission’s recommended ECEC Development Fund to assist not-for-profit providers in thin markets,⁴³ block-based funding for small, regional areas, where there may be lower enrolment numbers or limited use of ECEC services,⁴⁴ and funding to ensure all services can operate a minimum of two staff without operating at a loss, given many regional and rural services operate on a single staffing model to ensure viability.⁴⁵ The Australian Childcare Alliance also called for a Market Stewardship role to coordinate planning across all tiers of government to prevent oversupply and thin-market failures.⁴⁶
- 5.29 Other proposals included investment in models particularly used in thin markets, such as in-venue care⁴⁷ and family day care,⁴⁸ while the Australian Services Union called for the Australian Government to increase grant funding for regional local government ECEC programs, given these are often a provider of last resort.⁴⁹
- 5.30 In the area of OSHC in particular, the National Outside School Hours Services Alliance called for guaranteed OSHC in all school communities and support for

³⁹ Local Government Association of Queensland, *Submission 104*, p. 2; Remote Area Planning and Development Board, *Submission 124*, p. 2; Dr Helen Haines MP, *Submission 20*, pp. 1–2. Dr Haines proposed amending the Fund so ‘so that sustainability funding is delivered on a demand-driven basis, not through a competitive grants process... if you can prove your service needs support to remain open, and you are the only provider in your region, then you will receive support’.

⁴⁰ Remote Area Planning and Development Board, *Submission 124*, p. 2

⁴¹ Remote Area Planning and Development Board, *Submission 124*, p. 3.

⁴² National Outside School Hours Services Alliance, *Submission 38*, pp. 6–7; Australian Childhood Foundation, *Submission 37*, p. 25.

⁴³ National Catholic Education Commission, *Submission 3*, p. 3.

⁴⁴ National Catholic Education Commission, *Submission 3*, p. 3; Australian Research Alliance for Children and Youth, *Submission 63*, pp. 6, 8.

⁴⁵ Australian Childhood Foundation, *Submission 37*, p. 26.

⁴⁶ Australian Childcare Alliance, *Submission 65*, p. 25.

⁴⁷ The Future Care Project, *Submission 60*, pp. 4, 5.

⁴⁸ Family Day Care Australia, *Submission 73*, p. 14.

⁴⁹ Australian Services Union, *Submission 79*, p. 11.

flexible models such as mobile or shared services for smaller communities,⁵⁰ while the Federation of Parents and Citizens Associations of New South Wales proposed a grant program to encourage establishment of not-for-profit OSHC services in underserved areas particularly.⁵¹

- 5.31 SNAICC – National Voice for Our Children called for the Australian Government with the states and territories develop and fully implement ‘a dedicated supply-side, needs-based, reliable and sustainable funding model for early years’ Aboriginal Community Controlled Organisations (ACCOs), along with ‘comprehensive sector scaffolding and backbone support’. They also proposed that 20 per cent of unallocated funds in the Building Early Education Fund be used ‘to build and establish new ACCO integrated early years services’.⁵² Ms Catherine Liddle from SNAIC suggested that without investment in services themselves, investment in other areas will ‘not hit the gains that they should. It’s almost like a car. There’s no point in getting a new engine in your car and thinking it’ll function if you don’t pay attention to the fact that the fanbelt might not be working’.⁵³

For-profit versus not-for-profit providers

- 5.32 Some evidence focused on data indicating that for-profit services proportionately are more likely to have lower quality ratings, with some submitters arguing that some for-profit providers prioritise may financial performance over other metrics.⁵⁴ Some submitters considered that some private

⁵⁰ National Outside School Hours Services Alliance, *Submission 38*, p. 7. This idea was also expressed in Catholic Social Services Australia’s submission (*Submission 54*, p. 17).

⁵¹ Federation of Parents and Citizens Associations of New South Wales, *Submission 48*, p. 14.

⁵² SNAICC – National Voice for Our Children, *Submission 46*, p. 6; Ms Catherine Liddle, Chief Executive Officer, SNAICC—National Voice for our Children, *Proof Committee Hansard*, 17 February 2026, p. 50. Social Ventures Australia (*Submission 78*, p. 7) also called for ‘a dedicated ACCO funding model’.

⁵³ Ms Catherine Liddle, Chief Executive Officer, SNAICC—National Voice for our Children, *Proof Committee Hansard*, 17 February 2026, p. 55. The Australian Childcare Alliance suggested that co-design with ACCHOs is ‘essential in delivering community-led, place-based solutions for First Nations and for service provision in thin markets’ (Australian Childcare Alliance, *Submission 65*, p. 24). The Australian Research Alliance for Children and Youth called for ACCOs to ‘be resourced to expand their reach and sustainability, with quarantined funding within the Building Early Education Fund directed to growing a sustainable First Nations-led sector’. Alongside this, they proposed investment in family day care and flexible models of ECEC provision, such as mobile children’s services (Australian Research Alliance for Children and Youth, *Submission 63*, pp. 8–9). Goodstart Early Learning (*Submission 83*, p. 27) also called for support for Aboriginal community-controlled services.

⁵⁴ For example, Independent Education Union, *Submission 17*, pp. 17–19. On the first point, see also Australian Education Union, *Submission 34*, pp. 14–15, 18; The Parenthood, *Submission 41*, pp. 5–6; Federation of Parents and Citizens Associations of New South Wales, *Submission 48*, p. 10; Australian Local Government Association, *Submission 50*, p. 6; Parents Work Collective, *Submission*

for-profit providers may be reducing costs in areas that directly reduce quality and safety, including by reducing staff hours, hiring lower-qualified staff and limiting training.⁵⁵

- 5.33 Further, the committee heard that the need for for-profit centres to generate profits may lead to low-income, outer metropolitan and regional, rural and remote communities being underserved and create 'childcare deserts'.⁵⁶ It may also lead to for-profit OSHC providers choosing not to offer vacation care at a particular school because it often has slimmer profit margins than before and after school care.⁵⁷
- 5.34 The committee received evidence arguing that current funding models have 'skewed the rapid expansion of services towards private for-profit services'.⁵⁸ Some submitters were critical of a market-based model of ECEC provision, with the University of Queensland noting, for example, that 'ECEC is the only education sector in which profit generation is both allowed and encouraged'.⁵⁹

⁵⁶, p. 5; Family Day Care Australia, *Submission 73*, pp. 6–7; Australian Services Union, *Submission 79*, p. 8; United Workers Union, *Submission 80*, p. 18; Goodstart Early Learning, *Submission 83*, p. 20; Minderoo Foundation/Thrive by Five, *Submission 85*, p. 8.

⁵⁵ For example, Network of Community Activities, *Submission 42*, pp. 5–6; Lady Gowrie Qld, *Submission 45*, pp. 10–11; Integricare, *Submission 61*, p. 9. See also Name Withheld, *Submission 117*, p. 4; and NSW Advocate for Children and Young People, *Submission 18*, p. 2.

⁵⁶ For example, Lady Gowrie Qld, *Submission 45*, p. 11; National Foundation for Australian Women, *Submission 49*, p. 6; Tasmanian Government, *Submission 96*, p. 2; Body Safety Australia, *Submission 97*, p. 6; Australian Research Alliance for Children and Youth, *Submission 63*, p. 6; NSW Advocate for Children and Young People, *Submission 18*, p. 2; Integricare, *Submission 61*, p. 11. The Parenthood argued that the Child Care Subsidy 'is unfit for the purpose of funding early childhood education and care', and 'has pushed up the out-of-pocket price of early childhood education and care very consistently'. They called for 'a funding model that doesn't incentivise providers to set up in areas just where parents are capable of paying exorbitant out-of-pocket fees' (Ms Georgie Dent, Chief Executive Officer, The Parenthood, *Proof Committee Hansard*, 24 February 2026, p. 52).

⁵⁷ Federation of Parents and Citizens Associations of New South Wales, *Submission 48*, p. 10.

⁵⁸ Community Early Learning Australia & It Takes a Village, *Submission 47*, p. 18. They submitted that the for-profit sector has grown by over 30 per cent since 2015, while the community not-for-profit sector has declined by 8 per cent.

⁵⁹ The University of Queensland, *Submission 24*, p. 18. The Women's Electoral Lobby considered that retaining 'the market-based model, where for-profit providers continue to increase their market share, will exacerbate ongoing problems that families experience with ECEC in terms of quality, cost, complexity and availability' (Women's Electoral Lobby, *Submission 66*, p. 6). The Independent Education Union called for large for-profit ECEC centres to be 'ineligible for government funding' and for a move towards government-owned centres (Independent Education Union, *Submission 17*, pp. 6–7). Ms Lisa Bryant (*Submission 25*, p. 5) proposed 'that no new private equity or corporate owned education and care services be granted service approvals', and the NSW Advocate for Children and Young People suggested 'there is increasing recognition that governments must play a central role, not only as a funder and regulator, but also as a direct provider of services... A publicly led model, similar to the public school system, could provide the safety, quality,

The Australian Education Union argued that public subsidies for private ECEC services 'has led to the emergence of ECEC providers as an increasingly popular asset class for investors in recent years'. Further, 'the subsequent increased involvement of large investment funds in the ownership of groups or chains of providers has made identifying chains of ownership and related providers increasingly difficult'.⁶⁰

- 5.35 The Centre for Policy Development considered that without 'active government stewardship and funding tied to quality improvement, the system risks entrenching disparities, with children in for-profit settings systematically less likely to access the highest-quality education and care'.⁶¹
- 5.36 Parents Work Collective pointed to Canada, arguing that the 'Canadian government has identified that it is a poor and inefficient use of taxpayer funds to continue heavily subsidizing a sector to the point of universal access when it is largely owned by private entities that keep raising their fees in line with subsidy increases. They reported that the Canadian government 'plans to constrain the growth of for-profit centres by legislating caps on their profits, auditing spending, and restricting public funds that are funnelled into them'.⁶²
- 5.37 Others, however, supported a mixed market. For example, the Productivity Commission noted studies indicated that having a mixed market can lift the quality of all providers in an area and they 'didn't see a reason why the current process couldn't continue'.⁶³
- 5.38 In the OSHC sector, the National Outside School Hours Services Alliance suggested that 'private for-profit providers often employ practices that undermine quality and create unsustainable competitive environments', such as offering 'inflated rental payments or incentives to secure service contracts with schools' which then lead to an impact on quality to cover school payments.⁶⁴ However, the Outside School Hours Council of Australia considered that 'narratives that focus on the ownership structure and financial status of providers is not helpful and a misdirection'.⁶⁵

availability and inclusiveness that families and educators deserve' (NSW Advocate for Children and Young People, *Submission 18*, p. 3). For further criticisms of profit motives, see Federation of Parents and Citizens Associations of New South Wales, *Submission 48*, p. 10.

⁶⁰ Australian Education Union, *Submission 34*, p. 18.

⁶¹ Centre for Policy Development, *Submission 11*, p. 7.

⁶² Parents Work Collective, *Submission 56*, p. 6.

⁶³ Mr Martin Stokie, Commissioner, Productivity Commission, *Proof Committee Hansard*, 24 February 2026, p. 22.

⁶⁴ National Outside School Hours Services Alliance, *Submission 38*, pp. 5–6.

⁶⁵ Outside School Hours Council of Australia, *Submission 82*, p. 12.

- 5.39 The Victorian Government considered that ‘increasing reliance on private delivery of ECEC has led to market failure and poor provision’. They proposed ‘moving away from a passive approach that provides subsidies and runs grant programs but largely “lets the market run”’. They considered ‘a system with broad targets for market share between privately owned for-profit, not-for-profit, local government and state or Commonwealth owned and operated services’ would ‘uplift quality and access’.⁶⁶
- 5.40 The committee also heard evidence indicating that many for-profit organisations have good safety records.⁶⁷ The Australian Childhood Foundation noted that ‘many private operators deliver excellent care’ while also stating that ‘the incentive structures inherent in a for-profit model can, if not checked, have adverse effects on quality and safety’. The Foundation suggested that not-for-profit ‘and government providers, by virtue of their missions, often re-invest surplus into quality improvements’, but some ‘corporate providers do choose to go above ratio or provide additional services... because they market themselves on quality, which shows even in a market system, there can be a competitive drive toward quality, not just lower costs’.⁶⁸
- 5.41 The Front Project noted that while the ECEC system has been expanding, the for-profit sector has been ‘willing to take on the capital risk of growing’. Their Chief Executive Officer acknowledged that the community-managed not-for-profit sector, given it is typically connected to a local community, has not been ‘very interested in expanding’. She considered ‘there’s something about the risk appetite for not-for-profits that is different’.⁶⁹
- 5.42 Guardian Childcare & Education called for an end to ‘the demonisation of for-profit early learning’, noting ‘there are both excellent and poor providers in the not-for-profit and for-profit areas of the sector... In reality, great organisations that thrive typically do so because they are passionate about what they do. Revenue success and profits are a byproduct of that’. They suggested that without ‘viable for-profit centres in the sector, the drain on the public purse would likely become progressively worse and, over time, quality and supply could become a major risk’. Guardian suggested there is ‘an ideological mindset against for-profit centres that could ultimately result in the loss of high-quality centres that are loved and valued by children and families’.⁷⁰

⁶⁶ Victorian State Government, *Submission 95*, p. 9.

⁶⁷ Dr Roslyn Baxter, Chief Executive Officer, Goodstart Early Learning, *Proof Committee Hansard*, 23 February 2026, p. 7.

⁶⁸ Australian Childhood Foundation, *Submission 37*, pp. 21–23.

⁶⁹ Dr Caroline Croser-Barlow, Chief Executive Officer, Front Project, *Proof Committee Hansard*, 17 February 2026, p. 34.

⁷⁰ Guardian Childcare & Education, *Submission 72*, pp. 3, 8.

- 5.43 Affinity Education Group argued that for-profit provider contributions to the market have helped meet demand quickly,⁷¹ while G8 Education contended that all ‘providers, regardless of ownership model, operate under the same robust regulatory framework and should be assessed by outcomes and compliance history, not ownership structure’.⁷² Guardian Childcare and Education pointed to issues it considered may be influencing data differences between for-profit and not-for-profit providers, including that newer centres ‘are far less likely to secure Exceeding in their first five years of operation... More than 90% of centres in their first five years of operation are for-profit centres’.⁷³
- 5.44 Some evidence argued that not all providers should be grouped together when distinguishing between for-profits and not-for-profits.⁷⁴ For example, the Australian Childcare Alliance suggested that ‘public discourse often oversimplifies the broad diversity that exists within the sector’, arguing that there ‘is a frequent misunderstanding about what profit means in the ECEC sector, and for-profit providers have become dangerously homogenised, not representing the financial realities of the smaller privately owned centres’.⁷⁵
- 5.45 The Front Project considered profit ‘motives are not inherently good or bad’. They can ‘enable rapid expansion of services, but they can also create pressures that compromise quality and safety if not carefully managed’. While evidence from multiple reviews, inquiries and research indicates that ‘profit-driven incentives can sometimes run counter to the conditions children need to thrive’, at ‘the same time, there are many examples of high-quality for-profit providers, just as there are not-for-profits that fall short’. The Front Project considered that a ‘balanced, evidence-based approach would go further than broad labels of “for-profit” or “not-for-profit” to examine how incentives shape provider behaviour in practice’.⁷⁶
- 5.46 Outside School Hours Council of Australia noted that incentives ‘are not just confined to for profit delivery structure, and incentives come in many varying shapes and forms, including in the not-for-profit sector’.⁷⁷

⁷¹ Affinity Education Group, *Submission 31*, pp. 14–15, 16. Y Australia (*Submission 40*, p. 12) also noted that ‘not-for-profits face significant barriers in accessing capital and managing commercial risk’.

⁷² G8 Education, *Submission 43*, p. 5.

⁷³ Guardian Childcare & Education, *Submission 72*, pp. 8–9.

⁷⁴ Mrs Melinda Crole, President, Outside School Hours Council of Australia, *Proof Committee Hansard*, 17 February 2026, p. 27.

⁷⁵ Australian Childcare Alliance, *Submission 65*, p. 17.

⁷⁶ The Front Project, *Submission 9*, p. 20.

⁷⁷ Outside School Hours Council of Australia, *Submission 82*, p. 12.

Proposed reforms

- 5.47 Proposed reforms put forward by submitters included funding conditions or incentives to encourage services to focus on quality,⁷⁸ including higher Child Care Subsidy rates or bonus payments to services that meet certain quality benchmarks (such as achieving Exceeding ratings) as an incentive for providers to invest in quality improvements, as suggested by the Australian Childhood Education.⁷⁹
- 5.48 Goodstart Early Learning proposed that the Australian Government support a range of programs to improve access to capital to fund the expansion of the not-for-profit sector.⁸⁰
- 5.49 The Centre for Policy Development expressed its support for price regulation, such as profit caps ‘to disincentivise those providers that are coming into the system for maybe the wrong reasons’. However, they also proposed ‘something like an independent pricing authority... to ensure that services are being funded to deliver a really high-quality service’.⁸¹

Rental fees

- 5.50 The committee also was informed that landlords may be deliberately charging ECEC centres high fees because of the expectation that government subsidies will continue. For example, Goodstart Early Learning submitted that developers ‘rather than providers are the driving force in growth of most new centres’, arguing that ‘considerable profits can be made in selling centres, and in leasing them’. They pointed to research which found ‘the influence of corporate landlords on the supply, type, quality and cost of ECEC services is substantial and increasing’, with rising rents in particular having an impact. Goodstart considered that too ‘much money is being made buying and selling ECEC providers and services banking on the “guarantee” of ongoing government subsidies’, which ‘in turn pushes up parent fees’.⁸² The Centre for International Corporate Tax Accountability and Research also argued that ‘corporate landlords’ influence on the supply, type, quality and cost of ECEC services is substantial and increasing’, and provided a comprehensive submission in support of this argument. In particular:

⁷⁸ Australian Education Union, *Submission 34*, p. 18. See also Australian Childhood Foundation, *Submission 37*, p. 22; The Parenthood, *Submission 41*, pp. 6, 8.

⁷⁹ Australian Childhood Foundation, *Submission 37*, pp. 22, 25.

⁸⁰ Goodstart Early Learning, *Submission 83*, p. 22.

⁸¹ Ms Adelajda Soltysik, Senior Adviser, Centre for Policy Development, and Ms Katherine Osborne, Program Director, Social Services, Centre for Policy Development, *Proof Committee Hansard*, 17 February 2026, p. 40.

⁸² Goodstart Early Learning, *Submission 83*, p. 21.

Corporate landlords' reports to investors reveal an expectation that increased subsidies will strengthen landlords' capacity to charge higher rents, as centre operators can use increased subsidies to increase fees without affecting families' capacity to pay.⁸³

- 5.51 The Centre considered that the Australian Government should increase transparency about how subsidies and family contributions are spent in ECEC. They proposed that the Australian Government (potentially with state and territory governments) 'support and invest in alternative models of land ownership in ECEC'. This could include regulating rental caps, and a significant expansion of the Australian Government's direct ownership of ECEC real estate.⁸⁴
- 5.52 The Australian Education Union pointed to data from the 2024 Australian Early Development Census indicating the proportion of children who are developmentally vulnerable has increased in every domain, arguing that it 'is clear from the data that the ECEC market model is not designed to adequately meet the needs of Australia's children and our continued overreliance on private providers is a threat to quality provision'.⁸⁵

Licence fees

- 5.53 Y Australia submitted that licence fees paid by OSHC providers to schools to secure a contract range up to \$120,000 a year, arguing that 'the licence fee is ultimately paid through the CCS which is intended to support the ECEC system, not fill gaps in school funding'. They called for action to address 'the issue of unregulated licence fees'.⁸⁶

Flexibility and choice

- 5.54 The committee learned that the current funding system is not providing sufficient choice and is excluding particular cohorts of children.⁸⁷ In particular,

⁸³ Centre for International Corporate Tax Accountability and Research, *Submission 86*, pp. 2–3, 18.

