

Submission to the Victorian Inquiry into the Early Childhood Education and Care Sector in Victoria

December 2025



**Victorian Aboriginal
Children & Young
People's Alliance**



Artist's Note

Tarsha Davis is a Kuku Yalanji and Palawa woman and multidisciplinary artist. "This artwork represents the Victorian Aboriginal Child and Young People's Alliance as an interconnected system, a network of organisations that are both distinct and mutually reinforcing, working together to support Aboriginal children, young people, and families across Victoria. The design acknowledges both the diversity and collective strength of VACYPA's 15 members. Each solid- fill circle in the base layer represents one of these organisations and their unique contributions to education, wellbeing, and cultural continuity."



Acknowledgment of Country

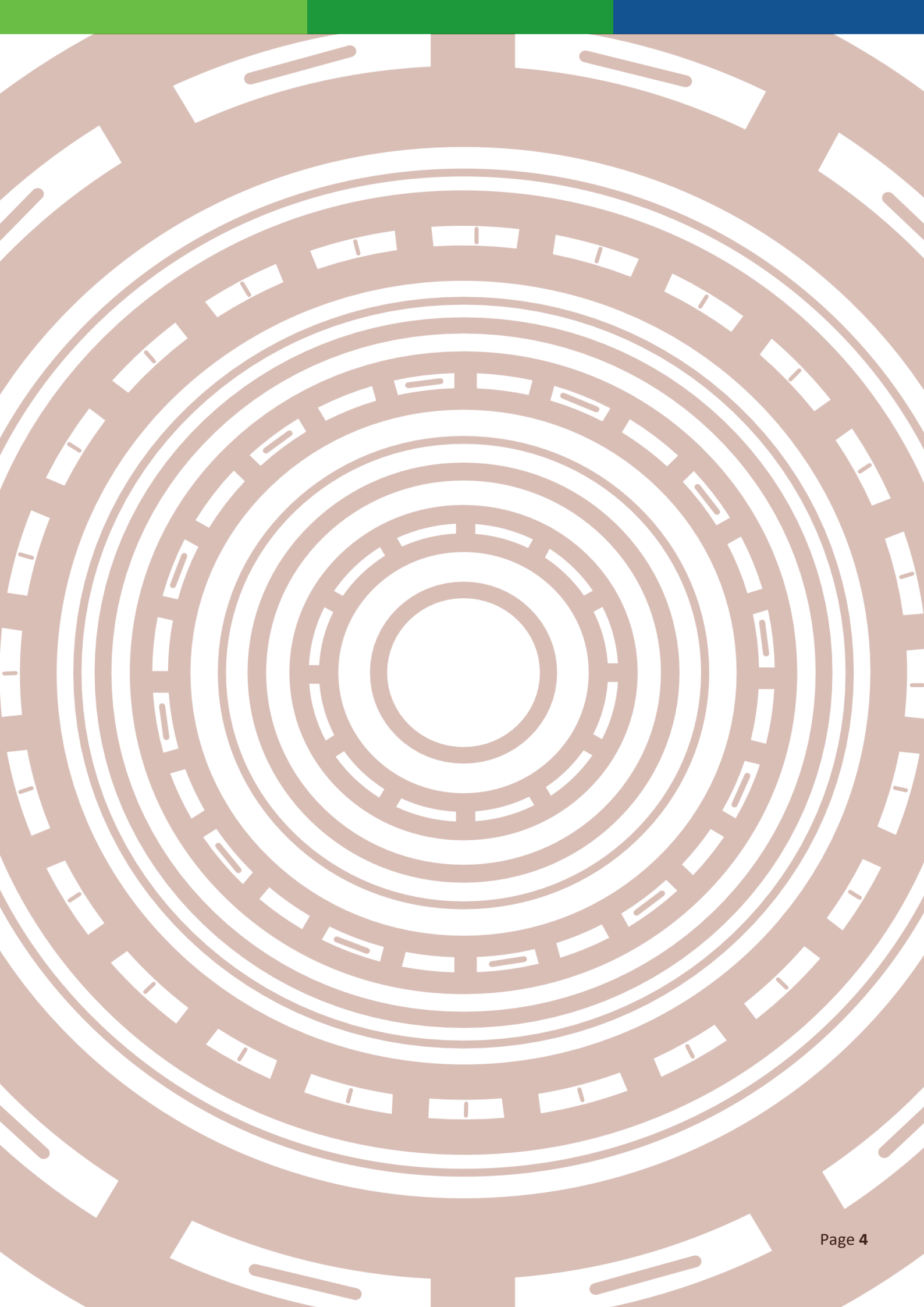
The Victorian Aboriginal Children and Young People's Alliance (VACYPA) acknowledge the Traditional Owners of the lands on which we have prepared this submission, the Wurundjeri Woi-Wurrung and the Bunurong Boonwurrung peoples of the Kulin Nations, as well as the traditional custodians of the lands where VACYPA's members reside and provide their services. Sovereignty was never ceded, and these will always be Aboriginal lands.

Dedication and thanks

VACYPA gives warm thanks to the 15 Aboriginal Community Controlled Organisations (ACCOs) members of VACYPA, for their contribution to this submission and their ongoing connection to Aboriginal communities, advocating and supporting the rights of Koorie children and young people in the place we now call Victoria. We have attempted to represent their views and aspirations as much as possible and do hope this submission will be true to those.

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Introduction

About VACYPA

The Victorian Aboriginal Children and Young People's Alliance (VACYPA) is the collective voice of Victorian Aboriginal communities working together to positively influence the future of Aboriginal children and young people. We are the Victorian peak body for 15 Aboriginal Community Controlled Organisations (ACCOs) providing child and family services to Aboriginal communities under the *Children, Youth and Families Act 2005 (Vic)* (CYFA).

Our organisation is member-controlled and underpinned by a robust Aboriginal governance structure. Our program support, policy and advocacy functions focus on expanding the outreach and voices of VACYPA's Member ACCOs as they strive to provide every opportunity to Aboriginal children and youth to thrive and be raised safely in Aboriginal families and communities. VACYPA is a Child Safe organisation and is compliant with the Commission for Children and Young People's Child Safe Standards.