⁸⁴ Centre for International Corporate Tax Accountability and Research, *Submission 86*, pp. 2–3, 20.

⁸⁵ Australian Education Union, *Submission 34*, pp. 13–14.

⁸⁶ Y Australia, *Submission 40*, p. 13. The Federation of Parents and Citizens Associations of New South Wales submitted that before 2021, the NSW Department of Education treated parent-managed, not-for-profit OSHC services as preferred providers on public school grounds, meaning these services were generally exempt from routine tendering. However, now, 'in tender evaluations, the big commercial providers offer attractive financial incentives – the [NSW] Department of Education has set significantly higher license fees paid to them in licences to operate on public schools than they do for community-based not-for-profit providers' (Federation of Parents and Citizens Associations of New South Wales, *Submission 48*, p. 10). Outside School Hours Council of Australia (*Submission 82*, p. 13) also noted 'a continual increase in the dollar value of licence fees year on year', which places 'considerable pressure on providers and is too regularly resulting in providers being forced to hand back licences as services become unviable'.

⁸⁷ Childcare Choice, *Submission 126*, p. 3. See also The Page Research Centre, *Submission 127*, p. 5.

evidence indicated that the current ECEC system may not be fit-for-purpose for some children—even excluding—unless their families can pay for services like nannies or au pairs, or, because of generational wealth, have grandparents who can afford to care for their grandchildren.⁸⁸ These cohorts include:

- Families struggling with ongoing childcare illnesses, including those who are immunocompromised and have complex health conditions;
- Families whose children have attended centres subject to recent allegations of abuse;
- Families living in ‘childcare deserts’ where the wait for universal child care will be too long without other subsidised alternatives;
- Mothers who wish to return to work but would like to continue to breastfeed their baby;
- Neurodiverse children (or suspected neurodiverse children, given the time required for a diagnosis);
- Children who are not coping with childcare;
- Single parents;
- Children with Type 1 Diabetes;
- Shift and fly-in-fly-out workers;
- Seasonal workforces; and
- Australians for whom placing children into the care of unfamiliar adults may not be culturally appropriate, including First Nations families.⁸⁹

5.55 A variety of options are available in Australia as an alternative to centre-based care, but these are financially out of reach for many families.⁹⁰ To put this another way, ‘choice’ in the current ECEC market ‘often exists only for those with the financial or social means to exercise it’.⁹¹ BubbaDesk argued that a ‘system that mandates full separation—or provides no funded alternatives—imposes costs on families who cannot conform’.⁹²

⁸⁸ Ms Cecilia Cobb, Co-Founder and Director, For Parents, *Proof Committee Hansard*, 23 February 2026, pp. 25, 30–31.

⁸⁹ Ms Cecilia Cobb, Co-Founder and Director, For Parents, *Proof Committee Hansard*, 23 February 2026, pp. 25, 30–31; Ms Angela Cochrane, Founder, The Future Care Foundation, *Proof Committee Hansard*, 23 February 2026, pp. 26, 27; Mrs Jennifer Fleming, Spokesperson, Childcare Choice, *Proof Committee Hansard*, 23 February 2026, p. 34; For Parents, *Submission 75*, p. 7.

⁹⁰ Council of Single Mothers and their Children, *Submission 2*, p. 5.

⁹¹ Childcare Stress Project, *Submission 88*, p. 4; Childcare Choice, *Submission 126*, p. 4.

⁹² BubbaDesk, *Submission 36*, p. 5.

- 5.56 Early Childhood Australia gave evidence that it ‘would like to see more consideration given to models like in-venue care, particularly in rural areas, where there is an undersupply of early childhood education and care’.⁹³
- 5.57 The committee learned that current ECEC policy settings heavily favour large childcare centres, and alternative models, including family-based care, micro-centres and supported stay-at-home parenting are underfunded or not funded at all.⁹⁴ The impact of lack of choice may be discouraging families from having children, with the Future Care Foundation pointing out that Australia has ‘the lowest birth rate in history. If we’re not finding ways to support families and having children and what that looks like, we’ll be in a dire situation in our economy in the next 20 years’.⁹⁵ Conversely, improved choice may encourage greater workforce participation by parents and improve long-term outcomes for children.⁹⁶
- 5.58 As such, as outlined below, many submitters and witnesses called for families to be provided with more genuine choice in the type of care they can access for their children.⁹⁷ One witness argued ‘[y]ou wouldn’t have a public transport system with only trains or a healthcare system with only tertiary hospitals. So why do we have a childcare system that is one size fits all?’⁹⁸

Limitations of existing options

- 5.59 The committee heard that there are issues in the existing models often referred to as providing genuine choice for families. For example, one submitter, who used in home care, reported that centre-based care ‘completely fails those with specific needs’, submitting that their child’s ‘life would be at risk’ in centre-based care’. As a result, in home care was their ‘only viable option... However, it feels as though my family is being punished for this medical necessity’. They reported that because of significant fee increases, the family may be unable to

⁹³ Ms Smantha Page, Chief Executive Officer, Early Childhood Australia, *Proof Committee Hansard*, 10 December 2025, p. 12.

⁹⁴ For example, Mrs Sally Robinson, *Submission 8*, pp. 2, 4.

⁹⁵ Ms Angela Cochrane, Founder, The Future Care Foundation, *Proof Committee Hansard*, 23 February 2026, p. 30; Mrs Sally Robinson, *Submission 8*, pp. 2, 4. See also Think Forward, *Submission 28*, p. 2, which suggested ‘more and more Millennial and Gen Z Australians [are starting to] question whether to have a second child or start a family altogether’.

⁹⁶ Australian Parents Council, *Submission 4*, p. 2.

⁹⁷ Think Forward, *Submission 28*, p. 2.

⁹⁸ Ms Cecilia Cobb, Co-Founder and Director, For Parents, *Proof Committee Hansard*, 23 February 2026, p. 25.

afford in home care, because of the gap between the subsidy and the cost of providing care.⁹⁹

- 5.60 As one witness noted at the Brisbane hearing, the in home care program is under-subscribed because it ‘is incredibly complex to navigate’, including a reassessment process every three months for ongoing eligibility for the Child Care Subsidy. This in turn, she argued, created workforce instability given the uncertainty of whether work would continue after three months. She argued that the in home care system is ‘on the precipice of collapse, truly... which is just devastating to think about for families that are never going to be able to access a centre, for families that have children with complex needs and for families of shift-workers’.¹⁰⁰
- 5.61 Family Day Care Australia argued that without ‘urgent policy recalibration to safeguard and grow this sector, thousands of families, particularly those for whom centre-based care is either unavailable or unsuitable, face the risk of being left without any viable childcare option’.¹⁰¹ In particular, they were of the view that demand for family day care ‘has not fallen. Viability has’, because of a ‘cumulative administrative load which is becoming unsustainable’.¹⁰²
- 5.62 The Australian Home Childcare Association submitted that current Child Care Subsidy settings for in home care ‘do not recognise the real cost of delivering high-risk, labour intensive, and time-sensitive services to families with significant complexity’. They argued that a complexity-weighted model aligning with approaches for the NDIS, family services, allied health and clinical care has never been properly implemented for in home care.¹⁰³
- 5.63 The Page Research Centre submitted that ‘the institutional childcare model is not delivering consistent and sufficiently high-quality care’. In particular, while public ‘investment in childcare is high... the quality children receive is uneven, inconsistent, and often insufficient’. It further stressed that, for children under the age of three ‘where attachment and relational continuity matter most’ care is often inconsistent in childcare centres.¹⁰⁴

⁹⁹ Name Withheld, *Submission 107*, p. 1.

¹⁰⁰ Ms Angela Cochrane, Founder, The Future Care Foundation, *Proof Committee Hansard*, 23 February 2026, pp. 27–28.

¹⁰¹ Family Day Care Australia, *Submission 73*, pp. 15–16.

¹⁰² Mr Andrew Paterson, Chief Executive Officer, Family Day Care Australia, *Proof Committee Hansard*, 24 February 2026, p. 8. Mr Paterson called for an adjustment to the Child Care Subsidy rate for Family Day Care (p. 9).

¹⁰³ Australian Home Childcare Association, *Submission 105*, p. 7.

¹⁰⁴ The Page Research Centre, *Submission 127*, pp. [11, 12].

5.64 Proposed changes from the Future Care Project to the in home care program included removing restrictive eligibility, raising subsidy caps and delivering business training. They also proposed changes to family day care, including reviewing how educators can access 120-hour placements, providing mentoring and funding rural educator retention.¹⁰⁵

Infants

5.65 The committee learned that many parents would prefer home-based or informal care, especially for very young children.¹⁰⁶ Further, some parents do not want to be separated from infants in the first 1000 days, wish to continue to breastfeed on demand, want more flexibility, and consider institutional environments unsuitable for very young infants.¹⁰⁷

5.66 Parents Work Collective noted that staffing ratios in Australia require one caregiver per four children (maximum) under two, 'while the international recommendation is three children under two per caregiver, and many experts recommend just one or two babies per caregiver'. They argued that the evidence of benefits of ECEC to babies and young toddlers is not yet established, and 'is, at best, mixed, with a significant number of studies showing adverse impacts'. Further, the high staffing ratios are expensive, pointing to Hungarian research suggesting that because of higher infection rates in group care, 'the annual cost per child of parental leave was actually one third of the cost of running public daycare facilities'.¹⁰⁸

5.67 Evidence pointed to the importance of secure, consistent caregiving in children's early years to support better mental and physical health and educational attainment, and to the risks associated with high stress, fragmented care and

¹⁰⁵ The Future Care Project, *Submission 60*, p. 2. Family Day Care Australia argued that the current Child Care Subsidy hourly rate cap for family day care 'does not accurately reflect actual delivery costs or workforce remuneration needs'. Further, the 'family day care model, characterised by flexible hours, non-standard care, and decentralised educator locations, requires a funding system that is equally flexible, responsive to variation in care types, and capable of supporting innovation in service delivery, including mixed-hour sessions, overnight care, and education in rural or isolated settings'. Family Day Care Australia, *Submission 73*, pp. 9–10. See also Mr Andrew Paterson, Chief Executive Officer, Family Day Care Australia, *Proof Committee Hansard*, 24 February 2026, p. 10.

¹⁰⁶ Centre for Independent Studies, *Submission 92*, pp. 9–10. See also Mr Blaise Joseph, Director, Education Program, Centre for Independent Studies, *Proof Committee Hansard*, 24 February 2026, p. 36; Ms Cecilia Cobb, Co-Founder and Director, For Parents, *Proof Committee Hansard*, 23 February 2026, p. 26. Childcare Choice reported that separation from a baby or toddler in the early years is 'one of the most emotionally difficult transitions many parents experience' (*Submission 126*, p. 1).

¹⁰⁷ BubbaDesk, *Submission 36*, pp. 3, 4. See also Childcare Choice, *Submission 126*, pp. 1–2.

¹⁰⁸ Parents Work Collective, *Submission 56*, p. 3. The United Services Union also called for changes to staffing ratios in centre-based care: see *Proof Committee Hansard*, 24 February 2026, pp. 41–43.

- early institutionalisation, of behavioural and emotional difficulties.¹⁰⁹ The Centre for Independent Studies (CIS) argued that for ‘most infants, the evidence shows no inherent developmental advantage to early formal care over attentive parental care’, noting that there may be potential negative effects for very young children in ECEC. They also noted some research shows ‘a strong preference for parental or familial care in the first year’.¹¹⁰
- 5.68 Parents Work Collective proposed ‘proper consideration’ to ‘individualised, in-home care for very young children, especially pre-verbal babies and toddlers’. They proposed that this involve ‘increasing the Commonwealth’s paid parental leave scheme from 26 weeks to 52 weeks, together with expanding the CCS Scheme to cover care by grandparents, nannies and co-working creche options’, while continuing centre-based care as an option.¹¹¹
- 5.69 The CIS further submitted that ‘Australian research indicates that formal childcare during the toddler years does not consistently produce cognitive gains for the broader population’, with the greatest developmental benefits being among children from disadvantaged backgrounds, who ‘are also disproportionately from families who do not meet the CCS activity test requirements – often due to low or irregular employment’.¹¹²
- 5.70 Mr Martin Stokie, Commissioner at the Productivity Commission, acknowledged that for ‘nought to three there are mixed studies, and probably the conclusion would be that early childhood education and care can be significantly beneficial relative to the alternative environment in which those children are growing up... [I]t’s more compelling with four- to-five-year-olds, less so at zero to three’.¹¹³
- 5.71 The CIS’s view was that ‘the evidence shows children’s developmental needs vary markedly by age, and... policy should reflect this diversity rather than [imposing] uniform structures across the 0–5 age spectrum’.¹¹⁴

¹⁰⁹ For example, Parents Work Collective, *Submission 56*, pp. 2, 3.

¹¹⁰ Centre for Independent Studies, *Submission 92*, p. 6.

¹¹¹ Parents Work Collective, *Submission 56*, p. 3.

¹¹² Centre for Independent Studies, *Submission 92*, p. 7. See also Ms Alannah Batho, Director, Parents Work Collective, *Proof Committee Hansard*, 17 February 2026, pp. 43, 44; Mr Blaise Joseph, Director, Education Program, Centre for Independent Studies, *Proof Committee Hansard*, 24 February 2026, p. 36.

¹¹³ Mr Martin Stokie, Commissioner, Productivity Commission, *Proof Committee Hansard*, 24 February 2026, p. 20. Mr Stokie also noted that the Commission put more weight on causal studies.

¹¹⁴ Centre for Independent Studies, *Submission 92*, p. 8.

Subsidised options

5.72 As outlined below, many submitters and witnesses called for more choice and more flexible care options and funding structures that will help services to effectively meet families' needs.¹¹⁵ In support of increased flexibility, one witness pointed to other systems as examples of government funding supporting individualised choice of care.¹¹⁶ As Childcare Choice argued, in the current ECEC system:

Families with financial means can exercise choice. They can supplement care, adjust arrangements, or privately fund alternatives. Families without those means must rely on the subsidised model, regardless of whether it suits their circumstances. Expanding subsidy flexibility would not create inequality. It would reduce it. It would ensure that ordinary Australians—including those without extended family support or financial buffers—have the same ability to shape care arrangements as more affluent households. Choice should not be a luxury.¹¹⁷

5.73 Some submitters called for an expansion of the Child Care Subsidy to a broader range of care options.¹¹⁸ These could include care from grandparents, nannies and au pairs.¹¹⁹ Parents Work Collective considered that this would 'reduce pressure on centre based services; free up places for children who benefit most from group care, including disadvantaged children and older children; and it would provide greater flexibility for families who are currently locked out of the system'.¹²⁰

5.74 Further options proposed included expanding a payment like the Carer Payment so it includes parents or grandparents caring for children, and making payments direct to parents to support their choice of care for their child.¹²¹ Others proposed increased support for care outside standard hours, such as

¹¹⁵ For example, Ms Celeste Pater, *Submission 1*, p. 2.

¹¹⁶ Mrs Madeline Simmonds, Spokesperson, Childcare Choice, *Proof Committee Hansard*, 23 February 2026, p. 36.

¹¹⁷ Childcare Choice, *Submission 126*, p. 4.

¹¹⁸ For example, Name Withheld, *Submission 116*, p. 2; Childcare Choice, *Submission 126*, pp. 3–4. See also The Page Research Centre, *Submission 127*, p. 7, which proposed replacing the Child Care Subsidy 'with a Choice in Care Subsidy for children aged 0–3, payable for parental care, kinship care, home-based care, community care, or centre-based care'.

¹¹⁹ For Parents, *Submission 75*, pp. 4, 12; Centre for Independent Studies, *Submission 92*, p. 6.

¹²⁰ Ms Alannah Batho, Director, Parents Work Collective, *Proof Committee Hansard*, 17 February 2026, p. 43.

¹²¹ Ms Alannah Batho, Director, Parents Work Collective, *Proof Committee Hansard*, 17 February 2026, p. 48. See also Mrs Sally Robinson, *Submission 8*, p. 4 re subsidies given to families directly.

publicly funded centres close to hospitals for shift workers¹²² and an expansion of the Child Care Subsidy to close close-proximity childcare options that would allow parents to work with onsite childminding.¹²³

- 5.75 The Centre for Independent Studies (CIS) proposed a three-tiered model which would include centre-based and family day care, licensed in-home or micro-group care, and occasional or non-resident relative care. They suggested that access be dependent on registration, identity verification and a prohibition on intra-household payments.¹²⁴
- 5.76 The CIS argued that ‘government spending on child care is equivalent to over \$11,000 per child per year’ for age 0–5, equating to around \$9000 per child in Australian Government spending. They contended that the Australian Government ‘could instead simply give every family in Australia a \$9,000 cash payment per year for every child between zero and five years old for the same cost to the budget’.¹²⁵
- 5.77 Not all evidence supported these proposals. The Parenthood pointed to overseas experience in the United States and the United Kingdom ‘where government funding has been provided to assist parents to use alternative models of care to centre based day care’, stating that ‘what we’ve seen happen is the same thing that happens with the childcare subsidy: the cost of the service invariably goes up by the amount of the subsidy or the voucher’.¹²⁶

Safeguarding

- 5.78 Some evidence underlined the importance of ensuring that every option for early childhood care is safe if the current funding system were to be expanded.¹²⁷

¹²² Think Forward, *Submission 28*, p. 4. The Salvation Army (*Submission 30*, p. 11) also proposed the Australian Government work with the ‘state and territory governments to enhance ECEC flexibility. This could include opening casual days and extended opening hours’.

¹²³ BubbaDesk, *Submission 36*, pp. 6, 17–19, 48; For Parents, *Submission 75*, pp. 4, 12. See also Integricare, *Submission 61*, p. 12, which proposed funding for pilot programs for very young children, such as for co-working creche models; Childcare Choice, *Submission 126*, p. 3.

¹²⁴ Centre for Independent Studies, *Submission 92*, pp. 1, 3, 13–14. See also *Proof Committee Hansard*, 24 February 2026, pp. 36–37.

¹²⁵ Mr Blaise Joseph, Director, Education Program, Centre for Independent Studies, *Proof Committee Hansard*, 24 February 2026, p. 36.

¹²⁶ Ms Georgie Dent, Chief Executive Officer, The Parenthood, *Proof Committee Hansard*, 24 February 2026, p. 52. They also suggested that the cost of nannies in a former Nanny Pilot Programme ‘remained prohibitive even with government assistance’.

¹²⁷ The Front Project, *Submission 9*, p. 26. See also Dr Roslyn Baxter, Chief Executive Officer, Goodstart Early Learning, *Proof Committee Hansard*, 23 February 2026, p. 7; Australian Childcare Alliance, *Submission 65*, p. 23.

- 5.79 Ms Hetty Johnston AM from Safeguarding People Australia noted ‘a push for “childcare-at-home” funding... I understand this idea, and the fear that drives it’. However, ‘this proposal would be open to financial rorting on an industrial scale... no registration, oversight, management, safeguarding – no checks and balances’.¹²⁸
- 5.80 However, Ms Alanna Batho from Parents Work Collective told the committee ‘I don’t agree with the proposition that unregulated care is risky care... We have this form of care already... Many people use it, but, equally, because of economic necessity, many people are locked out of using it’.¹²⁹
- 5.81 Proposals put forward in evidence to overcome any safety issues that could arise with expanded government funding for increased choice included community awareness raising, particularly on grooming and adult-to-adult grooming, given ‘the first step these bad actors take is to groom the adults around them’,¹³⁰ as well as mandatory child safety training, registration, minimum qualification requirements, WWCCs, child safety standards and oversight from a regulator.¹³¹
- 5.82 Ms Allanah Batho from Parents Work Collective suggested the aged care model ‘of contracting with an individual person would be analogous to what we’re proposing here’, including with independent contractors.¹³² Similarly, Ms

¹²⁸ Safeguarding People Australia, *Submission 7*, p. 5. Mr Andrew Paterson, Chief Executive Officer, Family Day Care Australia (*Proof Committee Hansard*, 24 February 2026, p. 10) argued that ‘people follow government money. They move from one sector to another’. He highlighted the dangers of ‘opening the door to quality, safety and payment integrity risk’. Dr Amy Graham, Senior Adviser, Valuing the Early Years, Minderoo Foundation and Thrive by Five, *Proof Committee Hansard*, 24 February 2026, p. 28 also expressed concerns about regulating in-home options, arguing that expanding ‘to unregulated options may bring in even more unintended consequences’. See also Ms Samantha Page, Chief Executive Officer, Early Childhood Australia, *Committee Hansard*, 10 December 2025, p. 12, who questioned ‘how we could regulate, for example, grandparent care... I don’t know that it’s in the public interest to do that’.

¹²⁹ Ms Alannah Batho, Director, Parents Work Collective, *Proof Committee Hansard*, 17 February 2026, p. 48.

¹³⁰ Mr Luke Twyford, Principal Commissioner, Queensland Family and Child Commission, *Proof Committee Hansard*, 23 February 2026, pp. 45, 47–48. Ms Georgie Dent (Chief Executive Officer, The Parenthood, *Proof Committee Hansard*, 24 February 2026, p. 57) highlighted ‘really clear’ evidence ‘that more than 95 per cent of child sexual abuse is perpetrated by somebody who is known to the child and the family’, emphasising that ‘safety and oversight have to remain paramount priorities’. Further, ‘we need systems that mean we’re not relying on the intuition or goodwill of parents to ensure the safety of their children in their home, because – and this applies whether it’s in a school, an early learning service or a home – what we know about predators is that they groom adults as well as grooming children’.

¹³¹ Australian Childcare Alliance, *Submission 65*, p. 23; Ms Georgie Dent, Chief Executive Officer, The Parenthood, *Proof Committee Hansard*, 24 February 2026, p. 57; For Parents, *Submission 75*, p. 13.

¹³² Ms Alannah Batho, Director, Parents Work Collective, *Proof Committee Hansard*, 17 February 2026, p. 45.

Angela Cochrane from the Future Care Foundation suggested looking to the regulation and oversight of other sectors involving care of vulnerable people. She argued:

Instead of making flexible home based care fit centre based care regulations, let's look at the regulatory framework of other more adaptive models and then try and apply it in that space instead.¹³³

5.83 Ms Batho suggested that care could be provided by registered carers, provided the carer meets certain minimum safeguards. She suggested carers could be registered on the National Early Childhood Worker Register, and minimum standards and monitoring could be introduced.¹³⁴

Expanded Paid Parental Leave

5.84 Various submitters and witnesses called for Paid Parental Leave to be expanded, with some calling for 12 months as a minimum.¹³⁵ The Front Project argued that real choice for families is 'supported by parental leave policies that enable families to balance time at home with access to education and care'.¹³⁶

5.85 Think Forward submitted that the existing 'Paid Parental Leave scheme is still among the least generous in the OECD'. They argued that longer 'parental leave improves child development outcomes, supports bonding, reduces maternal mental health risk, and helps fathers participate more fully in early caregiving'. Further, every 'family deserves the security of knowing they can spend the first year of their child's life together without sacrificing their financial wellbeing'.¹³⁷

5.86 Ms Georgie Dent from The Parenthood informed the committee that 'zero to 12 months is the hardest window to do well in early childhood education and care'. Further, 'we know the evidence is really clear that, when babies have the

¹³³ Ms Angela Cochrane, Founder, The Future Care Foundation, *Proof Committee Hansard*, 23 February 2026, p. 31. See also Parents Work Collective, *Submission 56*, pp. 4–5; Ms Alannah Batho, Director, Parents Work Collective, *Proof Committee Hansard*, 17 February 2026, pp. 44, 46.

¹³⁴ Ms Alannah Batho, Director, Parents Work Collective, *Proof Committee Hansard*, 17 February 2026, pp. 43, 44.

¹³⁵ For example, Think Forward, *Submission 28*, pp. 1, 3; Parents Work Collective, *Submission 56*, p. 1; For example, Name Withheld, *Submission 116*, p. 2; Mrs Jennifer Fleming, Spokesperson, Childcare Choice, *Proof Committee Hansard*, 23 February 2026, p. 40; Ms Georgie Dent, Chief Executive Officer, The Parenthood, *Proof Committee Hansard*, 24 February 2026, p. 51; Dr Caroline Croser-Barlow, Chief Executive Officer, Front Project, *Proof Committee Hansard*, 17 February 2026, p. 33; Ms Katherine Osborne, Program Director, Social Services, Centre for Policy Development, *Proof Committee Hansard*, 17 February 2026, p. 38; Ms Alannah Batho, Director, Parents Work Collective, *Proof Committee Hansard*, 17 February 2026, p. 43. Playgroup Australia (*Submission 32*, p. 3) also called for redesigned Paid Parental Leave to 'promote equitable care responsibilities by enabling both parents to take meaningful leave'. See also The Page Research Centre, *Submission 127*, p. 7.

¹³⁶ The Front Project, *Submission 9*, p. 25.

¹³⁷ Think Forward, *Submission 28*, p. 3.

opportunity to be cared for at home, when parents aren't forced back to work before they're ready, children do really well and so do parents'. She acknowledged that Child Care Subsidy for aged six months to 12 months 'is cheaper than paid parental leave would be, but it's not that much different', pointing to 'what we are getting for that investment' in terms of reducing pressure on the early education workforce and allowing parents 'to stay at home for longer when that's what they want'.¹³⁸

- 5.87 While this evidence highlights the importance of the first 12 months in a child's development, it also underscores the role that policy settings play in enabling families to make decisions that reflect their circumstances. In this context, the committee received broader evidence that many families require flexible options that allow for care arrangements beyond a single model, particularly where extended periods at home are not feasible. This suggests that, within the existing framework, settings that support a range of care options may better enable parents to access more proximate or flexible forms of care during this period.
- 5.88 The NSW Advocate for Children and Young People noted that under the current system, 'parents have no choice but to return to work'. She argued that it 'is time to give serious consideration to how governments can enable parents to spend longer at home with their children if they choose to, or if no affordable or quality service is available'. She considered that this would 'enable true choice around services' and 'significantly reduce the current burden on the system, which is unsustainable'.¹³⁹

¹³⁸ Ms Georgie Dent, Chief Executive Officer, The Parenthood, *Proof Committee Hansard*, 24 February 2026, p. 56.

¹³⁹ NSW Advocate for Children and Young People, *Submission 18*, p. 3.

Chapter 6

Committee view

- 6.1 The committee thanks all individuals and organisations who contributed to this inquiry, including those who made written submissions, appeared at public hearings, and informed the thinking of committee members through community forums. The committee acknowledges the time, expertise and lived experience shared by participants, particularly given the sensitive nature of the issues under consideration.
- 6.2 The committee notes with concern recent public commentary directed at individuals who provided evidence to this inquiry. Parliamentary inquiries rely on the willingness of participants to engage openly, constructively and in good faith. Efforts to publicly discredit or politicise witnesses risk undermining the integrity of the inquiry process, particularly where the subject matter involves serious issues relating to the safety and wellbeing of children.
- 6.3 The committee further notes that a range of organisations and advocacy groups participating in this inquiry hold particular policy positions and affiliations. This is not uncommon in public policy debates, and underscores the importance of assessing all evidence on its merits, ensuring that contributors are able to participate in the process without fear of personal criticism or external pressure.
- 6.4 Australia's early childhood education and care sector is sustained by the dedication of thousands of professional educators and providers who bring genuine commitment, skill and compassion to the children in their care each day. The committee acknowledges their work, and the work of the many services operating to high standards across the country. This report is not a judgement upon them.
- 6.5 It is, however, a reckoning with a harder truth: that within this same sector, a small number of individuals have been permitted to cause harm of a kind that is difficult to put into words, and that the systems designed to protect children have not always stopped them. The evidence before this committee made that clear; not in the abstract, but through the accounts of real families whose lives have been altered, in some cases irrevocably, by failures that were preventable.
- 6.6 Consider what that looks like in practice. A parent like Bec, whose toddler required an STD test following allegations of sexual abuse at a daycare centre; a parent who cannot be expected to trust another centre, and who cannot access the childcare subsidy to pay neighbours who have offered to help.¹ Or Emma, a rural nurse and survivor of domestic violence who, after a lifetime of effort to

¹ Ms Cecilia Cobb, For Parents, Co-founder and Director, *Proof Committee Hansard*, 23 February 2026, p. 25.

secure her own independence, is now at risk of losing her nursing registration because she cannot find subsidised care that fits her shifts. Or Anna, forced to choose between her child's health and her ability to work, after repeated illness from daycare was affecting her capacity to have a second child.² These are not edge cases. They are the human cost of a system that is not working as it should.

- 6.7 The evidence also illuminated a deeper structural tension, one that goes to the question of whose rights, in practice, take precedence. Mr Colm Gannon, Chief Executive Officer of the International Centre for Missing and Exploited Children Australia, put it with precision at the committee's first hearing: 'Privacy, as opposed to the rights of children, is taking a pinnacle position. The rights of privacy are superseding the rights of children'. He continued: 'We need to make sure we balance the rights of children high above the privacy rights of criminals'.³ The committee agrees. When the protection of children and the privacy of those who would harm them are weighed against one another, there should be no ambiguity about where the balance must fall.
- 6.8 This is not a matter that divides along political lines, nor should it. Governments of all persuasions have held responsibility for this sector over many years, and the failures documented in this report did not accumulate overnight or under a single administration. The committee approaches its recommendations in that spirit: not to assign partisan blame, but to insist, with the seriousness the evidence demands, that the status quo is no longer acceptable. The case for action is urgent, the evidence is clear, and the time for incrementalism has passed.
- 6.9 This is not the first inquiry to conclude that the early childhood education and care (ECEC) system is complex, fragmented and not meeting the needs of many Australians, and it likely will not be the last—not without the reforms that the committee proposes below. The committee acknowledges that the Australian and state and territory governments have recently attempted to reform some of the most concerning aspects of the system that allowed systemic issues with quality and safety to persist and fester.
- 6.10 However, the evidence received throughout the inquiry is that there are too many systems with too little communication between them. There are too many regulatory gaps, and overregulation with a significant compliance burden in areas that have no proven benefits in terms of improving quality and safety for children. The system does not provide sufficient choice, especially for families unable to access centre-based care, whether because they live in a 'childcare desert' with limited or no services, or because centre-based services are not

² Ms Cecilia Cobb, For Parents, Co-founder and Director, *Proof Committee Hansard*, 23 February 2026, p. 25.

³ Mr Colm Gannon, Chief Executive Officer, International Centre for Missing and Exploited Children Australia, *Committee Hansard*, 19 November 2025, p. 31.

suitable for their child's needs. The Australian Government appears to have focused its policy settings and funding levers on centre-based care catering to large numbers of children. As a result, families are faced with limited affordable alternatives that they trust.

Safety in childcare

- 6.11 At the heart of this inquiry is a simple expectation shared by every family: when a child is placed in care, that child must be safe. The evidence before the committee raises serious concerns about whether current arrangements are consistently meeting that expectation. Throughout the inquiry, the committee was disappointed to realise that matters of child safety were not acted upon faster and more seriously in the wake of the conviction of Ashley Paul Griffith in Queensland in 2024.
- 6.12 At the public hearing on 19 November 2025, which focused on the criminal justice response to child sexual abuse, including in childcare settings, the committee heard deeply distressing evidence on how perpetrators deliberately seek out childcare environments and target very young, often non-verbal children.
- 6.13 The Australian Federal Police (AFP) Deputy Commissioner confirmed it is now investigating organised international paedophile networks, and the Australian Centre for Countering Child Exploitation receives an average of 226 reports of child sexual exploitation every single day. The Deputy Commissioner said:
- I'm going to be honest Chair and Committee members – the crime of online child sexual exploitation is not getting better - it is getting worse. I do not share this to scare the public – although I concede it will shock some caregivers and parents.⁴
- 6.14 In the committee's view, these events cannot be met with complacency and must be addressed as a matter of the highest urgency. They call for decisive action, and for a willingness, at the national level, to confront some deeply uncomfortable truths about the prevalence of child sexual abuse in Australia. Australia holds the world's third-highest number of INTERPOL Green Notices, the substantial majority of which relate to child sex offenders.⁵ Research led by UNSW found that across the spectrum of conduct (from online behaviour to contact offending), almost one in ten Australian men reported having engaged in conduct meeting the definition of a sexual offence against a child under 18. The researchers' own analysis indicates that contact offending specifically affected approximately 3.2 per cent of men surveyed – a figure corroborated by

⁴ Mr Ian McCartney, Deputy Commissioner, Crime, Australian Federal Police, *Committee Hansard*, 19 November 2025, pp. 1–2

⁵ AFP, [AFP targets child sex offenders travelling overseas](#), 15 September 2024 (accessed 26 March 2026).

independent international research.⁶ These figures speak to a national problem of profound scale, one that implicates not only the regulation of the early childhood sector, but the broader frameworks of criminal law, enforcement and community accountability within which that sector operates. The committee appreciates many of the matters raised relate to criminal law and sit within the jurisdiction of Attorney-General.

- 6.15 In October 2025, the Coalition introduced the Crimes Amendment (Mandatory Minimum Sentences for Child Sexual Abuse) Bill 2025 (the bill), which would ensure that those who abuse, exploit or prey upon children face real justice. The bill introduces mandatory minimum sentences of five years' imprisonment for serious Commonwealth child sexual abuse offences, increasing to six years for repeat offenders.
- 6.16 A clear message from the evidence was that child safety in ECEC depends on strong, practical safeguards operating consistently in daily practice. This includes effective workforce screening and reporting arrangements, appropriate supervision practices, and other measures that reduce opportunities for harm and support timely intervention when concerns arise.
- 6.17 Importantly, these practical safeguards must sit within a broader ecosystem that provides layered and overlapping protections. The committee heard that complaints, reportable-conduct concerns, regulator findings, Working With Children Check (WWCC) information and police intelligence sit in separate channels, with poor feedback loops and weak capacity to 'join the dots'. A more joined-up system that allows for better and smoother cooperation and coordination between police, regulators, providers and other relevant bodies will help improve child safety overall.
- 6.18 State and territory regulators, which were not called to give evidence at this inquiry, play an integral role in improving the safety of ECEC environments. The committee was therefore unable to form a view about whether there are obvious opportunities to improve the regulatory environment within the current frameworks. In addition, Australian Children's Education and Care Quality Authority (ACECQA) did not provide a submission to the inquiry. There may be a case, for example, for jurisdictions to coordinate consistent targets on the frequency of service visits, or ways to implement and monitor continuous improvements in child care settings.
- 6.19 Despite the limited evidence available at the state and territory regulator level, the committee's clear view is that there are gaps between jurisdictions and a lack of consistency relating to compliance and regulatory activity. Undoubtedly, this is leading to weaknesses which could risk the safety of children.

⁶ UNSW Sydney, [*Almost 1 in 10 Australian men have committed a sexual offence against children: Study*](#), 20 November 2023 (accessed 26 March 2026).

- 6.20 In the regulatory space, the committee notes that governments have begun work on a number of reforms, including the package agreed by education ministers in August 2025. The principal reforms relate to a National Educators Register, and WWCCs. These are important steps. However, the evidence to the inquiry suggests that reform in this area has too often followed serious incidents rather than anticipating risk. The committee considers that safeguarding reforms must now proceed with greater urgency and with a clearer focus on prevention.
- 6.21 This focus on anticipation of risk should direct the regulatory reforms currently underway, and allow providers to prevent—rather than respond to—serious incidents. However, in many cases it is apparent that the reforms are not yet sufficiently advanced to allow this to occur.
- 6.22 Multiple submitters emphasised that it was essential for the National Educator Register to include information that facilitates risk-based assessments, and the identification of 'red flags' or concerning behavioural patterns. For instance, submitters recommended the integration of the register with police and child protection databases; automatic alerts where a person is disqualified, investigated or sanctioned; real-time verification of misconduct or disciplinary action; records of substantiated allegations of child harm or serious misconduct; and a record of cases where a person resigns while an investigation is underway. The National Educator Register does not yet appear to offer this functionality.
- 6.23 Similarly, multiple submitters raised concerns about the effectiveness of WWCCs, describing the system as fragmented or fractured, and replete with practical difficulties.
- 6.24 The committee notes with particular concern the evidence that WWCCs were not effective in identifying or preventing some of the worst cases of child sexual abuse in centre-based day care, and that in some jurisdictions WWCCs were not even scrutinised but were simply treated as a 'tick-box' exercise. The committee notes that one of Australia's worst child sex offenders, Ashley Griffith, held and was entitled to hold a WWCC throughout the course of his offending across centres in New South Wales and Queensland.
- 6.25 The committee further notes that WWCC reforms have not met announced deadlines. In August 2025, the Australian Government committed to delivering nationally consistent 'banned in one, banned in all' rules by the end of 2025. This deadline was not achieved.
- 6.26 Furthermore, the hearings made clear that a regulatory approach alone has not and will not be sufficient to ensure safety in centre-based daycare, and that partnership with law enforcement is critical. The committee heard evidence about horrific instances of child sexual exploitation that were not (and in some cases could not have been) detected by regulatory activity, and were only stopped by effective law enforcement action.

- 6.27 The committee notes in particular the evidence from the AFP, Professor John Rouse, Dr Michael Salter, the International Centre for Missing and Exploited Children and the Alannah and Madeline Foundation. The committee heard a clear message about the significant rise in recent times in online child sexual exploitation, and the nexus between that type of offending and childcare centres.
- 6.28 The committee further notes the important disruptive role that law enforcement can play in identifying and preventing that type of offending. However, the committee is concerned with the evidence that law enforcement was working with 'their hands tied behind their back in relation to using certain technologies' due to privacy restrictions in relation to facial recognition.⁷ The committee considers that enabling effective and rapid victim identification may provide an important law enforcement effect, both by preventing ongoing abuse and allowing the identification and imprisonment of offenders who might otherwise go on to offend repeatedly.
- 6.29 The committee shares concerns that individual child safety reports often do not meet the threshold to involve police or to conclude that there was reportable conduct, but that in aggregate those reports can paint a much clearer picture of risk.
- 6.30 The committee notes the important evidence about CCTV and other technological measures in creating a child-safe environment. The committee notes that for very young children (including pre-verbal children), disclosure is often limited and convictions can be difficult to obtain—and that in those circumstances recordings or medical evidence may be critical.
- 6.31 Notwithstanding the volume of regulatory requirements, the committee received compelling evidence that individuals who have perpetrated abuse in ECEC settings have, in some cases, passed WWCCs and been employed in services rated as 'Exceeding'. This raises serious concerns about whether the current regulatory framework is overly focused on process compliance, rather than effective risk detection and prevention. The committee considers that the policy objective should not be the expansion of regulation for its own sake, but the delivery of better, more targeted and more enforceable regulation that prioritises child safety outcomes.
- 6.32 The committee notes that ACECQA has undertaken a rapid review of staffing and supervision arrangements in ECEC services. Evidence indicated that current regulatory settings in some jurisdictions allow educator-to-child ratios to be reduced during sleep and rest periods. The committee also heard that Queensland has recently moved to remove these provisions and require

⁷ Mr Colm Gannon, Chief Executive Officer, International Centre for Missing and Exploited Children Australia, *Committee Hansard*, 19 November 2026, p. 30.

consistent supervision arrangements throughout the day. In the committee's view, educator-to-child ratios should be maintained at all times, including during sleep and rest periods.