VACYPA's members provide child and family services across 97.5% of Victoria, working in 75% of local government areas, with a combined annual revenue above \$250 million and over 2,000 employed staff. In total, 72% of Aboriginal children in Victoria, 76% of Aboriginal children on Protection Orders and 73% of Aboriginal children in out-of-home care live in areas covered by VACYPA's members.

VACYPA Members

- Ballarat and District Aboriginal Cooperative
- Bendigo & District Aboriginal Co-Operative
- Dandenong and District Aborigines Co-Operative Limited
- Dhauwurd Wurrung Elderly & Community Health Service
- Gippsland & East Gippsland Aboriginal Cooperative Ltd
- Goolum Goolum Aboriginal Co- Operative
- Gunditjmara Aboriginal Cooperative Ltd
- Njernda Aboriginal Corporation
- Mallee District Aboriginal Services
- Murray Valley Aboriginal Cooperative
- Mungabareena Aboriginal Corporation
- Ramahyuck District Aboriginal Corporation
- Rumbalara Aboriginal Co-Operative
- Wathaurong Aboriginal Co-Operative
- Winda-Mara Aboriginal Corporation

Purpose of this submission

We appreciate the opportunity to provide a submission to the Victorian Parliamentary Inquiry into the Early Childhood Education and Care (ECEC) sector in Victoria. VACYPA's deep interest in the wellbeing of Aboriginal children is relevant to the terms of reference of the inquiry and strongly intersects with the policy and advocacy work we do in the child and family services sector. We seek to further the philosophies of the ACCOs we represent, who have long advocated for cross-portfolio and holistic models of care for their children and families, in particular for children that live out of home, despite the silos between government portfolios and budget streams.

This submission attempts to highlight that a child's early education and development are not limited to the school setting. They reside in the social determinants of health and wellbeing. This includes their physical and emotional health, intellectual and cognitive development, but also importantly the wellbeing of their carers, including parents, families and the broader community. Importantly, an Aboriginal child's wellbeing and ability to thrive is fully codependent on their ability to experience and enliven a strong, vibrant culture.

There is great urgency in reforming the ECEC sector and the system of early childhood care, education and related family supports for Aboriginal children. We know that in Victoria Aboriginal children are reported at 4 times the

rate of non-Aboriginal children, subject to 7 times the rate of investigations, 9 times the rates of substantiations and, dumbfoundedly, 22 times more likely to enter Out-of-Home Care (OoHC) (as opposed to a national rate of 11 times more likely, showing Victoria's 'eagerness' to put children in care). More than half of reports are made when the children are aged 2 years or under, during those years of early childhood care and education. Nationally, Aboriginal and Torres Strait Islander children represent 41% of children in out-of-home care, and this number is projected to rise.

As part of our policy, advocacy and program support work, VACYPA keeps close oversight and provides input into the implementation of *Wungurilwil Gapgapduir: Aboriginal Children and Families Agreement*, in particular its Strategic Action Plan 2025-2026. *Wungurilwil Gapgapduir*, meaning "strong families" in the Latji Latji language, is a Victorian government agreement with Aboriginal communities and the child and family services sector to improve outcomes for Aboriginal children and families. Its purpose is primarily to address the over-representation of Aboriginal children in the child protection system, through principles of self-determined and culturally safe services, although there remains much work for government to do to genuinely support self-determination in policies and program design. The Agreement and Plan are governed by the Aboriginal Children's Forum, of which all VACYPA's members are also members. We see great relevance between the work to be done by the Victorian Government under *Wungurilwil Gapgapduir* and improving policies and processes in the ECEC space for Aboriginal children, particularly for those in OoHC.

Methodology

VACYPA has engaged with Members in the preparation of this submission. We led two workshops with key representatives from ACCOs who had deep knowledge of Aboriginal-led early childhood services and child safety standards, as well as of child and family services that support attendance in early schooling, host playgroups and provide related parenting support. Importantly, some of these ACCOs also provide care services including case contracting services for Aboriginal children in OoHC, and statutory functions under Section 18 of the CYFA, referred to as **Aboriginal Children in Aboriginal Care (ACAC)** and **Community Protecting Boorais (CPB)**.

They all play strong roles in and advocate for greater prevention and early intervention programs to reduce child protection and youth justice interventions. It was evident during conversations with VACYPA Members that ACCOs see great relevance between this inquiry and the work they do, even where they do not provide early learning services themselves at this stage. It was apparent that holistic, integrated service models founded in community knowledges and evidence, form the key aspiration for the way ACCOs wish to care for Aboriginal young children and their families. This submission links our engagement findings with relevant policy and evidence, where available, as well as the work undertaken under *Wungurilwil Gapgapduir*.

Structure

This submission aims to highlight three key messages. The first, that the ECEC sector in Victoria and Australia, needs system wide reform, at regulatory, governance and accountability levels, as well as reforming its profit-based model. Secondly, it advocates that ACCOs, led by Aboriginal community members embedding local ways of knowing, being and doing, are the best-placed to provide early education services to Aboriginal children and their families. Raised in culture, children are safe and strong, looked after by a community network who cares deeply about their wellbeing.

Thirdly, we advocate that, where Aboriginal children cannot receive early education in an Aboriginal-led setting, much greater and more effective efforts need to be made to embed cultural safety and humility in the mainstream ECEC sector, because without cultural safety, there can simply be NO safety for an Aboriginal child. This argument is expanded to provide recommendations on how to improve safety for Aboriginal children in mainstream childcare centres and kindergartens and invest in culture and inclusion as key determinants.

Authorship

This submission has been prepared by VACYPA's Policy and Advocacy team, with input from our broader staff and under the oversight of Jason Kanoa, strong Gunditjmara / Bunitj man and CEO of VACYPA. We thank all those that have contributed to this piece internally and externally, workshop participants and Member ACCOs.