Recommendation 1

6.33 The committee recommends that the Government prioritise the closer integration of law enforcement into current child safety reforms, to allow a more joined-up approach to child safety. Specifically, the committee recommends the government consider:

- **as a priority—closer integration of the WWCC register, the National Educator Register and police/regulator intelligence;**
- **reforms to allow the use of facial recognition tools for the purpose of rapid victim identification by police in cases of child sexual assault, subject to appropriate legislative guardrails and oversight mechanisms commensurate with the sensitivity of the technology and the privacy interests engaged, and noting its status as an emerging technology;**
- **establishing appropriate mechanisms, whether operational, structural or otherwise, to allow regular two-way feedback between police and regulators in relation to sub-threshold matters; and**
- **establishing clear guidance on the preservation of CCTV footage and other records for evidentiary purposes in cases involving alleged child sexual abuse, including appropriate retention periods, access protocols, and safeguards to ensure that any such requirements do not result in the surveillance of children beyond what is necessary for child protection purposes.**

Recommendation 2

6.34 The committee recommends that the Australian Government refer to the Australian Law Reform Commission the question of whether existing sentencing frameworks for serious child sexual abuse offences adequately serve as a deterrent and protect children from individuals who pose an ongoing risk. The referral should consider whether current sentencing provisions, including for repeat offenders, are commensurate with the gravity of these offences, and what reforms may be appropriate to ensure that those who abuse, exploit or prey upon children do not remain a threat to child safety.

Timeframes for Regulatory Response

6.35 The committee was concerned by reports that there are delays in follow-up by state and territory regulators to reports of abuse and breaches of the National Law and regulations. Given the risk of further abuse and breaches occurring in the intervening period, this is unacceptable. The committee notes that

governments have recently provided more funding to regulators, but considers that the Australian Government, with the state and territory governments, should consider setting clear timeframes for responses, with regulators to report on these timeframes. As an example, the National Disability Insurance Scheme's Participant Service Charter includes timeframes, and each quarter the National Disability Insurance Agency is required to report against those timeframes. Given the urgency of regulators acting on concerning allegations, a similar approach should be adopted in the ECEC sector.

Recommendation 3

6.36 The committee recommends that the Australian Government with the state and territory governments develop clear, consistent timeframes for regulators to respond to allegations of concerning behaviour and breaches of the National Law and regulations.

Strengthening Pre-Employment Screening

6.37 The committee considers that improving the visibility of relevant employment and regulatory history would strengthen safeguards across the sector and reduce the risk of individuals with concerning conduct moving undetected between services.

Recommendation 4

6.38 The committee recommends that the Australian Government, in consultation with state and territory governments, consider expanding access to the National Early Childhood Worker Register to enable prospective employers to undertake appropriate pre-employment checks.

This should include consideration of mechanisms to allow employers to access relevant information relating to an individual's regulatory history, including any prohibition notices, suspensions, or substantiated breaches of workplace health and safety or service-level policies, subject to appropriate privacy and procedural safeguards.

Strengthening Safeguards in Law and Training

6.39 The committee accepts that procedural fairness in employment is a legitimate and important principle. It does not accept that it should operate, in practice, as a shield for individuals who pose a credible risk to children.

6.40 The evidence before the committee points to a consistent and documented pattern: providers who hold genuine, reasonable concerns about a worker's behaviour around children currently face significant legal and financial exposure if they act on those concerns decisively or share them with prospective employers, and the architecture of employment law accordingly creates a powerful disincentive to do either.

- 6.41 As confirmed by Mr Glen Hurley, Chief Executive Officer of Affinity Education Group, providers are not willingly withholding this information; they are legally constrained from sharing it.⁸ The consequence, as Mr Luke Twyford, Principal Commissioner of the Queensland Family and Child Commission put it plainly, is that children are left holding the risk that employment law will not allow providers to manage, and that the sector is prevented from collectively protecting itself and the children in its care.⁹
- 6.42 The committee notes that this is not a theoretical concern. The *In Plain Sight* report documented multiple points at which intervention in the Ashley Griffith case was possible but did not occur, in part because of the legal and financial risks facing providers who act on concern rather than proven misconduct. The committee considers it unacceptable that the architecture of employment law continues to produce this outcome in child-facing workplaces.
- 6.43 The committee notes the response of the Australian Services Union NSW (ASU NSW) when asked directly whether a provider should be able to terminate swiftly where it holds serious concerns about an educator's behaviour around children (including repeated boundary violations or supervision breaches) that have not yet resulted in a formal finding or criminal charge. The ASU's response restated opposition to any diminution of Fair Work protections and addressed a series of matters—ratio enforcement, investigation timelines, and protections for workers who make reports—which, while legitimate child safety considerations in their own right, speak to the conditions that should prevent the dilemma from arising rather than to what a provider should do when those conditions have failed and a credible concern remains.¹⁰
- 6.44 The committee does not suggest that the interests of the workforce the ASU NSW represents are unimportant. The ASU NSW raises concerns about workforce conditions in the sector, and the committee acknowledges that questions of job security and remuneration for ECEC workers are matters of genuine public interest and addressed elsewhere in this report. The union representing workers in a child-facing sector bears a particular responsibility to engage meaningfully with evidence that the current employment framework places children at preventable risk. The committee considers that employee protections cannot take primacy over child safety. The committee's view is that

⁸ Mr Glen Hurley, Chief Executive Officer, Affinity Education Group Pty Ltd, *Proof Committee Hansard*, 23 February 2026, pp. 16–17.

⁹ Mr Luke Twyford, Principal Commissioner, Queensland Family and Child Commission, *Proof Committee Hansard*, 23 February 2026, p. 43.

¹⁰ Australian Services Union NSW—answers to questions taken on notice at a public hearing in Canberra on 24 February 2026 (received 10 March 2026).

reform is necessary, and the weight of evidence points overwhelmingly in this direction.

Recommendation 5

- 6.45** The committee recommends that the Australian Government amend the *Fair Work Act 2009* to ensure that employment settings appropriately reflect the safeguarding requirements of child-facing workplaces, including early childhood education and care, and protect employers who, in good faith and on reasonable grounds, take adverse employment action (including suspension, role reassignment, or termination) due to concerns about a worker's potential risk to children.

Recommendation 6

- 6.46** The committee recommends that the Australian Government review how national child safety training is delivered and assessed in early childhood education and care sector to ensure it drives genuine engagement with safeguarding.

This should include strengthening assessment requirements so that participants demonstrate a clear understanding of the material, and examining whether current settings adequately require engagement and robust evaluation, with ongoing monitoring incorporated into regular audit processes. The review should ensure the training functions as a real safeguard that builds capability and awareness, rather than a procedural exercise.

Managing Allergies and Diabetes in Early Childhood Settings

- 6.47** The inquiry also highlighted risks faced by children with medical conditions such as food allergies and type 1 diabetes. For many families, early learning settings are the first places outside the home where these conditions must be managed by others. Evidence to the inquiry indicated that inconsistent practices, limited training and uncertainty among educators can place these children at risk and create significant anxiety for families.
- 6.48** The committee considers that children with allergies or diabetes should be able to participate in ECEC on the same basis as other children. Evidence-based guidance already exists to support services in managing anaphylaxis risks, including the National Allergy Council's Best Practice Guidelines, yet these approaches are not implemented consistently across the sector. The committee also notes the absence of an accredited training pathway enabling educators to safely undertake the time-critical tasks required to support children with type 1 diabetes.
- 6.49** In the committee's view, these gaps cannot be resolved on a service-by-service basis and require coordinated national reform aligned with existing government work to safely support children with complex medical needs.

Recommendation 7

6.50 The committee recommends that the Australian Children’s Education and Care Quality Authority, in consultation with relevant peak bodies, develop and implement guidelines for anaphylaxis prevention and management for children with allergies; and guidelines for the appropriate safety and care of children with type 1 diabetes.

Workforce Conditions and Regulatory Oversight

6.51 The committee learned that one of the most significant factors determining the quality and safety of care for young children is employment practices and conditions. Overwhelmingly, educators and staff genuinely care about the children entrusted to their care, are hard-working and dedicated to their jobs. However, there are increasing levels of staff burnout, in large part due to increasing compliance requirements of educators that draw them away from care. Providers, most of whom are trying to do the right thing, have been burdened by the rapid pace of changes to the sector since 2022.

Recommendation 8

6.52 The committee recommends that, as part of its rapid review, the Australian Children’s Education and Care Quality Authority recommend that all jurisdictions amend their regulatory framework to:

- **Ensure the practice of active rather than passive supervision, to minimise opportunities for unsafe behaviours; and**
- **Address the underlying operational and regulatory pressures that are contributing to reduced educator-to-child ratios during sleep and rest periods in early childhood education and care services.**

Recommendation 9

6.53 The committee recommends the Australian Government through Education Minister Meetings or through a request to ACECQA, increase the frequency of authorised officer spot check visits to early childhood education and care services, and ensure that authorised officers receive appropriate training, including in early childhood and care practice. To strengthen oversight, the policy should incorporate minimum targets, such as a minimum of four unannounced spot checks per year. The committee notes this may necessitate a resource commitment from states and territories.

Workforce stability, staffing levels and worker retention

6.54 Evidence indicated that high staff turnover, casualisation and heavy reliance on agency staff can directly impact quality and safety in ECEC. In particular, constant staff turnover can prevent children from building the secure attachments that we know they need for their future health and mental health.

It can also reduce opportunities for staff to recognise concerning patterns of behaviour. More than a third of ECEC workers may be leaving their jobs each year, with turnover rates higher in rural and remote areas.¹¹

- 6.55 One survey conducted in June and July 2025 indicated that 77 per cent of early childhood educators had worked in centres operating below minimum staffing requirements at least weekly, with 42 per cent reporting that it was happening daily.¹² The committee also learned that state and territory regulators continue to provide staffing waivers, largely in relation to early childhood teachers, and that waiver rates are disproportionately high in long day care and rural and remote communities, where there may be challenges in attracting and retaining qualified educators.
- 6.56 One factor impacting high staff turnover is wages. Qualified educators reportedly leave the ECEC sector for roles in schools, retail, disability support and other sectors that may have less demanding working conditions, and provide equal or better pay.¹³ However, given workforce is generally the largest cost in the delivery of ECEC services, many providers have limited capacity to fund wage increases without passing on price increases to families.¹⁴
- 6.57 The committee notes evidence that the Worker Retention Payment has helped to increase wages for many ECEC workers, but this increase alone is unlikely to attract the additional educators needed in the sector.¹⁵ Further, the Australian Government has only committed to the program until November 2026, leading to uncertainty for both providers and staff.¹⁶ The committee calls on the Australian Government to provide the sector certainty in this area.

Recommendation 10

- 6.58 The committee recommends that the Australian Government publicly announce whether it intends to continue or cease the Worker Retention Payment as soon as possible to provide the early childhood education and care sector with certainty.**

¹¹ Australian Services Union, *Submission 78*, p. 7.

¹² United Workers Union, *Submission 80*, p. 7. Minderoo Foundation/Thrive by Five, *Submission 85*, p. 8 also noted issues with staffing ratios.

¹³ See: Lady Gowrie Qld, *Submission 45*, p. 9; and Name Withheld, *Submission 117*, p. 4.

¹⁴ Productivity Commission, *Submission 44*, p. 6.

¹⁵ Australian Education Union, *Submission 34*, p. 8.

¹⁶ Early Learning Association Australia, *Submission 19*, p. 3.

Tax Reform to Support Staff Retention

6.59 ECEC workers are unable to access salary packaging concessions that many workers in the aged care and disability workforce working for Public Benevolent Institutions can. The committee considers that there is room for reform in the area of tax concessions that would not impose further regulatory burdens on employers. Such reform would help to encourage staff to remain in the sector and also potentially encourage more professional educators to consider working in the industry.

Recommendation 11

6.60 The committee recommends that the Australian Government consider tax concessions for the cohort of the early childhood education and care workforce for Public Benevolent Institutions that is currently unable to access salary packaging concessions to encourage staff retention and reduce turnover.

Training Quality and Workforce Development

6.61 On the matter of education and training for ECEC staff, the committee notes that the system has expanded at such a rapid rate that there have not been sufficiently qualified staff to meet the demand. While mandatory national child safety training has recently been introduced, staffing issues and tight margins mean that many employers struggle to find the time and money to release staff to undertake professional development. On this matter, the committee notes that the Productivity Commission recommended that the Australian, state and territory governments provide financial support for the workforce to undertake professional development, including activities to help staff remain up-to-date with the latest pedagogical research and understand and apply the National Quality Standard.

6.62 There are also ongoing concerns about low-quality training providers. The committee acknowledges evidence from the Australian Skills Quality Authority of 'specific vulnerabilities' relating to early education and care qualifications. If the Australian Government is to agree to the Productivity Commission's recommendation, it is imperative that the Australian Skills Quality Authority is sufficiently resourced to determine whether education and skills providers are offering quality courses and programs.

Recommendation 12

6.63 The committee recommends that the Australian Government work with the regulators of both vocational education and training and higher education to ensure high-quality educators and early learning teachers are entering the profession.

Regulatory burden

- 6.64 The committee learned that the regulatory system is fragmented, under-resourced, more reactive than proactive, and has inadequate oversight measures in place. Decisions are often inconsistent and even within the same jurisdiction multiple government agencies may be involved in oversight, monitoring and compliance. Further, there is a lack of clarity on the division of responsibilities between Commonwealth and state/territory governments.
- 6.65 Of particular concern is, as outlined above, the increasing administrative burden on providers and staff. Educators are reporting that they do not have adequate time to interact with children. The committee was particularly concerned to learn that administration and documentation take up around a third of educators' total workload, taking them away from time they should be spending engaging directly with children.¹⁷ Further to this, the committee heard that children are at times being placed into rest or sleep periods to allow educators to complete documentation or cleaning tasks. The committee considers that this reflects the impact of regulatory and administrative burden on service delivery, with implications not only for supervision and child safety, but for the quality of care and children's developmental outcomes by reducing opportunities for meaningful interaction, learning and engagement.
- 6.66 The committee further learned that staff are required to be across than 1000 pages of information concerning regulatory requirements.¹⁸ Further, some centre directors and educators intend to leave the ECEC sector because of their experiences with accreditation, with reports that some have lost faith in the Assessment and Rating process. There are inconsistencies in how state and territory regulators assess providers in the Assessment and Ratings process, which may explain significant differences in the proportion of services achieving 'Excellent' ratings between jurisdictions. Different advice from different authorised officers within the same regulator can even be a daily occurrence.¹⁹
- 6.67 A further area of concern is that some areas of the regulatory system rely too heavily on a tick-box approach to compliance, rather than fostering a culture of continuous improvement. In particular, the current regulatory system may encourage providers to focus on documentation, forms and procedural compliance, rather than children's actual safety, and the quality of the services

¹⁷ Integricare, *Submission 61*, pp. 4–5; and Name Withheld, *Submission 117*, p. 3.

¹⁸ Independent Education Union, *Submission 17*, p. 12.

¹⁹ Early Learning and Care Council of Australia—answers to questions taken on notice at a public hearing in Sydney on 10 December 2025 (received 21 January 2026), pp. 2–3.

they provide.²⁰ This is turning into what Body Safety Australia termed 'regulatory ritualism', which is alarming given relationship-building is key to preventing issues with quality and safety.²¹ Services that choose to focus on relationship-building with children may then suffer when it comes to Assessment and Ratings against the National Quality Framework.

- 6.68 The evidence received by the committee suggests that an over-reliance on quality ratings risks obscuring the lived experience of families and the practical realities within services. Several submitters emphasised that compliance with the National Quality Standard, while important, does not necessarily reflect whether children are consistently safe in day-to-day practice.²² In particular, evidence highlighted that staffing ratios can be technically met while still resulting in inadequate supervision, especially where educators are not actively positioned or engaged in a way that mitigates risk. This disconnect between regulatory compliance and operational reality raises questions about whether the current framework is sufficiently focused on outcomes rather than inputs.
- 6.69 The issues raised about the Assessment and Rating process are too lengthy to cover in detail here, but it is clear to the committee that regulators are inconsistent in how they assess centres, services with greater numbers of children with complex needs may struggle to obtain any rating above 'Meeting' because of factors beyond their control, and there is an overreliance on paperwork for a rating that many parents are unaware of or indifferent to.
- 6.70 This begs the question: why are providers and staff required to spend so much time meeting regulatory requirements that may not even be beneficial for children? Why are providers who do spend their time on excessive documentation rewarded with better quality ratings, when relationship-building is key to child development?
- 6.71 It is clear that overregulation is contributing to staff turnover and burnout. It is also increasing the risk of quality and safety issues occurring, because staff are unable to observe children or their colleagues' interaction with children. This is an unacceptable risk.

²⁰ The Front Project, *Submission 9*, p. 11; Australian Childhood Foundation, *Submission 37*, p. 13; Federation of Parents and Citizens Associations of New South Wales, *Submission 48*, p. 4; Busy Bees Early Learning Australia, *Submission 59*, p. 3.

²¹ Body Safety Australia, *Submission 97*, pp. 2, 4, 6.

²² Professor Karen Thorpe from the University of Queensland informed the committee that only three of the seven quality areas of the National Quality Standards were the most consistent predictors of child outcomes at school entry. The University of Queensland, *Submission 24*, pp. 10–11. Of note, the Productivity Commission proposed that the Australian Government commission 'an independent review of the NQF, focussing on the way in which services are assessed against the NQS and if assessments could be made more accurate, consistent and efficient'. Productivity Commission, *Submission 44*, p. 5.

- 6.72 The Australian Government appears to have concluded that higher wages and better workforce conditions are the key lever to retaining ECEC staff. However, so long as there is an excessive compliance burden, staff will still be drawn away from young children, and poor employers will expect them to meet compliance requirements in their own, unpaid time. It is not more regulation that will address this issue, but better regulation. In short, existing regulatory requirements are onerous, with limited effect. Time spent by ECEC staff to meet regulatory requirements is not translating into better outcomes for children.
- 6.73 The committee considered a range of proposed reforms in this area, including whether the current Assessment and Rating system should be replaced by a simpler system in which providers are assessed as either 'Meeting' or 'Working Towards', and whether assessments should involve more observation on the part of regulators rather than a tick-box style, paperwork-based approach.
- 6.74 While sympathetic to calls from the sector for more funding to ensure that staff are paid for the time they are expected to complete paperwork, the committee considers that it is time to consider whether the National Quality Framework is fit-for-purpose. The committee notes that the Productivity Commission recommended that governments commission an independent review of the National Quality Framework 'with a specific focus on the way in which services are assessed against the National Quality Standard, and if assessments could be made more accurate, consistent and efficient'.²³
- 6.75 The committee supports this recommendation, given the risks to children's safety and of even more staff turnover and burnout if governments persist with the current approach. Regulation should be fit-for-purpose and necessary. An independent review is urgently needed, and this review should be independent so that it is able to fully determine what changes are needed to the National Quality Framework without government interference.

Recommendation 13

- 6.76 The committee recommends that the Australian Government with the state and territory governments urgently commission an independent review of the National Quality Framework, focusing on how services are assessed against the National Quality Standard and how assessments can be made more accurate, transparent and consistent.**

Implementation of the Professional Development Subsidy

- 6.77 Following evidence of serious child abuse in early childhood education and care settings, the Australian Government made national child safety training mandatory for all people working or volunteering in ECEC services regulated under the National Quality Framework. The training is delivered exclusively

²³ Productivity Commission, *Early Childhood Education and Care – Volume 1*, June 2024, p. 89.

through Geckko, the Australian Government's online learning platform for the sector. All existing staff are required to complete foundation training by 27 August 2026. Staff entering the sector from 14 August 2026 must complete it by whichever occurs earliest: 27 August 2026; within 14 days of commencing employment; or before they work directly with children.²⁴

- 6.78 The committee supports the intent of this reform. Making child safety training mandatory is a reasonable and necessary response to the failures documented throughout this report. However, evidence received by committee members raises serious concerns about the implementation of the associated professional development subsidy, which is designed to help providers meet wage costs while staff complete the training.
- 6.79 As of the time of reporting, grant guidelines for the subsidy have not been released, and applications are expected to open only in Quarter 2 of 2026,²⁵ which is a timeline that creates a direct and foreseeable problem. Providers are required to fund training for new staff commencing from 14 August 2026 within a fortnight of employment, yet the subsidy mechanism to offset those costs has not been established in time for providers to plan accordingly. This places an upfront financial burden on providers, particularly smaller operators with limited cash reserves, before any relief is available. The committee notes that if a provider employs new staff between the mandatory training deadline and the eventual opening of subsidy applications, they may bear those costs with no guarantee of reimbursement.
- 6.80 The committee further notes that for not-for-profit providers, the costs associated with mandatory compliance extend beyond wage supplementation to include payments to casual staff completing training outside rostered hours and the administrative burden of grant administration; costs which, for services that reinvest all surplus back into their communities, cannot be absorbed without direct consequence for the children and families they serve.
- 6.81 The committee is also concerned about the structure of the subsidy allocation. Published guidance indicates that if demand exceeds available funding, priority will be given to small and medium providers operating fewer than 25 services on a first-come, first-served basis, with large providers considered only if funding remains. While the committee acknowledges the policy rationale for prioritising smaller operators, a first-come, first-served model, applied before updated grant guidelines have even been published, creates inequitable and unpredictable conditions for the sector. Providers cannot make sound operational or financial decisions without knowing the rules, the quantum of funding available, or whether they are likely to receive support at all.

²⁴ Department of Education, [National child safety training](#) (accessed 26 March 2026).

²⁵ Department of Education, [Professional development subsidy](#) (accessed 26 March 2026).

- 6.82 The committee also notes that from 2026–27, the professional development subsidy will fund national child safety training only, replacing its previous broader application to professional development more generally. This narrowing of scope, combined with the delayed rollout, means the subsidy's utility is simultaneously being constrained at the same time providers face new mandatory compliance obligations.
- 6.83 The committee considers that the Australian Government should, as a matter of priority, release the grant guidelines, confirm the application opening date, and provide clear advice to the sector on funding availability and eligibility. Providers should not be expected to absorb compliance costs in the absence of the administrative framework needed to access the support that has been announced.

Recommendation 14

6.84 The committee recommends that the Australian Government, as a matter of urgency:

- **Publish grant guidelines and confirm the application opening date for the professional development subsidy ahead of the commencement of mandatory national child safety training obligations for new staff on 14 August 2026;**
- **Provide clear public guidance on the total funding available under the subsidy, the allocation methodology, and the treatment of training costs incurred by providers prior to the opening of applications;**
- **Ensure that the subsidy administration process does not disadvantage providers (particularly small and medium operators and not-for-profit services,) who incur upfront training costs for new staff before applications open, and consider mechanisms to allow retrospective claims for eligible costs incurred from the commencement of mandatory training obligations; and**
- **Review whether the subsidy adequately accounts for the full range of costs associated with mandatory compliance, including out-of-pocket expenses such as payments to casual staff completing training outside rostered hours, and the administrative burden placed on providers, particularly not-for-profit services, in managing grant applications and acquittals, recognising that for not-for-profit providers, unsubsidised compliance costs are borne directly by the communities and children they serve.**

Quality Improvement and Provider Accountability

6.85 The committee notes evidence pointing out that there is little support for ECEC services that may wish to improve their quality ratings or to support continuous improvement. The Productivity Commission proposed that state and territory

governments 'facilitate the provision of a more consistent suite of support for ECEC services, including more intensive programs for services not meeting the National Quality Standard, as well as education, training and information that assists all services to foster continuous improvement'. They recommended all programs be developed with the ACECQA to improve consistency and effectiveness.

- 6.86 The committee supports this recommendation. Most providers are trying to do the right thing, but an overregulated system filled with inconsistencies is not helping them to do so.

Recommendation 15

- 6.87 The committee recommends that regulatory authorities provide clear, timely and actionable feedback to services following assessment and rating processes, to support continuous improvement and greater transparency.**

Recommendation 16

- 6.88 The committee recommends that the Australian Government, in consultation with state and territory governments, introduce regulatory mechanisms to prohibit early childhood education and care providers from expanding or establishing additional services where they are not consistently meeting the National Quality Standard across their existing services. In implementing this measure, governments should consider clear thresholds and criteria to ensure that expansion is contingent on demonstrated and sustained compliance with quality and safety requirements.**

Scope and Purpose of an Independent ECEC Commission

- 6.89 The committee carefully considered evidence arguing that the sector needs an independent Early Childhood Education and Care Commission or similar body, as recommended by the Productivity Commission, to monitor and publicly report on the progress of governments on outcomes, provide independent advice to governments on how to coordinate and design policies to achieve effective outcomes, and act as a custodian over research and data.
- 6.90 However, much of this evidence focused on the principle of supporting an independent ECEC body, without referencing how such a body would operate with respect to improving the safety of children. Submissions often assumed a new body would support child safety outcomes, without examining in what ways a new ECEC body would differ from the existing infrastructure. While many submitters used the language of 'stewardship' and seemed to envisage a body which supports the existing framework for ECEC oversight in Australia through all levels of government, other evidence envisaged the subsuming of state and territory responsibilities into such a body.

- 6.91 It is not clear to the committee how such a body would exercise authority over state and territory functions, for example, the funding of regulatory bodies to undertake appropriate levels of compliance activity.
- 6.92 However, if created, the committee considers its focus should be on how to streamline and simplify regulatory requirements to help reduce the compliance burden on providers and over-worked staff, and ensure that regulatory requirements are fit-for-purpose.

Funding for early childhood education and care

- 6.93 The inquiry received some evidence calling for needs-based funding that takes into account complex circumstances, such as a rural or remote location, children with higher support needs, and socio-economic background. The committee heard that such funding, in the form of loadings per child, could provide an incentive for providers to move into 'childcare deserts'.
- 6.94 Especially worrying was the significant body of evidence noting serious issues with the Inclusion Support Program, which provides funding for services to support children with additional needs. The committee was informed that the process is administratively burdensome, not meeting the needs of children, does not cover the costs associated with inclusive early childhood education and has not increased in line with CPI or minimum award rates. In fact, the actual cost of an inclusion support educator is almost double the cost of the subsidy provided through the Inclusion Support Program.²⁶ As a result, some centres may not be accepting children with disability.
- 6.95 These problems are not new. A Review of the Inclusion Support program concluded in March 2023.²⁷ The Productivity Commission in June 2024 made multiple concerning findings about the Inclusion Support Program, and recommended that enhancing it 'should be an immediate priority', including an increase to the hourly subsidy rate.²⁸
- 6.96 The committee notes that the 2024–25 Budget allocated a further \$98.4 million to the Inclusion Support Program.²⁹ However, the following Budget did not appear

²⁶ See: Outside School Hours Council of Australia, *Submission 82*, p. 10; Goodstart Early Learning, *Submission 83*, p. 25, reported that the subsidy covered 87.6 per cent of the cost of employing inclusion workers in 2017 but 'by 2025 it covered just 65 per cent of the cost with providers expected to make up the difference'.

²⁷ Department of Education, [Review of the Inclusion Support Program – Final Report](#) (accessed 13 March 2026).

²⁸ Productivity Commission, *Early Childhood Education and Care – Volume 1*, Inquiry Report, June 2024, p. 62.

²⁹ Department of Education, [Budget 2024–25: Funding for the Inclusion Support Program](#) (accessed 13 March 2026).

to continue this funding.³⁰ The 2025–26 Mid-Year Economic and Fiscal Outlook indicates that supplementary funding of \$59.2 million has been allocated to the program for 2026–27, stating this funding is 'to help early childhood education and care services increase their capacity to support the inclusion of children with additional needs'. However, no further funding appears to have been allocated beyond this point.³¹

- 6.97 The committee questions how the Australian Government considers that intermittent funding will help to address the needs of children with disability, which are lifelong. Ad hoc funding certainly does not support the parents of these children to work, and it provides no certainty to providers, many of whom may wish to support children with disability but are dealing with very tight budgets and a Child Care Subsidy that does not take into account the different needs of different children. Are providers to increase the fees they charge to families of children with disability, so that they are able to better support the additional staffing requirements needed to support children with disability and complex needs? This hardly seems fair to the families of these children, who are already facing additional challenges; in fact, it seems discriminatory.
- 6.98 The committee acknowledges that the Thriving Kids program is due to be rolled out from 1 October 2026 to help support children aged eight and under with developmental delay and/or autism with low to moderate support needs. However, it is unclear whether the program will support the ECEC sector with the additional staffing requirements needed to facilitate the attendance of children with higher support needs. Of note, a fact sheet with questions and answers on the program states that 'states and territories will deliver general parenting supports, local information, advice and navigation, and targeted allied health supports' while the Australian Government will be 'responsible for national measures that will enable the program to operate effectively—including information and awareness activities, online and phone advice... workforce initiatives, and program evaluation'.³² A fact sheet on the program itself notes it will include supports to help improve awareness of developmental delays, better identify developmental delays, parents and families build their skills, and connect children and families to targeted supports.³³
- 6.99 On the face of it, the Thriving Kids program does not appear to be related in any way, shape or form to supporting providers to provide a higher level of

³⁰ Early Childhood Australia, *Federal Budget 2025–26: Summary and Response*, March 2025, p. 2.

³¹ Australian Government, *Mid-Year Economic and Fiscal Outlook 2025–26*, December 2025, pp. 184, 229.

³² Australian Government Department of Health, Disability and Ageing, [Questions and Answers: Foundational Supports and Thriving Kids](#), 3 February 2026 (accessed 24 March 2026).

³³ Australian Government Department of Health, Disability and Ageing, [Fact Sheet: Foundational Supports and Thriving Kids](#), 3 February 2026 (accessed 24 March 2026).

supervision to children with disability in ECEC settings. The Child Care Subsidy does not account for the higher support needs for this cohort, and families should not have to pay more for additional staffing requirements just because their child has a disability or developmental delay. The committee therefore calls on the Australian Government, as a matter of urgency, to fully fund the Inclusion Support Program and commit to ongoing funding.

Recommendation 17

6.100 The committee recommends that the Australian Government as a matter of urgency, review its support for children with additional needs, including the existing Inclusion Support Program and the impacts of the Thriving Kids program, with a view to providing funding certainty for families and early childhood education and care providers.

Access to ECEC in Underserved Communities

6.101 On the matter of supply-side funding, the committee notes findings from the Australian Competition and Consumer Commission that policy initiatives that persist in applying a 'one size fits all approach' will leave some communities under-served, unserved and without sufficient and appropriate access to ECEC services.³⁴ Evidence expressed support for supply-side funding to address thin markets and childcare deserts.

6.102 To some extent, the Australian Government's Building Early Education Fund and the Community Child Care Fund have helped to address some of the calls for supply-side funding. However, the committee heard that the Community Child Care Fund has been oversubscribed, with a number of providers who relied on the funding missing out in the July 2024–June 2026 round. This indicates that there is insufficient funding in the pool.

6.103 Early announcements from the Building Early Education Fund do not appear to target areas most in need. indicated it wishes to pursue a 'universal' child care system, without defining how a universal system would operate for families. However, it has not sufficiently funded the only services in childcare deserts that already exist—in effectively removing the only choice available for some families.

6.104 The committee would be greatly concerned if it appeared that funding has been removed from particular grants under the Community Child Care Fund to expand other types of grants, without ensuring that services that already exist are resourced to continue operating in thin markets. As such, the committee recommends that the Australian Government ensure that the Community Child

³⁴ Australian Competition & Consumer Commission, *Childcare Inquiry: Final Report*, December 2023, p. 2.

Care Fund is sufficiently funded to meet existing demand from services that are providers of last resort in childcare deserts.

Recommendation 18

6.105 The committee recommends that the Australian Government ensure that the Community Child Care Fund is sufficiently funded to meet existing demand for services in childcare deserts and consider models better suited to thin markets.

Rental Costs and Licence Fees

6.106 On the matter of the debate concerning for-profit versus not-for-profit providers, the committee considers this discussion is divisive and overlooks the fact that the majority of for-profit providers are doing the right thing and, in most instances, are small operators. Many are focused on providing the best quality for children, not cost-cutting. The more choice available in the market, the better for families, particularly because the for-profit sector is much more likely to take risks to build and expand without government support, helping to address supply issues.

6.107 However, the committee does have concerns about allegations that landlords are charging high rental fees charged of ECEC centres because of the belief that government subsidies enable providers to pay these fees. Such practices severely limit the capacity of providers to expand and grow. The committee notes that the Building Early Education Fund is providing capital for new services and to expand existing services. Nonetheless, this does not address the immediate matter of concern, i.e. that government subsidies are, by accident, inflating rental costs. The committee draws this matter to the attention of the Australian Government and education ministers, and recommends that the matter be discussed at a future Education Ministers Meeting.

6.108 The committee received evidence indicating that Outside School Hours Care providers must pay substantial licence fees to schools to secure service contracts. The committee is concerned that unregulated licence fees are allowing for a significant portion of the Child Care Subsidy to be directed toward licence payments, rather than improving the quality of care being provided.

Recommendation 19

6.109 The committee recommends that the Australian Government together with the state and territory governments discuss the matter of inflated rental fees and license fees, including those charged by public primary schools, for early childhood education and care services at a future Education Ministers Meeting and consider potential measures to address this issue.

Flexibility and choice

- 6.110 A clear theme emerging from the evidence to the committee is that while many submitters support 'universal' childcare, there is no clear or consistent understanding of what 'universal' childcare actually entails. Generally, 'universal' childcare is used as an aspirational term that is necessarily vague. It provides little clarity in discussions of concrete policy options on how to provide support to young children and their families.
- 6.111 In terms of safety issues and concerns, the committee received lived experience accounts from parents that illustrate how safety concerns manifest in practice. These accounts described the impact of both perceived and actual risks on family decision-making, including withdrawing children from care, reducing working hours, or relying on informal and unsupported arrangements. Such evidence highlights that public confidence in the safety of the system is as important as the operation of formal safeguards, and that policy settings must respond not only to measured risk, but also to the lived experience of families navigating the system.
- 6.112 The lack of clarity impedes debate and policy development. In some cases, the term 'universal' childcare is used to refer to access to and availability of centre-based day care; in others it refers to a particular pricing model—such as \$10-a-day flat fee structures—that could be employed in centre-based daycare. Many references to a 'universal' system (and/or its perceived benefits) do not draw a distinction between the different needs of children in the 0–3 bracket and those in the two years before school. In almost all cases, references to 'universal' childcare implicitly exclude the role that parents, carers, extended family and kinship networks can play in raising children and instead focus exclusively on the provision of formal services—usually centre-based day care.
- 6.113 Crucially, the Productivity Commission has done important modelling of some of the measures that are often discussed in the context of 'universal' childcare. In its 2024 report, it found that a 90 per cent subsidy rate for all families would lead to a 9 per cent spike in demand, a 47 per cent increase in the cost of the system (to the tune of an additional \$6bn per annum) but increase workforce participation by just 1.4 per cent. A model based on a flat fee of \$10 per day with no activity test—the model reportedly favoured by the Prime Minister—would increase demand by 14 per cent, and increase government expenditure by an extraordinary 66 per cent—but lead only to a 0.9 per cent increase in workforce participation. The Productivity Commission explicitly said that these options 'come at a higher cost and do not prioritise families experiencing disadvantage'; in the case of a \$10-a-day model, almost 50 per cent of the benefit flows to families in the highest income quartile.³⁵

³⁵ Productivity Commission, *A path to universal early childhood education and care – Volume 1*, Inquiry Report, June 2024, p. 37.

- 6.114 The committee considers that the knock-on impacts of demand spikes are likely to be significant: an increase in demand is likely to increase waitlists, making it more difficult for families to get a place. Furthermore, the committee is concerned that a capped fee model is likely to have an adverse impact on quality and safety: these models necessarily constrain margins, meaning less headroom to spend on measures that improve child safety and child wellbeing—an unacceptable trade off in light of recent circumstances. The committee is also concerned that flat cap pricing measures reduce providers’ resilience to pricing shocks and economic pressures. Inevitably, it is the smaller operators who will be least able to absorb the impacts, likely leading to greater consolidation in the hands of larger corporate entities (whether for-profit or not-for-profit). This reduces the range and diversity of services on offer, and inhibits the growth and viability of smaller providers which can be far more responsive to context and community.
- 6.115 The committee considers that, as a fundamental principle, the needs of children should be at the centre of childcare policy. As a basic rule, children should be cared for in a way that accords with their family needs and parental choices, and which provides for children’s safety and wellbeing.
- 6.116 In many cases, this will include a mix of formal and informal care. For some families, parents will be the sole care givers. In other families, extended family or trusted friends will play a role. Where families do look to formal models of care, based on service provision, many will look to centre-based daycare, but others will look to family day care or other models. These choices will also change over time, as children grow and family circumstances change. All of these matters should be taken into account in developing childcare policy.
- 6.117 In particular, the committee notes that informal networks and models of care can be extremely important for some children and families, and can help to foster a secure environment, reduce parental stress and provide emotional support. These models of care can directly boost child outcomes through positive role modelling, increased social connections, better mental health, enhanced cognitive growth, and a sense of community belonging. These benefits can cascade and accumulate through multiple areas: health, social cohesion, educational outcomes and so on. Informal models of care for young children should be recognised, valued and supported by government policy.
- 6.118 However, the current ECEC system, and broader childcare policy, are framed primarily around centre-based daycare.
- 6.119 Generally it appears that existing formal systems that provide an alternative to centre-based day care services have fallen by the wayside. In home care is undersubscribed because of its complexity and on the verge of collapse, despite providing an alternative for children with complex needs and the children of shift-workers. Family day care also has a viability issue because of an

unsustainable administrative load. In short, current childcare policy settings favour centre-based care and have overlooked alternatives that are necessary because not every child is the same, and not all families have the same needs.

6.120 For too many families, this narrow focus on centre-based care does not provide sufficient choice. Different families have different needs, and for several cohorts of children centre-based care is not a workable option. These cohorts include:

- Families struggling with ongoing childcare illnesses, including those who are immunocompromised and have complex health conditions;
- Families whose children have attended centres subject to recent allegations of abuse;
- Families living in ‘childcare deserts’;
- Mothers who wish to return to work but would like to continue to breastfeed their baby;
- Neurodiverse children (or suspected neurodiverse children, given the years required for a diagnosis);
- Children who are not coping with childcare;
- Single parents;
- Children with type 1 diabetes;
- Shift and fly-in-fly-out workers;
- Seasonal workforces; and
- Australians for whom placing children into the care of unfamiliar adults may not be culturally appropriate, including Aboriginal and Torres Strait Islander families.

6.121 Continuing to approach childcare as a policy suite that is framed solely around formal, centre-based care will only leave these families on the outer.

6.122 Importantly, this is consistent with the approach recommended by the ACCC in its 2023 *Childcare Inquiry*, which expressly found that:

A mix of different regulatory measures and government support is likely needed to meet the needs of different types of children and households in a range of different locations and situations across Australian society. A ‘one size fits all’ approach is likely to continue leaving communities under-served, un-served or without adequate and appropriate access to childcare options.³⁶

6.123 The committee had an opportunity to reflect on the broader context of support for families, including those that operate in the tax system, the social service system and through formal and informal childcare models. There is interest in new and emerging models of care, and the committee heard from stakeholders who were frustrated by the limitation of policy discussion to a narrower focus on centre-based day care. It is the committee’s view that families ultimately

³⁶ Australian Competition & Consumer Commission, *Childcare inquiry: Final report*, December 2023, p. 42.

make the best choices for their children and that there are a wide range of options to better support families which merit further consideration.