Any views or new evidence presented in this paper is the intellectual property of VACYPA and VACYPA members and should be referenced as such. Where applicable, references are provided in text to provide source of the information provided. Where no reference is provided, it can be assumed that findings have emanated from VACYPA's engagements and its internal knowledge of sector issues.

Implement system reforms across jurisdictions

A rights-based model for Aboriginal children, not a profit model

The rights of Aboriginal children are universal; they are not optional. These are enshrined in international documents like the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and the United Nations Convention on the Rights of the Child (UNCRC). In Victoria, these obligations are reinforced through the Victorian Charter for Children in Out-of-Home Care, which confirms the state government's duty to uphold these rights for children on child protection orders, amongst which we know Aboriginal children are greatly overrepresented. The Child Safe Standards add to the responsibilities and highlight the importance of cultural safety for Aboriginal children (Standard 1), and of equity being upheld and diverse needs respected (Standard 5). These responsibilities are not abstract; they are legally and morally binding obligations for both the State and Federal governments that require active implementation to enable access to quality and culturally empowering early education and child services for Aboriginal children.

Frameworks at the Federal level also recognise these rights. *Safe & Supported: The National Framework for Protecting Australia's Children 2021–2031* and its Aboriginal and Torres Strait Islander First Action Plan 2023–2026, the National Agreement on Closing the Gap and the Victorian Implementation Plan, alongside the Early Childhood Care and Development Policy Partnership (ECCDPP), place clear responsibilities on both levels of governments to ensure the wellbeing of Aboriginal children in their early years through culturally safe, community-led, not-for-profit approaches, and to continuously invest in ACCO-led services that work best for young Aboriginal children and their families.

Yet, in Victoria as in other parts of the country, the current mainstream ECEC system is still largely profit-driven, a model of care that clearly conflicts with the idea of embedding universal rights. Profit-based models are made, as any business, to prioritise efficiency and reduce operating costs (including workforce costs such as training) at the expense of quality education and supportive care. This results in high staff turnover, risks managed by bureaucratic compliance exercises over care, and increased safety risk for children. VACYPA members are of the view that profit-based ECEC services don't enable high-quality, passionate care services in the same way that Aboriginal-led and community-led models do, for they are efficiency-based and transactional, as opposed to effective and relational. Cutting down cost to make profit results in lesser workforce and resource capacity for genuine and quality education to be provided, which impacts the standard of care children receive. This is even more inappropriate for Aboriginal children who have long been facing profound disadvantage. An expensive, profit-driven system results in limited access to mainstream ECEC services due to prohibitive costs, even with the Childcare Subsidy rebate in place and the activity-test waived.

The recent Rapid Child Safety Review (2025) commissioned by the Victorian Government confirms these views, stating that so long as the current market-driven model for ECEC stays in place, the risks to quality and safety for children in early childhood education and care settings will remain. The review states that for-profit long day

care services in Victoria are more likely to be rated as ‘Working Towards the National Quality Standard’ than not-for-profit long day care services, and less likely to exceed the National Quality Standard. Profit-based ECEC services are also more likely to be ‘working towards’ and ‘less exceed’ Quality Area 2 (child health and safety) than not-for-profit long day care services. The review highlights that thousands of ECEC services in Australia are run by providers that have a complex array of business structures and priorities and therefore may not be specialised in ECEC service provision or child safety. Children are at the heart of every community, including Aboriginal communities. Utilising their education and care for private businesses to profit from, and continually invest in more private independent ventures, drives early learning costs up and reduces the quality of care. This is inconsistent with the universal rights of Indigenous children to be safe and to be able to access education without discrimination (UNDRIP, Article 14.2).

In stark contrast, ACCOs adopt very different approaches to delivering childcare and kindergarten services to children in their communities. They do not seek profit; they look after children as if they were family or kin, and place high levels of scrutiny and accountability on themselves as custodians. Their focus is on reducing risks to genuinely protect children, with internal networks inside ACCOs working together to keep kids safe and support families where reportable conduct may arise, taking tough decisions when necessary, held accountable by their own community. They deliver culturally safe, community-led services that adopt a whole-of-family approach. Programs like the *bupup balak wayipungang* initiative (formerly the Koorie Preschool Assistant, or KPSA, program), Koori Supported Playgroups (KSP, a dual parenting and early education support program), and Koori Families as First Educators (KFFE) demonstrate that ACCOs best integrate education with family support and culture. They go above and beyond to ensure that children can participate in early education and care, supporting families with transport and other supports to make their services accessible. They know the kids coming to their services, and those that aren’t, and can identify the early signs that a family might need extra support and engage with them in a culturally safe, non-threatening way. Most of this work is not seen in the compliance assessments and reporting exercises asked of them as part of their obligations under grants and funding agreements. It is work that happens behind the scenes, never recognised but ever present, with the genuine care factor making that difference which the current profit-based system cannot provide.

Recommendation 1: The Victorian and Federal Governments should overhaul the profit-based ECEC system and invest in not-for-profit and ACCO-led models for Aboriginal families that prioritise culture, holistic care and community. Aboriginal and Torres Strait Islander children in Victoria deserve safe, culturally grounded, quality early childhood education and care as per their universal rights.

Clear government accountabilities, with interlocking regulations and compliance

The recent Rapid Child Safety Review (2025) makes it clear: “The actions of Victoria alone will not fix the quality and safety issues in ECEC.” Yet, it remains unclear to ACCOs who between the State and Federal Governments is ultimately responsible for ensuring safety and quality for our children in early childhood education and care services. The legislation, policies and frameworks at both jurisdictional levels are complementary but duplicative and overlapping in places. Policy and regulations are inconsistent, and final accountabilities are not clear. The Federal Government funds the Child Care Subsidy (CCS) and oversees the National Quality Framework (NQF), while Victoria enforces the Child Safe Standards through the Commission for Children and Young People (CCYP), which confusingly holds limited authority overall and lacks sufficient resources to ensure children are actually safe. However, ECEC does not fall under Victoria’s independent Social Services Regulator (SSR) because CCS is funded by the Federal Government and childcare providers need to meet Commonwealth regulations. This fragmented approach means that while Victorian standards exist, enforcement powers and resources are blurred and limited, and accountability is weak. This allows for blame to be passed between jurisdictions, as well as onto the profit-based ECEC sector, but leaves systemic issues unresolved.