- 6.124 The committee heard multiple policy options which would have a direct impact on the use of subsidised childcare. These included expanding Paid Parental Leave, so that parents have the option to care for their own children for longer, as well as expanding the Child Care Subsidy to a broader range of care options, including care from grandparents, nannies and au pairs, along with close-proximity childcare options that would allow parents to work with onsite childminding. Where evidence considered these options, the flexibility and choice for parents, as well as early childhood development outcomes, were central.
- 6.125 It was not clear to the committee how parent choice is considered in the Australian Government's policy design. In Senate Estimates before the Education and Employment Legislation committee, the Department of Education confirmed with respect to the design of the Building Early Education Fund that it did not directly engage with parents. Ms Kylie Crane of the Department of Education said, '[o]ur role is primarily with providers, peaks and states'.³⁷
- 6.126 Overall, the committee considers the lack of consultation with parents is problematic and as a general principle, parents should be given a reasonable opportunity to contribute to policy development.

Recommendation 20

- 6.127 The committee recommends that future policy development includes, as a general principle, consultation with parents so that support for families considers flexibility and choice for parents, as well as early childhood development outcomes for children in their early years.**

System Design, Affordability and Access

- 6.128 The committee accepts the views of the Productivity Commission with respect to its modelling of 'universal' childcare, and recommends that the Australian Government focuses its efforts, in partnership with states and territories, on improving choice, flexibility, accessibility, safety and affordability of early childhood education and care.
- 6.129 The committee notes the Productivity Commission's finding that a proposed expansion of the centre-based model to a 'universal model' of 90 per cent subsidy or \$10 a day would represent a significant departure from the current Child Care Subsidy framework, without addressing underlying equity concerns. The Commission observed that such approaches would

³⁷ Ms Kylie Crane, Department of Education, Education and Employment Legislation Committee, 2025-26 Supplementary budget estimates, *Committee Hansard*, 10 October 2025, p. 59.

disproportionately benefit higher-income families, and fail to meaningfully increase childcare access for lower-income families. The committee further notes the Productivity Commission's findings that these approaches are likely to increase government expenditure and drive additional demand, without delivering meaningful improvements in workforce participation.

- 6.130 The committee was not presented any further evidence to support the Australian Government pursuing a single-model approach to childcare system design. The committee considers that policy should instead focus on improving access, affordability and quality within a flexible framework that reflects the diverse needs of families and the operational realities of the sector.
- 6.131 The committee also recognises the need for appropriate regulation and oversight of these options to safeguard the health and safety of children.
- 6.132 Policy measures that the committee considered in this space included mandatory training for caregivers on grooming behaviours, particularly grooming of parents, along with mandatory registration, minimum standards and monitoring. As some evidence noted, individualised care on the basis of choice is available in other care sectors, such as disability and aged care. The monitoring and oversight mechanisms that exist for those sectors could be adapted to the expansion of choice for early childhood education and care.
- 6.133 The committee recognises that the early childhood education and care system has expanded rapidly to meet growing community demand. However, the committee is concerned that, without adequate reform, a further rapid expansion of the sector under current regulatory, workforce and funding settings risks compounding existing challenges and undermining quality and safety outcomes.

Recommendation 21

- 6.134 The committee recommends that the Australian Government improve accessibility and clarity of information regarding the Child Care Subsidy, including through the development of a user-friendly calculator on Service Australia's website to address the difficulties families experience in understanding their eligibility and entitlements.**

Ratios in Outside School Hours Care

- 6.135 The evidence before the committee raises a legitimate question as to whether the uniform application of a 1:15 educator-to-child ratio in Outside School Hours Care (OSHC) remains fit for purpose across all school-aged cohorts and service settings. OSHC is not simply an extension of long day care. It serves older children, often in shared school environments, and involves a broader mix of activities (such as dance, music and sport) alongside varied transitions and supervision arrangements. The committee is not persuaded that a single ratio, applied uniformly to children ranging from five to 12 years of age and across

materially different activities and settings, will in all circumstances provide the most developmentally appropriate framework for safety, quality and service delivery.

6.136 The evidence further indicates that if governments wish to support broader access to OSHC, staffing settings must remain workable for providers, particularly in regional, remote and smaller school communities. This consideration is especially pressing where OSHC is expected to support parental workforce participation and provide the flexibility required by modern working arrangements, including varied start and finish times and non-standard hours of operation.

Recommendation 22

6.137 The committee recommends that the Australian Government, in consultation with state and territory governments, review educator-to-child ratio requirements in Outside School Hours Care to ensure they are calibrated to the developmental and supervision needs of school-aged children. The review should consider the differing needs of younger and older primary school-aged children, whether activity-based or age-differentiated staffing arrangements are appropriate across different Outside School Hours Care settings and transitions, and how ratio settings can maintain child safety while supporting the viability of services, particularly in regional, remote and smaller school communities.

Recommendation 23

6.138 The committee recommends that the Australian Government, in consultation with state and territory governments, undertake a comprehensive review of the appropriateness of the National Quality Framework as it applies to Outside School Hours Care, with a view to developing a fit-for-purpose regulatory framework that reflects the distinct nature of school-aged care.

**Senator Maria Kovacic
Chair
Senator for New South Wales**

**Senator Matt O'Sullivan
Member/Shadow Minister for
Choice in Childcare and Early Learning
Senator for Western Australia**

Labor Senators' dissenting report

- 1.1 In August 2025, Education Ministers, from the Commonwealth and all states and territories, and from different political parties, stood shoulder-to-shoulder in bipartisan agreement to implement the National Child Safety Reforms.
- 1.2 These reforms represented the most significant child safety and quality reforms undertaken since the modern early learning system was introduced 15 years ago. At the time the Federal Coalition welcomed and offered bipartisan support.
- 1.3 Since then, the impacts of these reforms have made their mark on the early education and care sector, ensuring child safety is the paramount consideration in both the National Law and in the Family Assistance Law.
- 1.4 Every reform in that package has been progressed, and all of them are on track and on time.
- 1.5 It was the multipartisan and cross-jurisdiction collaboration focused on child safety which marked these significant reforms.
- 1.6 The Majority Report of the Coalition chooses to ignore the significant amount of evidence received to this inquiry backing the bipartisan and cross jurisdictional National Child Safety Reforms. It nonetheless reiterates in its recommendations reforms which are already underway or announced as part of the National Child Safety Reforms.
- 1.7 Finally, the Majority Report is critical of centre-based care that supports over a million families but does not offer an alternative through their inquiry. Neither does it endorse the significant amount of evidence received to this inquiry which backed the Albanese Government's policies in support of universal access to early learning.

Quality improvement and the pathway for reform

- 1.8 Labor Senators note the significant work currently underway by the Albanese Government, in partnership with the states and territories, and often underpinned by bipartisan support, to improve quality and safety in the sector.
- 1.9 Quality early education provides opportunities for children to get a great start to life and supports families to work and study.
- 1.10 It is an essential and foundational part of our education system, that deserves due recognition. So too, do the extraordinary educators who work within it.
- 1.11 Labor Senators welcome access to affordable, quality and safe early learning and care as a core priority of the Albanese Government.
- 1.12 We acknowledge, with great gravity, that this inquiry was established in the wake of horrific allegations of abuse and misconduct in early learning services. We agree that the first focus of governments across the country should be to

prevent abhorrent incidents like these from occurring again, no matter the setting.

- 1.13 Labor Senators welcome the significant steps which have been taken across the nation in response to these incidents, and the bipartisan nature in which reforms have been adopted to lift standards and keep children safe.
- 1.14 Labor Senators also believe it is important to acknowledge the vast majority of early learning services across the country provide high quality and safe early learning and care, and that this is underwritten by a dedicated, professional and caring workforce of educators.
- 1.15 With respect to the broader issues of quality and access to early learning that this committee further inquired into, Labor Senators acknowledge the meaningful steps being taken to improve access and support for families, particularly through three days of guaranteed Child Care Subsidy for every child no matter what their parents do, and the \$1 billion Building Early Education Fund which is delivering more early learning centres for more families in more places where they are needed.
- 1.16 Labor Senators recognise that while the Albanese Government is strengthening standards in the early learning and care sector, other practical solutions are also being delivered for families which form the building blocks of a universal early learning system that benefits every child and family.
- 1.17 A strong theme among inquiry participants was an endorsement of the ongoing focus on reforms to the early learning sector and workforce, particularly the impact this is having on the provision of accessible, affordable, quality and safe early learning for families.
- 1.18 Another strong theme which emerged throughout the inquiry was support for universal access to early learning and care. Labor Senators believe this is inadequately acknowledged in the Majority Report.
- 1.19 Further, Labor Senators note that the Albanese Government is already delivering a reform agenda related to many of the issues the Majority Report makes recommendations on. Labor Senators particularly note the important work underway in progressing child safety reforms through the Standing Council of Attorneys-General (SCAG) on Working With Children Checks and the National Continuous Checking Capability. Labor Senators note the need to continually monitor our criminal justice system to ensure it remains fit for purpose, including the importance of consultation with law reform experts and stakeholders with lived experience.
- 1.20 The impact of the Albanese Government's reform agenda is significant. Witnesses consistently highlighted the profound impact of the Albanese Government's \$3.6 billion Worker Retention Payment on the workforce. As a result of the program, there are more educators, less vacancies and less waivers.

-
- 1.21 There are 50 000 more early learning workers than when Labor came to government, and almost 15 000 more educators in the last year alone because of the Albanese Government's pay rise for the sector's hard working and dedicated workforce.
- 1.22 Labor Senators particularly welcome the meaningful impact the Albanese Government reforms are having on strengthening the sector. The most recent quality and rating results published by ACECQA found that:
- (a) 92 per cent of services met or exceed National Quality Standards in Q4, 2025—the highest ever level since the rating system was introduced.
 - (b) The number of services with a quality rating has increased to 94 per cent.
 - (c) The number of services with a rating of Significant Improvement Required decreased by almost 40 per cent.
- 1.23 Labor Senators believe we must be continually seeking to improve quality and are encouraged that Ministers Walsh and Clare are taking further action to strengthen the sector, like closing staffing ratio loopholes introduced in 2018 and banning the bad business models that came out of them.

Lifting standards and improving safety

- 1.24 Last year, the entire nation was confronted by horrific reports about incidents that happened—and are alleged to have happened—in early learning centres.
- 1.25 The National Child Safety Reforms are strengthening the sector. It supports the overwhelming majority of services that are dedicated to children and families every day, and it shuts the door on those who are not.
- 1.26 The National Child Safety Reforms are delivering:
- (a) A stronger workforce with mandatory child safe training, a national educator register, and stronger staffing practices.
 - (b) Stronger rules in centres to ban personal devices that take images, a CCTV assessment, and more information for parents.
 - (c) Stronger regulation with increased penalties, more regulator visits, and withdrawing funding from poor providers.
- 1.27 Labor Senators welcome the commencement of all parts of the National Child Safety Reforms.
- 1.28 The new National Early Childhood Worker Register is now mandatory. It makes it easier to track workers across centres and jurisdictions and helps identify people moving for the wrong reasons. Providers must maintain the Register and update it within 14 days whenever someone is employed, leaves, or when relevant information changes. Providers who fail to provide this information can be fined up to \$34,200.
- 1.29 Labor Senators acknowledge that early learning educators are central to keeping children safe, and initiatives that support the workforce are highly effective. To

this end, Labor Senators welcome that, for the first time, child safety training is now mandatory. This training will help give the workforce the skills they need to recognise when something is not right, and the confidence to act.

- 1.30 The training has been developed by the Queensland Government and the Australian Centre for Child Protection. Importantly, the Commonwealth Government is providing funds to services, so that staff can be paid to undertake this training.
- 1.31 Labor Senators support tough new laws that our Government passed, allowing the cancellation, or suspension of the Commonwealth Child Care Subsidy to providers that put profit ahead of child safety. Labor Senators welcome the Albanese Government using these tough new powers and acknowledge that the majority of services that have been put on notice, to date, are now meeting the National Quality Standards.
- 1.32 The Albanese Government has worked with state and territories to deliver more regulator visits to more centres, more often. Labor Senators support the additional \$95 million the Albanese Government is investing in regulatory authorities. This includes \$73 million to conduct an additional 1600 unannounced spot checks every year and \$22 million for joint compliance work and monitoring with states and territories on cross-border regulatory matters.
- 1.33 As part of nationally coordinated approach, the Albanese Government's additional regulatory investment has been complemented by \$130 million of increased investment by state and territories for their regulators.
- 1.34 The committee heard evidence that acknowledged the comprehensive nature of the National Child Safety Reforms and welcomed the bipartisan and quick manner in which reforms were adopted. This was important to ensure the continued safety of children, and to ensure there is continued trust and public confidence in our early learning system, particularly among families and the early learning workforce.
- 1.35 Ms Samantha Page, CEO of Early Childhood Australia (ECA), supported the reforms:

We support the move to make children's safety, rights and best interests a paramount consideration in the national law. We think that's a powerful guide to drive early childhood reform.¹

Access and Affordability

- 1.36 Labor Senators note the endorsement many inquiry participants offered for the Albanese Government's reforms which are supporting children into early learning and providing practical support for families.

¹ Ms Samantha Page, Chief Executive Officer, Early Childhood Australia, *Proof Committee Hansard*, 10 December 2025, p. 8.

- 1.37 The Government's Cheaper Childcare reforms will save the average family \$3500 this year, and capping fee increases has limited growth to 3.5 per cent.

Three Day Guarantee

- 1.38 Importantly, every child now has a right to three days of Child Care Subsidy, and every parent has this subsidy to support them to get back to work when they are ready.

- 1.39 Dr Ros Baxter, CEO of Goodstart Early Learning, endorsed the Three Day Guarantee, saying:

We certainly welcomed the government's three-day guarantee. It was something that Goodstart had called for a long time, and we think it was absolutely pivotal in making sure that low-income families, and all families, can have access to the education and care that underpin child development outcomes for school and life.²

- 1.40 Catherine Liddle, CEO of SNAICC, commented on the Three-Day Guarantee for Aboriginal and Torres Strait Islander children:

The benefit that this will have is immeasurable, actually. It is not only good for children and their developmental outcomes; it is good for families, because we know families who access early education and care are far less likely to come into contact with systems like jails, prisons, child protection. We know that if we can stop that we have a much more productive society, and all the other investments that governments are making pay off a lot better. You're effectively investing in people, which is productivity.³

- 1.41 Particularly welcomed by submitters was the Albanese Government's scrapping of the Coalition's punitive Activity Test. It cut too many families off the Child Care Subsidy, and it locked too many children out of early learning immediately when many parents prefer to return one or two days a week.

Building Early Education Fund

- 1.42 Labor Senators believe that every child deserves access to quality early learning no matter their postcode. We welcome the Albanese Government's \$1 billion investment in the Building Early Education Fund. We acknowledge there are real and serious access issues in some communities and welcome the role this fund will play in addressing them.

- 1.43 The Building Early Education Fund is building more quality not-for-profit early learning centres, many co-located at schools to help with the double drop off,

² Dr Roslyn Baxter, Chief Executive Officer, Goodstart Early Learning, *Proof Committee Hansard*, 23 February 2026, p. 9.

³ Ms Catherine Liddle, Chief Executive Officer, SNAICC—National Voice for our Children, *Proof Committee Hansard*, 17 February 2026, p. 54.

and in the places where families need it most, including in the outer suburbs and in the regions.

1.44 Overwhelmingly, inquiry participants welcomed the initiatives of the Building Early Education Fund, and in particular the provision of more quality not-for-profit services in the places that need them.

1.45 Ms Emma Sydenham, Director Early Childhood at Social Ventures Australia, said:

The Building Early Education Fund is such a critical opportunity. We've been thrilled with that investment. ... SVA would see that the integration in these areas of high need should be the norm rather than the exception, so we would encourage the government to be looking at building more of an integrated early childhood hub model within all of the services that are built in these areas of high need.⁴

1.46 Mr Craig Mathieson, CEO of Y Ballarat, described the Building Early Education Fund as a 'missing link', and welcomed the investments to expand not-for-profit services:

I certainly want to recognise the Building Early Education Fund, which is just coming to fruition as well, specifically for not-for-profits, as it's such a strong missing link not just in having more not-for-profits providing the service but also in being able to influence the design of the services. It is much more about using that operational excellence that many of the not-for-profit providers have, to build and embed quality and safety through line-of-sight, design and layout, and the architecture, rather than coming in as a tenant. That will have much more influence through the design feature that embeds that safety from a design phase.⁵

1.47 Labor Senators welcome these continued positive interventions from the Albanese Government to support families with access to quality early learning in the outer suburbs and in the regions, and to address the genuine and concerning access gaps.

The early childhood education workforce

1.48 Labor Senators believe Australia's early educators do one of the most important roles on the planet and we acknowledge that for too long their work has not been adequately valued.

1.49 We support the Albanese Government's focus on settings and reforms that support a stable, respected and quality workforce to deliver the best outcomes for children, especially the Albanese Government's 15 per cent pay rise for educators through the \$3.6 billion Worker Retention Payment.

⁴ Ms Emma, Director Sydenham, Early Childhood, Social Ventures Australia, *Proof Committee Hansard*, 10 December 2025, p. 22.

⁵ Mr Craig Mathieson, Chief Executive Officer, Y Ballarat, *Proof Committee Hansard*, 17 February 2026, p. 9.

1.50 This pay rise is seeing our hardworking educators go home with around \$200 more a week. It is driving up worker retention across the sector. It is driving down vacancy rates, and its means centres are using fewer staffing waivers.

1.51 The United Workers Union represents the early learning workforce and noted the Albanese Government's 15 per cent pay rise is supporting retention and stabilising the workforce.

1.52 Ms Natalie Daberera, Research Coordinator at the United Workers Union, told the inquiry:

We have found, as well, that the retention payment has stabilised the workforce. More educators want to stay in the sector because now they're better able to meet their financial obligations.⁶

1.53 Ms Taj Al-Thifairy, Early Educator and Delegate Member of the United Workers Union, recounted how the pay rise has impacted her personally:

Before the pay rise, I struggled significantly with money ... I was picking up extra work during the night as well, so I wasn't getting enough sleep. I was going into work the next day. I hadn't eaten properly. I hadn't slept enough. My mental health was worse than it had ever been. This was all due to the fact that I did not have enough money to live. Actually getting that pay rise means that I can afford the basic things that I need in life. There's still a way to go. It is an absolute necessity for educators to be able to meet their basic needs. We cannot be at a hundred per cent for the children if our basic needs aren't being met. Having adequate pay is extremely important for the children to get the quality care that they deserve.⁷

1.54 Dr Ros Baxter, CEO of Goodstart Early Learning, recounted this story from the day workers received the first 10 per cent of their 15 per cent pay rise:

I was in a centre on the day that the first 10 per cent increase dropped into the accounts of the women who were in that centre, and I happened to be in the breakroom when they were all checking their phones—disbelieving, I think, that the money was actually going to be there. In my career I've never, I don't think, had such an emotional moment with people who work for an organisation.⁸

1.55 Dr Baxter also informed the inquiry of the impact the pay rise has had on workforce retention, and broader operations across their services:

We saw—at a national, macro, level and also in Goodstart—the immediate impact that the 15 per cent wage subsidy had on retention of staff. We saw a really dramatic decrease in turnover of teachers and educators. We saw a

⁶ Ms Natalie Dabarera, Research Coordinator, United Workers Union, *Proof Committee Hansard*, 10 December 2025, p. 4.

⁷ Ms Taj Al-Thifairy, Delegate Member, United Workers Union, *Proof Committee Hansard*, 10 December 2025, p. 4.

⁸ Dr Roslyn Baxter, Chief Executive Officer, Goodstart Early Learning, *Proof Committee Hansard*, 23 February 2026, p. 6.

great increase in applications from people coming to Goodstart. We have been investing a lot in the pay and conditions of staff for a long time, but this was still—you can look at the data and see the inflexion point when this happened.⁹

- 1.56 The establishment of a National Early Childhood Worker Register was a key measure of the National Child Safety Reforms, and represents both an important tool for early learning centres to understand more about their workforce, but also an important form of professional recognition for the early educator workforce and the role they play as qualified educators, not just occasional carers or babysitters as they have been perceived as, for too long.
- 1.57 Professional development and support for training is another way the Albanese Government is supporting the early education workforce. Early education courses are a core feature of Australia's Free TAFE program, and for the first time ever the Government has funded paid training for educators and centre managers to do mandatory child safety training.
- 1.58 Numerous witnesses acknowledge the important role that training and professional development has on the workforce, the enduring impact it has on quality and safe early learning and welcomed that for the first time Child Care Subsidy is being used to support mandatory child safety training.
- 1.59 Ms Alexandra Ash, the CEO of Y Australia, noted:
- Increased emphasis on training and professional standards is also critical. These reforms provide a strong foundation.¹⁰
- 1.60 Mr Jarrod Dobson, National Director of Advocacy and Public Policy at Y Australia, added:
- The wages, the working-with-children check improvements, the workers register—all these are terrific reforms.¹¹
- 1.61 Labor Senators acknowledge the focus and genuine efforts of the Albanese Government to recognise the professional standing of early educators, the significant impact the pay rise has had on workforce retention, and most importantly, the individual impact it has had on each educator's life.

System Planning

- 1.62 Witnesses and submitters acknowledged steps the Albanese Government has taken which form the basis of system planning efforts for the ECEC sector,

⁹ Dr Roslyn Baxter, Chief Executive Officer, Goodstart Early Learning, *Proof Committee Hansard*, 23 February 2026, p. 6.

¹⁰ Ms Alexandra Ash, Chief Executive Officer, Y Australia, *Proof Committee Hansard*, 17 February 2026, p. 1.

¹¹ Mr Jarrod Dobson, National Director, Advocacy and Public Policy, Y Australia, *Proof Committee Hansard*, 17 February 2026, p. 6.

including the investment in the Building Early Education Fund, the use of Child Care Subsidy as a lever to encourage greater quality and safety compliance, and the National Child Safety Reforms which brought the Commonwealth, state and territory governments together.

1.63 Witnesses held broad, varied and constructive views on the opportunity for greater system planning in the early learning sector, and the enduring impact this could have in supporting a truly universal system of early learning in Australia.

1.64 Professor Michael Salter, Director of Childlight East Asia and Pacific Hub, told the public hearing there are opportunities to further use Child Care Subsidy levers:

I think what we have seen is a shift at a Commonwealth level from the use of CCS in a more passive way to thinking about it as a lever for compliance, and a lever for child protection and safeguarding. I think we are seeing a move in that direction. There are a lot of opportunities there at the Commonwealth level to use that piece of funding leverage to ensure compliance and consistency across the country.¹²

1.65 Suggested models of greater system planning were broad and reflected the recommendation from the Productivity Commission's inquiry into Australia's early childhood education and care system.

1.66 Sam Page, CEO of Early Childhood Australia, told the inquiry:

We would like to see a federal body—and, yes, that could be an early childhood commission—taking a more active role in determining where services are provided, where there are gaps and how those might be addressed.¹³

1.67 Anne Hollonds AO, CEO Early Learning & Care Council of Australia, said an independent national commission should be considered:

An independent national commission should be considered to provide this kind of stewardship and build a more effective system.¹⁴

1.68 Ms Adelajda Soltysik, Senior Adviser at the Centre for Policy Development, outlined their long-term visions for the ECEC, acknowledging some of these may take many years. One of these visions included:

... greater government stewardship and clear Commonwealth and state roles and responsibilities, which would mean government having a more

¹² Dr Michael Salter, Director, Childlight East Asia and Pacific Hub, University of New South Wales, *Proof Committee Hansard*, 19 November 2025, p 41.

¹³ Ms Samantha Page, Chief Executive Officer, Early Childhood Australia, *Proof Committee Hansard*, 10 December 2025, p. 9.

¹⁴ Ms Anne Hollonds, Policy Manager, Early Learning and Care Council of Australia, *Proof Committee Hansard*, 10 December 2025, p. 32.

active role in the market with greater coordination and actively supporting services to lift and sustain quality.¹⁵

- 1.69 Dr Amy Graham, Senior Adviser at Valuing the Early Years at Minderoo Foundation and Thrive by Five, called for strong national stewardship:

We call for strong national stewardship of early childhood education and care ... establishing clearer national governance, such as a national early childhood services commission, to align funding regulation data and accountability across jurisdictions.¹⁶

- 1.70 Georgie Dent, CEO of The Parenthood, said that planning was needed for more not-for-profit and community early learning services.:

We must establish and fund a national early childhood commission to ensure that services are safe and high quality and to ensure we grow and expand quality provision of early education and care by not-for-profits and community services.¹⁷

- 1.71 Labor Senators acknowledge and see genuine merit in the calls from the early learning sector to establish greater system planning and delivery of the sector and greater access to early learning services. We strongly encourage the Albanese Government, as it continues in its broad and ambitious reform agenda, to explore models for the delivery of such a function.

Recommendation 1

- 1.72 Government Senators recommend consideration of opportunities to provide increased system planning and coordination between the Commonwealth, states and territories in the development, and delivery of a universal early childhood education and care system.**

Senator Marielle Smith
Deputy Chair

Senator Josh Dolega
Member

Senator Corinne Mulholland
Member

¹⁵ Ms Adelajda Soltysik, Senior Adviser, Centre for Policy Development, *Proof Committee Hansard*, 17 February 2026, p. 37.

¹⁶ Dr Amy Graham, Senior Adviser, Valuing the Early Years, Minderoo Foundation and Thrive by Five, *Proof Committee Hansard*, 24 February 2026, p. 27.

¹⁷ Ms Georgie Dent, Chief Executive Officer, The Parenthood, *Proof Committee Hansard*, 24 February 2026, p. 51.

Australian Greens' dissenting report

- 1.1 This inquiry presented a critical opportunity for the committee to put forward a bold and comprehensive reform agenda. In a year marked by profound challenges, grief and pain across the early childhood education and care sector, including many high-profile alleged cases of child abuse and neglect, there was a compelling and urgent need for structural change.
- 1.2 The majority report falls well short of this task. In the face of what many stakeholders described as one of the most difficult periods in the history of early learning, the Liberal-controlled committee has failed to grapple with the underlying, systemic issues that continue to undermine outcomes for children, families, and educators.
- 1.3 We note our support for some of the recommendations that go to important issues of quality and safety; however, the report stops short of committing to universal, high-quality, affordable early childhood education and care, instead prioritising short-term fixes before broader reform. The Australian Greens consider this approach not just unambitious, but in denial of the transition already being charted. As with primary and secondary education, moving to universality is the foundation enhancing choice and access for families.
- 1.4 The inclusion of punitive and law enforcement policy proposals, such as a recommendation to refer sentencing frameworks for child sexual abuse to the Australian Law Reform Commission, is of particular concern because these proposals are not supported by evidence received throughout the inquiry. The Greens are concerned that this recommendation steers away from the original intent of the inquiry, to prevent instances of abuse and to lift quality in the early learning system, and instead re-focuses solely on punitive measures.
- 1.5 Section 6.15 of the report is written with no reference to evidence gathered through the inquiry process and contains unsubstantiated talking points about a Liberals private members bill.
- 1.6 The focus on justice system responses to child safety, while important, ignores preventative approaches. Evidence suggests that one of the best ways to ensure child safety in early childhood education and care (ECEC) settings is to have 'qualified, sufficient staff with established relationships with children and parents'¹ and investing in workforce pay and conditions,² and yet neither is a recommendation.

¹ Lady Gowrie Queensland, *Submission 45*, p. [16]. See also University of Queensland, *Submission 24*, p. 5.

² St Kilda & Balaclava Kindergarten, *Submission 106*, p. [3].

- 1.7 The committee heard evidence that it is unclear who is ultimately responsible for different parts of the ECEC system.³ The workforce is a clear example of this dynamic. All levels of government and service providers are responsible for different parts of the workforce, yet no single body is charged with viewing or managing it as a coherent system. We reject the committee's assertion that 'it is not in the Terms of Reference to consider the division of responsibilities in ECEC compared to other areas of public policy'.⁴ Unclear Commonwealth and state and territory roles and responsibilities fit within item (b) of the Terms and Reference and have a significant impact on quality and safety in ECEC.
- 1.8 Despite the profit-driven model of early childhood education and care being explicitly included within the Terms of Reference, the committee has failed to make a single recommendation to examine or reform this model. Evidence presented to the inquiry repeatedly highlighted the tensions between profit maximisation and the delivery of high-quality, accessible care.⁵ The refusal to engage with this issue represents a significant missed opportunity to address one of the core structural drivers of cost, access and quality concerns within the system.
- 1.9 The committee heard substantial evidence supporting the establishment of an independent ECEC commission,⁶ including prior recommendations by the

³ The Parenthood, *Submission 41*, p. 3. See also Ms Katherine Osborne, Program Director, Social Services, Centre for Policy Development, *Proof Committee Hansard*, 17 February 2026, p. 37; Brotherhood of St. Laurence, *Submission 52*, p. 2; The Front Project, *Submission 9*, pp. 11, 29.

⁴ Committee Report, para 4.9, p. 73.

⁵ Lady Gowrie Qld, *Submission 45*, p. 11; National Foundation for Australian Women, *Submission 49*, p. 6; Tasmanian Government, *Submission 96*, p. 2; Body Safety Australia, *Submission 97*, p. 6; Australian Research Alliance for Children and Youth, *Submission 63*, p. 6; NSW Advocate for Children and Young People, *Submission 18*, p. 2; Integricare, *Submission 61*, p. 11. The Parenthood argued that the Child Care Subsidy 'is unfit for the purpose of funding early childhood education and care', and 'has pushed up the out-of-pocket price of early childhood education and care very consistently'. They called for 'a funding model that doesn't incentivise providers to set up in areas just where parents are capable of paying exorbitant out-of-pocket fees' (Ms Georgie Dent, Chief Executive Officer, The Parenthood, *Proof Committee Hansard*, 24 February 2026, p. 52).

⁶ For example, The Parenthood, *Submission 41*, p. 3; Productivity Commission, *Submission 44*, pp. 8–10; SNAICC – National Voice for Our Children, *Submission 46*, p. 8; Brotherhood of St. Laurence, *Submission 52*, p. 3; Women's Electoral Lobby, *Submission 66*, p. 3; Social Ventures Australia, *Submission 78*, pp. 2, 9; Playgroup Australia, *Submission 32*, p. 4; Goodstart Early Learning, *Submission 83*, pp. 17, 19; Minderoo Foundation/Thrive by Five, *Submission 85*, p. 5; Dr Amy Graham, Senior Adviser, Valuing the Early Years, Minderoo Foundation and Thrive by Five, *Proof Committee Hansard*, 24 February 2026, pp. 29, 30; Victorian State Government, *Submission 95*, pp. 3–4, 6, 12–13; Name Withheld, *Submission 114*, p. 2; Mrs Mary Winkels, *Submission 125*, p. 7; Ms Skye Kakoschke-Moore, Chief Executive Officer, Children and Young People with Disability Australia, *Proof Committee Hansard*, 17 February 2026, p. 15; Dr Caroline Croser-Barlow, Chief Executive Officer, Front Project, *Proof Committee Hansard*, 17 February 2026, p. 29; Ms Catherine Liddle, Chief Executive Officer, SNAICC – National Voice for our Children, *Proof Committee Hansard*, 17 February

Productivity Commission, but the majority report fails to adopt this as a recommendation despite there being near-consensus amongst witnesses.

- 1.10 While the precise model of such a commission remains subject to sector-wide consultation, the case for a national, coordinated body is clear. Evidence before the committee consistently pointed to the need for an authority that is capable of driving reforms, addressing the fragmentation of jurisdiction-based regulation, serving as a central hub for research and analysing data, holding governments to account for commitments made, and shepherding the transition to a genuinely universal, high-quality ECEC system.
- 1.11 The omission of this recommendation not only represents a missed opportunity for systemic reform, but also undermines the weight and consistency of evidence provided by witnesses to the inquiry.
- 1.12 Recommendations 12 and 13 do not go far enough. Evidence points to state and territory regulators being underfunded with long lags between assessment and ratings. Until 2018, the Commonwealth Government contributed significant funding to state and territory regulators through the National Partnership on the National Quality Agenda for Early Childhood Education and Care. This partnership was an important mechanism that demonstrated joint interest in enhancing quality in services that receive the Child Care Subsidy.⁷
- 1.13 Recommendation 17 is grossly inadequate given the Australian Government has already reviewed the Inclusion Support Program (ISP) and the 2024 Productivity Commission report goes into significant detail about how to reform inclusion in ECEC. Many children with additional needs or developmental delay are turned away from ECEC services and many services and educators do not feel supported in this space. The committee report noted a ‘significant body of evidence noting serious concerns with the Inclusion Support Program (ISP),’⁸ yet the committee’s report stops short of making concrete recommendations. Furthermore, the Thriving Kids initiative provides

2026, p. 54; Ms Michele Carnegie, Chief Executive Officer, and Ms Laura Stevens, Director, Policy and Strategy, Community Early Learning Australia, *Committee Hansard*, 10 December 2025, p. 17; Ms Anne Hollonds, Chief Executive Officer, Early Learning and Care Council of Australia, *Committee Hansard*, 10 December 2025, pp. 32, 34; Ms Deborah Tsorbaris, National Children’s Commissioner, Australian Human Rights Commission, *Committee Hansard*, 10 December 2025, p. 45; Australian Childhood Foundation, *Submission 37*, p. 27; Early Learning and Care Council of Australia—answers to questions taken on notice at a public hearing in Sydney on 10 December 2025 (received 21 January 2026), pp. 5–6; Mr Martin Stokie, Commissioner, Productivity Commission, *Proof Committee Hansard*, 24 February 2026, p. 21; Ms Georgie Dent, Chief Executive Officer, The Parenthood, *Proof Committee Hansard*, 24 February 2026, pp. 51, 54.

⁷ Government of South Australia, *Submission 69*, p. 3; The Front Project, *Submission 9*, pp. 10–11; ACT Government, *Submission 21*, p. 6; The Parenthood, *Submission 41*, p. 3.

⁸ Committee Report, para 6.94, p. 141.

a unique opportunity to link reforms and better serve Australian families with diverse needs.

- 1.14 The committee heard that despite the Worker Retention Payment and Fair Work announcement, pay remains below that of other education sectors and, in some cases, below industries requiring fewer qualifications and carrying fewer legal responsibilities.⁹ The committee also heard evidence linking higher wages to higher quality ECEC services, yet stopped short of recommending a pay increase.
- 1.15 There is no recommendation relating to improving workforce conditions despite it being 'one of the most significant factors determining...quality and safety'.¹⁰ Workforce shortages frequently push providers to rely on agencies and trainees to fill vacancies,¹¹ placing added pressure on permanent staff and undermining quality and safety.¹² Workers' compensation claims run at more than double the industry average, and over 70 per cent of staff perform seven to nine hours of unpaid work each week. It is little wonder, then, that one in three ECEC workers are considering leaving the profession.¹³
- 1.16 One of the key reasons why little change has occurred in relation to workforce challenges, despite there being a national level workforce strategy, is providers and government deflecting responsibility to each other.¹⁴ A national settlement of roles and responsibilities would enhance oversight and improve accountability.¹⁵
- 1.17 Overall, the Greens consider the findings and recommendations of the majority report to be wholly inadequate in the context of the challenges facing the sector. At a time when families are contending with escalating fees and inconsistent quality, and when educators are leaving the workforce in alarming numbers, this report offers little in the way of meaningful long-term vision. It is, ultimately, an affront to those who rely on a system that is demonstrably failing to meet their needs.

⁹ The University of Queensland Australia (Professor Karen Thorpe), *Submission 24*, p. 15. See also Early Childhood Australia, *Submission 89*, p. 10; Northern Rivers Preschools Alliance, *Submission 98*, pp. 2, 3. The Front Project, *Submission 9*, p. 19. Network of Community Activities, *Submission 42*, p. 5.

¹⁰ Committee Report, para 3.1, p. 45.

¹¹ The Front Project, *Submission 9*, pp. 14–15.

¹² Committee Report, para 6.54, p. 133.

¹³ Australian Services Union, *Submission 79*, p. 7.

¹⁴ Committee report, para 3.92, p. 69.

¹⁵ The Front Project, *Submission 9*, pp. 11, 29.

1.18 The Greens also note with concern the conduct of Affinity Education Group, one of Australia's largest for-profit early learning providers. Despite multiple requests from the committee, including one made during a public hearing and two issued as Questions on Notice, the company failed to provide the requested information until they were recalled to a special hearing only one week prior to the reporting date. This lack of transparency is unacceptable, particularly in the context of an inquiry tasked with examining quality, safety, and accountability across the sector, and the fact that Affinity themselves were central in a number of high-profile alleged abuse and neglect cases in the last 12 months.

Recommendation 1

1.19 That the Australian Government, in consultation with states and territories, establish an independent national ECEC Commission. Its mandate, scope and duration should be developed in close consultation with the sector to guide the transition to universal ECEC, with a focus on improving safety and quality as well as access and affordability across all jurisdictions.

Recommendation 2

1.20 That the objectives of early childhood education and care system should be explicitly stated and a framework developed to regularly report on system performance, including the extent to which objectives are being met. A Commission could take on this as an immediate task.

Recommendation 3

1.21 That there be a national settlement of roles and responsibilities between Commonwealth and state and territory governments to create clarity and accountability.

Recommendation 4

1.22 That the Australian Government legislates to require excessive profits by for-profit ECEC providers be reinvested back into improving quality and lifting wages and conditions for staff.

Recommendation 5

1.23 That the Australian Government increase funding to state and territory regulators over the long term, potentially through a new National Partnership.

Recommendation 6

1.24 That the assessment and rating process be revised to be more collaborative, transparent and frequent. Assessors should be trained and equipped to look beyond policies and examine the translation of these into everyday practice.

Recommendation 7

- 1.25 That the Australian Government, in consultation with states and territories, create a nationally consistent reportable conduct scheme, including aligning thresholds for what constitutes reportable conduct.

Recommendation 8

- 1.26 That the Australian Government develop and fund a national quality improvement program with expert coaching to improve quality in services receiving the Child Care Subsidy, starting with services that are not meeting the National Quality Standard.

Recommendation 9

- 1.27 That the Australian Government review the National Quality Framework to consider the inclusion of food quality and quantity and cultural safety.

Recommendation 10

- 1.28 That the Australian Government, over the medium term, implement supply side funding to publicly fund the delivery of quality early childhood education and care services. The Government should begin this transition by first implementing needs-based funding to children who need higher intensity supports or more enriched environments.

Recommendation 11

- 1.29 That the Australian Government lift wages to comparable levels in other education sectors and create more sustainable working conditions that support educators and reduce burnout, including:
- Permanent relief educators who undertake the same training and professional development as regular staff to help maintain ratios, cover breaks and support colleagues to take planning time; and
 - Increase paid planning time to five hours per educator per week.

Recommendation 12

- 1.30 That the Australian Government address inclusion in early childhood education and care by:
- Immediately increasing funding to the Inclusion Support Program to meet immediate unmet need and while the Service Delivery Price project reaches its conclusion, including increasing the additional educator hourly rate to meet award levels. The subsidy cap should also cover a child's full attendance of hours at a service;

- Over the short term create an Early Childhood and Education Fund with both a disability specific stream and mainstream inclusion support stream;
- Over the medium term develop and implement a needs-based funding model to support the inclusion of children with additional needs and developmental delay; and
- Collate data on how many children with disability are denied enrolment in ECEC services or supported through the Inclusion Support Program.