Recent accountability programs launched by the Victorian Government such as the **Kindergarten Audit and**

Assurance Program, seem to place the blame on individual ECEC services through audits and compliance programs, rather than addressing an inherently flawed system. While regular audits are necessary, they cannot replace structural reform. Both State and Commonwealth governments must take joint responsibility for child safety, development, and wellbeing, rather than shifting blame or relying on unclear accountability mechanisms. As far as child safety is concerned, the Federal Government should be fully accountable and exercise authority from the top down. SNAICC emphasises that reform must occur through shared responsibility and genuine partnership between Commonwealth, state, and territory governments, alongside Aboriginal and Torres Strait Islander communities, and VACYPA and its members support this view.

Additionally, it is reported to us by VACYPA members that current regulatory and compliance processes in the ECEC sector are very bureaucratic, repetitive, and cumbersome, taking time away from community without ensuring safety for children. There is a lot of duplication across state and federal compliance requirements for ACCOs to fulfill, as well as inconsistencies in compliance exercises. These too often feel tokenistic and transactional, and focused on protecting the organisation themselves as opposed to community members. While intended to increase safety, these measures fail to assess qualitative aspects of working within community and the impact this has on children and their families. VACYPA members report that it is hands-on engagement and spending time with families on the ground, that is the most effective form of prevention and early intervention. Reporting requirements consume time and resources that could be invested in service delivery, and thereby ironically reduce safety. ACCOs feel that safety regulations and compliance assessments should be streamlined into a single, coherent regulatory and reporting framework between State and Federal governments to reduce reporting burden and optimise service delivery. This is not just valid for ECEC regulations, but could extend to other mainstream compliance regulations, like Occupational Health and Safety (OHS). Furthermore, within the state itself, accessing funds from various budget streams for similar, intersecting programs means ACCOs report back to different government departments and have a suite of different reporting mechanisms they must comply with, including different reports, compliance measures and evaluation mechanisms. This is all time taken away from delivering the services these departments are investing in. As explored further below, compliance roles are rarely resourced at all, or sufficiently, to support ACCOs to meet these obligations, meaning they are often directly resourced from funds intended for front-line service delivery. The current system seems to be compensating for safety gaps with over-reporting, rather than investing in workforce and community engagement and outcomes, which are accurate evidence of child safety and wellbeing improvement.

The State of Australia's Children Report provides a roadmap for reform of the current system, calling for a **National Early Childhood Commission** to be established as a dedicated independent body to steward a unified early childhood development system in Australia with clear accountabilities. This body would enable long-term reform, align funding and policy across jurisdictions, and ensure decisions are informed by evidence and the voices of children, families and educators. It also advocates for a National Children's Act, overseen by a cabinet-level **Ministerial Council for Children**, to embed the UNCRC into Australian law and create unified accountability for children's rights across the country (ARACY, 2025).

Recommendation 2: The Victorian and Federal Governments should clarify their respective responsibilities by implementing a top-down approach that ensures both jurisdictions take full collective responsibility for child safety, development and wellbeing.

Recommendation 3: The Victorian and Federal Governments should streamline reporting requirements and mechanisms for ACCO-led ECEC and child and family services, ensuring consistency of policies and regulations between government jurisdictions and between State departments. To this effect, develop and implement interlocking policies, compliance and reporting processes that are efficient and effective, to streamline compliance obligations and free up time for ACCOs to focus on service delivery in their communities.

Invest in ACCO-led early childhood services

Children in Australia do not have equitable chances to reach their full potential. Aboriginal and Torres Strait Islander children, children living with disability, those from low socio-economic backgrounds, and young people who have experienced out-of-home care are less likely to have the resources and support they need to thrive. Indeed, only one-third of Aboriginal and Torres Strait Islander children are developmentally on track by the age of 5. This means that two-thirds of Aboriginal and Torres Strait Islander children are experiencing developmental vulnerability at a critical stage of life. These outcomes are not accidental but reflect the impact of successive policy failures (ARACY, 2025). The below provides key recommendations on how greater, ongoing investment in ACCO-led early childhood services would considerably assist to reduce this disadvantage and give Aboriginal children in Victoria a true capacity to thrive.

ACCO-led early learning services build strong foundations for Aboriginal children

VACYPA's members who deliver early learning services for Aboriginal children provide culturally embedded, community-based environments that nurture identity and wellbeing from a young age. These services are culturally safe, and ACCOs do the best they can within their means to invest in Aboriginal and non-Aboriginal workforce development to sustain and strengthen this safety. By embedding culture and local ways of knowing, being, and doing, they enable children to develop a strong sense of identity at a foundational stage of their life. This identity is essential for their future wellbeing and is presently not developed in mainstream services. Cultural identity and wellbeing act as protective factors that best prevent future wellbeing and behavioural issues, and their impact on the life of a child cannot be understated.

Additionally, ACCO-led ECEC services exercise greater levels of scrutiny and safety because children are seen as family and community. Looking after children is a cultural responsibility and ACCO staff interact with families in relational, as opposed to transactional, ways. The wellbeing of children and families in communities is paramount. Unlike profit-oriented models, ACCOs prioritise care over efficiency, and are able to obtain a level of trust from Aboriginal families that the mainstream sector cannot. They are able to positively influence participation of children in early schooling and create avenues for prevention and safety when reportable conduct arises. ECEC services in ACCOs have a role in early intervention and prevention, to reduce child protection orders by working closely with families, and by reducing youth justice involvement at a later age by setting strong identity and wellbeing foundations.

Action 1.2 of the *Wungurilwil Gapgapduir* Strategic Action Plan seeks to increase the number of Aboriginal children engaged in education and clearly states that the Department of Education (DE) in Victoria has a responsibility in achieving this, in collaboration with the Department of Families, Fairness and Housing (DFFH). The last Aboriginal Children's Forum which took place in Naarm on 23 October 2025, led groundbreaking conversations between the main departments involved in the wellbeing of children in OoHC, that is DFFH, DE and the Department of Health (DH). All department secretaries present, as well as the Victorian Minister for Children, agreed that much more concerted effort must be made on developing and embedding policies and processes between departments that take collective responsibility to ensure outcomes for children, as opposed to the historic and ongoing fragmented, siloed approaches in place. This inquiry is relevant to the cross-portfolio work that is required from the Victorian Government to ensure the wellbeing of Aboriginal young children, and of those who live outside their homes.

Research supports that Aboriginal cultural ways of child rearing, including practices such as storytelling, lifelong learning, and collective education with multiple care givers, are uniquely supportive of best practice in child development, and well suited to high-quality ECEC settings. ACCOs delivering those programs are duly recognised as strengthening Aboriginal and Torres Strait Islander children's school readiness and have

been shown as a preferred model of care for Aboriginal and Torres Strait Islander families and communities in the sector for quite some time (SNAICC, 2023). Acknowledging the cultural and wellbeing strengths, as well as increased participation emanating from community trust, it is evident that consistent commitment and investment towards ACCO-led ECEC services should be made by the Victorian and Commonwealth governments both, in particular as they continue to implement Priority 2 of the National Agreement on Closing the Gap.

Recommendation 4: The Victorian and Federal Governments should prioritise and expand investment in ACCO-led ECEC services as the most culturally grounded and safest early learning environment for Aboriginal children, and the earliest prevention model ensuring children have strong identity and wellbeing as a core foundation.

Recommendation 5: The Victorian Government should develop and implement cross-portfolio policies and processes between the education, health and social service departments that work towards collective outcomes for Aboriginal children, with added emphasis on those in out-of-home care.

ACCOs support Aboriginal children and their families beyond the school

Early learning services delivered by ACCOs are best placed to integrate education with a wide range of child and family support services for Aboriginal children and their families. ECEC services can become a contact point or platform for ACCOs to support families with access to wrap-around services, including prevention and early intervention initiatives. Their programs extend from early years to youth support, family wellbeing, health, social and emotional wellbeing and cultural events. They provide internal professional networks and connection to community that mainstream services cannot replicate.

Aboriginal and Torres Strait Islander Families may rightfully view mainstream services as focused on profit rather than their children's needs, with high staff turnover, limited access (cost and transport being two key barriers) and low quality of cultural learning. These concerns extend to other family services, parenting programs, and early interventions, creating barriers for Aboriginal and Torres Strait Islander families to access services they may need. Unlike profit driven providers, ACCOs are community-led and culturally safe for families. Some ACCO early childhood services will pick children up where they can, welcome parents and grandparents, and create a sense of belonging and safety. They collaborate with family services and providers, adopting a family-based approach for children and parents both. This can be seen in programs like Koorie Pre School Assistant (KPSA), Koorie Families as First Educators (KFFE), Koori Supported Playgroups (KSP), and Aboriginal-led Maternal and Child Health (MCH) services which all show great success.

Research shows that strengthening systems for children requires greater investment in prevention, early intervention, and targeted community led- support. Mainstream child and family services often struggle to get buy-in from Aboriginal families because of fear of child protection involvement. Understandably, many Aboriginal families avoid getting help to protect themselves from judgement and surveillance, a result of decades of assimilation policies that have seen families' children stolen and never returned, and failed child protection policies that continue to remove children from families over greater investment in prevention. When families have access to cultural activities, safe play spaces and community connections, however, they tend to engage more willingly (ARACY, 2025). This provides opportunities for the ACCO to connect them with other services, which again the mainstream sector is much less able to do.

Programs like the KPSA create linkages between families and the ECEC sector, mainstream and Aboriginal-led, as well as the broader range of services provided by ACCOs. KPSAs engage children across regions in early learning and supporting culturally safe environments for them and their families. These roles are pivotal in the community as they enhance access to prevention and early intervention support for families and assist in reducing child protection. Sadly, these roles are not consistently available across all regions, as

not all ACCOs are funded to provide this service. Consistent investment across Victoria should be made so that support and access to early learning is equitable amongst Aboriginal children.

Recommendation 6: The Victorian Government should commit to expanding and continuously funding ACCO led- ECEC services and Koorie early learning support roles to optimise the benefits of internal ACCO referral pathways for additional supports for Aboriginal children and their families.

The ACCO sector is aspiring for holistic, cultural models of childhood care

ACCOs delivering services to children and their families navigate a range of complex funding avenues, specific program streams and reporting mechanisms, all disconnected from one another. Although these programs individually aim to improve outcomes for the end client, they are implemented separately and fail to achieve holistic results for the wellbeing of a child and their family. These standalone and disconnected services make it very hard for ACCOs to provide the holistic support needed by their communities. Although ACCOs provide internal and external referrals for additional support, they also report that external siloes can infiltrate themselves in their organisations, due to the funding and reporting mechanisms in place. Aboriginal ways of knowing, being and doing adopt holistic views and philosophies of the person, with their social, emotional and physical wellbeing being interconnected and co-dependent with community and culture. This is why separate services simply do not work effectively for communities and fail to bear cumulative results. Additionally, community members often struggle to comprehend a complex Western system of health, education and social services and tend to disengage with services when they are compartmentalised.