Recommendation 13

1.31 That the Australian Government support Aboriginal and Torres Strait Islander children by:

- Developing an Aboriginal and Torres Strait Islander Early Years Workforce Strategy with the aim of achieving full workforce parity in remuneration and employment; and
- Implementing a dedicated supply-side, needs-based, reliable and sustainable funding model for early years' Aboriginal Community Controlled Organisations, along with 'comprehensive sector scaffolding and backbone support'.

Senator Steph Hodgins-May

Senator for Victoria

Australian Greens Spokesperson for Early Childhood Education

Appendix 1

Submissions and additional information

- 1 Ms Celeste Pater
- 2 Council of Single Mothers and their Children
- 3 National Catholic Education Commission
- 4 Australian Parents Council
- 5 Mr Robert Heron
- 6 Ms Emma Middlebrook
- 7 Safeguarding People Australia
- 8 Mrs Sally Robinson
- 9 The Front Project
- 10 Queensland Family and Child Commission
- 11 Centre for Policy Development
- 12 Childlight East Asia and Pacific Hub
- 13 Working with Women Alliance
- 14 Cultural Au Pair Association of Australia
- 15 Mrs Linda McLean
- 16 Soroptimist International Brisbane
- 17 Independent Education Union
- 18 NSW Advocate for Children and Young People
- 19 Early Learning Association Australia
- 20 Dr Helen Haines MP
- 21 ACT Government
- 22 National Allergy Council
- 23 The Social Policy Group
- 24 The University of Queensland
- 25 Ms Lisa Bryant
- 26 Three Brave Hearts
- 27 Alannah & Madeline Foundation
- 28 Think Forward
- 29 Lake Macquarie City Council
- 30 The Salvation Army Australia
- 31 Affinity Education Group
- 32 Playgroup Australia
- 33 Australian Industry Group
- 34 Australian Education Union
- 35 Australian Human Rights Commission
- 36 BubbaDesk
- 37 Australian Childhood Foundation
- 38 National Outside School Hours Services Alliance
- 39 Allergy & Anaphylaxis Australia

- 40 Y Australia
- 41 The Parenthood
- 42 Network of Community Activities
- 43 G8 Education
- 44 Productivity Commission
- 45 Lady Gowrie QLD
- 46 SNAICC – National Voice for our Children
- 47 Community Early Learning Australia & It Takes a Village
- 48 Federation of Parents and Citizens Associations of New South Wales
- 49 National Foundation for Australian Women
- 50 Australian Local Government Association
 - Attachment 1
 - Attachment 2
- 51 RSL Australia
- 52 Brotherhood of St. Laurence
- 53 Ms Abigail Boyd MLC
- 54 Catholic Social Services Australia
- 55 Uniting NSW.ACT
- 56 Parents Work Collective
- 57 National Aboriginal and Torres Strait Islander Education Corporation
- 58 Australasian Society of Clinical Immunology and Allergy
 - Attachment 1
- 59 Busy Bees Early Learning Australia
- 60 The Future Care Project
- 61 Integricare
- 62 CertaTrait
- 63 Australian Research Alliance for Children and Youth
- 64 NSW Anaphylaxis Education Program
- 65 Australian Childcare Alliance
- 66 Women's Electoral Lobby
- 67 NSW Department of Education
- 68 Australian Skills Quality Authority
- 69 Government of South Australia
- 70 HumanAbility
- 71 ANU South Asian Research and Advocacy Hub (SARAH)
- 72 Guardian Childcare & Education
- 73 Family Day Care Australia
- 74 Knowmore Legal Service
- 75 For Parents
- 76 NPY Women's Council
- 77 Department of Education
- 78 Social Ventures Australia
- 79 Australian Services Union

-
- 80 United Workers Union
- Attachment 1
- 81 Australian National Audit Office
- 82 Outside School Hours Council of Australia
- 83 Goodstart Early Learning
- 84 Children and Young People with Disability Australia
- 85 Minderoo Foundation/Thrive by Five
- 86 Centre for International Corporate Tax Accountability and Research (CICTAR)
- 87 ChildAware
- 88 Childcare Stress Project
- 89 Early Childhood Australia
- 90 Type 1 Voice
- 91 Early Learning and Care Council of Australia
- 92 Centre for Independent Studies
- 93 National Type 1 Diabetes Council
- 93.1 Supplementary to submission 93
 - Attachment 1
- 94 Australian Nanny Association
- 95 Victorian State Government
- 96 Tasmanian Government
- 97 Body Safety Australia
- 98 Northern Rivers Preschool Alliance
- 99 Confidential
- 100 Confidential
- 101 Miss Melissa Tait
- 102 Ms Lauren Brown
- 103 Longreach Regional Council
- 104 Local Government Association of Queensland
- 105 Australian Home Childcare Association
- 106 St Kilda & Balaclava Kindergarten
- 107 Name Withheld
- 108 Australian Paediatric Society
- 108.1 Supplementary to submission 108
 - 108.2 Supplementary to submission 108
- 109 Name Withheld
- 110 Name Withheld
- 111 Name Withheld
- 112 Name Withheld
- 113 Name Withheld
- 114 Name Withheld
- 115 Name Withheld
- 116 Name Withheld

- 117 Name Withheld
- 118 Name Withheld
- 119 Name Withheld
- 120 Name Withheld
- 121 Fivecast
- 122 Shop, Distributive & Allied Employees' Association
- 123 Name Withheld
- 124 Remote Area Planning & Development Board
- 125 Mrs Mary Winkels
 - 125.1 Supplementary to submission 125
- 126 Childcare Choice
- 127 The Page Research Centre
- 128 United Services Union NSW
- 129 Ms Francine Bartlett

Additional Information

- 1 Northern Territory Government—correspondence from the Hon Jo Hersey MLA, Minister for Early Education (received 6 October 2025).
- 2 Playgroup Australia—National Child Safety Governance and Reporting Framework (received 24 February 2026)

Answer to Question on Notice

- 1 International Centre for Missing and Exploited Children Australia—answers to written questions on notice from Senator David Pocock (received 11 December 2025).
- 2 Early Childhood Australia—answers to written questions on notice from Senator David Pocock (received 11 December 2025).
- 3 Alannah & Madeline Foundation—answers to written questions on notice from Senator David Pocock (received 11 December 2025).
- 4 BubbaDesk—answers to questions on notice from Senator David Pocock (received 11 December 2025).
- 5 Attorney-General's Department—answer to a question taken on notice at a public hearing in Canberra on 19 November 2025 (received 11 December 2025).
- 6 Community Early Learning Australia—answers to written questions on notice from Senators Hodgins-May and David Pocock (received 16 December 2025).
- 7 NSW Advocate for Children and Young People—answers to written questions on notice from Senator David Pocock (received 16 December 2025).
- 8 United Workers' Union—answers to written questions on notice from Senator David Pocock (received 23 December 2025).
- 9 Australian Federal Police—answers to questions taken on notice at a public hearing in Canberra on 19 November 2025 (received 6 January 2026).

-
- 10 Australian Children's Education and Care Quality Authority—answers to a question taken on notice at a public hearing in Sydney on 10 December 2025 (received 13 January 2026)
 - 11 Department of Education—answers to a question taken on notice at a public hearing in Sydney on 10 December 2025 (received 15 January 2026)
 - 12 Social Ventures Australia—answers to questions taken on notice at a public hearing in Sydney on 10 December 2025 (received 19 January 2026)
 - 13 Professor Michael Salter—answers to written questions on notice from Senator David Pocock (received 19 January 2026)
 - 14 Early Learning and Care Council of Australia—answers to questions taken on notice at a public hearing in Sydney on 10 December 2025 (received 21 January 2026)
 - 15 Productivity Commission—answer to a question taken on notice at a public hearing in Canberra on 24 February 2026 (received 25 February 2026)
 - 16 Outside School Hours Council of Australia—answers to questions taken on notice at a public hearing in Melbourne on 17 February 2026 (received 3 March 2026)
 - 17 The Front Project—answer to a question taken on notice at a public hearing in Melbourne on 17 February 2026 (received 25 February 2026)
 - 18 Playgroup Australia—answers to questions taken on notice at a public hearing in Canberra on 24 February 2026 (received 2 March 2026)
 - 19 Childcare Choice—answer to a question taken on notice at a public hearing in Brisbane on 23 February 2026 (received 5 March 2026)
 - 20 Early Learning Association Australia—answers to questions taken on notice at a public hearing in Melbourne on 17 February 2026 (received 6 March 2026)
 - 21 Queensland Department of Education—answer to a question taken on notice at a public hearing in Brisbane on 23 February 2026 (received 9 March 2026)
 - 22 Queensland Family and Child Commission—answer to a question taken on notice at a public hearing in Brisbane on 23 February 2026 (received 9 March 2026)
 - 23 Australian Services Union NSW—answers to questions taken on notice at a public hearing in Canberra on 24 February 2026 (received 10 March 2026)
 - 24 Affinity Education Group—answers to questions taken on notice at a public hearing in Brisbane on 23 February 2026 (received 10 March 2026)
 - 25 Affinity Education Group—answers to written questions on notice from Senator Hodgins-May (received 10 March 2026)
 - 26 Australian Skills Quality Authority—answers to written questions on notice from Senator Hodgins-May (received 13 March 2026)
 - 27 For Parents—answers to written questions on notice from Senator David Pocock (received 16 March 2026)
 - 28 Parents Work Collective—answers to written questions on notice from Senator David Pocock (received 16 March 2026)

- 29 Australian Paediatric Society—answers to written questions on notice from Senator David Pocock (received 16 March 2026)
- 30 Childcare Choice—answers to written questions on notice from Senator David Pocock (received 16 March 2026)
- 31 Family Day Care Australia—answers to written questions on notice from Senator David Pocock (received 16 March 2026)
- 32 The Future Care Project—answers to written questions on notice from Senator David Pocock (received 16 March 2026)
- 33 Playgroup Australia—answers to written questions on notice from Senator David Pocock (received 16 March 2026)
- 34 The Y Australia—answers to written questions on notice from Senator David Pocock (received 16 March 2026)
- 35 The Parenthood—answer to a question taken on notice at a public hearing in Canberra on 24 February 2026 (received 16 March 2026)
- 36 Centre for Policy Development—answers to written questions on notice from Senator David Pocock (received 17 March 2026)
- 37 The Front Project—answers to written questions on notice from Senator David Pocock (received 17 March 2026)
- 38 Australian Services Union—answer to a written question on notice from Senator Hodgins-May (received 17 March 2026)
- 39 NPY Women's Council—answers to written questions on notice from Senator David Pocock (received 18 March 2026)
- 40 Centre for Independent Studies—answers to written questions on notice from Senator David Pocock (received 18 March 2026)
- 41 Children and Young People with Disability Australia—answers to written questions on notice from Senator David Pocock (received 18 March 2026)
- 42 Outside School Hours Council of Australia—answers to written questions on notice from Senator David Pocock (received 18 March 2026)
- 43 G8 Education—answers to written questions on notice from Senators Hodgins-May and David Pocock (received 19 March 2026)
- 44 Affinity Education—further answers to questions on notice 24 and 25 (received 19 March 2026)
- 45 Affinity Education—answers to written questions on notice from Senator David Pocock (received 23 March 2026)
- 46 Australian Skills Quality Authority—answers to written questions on notice from Senator David Pocock (received 23 March 2026)
- 47 The Y Australia—answers to written questions on notice from Senator David Pocock (received 23 March 2026)
- 48 Minderoo Foundation—answers to written questions on notice from Senator David Pocock (received 23 March 2026)
- 49 Early Childhood Australia—answer to a written question on notice from Senator Hodgins-May (received 24 March 2026)

- 50 For Parents—answer to a written questions on notice from Senator Hodgins-May (received 27 March 2026)
- 51 Early Learning Association Australia—answers to written questions on notice from Senator David Pocock (received 27 March 2026)
- 52 Affinity Education—answers to questions taken on notice at a public hearing in Canberra on 24 March 2026, and an answer to a written question on notice from Senator Hodgins-May (received 27 March 2026)

Appendix 2

Public hearings and witnesses

Wednesday 19 November 2025

Parliament House
Committee Room 2S1
Canberra

Australian Federal Police

- Mr Ian McCartney, Deputy Commissioner Crime

Australian Centre to Counter Child Exploitation

- Ms Helen Schneider, Commander Human Exploitation

Attorney-General's Department

- Mr Chris Collett, First Assistant Secretary, WWCC Reform Taskforce
- Ms Lauren Barons, Assistant Secretary, National Office for Child Safety

Australian Institute of Criminology

- Dr Rick Brown, Deputy Director

Bravehearts (via videoconference)

- Mrs Alison Geale, Chief Executive Officer

Alannah & Madeline Foundation (via videoconference)

- Ms Sarah Davies, Chief Executive Officer
- Ms Lee Cameron, Director of Trauma Informed Programs

International Centre for Missing and Exploited Children Australia (via videoconference)

- Mr Colm Gannon, Chief Executive Officer

Professor Jon Rouse APM (via videoconference), Private capacity

Professor Michael Salter, Childlight East Asia and Pacific Hub (via videoconference)

NSW Advocate for Children and Young People (via videoconference)

- Ms Zoë Robinson, Advocate for Children and Young People

Wednesday 10 December 2025

Corinthian Room, Sydney Masonic Centre
66 Goulburn Street
Sydney

United Workers' Union

- Ms Natalie Dabarera, Research Coordinator
- Ms Taj Al-Thifairy, Delegate Member
- Mrs Rawat Pallavi, Early Childhood Teacher (via teleconference)

Early Childhood Australia (via teleconference)

- Ms Samantha Page, Chief Executive Officer

Community Early Learning Australia

- Ms Michele Carnegie, Chief Executive Officer
- Ms Laura Stevens, Director of Policy and Strategy

Social Ventures Australia

- Ms Rosie Hodson, Director, Policy & Advocacy
- Ms Emma Sydenham, Director, Early Childhood (via teleconference)
- Ms Olivia Hilton, General Manager, Restacking the Odds, Centre for Community Child Health at the Murdoch Children's Research Institute (via teleconference)

Australian National Audit Office (via teleconference)

- Ms Peta Lane, Group Executive Director, Performance Audit Services Group
- Mr David Tellis, Executive Director, Performance Audit Services Group
- Dr Hazel Ferguson, Senior Director, Performance Audit Services Group

Early Learning and Care Council of Australia

- Ms Anne Hollonds, Chief Executive Officer
- Ms Sally Maddison, Policy Manager (via teleconference)

BubbaDesk

- Mrs Lauren Perrett, Chief Executive Officer and Founder

Australian Human Rights Commission

- Ms Deborah Tsorbaris, National Children's Commissioner
- Dr Susan Nicolson, Director, Children's Rights Team

Australian Children's Education and Care Quality Authority

- Mrs Gabrielle Sinclair, Chief Executive Officer
- Mr Craig Bennett, General Manager, Policy and Regulatory Systems

Department of Education (via teleconference)

- Ms Kylie Crane PSM, Deputy Secretary, Early Childhood Group
- Ms Michele Arcaro, First Assistant Secretary, Early Learning Programs Division
- Mr Brendan Moon, First Assistant Secretary, Child Care Integrity Division

Tuesday 17 February 2026

Edinburgh Room
Stamford Plaza
111 Little Collins St
Melbourne

Y Australia

- Ms Alexandra Ash, Chief Executive Officer
- Mr Jarrod Dobson, National Director
- Mr Craig Mathieson, Chief Executive Officer, Ballarat

Children and Young People with Disability Australia (via teleconference)

- Ms Skye Kakoschke-Moore, Chief Executive Officer

Early Learning Association Australia

- Dr Karina Davis, Chief Executive Officer
- Ms Sally Maddison, Advocacy Director

Outside School Hours Council of Australia

- Mrs Melinda Crole, President

The Front Project

- Dr Caroline Croser-Barlow, Chief Executive Officer
- Ms Martel Menz, Strategic Policy Manager

Centre for Policy Development

- Ms Katherine Osborne, Program Director-Social Services
- Ms Adelajda Soltysik, Senior Adviser

Parents Work Collective

- Ms Alannah Batho, Director

SNAICC – National Voice for our Children

- Ms Catherine Liddle, Chief Executive Officer
- Mr Nick Davis, Early Education Policy Manager

Monday 23 February 2026

Leichhardt Room
Hotel Grand Chancellor
Brisbane

Goodstart Early Learning

- Dr Roslyn Baxter, Chief Executive Officer

Lady Gowrie Queensland

- Mr Julian Smart, Acting Chief Executive Officer

Affinity Education Group

- Mr Glen Hurley, Chief Executive Officer
- Mrs Nicola Page, Chief Risk and Quality Officer

The University of Queensland

- Laureate Professor Karen Thorpe, ARC Laureate Professor

The Future Care Project (via teleconference)

- Ms Angela Cochrane, Founder

For Parents

- Ms Cecilia Cobb, Co-Founder

Childcare Choice

- Mrs Jen Fleming, Spokesperson
- Mrs Madeline Simmonds, Spokesperson
- Mrs Mary Winkels, Spokesperson and Care Economy Consultant

Queensland Family and Child Commission

- Mr Luke Twyford, Principal Commissioner
- Ms Erin Glapiak, Executive Director Strategy and Impact
- Ms Anne Edwards, Executive Director Child Safe Organisations

Queensland Department of Education

- Ms Tania Porter, Deputy Director-General - Early Childhood, Regulation and Communication

Tuesday 24 February 2026

Parliament House

Committee Room 2S1

Canberra

G8 Education (via videoconference)

- Mr Pejman Okhovat, Chief Executive Officer
- Ms Josie King, Chief Legal Quality and Risk Officer

Family Day Care Australia

- Mr Andrew Paterson, Chief Executive Officer
- Mr Michael Farrell, General Manager, Advocacy and Engagement

Playgroup Australia

- Ms Patricia O'Donovan, Chief Executive Officer
- Ms Carley Jones, Executive Officer, ACT Playgroups

Productivity Commission

- Mr Martin Stokie, Commissioner

- Ms Miriam Veisman-Apter, Assistant Commissioner

NPY Women's Council (via videoconference)

- Mrs Margaret Smith, Chairperson
- Ms Patrina McMasters, Assistant Manager, Walytjapiti Program
- Ms Jessica Baker, Research and Policy Manager

Minderoo Foundation/Thrive by Five

- Dr Amy Graham, Senior Adviser, Valuing the Early Years

Australian Paediatric Society (via videoconference)

- Dr Peter Goss, Chair, Diabetes and Allergy

Centre for Independent Studies

- Mr Blaise Joseph, Director of Education Program
- Ms Trisha Jha, Research Fellow in the Education Program

Australian Services Union (via videoconference)

- Ms Zoe Edwards, Deputy Branch Secretary, Victorian and Tasmanian Branch
- Ms Stephanie Chiron, Early Childhood Education and Care Organiser
- Ms Valentina Olivares, Early Childhood Education and Care Organiser
- Evan Grey, Union Delegate Inner West Council, Early Childhood Educator
- Mrs Margaret Harrison, Union Delegate Campbelltown City Council, Outside School Hours Care Service Coordinator
- Mrs Cassandra Summers, Union Delegate Singleton Council, Supervisor Mobile Preschool

Australian Skills Quality Authority (via videoconference)

- Ms Saxon Rice, Chief Executive Officer
- Ms Vidoshi Jana, Deputy Chief Executive Officer

The Parenthood (via videoconference)

- Ms Georgie Dent, Chief Executive Officer

Tuesday 24 March 2026

Parliament House

Committee Room 2S1

Canberra

Affinity Education Group (via videoconference)

- Mr Glen Hurley, Chief Executive Officer