SNAICC's research highlights the key issues with the current ECEC funding models and service delivery for Aboriginal and Torres Strait Islander communities in Australia, which are also reflected here in Victoria. They:

- constrain delivery in areas of undersupply for ECEC, including regional, remote and some metro areas
- do not reflect the true cost of program delivery, such as additional staffing costs or housing for staff in areas experiencing critical workforce challenges
- do not support tailored programs to meet community needs and aspirations
- jeopardise the integrated, holistic services that ACCOs provide by being too narrowly focused on ECEC, without flexibility to provide broader supports and services
- risk excluding families by putting ACCOs in the position of having to charge increased fees to support the holistic programs provided
- constrain the staffing required to adequately support programs, and
- are prescriptive and inflexible, compromising support for programs that meet the needs of communities (2023).

During consultations led by VACYPA to develop an updated **Rights & Aspirations Report** for VACYPA's Members, ACCOs expressed a strong desire to be able to deliver culturally grounded ECEC services in an integrated early years community centre. In fact, 11 of the 15 VACYPA members aspire to develop integrated Early Childhood Hubs (ECH). This model seeks to provide wrap-around services for Aboriginal children and their families, connecting those to a network of support services in a single location that is embedded in culture and led by Community. A range of varying service components were raised by ACCOs, which demonstrated a mix of additional services tailored to the needs of their specific communities.

An integrated approach to early childhood services would encompass the provision of childcare (0-3 years old) and pre-school/kindergarten services (3-5 years old) alongside maternal and child health services, parenting programs, specialised child services and diagnosis. They would also provide robust referral pathways to other ACCO services to support parents experiencing health, AOD, domestic violence and housing challenges, to prevent and intervene at an early stage of child safety concerns, and ensure young children stay and grow in their families and communities as much as possible. A childhood hub creates an

internal professional network with various expertise and provides wrap-around oversight and support for a child's family.

SNAICC stated the strengths of integrated early years services and hubs by highlighting that they:

- are community-centred and build trust with children, families and their communities
- provide universal service offerings and are flexible to respond to needs
- support the needs of families holistically
- provide high-quality, culturally safe early childhood programs
- create safe spaces for community connection
- offer universal and flexible programs responsive to communities (2024).

An early childhood hub is also uniquely placed to coordinate and provide the support that is required for young children in OoHC. It would enable for the current responsibilities held by the DFFH, DE and DH for children in care, to be undertaken by ACCOs, ensuring optimum results for the child and referred care for their parents in an effort to reunify when safe, as well as providing targeted support to their carers in the community whilst on placement.

Current funding models undermine this vision. They focus on early childhood education and care (ECEC), limiting flexibility to deliver holistic services that families need. VACYPA's members reflected that divided infrastructure is itself an issue as community members need not only navigate different services, but also different buildings and locations, which further impacts their ability to comprehend and physically access the services. To mirror the holistic care model described above, there is a need for holistic infrastructure investment for each ACCO, and for compartmentalised infrastructure streams to be gathered to fund single, comprehensive projects, thereby reducing the costs and resources needed to implement the investment.

Holistic models of care are becoming increasingly known and implemented. They include the Connected Beginnings program, led by SNAICC working in partnership with ACCOs across the country, and the recent Building Early Education Fund (BEEF) initiated by the Federal Government. The latter plans to co-invest in integrated services with the philanthropic industry to improve the health and wellbeing of children, young people, and their families, by bringing together early learning, child and maternal health services, and family and community support in the mainstream sector. The Victorian Government should investigate how much of the BEEF incentive may be able to support ACCOs in Victoria and support them in obtaining any eligible investment, as well as commit to similar investment in integrated ACCO-led models in our state to meet the needs and aspiration of communities.

SNAICC continues to strongly advocate for the benefits of culturally embedded integrated service model delivered by ACCOs, having recently published a case study for the Maari Ma model available here: <https://www.snaicc.org.au/wp-content/uploads/2025/12/Family-Matters-Report-2025.pdf#page=39>. The case study demonstrates the benefits of a holistic model of care based on the strengths of culture and identity, that integrates early years and health services into a single child and family service. A video and further information also available here: <https://vimeo.com/1142776960?fl=pl&fe=sh>.

Recommendation 7: The State and Federal Governments should invest in integrated Early Childhood Hubs led by Victorian ACCOs to enable holistic models of care for Aboriginal children and their families, as the most effective wellbeing, prevention and early intervention mechanism. This investment should be flexible, needs-based and include integrated budgets for infrastructure and ongoing service delivery.

Increased compliance resources and information sharing for ACCOs

ACCOs face significant resource challenges to implement and report on the compliance and safety requirements imposed by funders and regulators in the early learning space. The risk management and reporting load is considerable, inconsistent and duplicative as mentioned previously, and takes extensive time from providers. Yet, this function is often unfunded, forcing ACCOs to use funding for other areas of businesses for compliance and risk management purposes. In the early learning sector in particular this creates a regulatory burden without adequate support, particularly for tasks like reportable conduct investigations, which are complex, ridden with conflicts of interest, and often need to be commissioned externally at great cost to the ACCO. It seems somehow ironic to have such high levels of safety requirements to comply with, without dedicated resources to be able meet those. This burden is met by doing out-of-hours work that adds to the already extensive colonial load and fatigue on Aboriginal and Torres Strait Islander workers, to the detriment of service delivery and workforce wellbeing. ACCOs have expressed the view that any ACCO should have a very minimum of 2 FTEs to undertake the regulatory and safety work in the organisation, including for early learning services.

It has also been shared with us that current safety processes lack effective cross-cultural information sharing. For example, whilst the Working with Children (WWC) is mandatory to ensure each educator passes a clearance threshold to work with children, it is also very constrained in what it can achieve and provides limited assurance to ACCOs on the safety of a particular educator. ACCOs have noted that the Reportable Conduct Scheme and Family Violence Information Sharing Scheme do not intersect with the WWC scheme, which creates a gap in reportable conduct information sharing. Whilst an ACCO may know if someone's WWC has been revoked, they are not notified of investigations that are still ongoing. They are also not able to assess a worker's history by accessing a comprehensive employment record to run a thorough reference check. Undeniably, it is difficult for ACCOs to be fully compliant with a system, and more importantly ensure the genuine safety of children in their care, when that system does not share relevant safety and employment record information with them.

Finally, current educator to child ratios and funding models are inadequate to create genuinely safe learning environments for young children. ACCOs early learning services often employ above the ratio requirements to enable safety, leaving them out-of-pocket as their services are funded based on minimum ratio compliance. Better resourcing is critical to ensure adequate ratios and greater attention and care can be provided to children. In this sense, safety is closely linked to workforce capacity. It is also linked with workforce capability, and it has been acknowledged that there is an unmet need for greater and better workforce training and development in early learning spaces. Educators, during their vocational studies but also during the course of their employment, must be provided with the adequate skills and tools to enact everyday safety, perceive potential child abuse and report safety concerns. However, workforce training is hard to implement in an already stretched workforce employing strict educator to child ratios under strict budgets. Allowing resources and time for educator training and ongoing learning is absolutely essential to ensuring they are appropriately resourced and skilled in detecting safety issues. Supporting educator wellbeing and minimising colonial load in ACCOs also requires resources for support programs, better supervision and access to wellbeing leave.

Recommendation 8: The Victorian Government should fund dedicated compliance and risk management roles in ACCOs to lessen the reporting and compliance burden on service delivery staff. This would optimise capacity to work with community, minimise safety risks for children and staff, and improve programs outcomes. ACCOs have requested a minimum of 2 FTEs per organisation, also noting that this may be reduced if reporting and compliance requirements were streamlined as described under Recommendation 3.

Recommendation 9: The Victorian Government should develop a WWC information sharing process for ACCOs and other ECEC providers to be proactively notified of individuals being currently reported, investigated or revoked from the WWC scheme. Additionally, ACCOs and mainstream services should be provided ongoing access to a database outlining any current and previously reported conducts, investigations and revocations

of individuals with WWC checks.

Expanded ACCO early learning, child and family services workforce investment

The latest ECEC National Workforce Census (2024) reported that Aboriginal and/or Torres Strait Islander workers comprised 3.8% of the total ECEC workforce across all service types, approximately 7000 workers. It also reported that the proportion of Aboriginal and/or Torres Strait Islander workers was greater in regional Australia (6.8%) and greatest in remote Australia (25%), as compared to major cities (2.4%). VACYPA's regional ACCO members struggle to fill positions in their early learning services with Aboriginal employees, and it seems there is an even greater shortage in urban areas where childcares are most numerous and cater for a larger proportion of children. It was also reported that 37.2% of Aboriginal and Torres Strait Islander children attending ECEC services, including mainstream and Aboriginal-led, had access to an Aboriginal or Torres Strait Islander paid contact worker at a minimum. This means that approximately 2/3rds of Aboriginal and Torres Strait children do not have access to care and support that bring culture and cultural safety into their early learning journey.

Investing in expanding the Aboriginal workforce in the ECEC sector in Victoria is required to enable ACCOs to deliver early learning and childhood services to Koorie children which we know work best in creating a strong sense of identity and wellbeing. However, ACCOs are facing steep workforce challenges, in particular in recruiting Aboriginal employees. There is a need for much greater investment in building and retaining both the Aboriginal and ECEC workforces. ACCOs are able to provide a culturally safe space for Aboriginal staff, and opportunities to embed culture in every day caring and teaching. This is an advantageous attraction and retention mechanism which should be leveraged. Investment in ACCO-led ECEC services, and in building the Aboriginal ECEC workforce is required to invest in culturally safe, empowering spaces for both employees and families.

ACCOs are also keen to train new workforce on the ground through paid traineeships and scholarships, to provide effective supervision and improve professional capabilities of recruits. They also want capacity to train existing staff into the next generation of leaders. Fully trained staff and recognised leaders take time and need long-term investment. ACCOs currently don't receive sufficient funding to invest in this type of workforce training and development, limiting their ability to upskill their staff and retain skilled workers seeking career advancement. ACCOs have also noted a gap in the existing workforce, where younger and older generations are relatively well represented, but the generation in between is missing, creating a large gap in skill level and experience. There is a need to better communicate to and entice mid-career Aboriginal community members to join the ECEC and child and family services workforce in workforce expansion initiatives. The provision of funded or heavily subsidized vocational courses and academic scholarships, with the addition of student support, are required in the sector to further attract workforce.

In view to retain Aboriginal ECEC and child service workforce, there is a need to invest in back-of-house services and recognise the colonial load and additional custodial responsibilities placed on Aboriginal staff and community members. Recognition and support may take the form of ongoing and regular access to Employee Assistance Programs, attending cultural retreats, forums and ACCO sector events, receiving increased support from supervisors, and accessing wellbeing and cultural leave. VACYPA recently hosted an Aboriginal Family Services Forum for VACYPA members, which included keynote presentations relevant to the sector, but also cultural events, craft and wellbeing workshops, and self-care exercises. Events of this type are a way for Aboriginal staff to connect, share, network and recentre. The Forum was very well attended and highly successful. We note that such incentives and investment are all the more needed now that new OHS psychological wellbeing and psychosocial hazard regulations have come into effect in Victoria.

Finally, there is a need to invest in the cultural safety skills of non-Aboriginal staff working in ACCO-led early learning and childhood services. Although the work environment can be a positive influence in itself, it is nonetheless a great risk to children and for the ACCO to have to fill an Aboriginal workforce gap with a workforce that has not received adequate cultural safety and humility training during their studies or

qualifications or previous professional development. There is a need for comprehensive cultural safety training to be mandated for ECEC educators and staff as part of the curriculum or requirements before they be fully qualified to work with Aboriginal children, in and outside of ACCO services. This capability should be mandated for any recruit from the start or provided for upon employment and be mandatory in all early education vocational and academic courses.

The elements above strongly intersects with Actions 4.1 and 4.2 of the *Wungurilwil Gapgapduir* Strategic Action Plan which requires for the Victorian Government to develop and invest in a 10-Year Aboriginal workforce plan by 2025 to guide proportionate, upfront, long-term funding, and recommissioning based on child, family, and community need, as well as to scale up investment in workforce and infrastructure to support local services for children and families and ensure cultural loads, and client complexity are adequately addressed. VACYPA prepared a submission for the development of the Aboriginal Sector Workforce Strategy by DFFH which highlights current barriers to building the workforce and provides recommendations to address these. We have attached this submission as **Appendix B** and recommend its recommendations may be considered here in the context of the early learning and childhood workforce.

Recommendation 10: The Victorian Government should invest in training, recruitment and retention of the Aboriginal early learning and childhood workforce by enabling culturally empowered spaces in ACCOS and minimising colonial load through cultural and wellbeing incentives, back-of-house and supervision supports, in-house traineeships and leadership mentoring, as well as external subsidized vocational training and academic opportunities. In light of the similar workforce barriers to the child and family services sector, and of the cross-portfolio approaches advocated for in this submission, the Victorian Government should consider extending the Aboriginal Sector Workforce Strategy being prepared by DFFH to include the early learning and childhood services workforce.

Recommendation 11: The Victorian Government should mandate comprehensive cultural safety training for non-Aboriginal ECEC workers prior to, or immediately at start of employment, in both ACCOs and mainstream ECEC spaces. This would be aided by comprehensive cultural safety training being mandatory in all ECEC vocational courses and early education academic curriculum.

Rights-based, equitable Aboriginal early learning services and support across Victoria

There is a need for strategic oversight and implementation to ensure equitable access to early learning services for young Aboriginal children across all of Victoria. This should include the provision of ACCO-led childcare centres and kindergartens wherever feasible, as well as ACCO-delivered Koorie support roles in mainstream ECEC settings. Such initiatives already exist, and VACYPA's members have consistently highlighted that, where implemented, they work well. However, not all Aboriginal children currently have access to ACCO-led services, and KPSA roles are inconsistently funded across the state. This creates significant gaps in support for children living in areas without ACCO-led services, KPSA roles or culturally safe early learning options. However, Child Safety Standard 5 mandates that equity be upheld and diverse needs respected in policy and practice in early learning settings.

The Victorian Government should consider the upcoming Rights & Aspirations Report, prepared by VACYPA on behalf of VACYPA members, and prioritise funding for both existing and new services where needed and desired. Additionally, it should develop a system-wide map of ACCO-led ECEC services and related supports such as KPSA for Aboriginal children and establish a systematic approach to funding Aboriginal support roles and services consistently across the state to achieve equity of access. These services should never be subject to competitive funding or procurement processes; instead, they must be universally funded based on the rights of Aboriginal children to access culturally safe education and to enliven culture in their early years within safe communities. Communities should not have to compete for their children to enjoy their rights. This approach aligns with Action 1.2 of the *Wungurilwil Gapgapduir* Strategic Action Plan, which aims to

create culturally safe school engagement and increase participation of Aboriginal children and young people. The Yoorrook Justice Commission also recommended that “Working with First Peoples, the Victorian Government must continue to ensure that ongoing sustainable funding is provided to First Peoples-led early education services, including to expand service delivery and meet demand for services.

Recommendation 12: The Victorian Government should ensure equitable access to culturally safe, ACCO-led early learning services for Aboriginal children through a strategic, system-wide investment approach. This includes creating a comprehensive map of existing ACCO-led ECEC services and Koorie support roles to identify gaps and guide funding decisions. Investments should be based on a consistent, rights-based, and non-competitive funding model and expand ACCO-led childcare centres and kindergartens, as well as embedding ACCO-delivered Koorie support roles across mainstream ECEC settings on a needs-basis statewide.

Invest in culture & inclusion in mainstream services

Research has consistently demonstrated the importance of culturally safe programs for Aboriginal and Torres Strait Islander children to build cultural pride, identity and wellbeing, building strong foundations as a preventative tool to potential wellbeing and behaviour challenges in the future. For all children, evidence shows that high-quality early learning improves self-regulation, language, cognitive skills, and social-emotional development (SNAICC, 2023). In addition to this, culture is an inherent right under UNDRIP and is a necessary element for Aboriginal children to thrive.

Without cultural safety, there can be no safety for Aboriginal children

VACYPA members were vocal about the need for cultural safety in mainstream early learning settings for Aboriginal children to be genuinely safe. Whilst lack of cultural safety, or cultural teaching, may not at first be seen as child abuse by Western safety frameworks, the lack of ability for an Aboriginal child to develop their cultural identity from a young age directly hinders their future wellbeing, and creates a great emotional and mental health risk. Being denied one’s culture, the truth about one’s history, and the ability to enjoy it in respectful, accepting and celebrating environments, has severe repercussions that harm Aboriginal children.

SNAICC advocates that ECEC services should be inclusive, celebrate Aboriginal and Torres Strait Islander cultures and should be led by or designed in collaboration with local communities, as well as demonstrate a deep respect for and engagement with Aboriginal and Torres Strait Islander people. This model of tailored early learning creates programs that are responsive to the specific needs and contexts of communities. When families feel invited and appreciated in early learning settings, it builds a sense of trust that is a key facilitator in building value for both children and families. The 3 elements of good practice in working with Aboriginal communities are:

- Safe people: the importance of local community leadership and affirmation from Elders
- Safe places: welcoming spaces which promote a sense of belonging, ownership and control for local people
- Safe programs: strengths-based and culturally meaningful approaches, responsive to communities and developed in collaboration Aboriginal and Torres Strait Islander children (SNAICC, 2023).

Culture must therefore be prioritised as an essential safety factor in mainstream services for Aboriginal children to be safe. ECEC mainstream services are seen as largely culturally unsafe by communities, with the ECEC sector failing to truly invest in culture as part of foundational learning, organising Reconciliation Week and NAIDOC events and undertaking Acknowledgements of Country without fully investing in understanding and teaching the origins of this country and its First Peoples. Child Safe Standard 1 requires organisations to establish culturally safe environments where Aboriginal children’s identities are respected and valued. However, this standard is largely implemented and monitored in tokenistic ways in mainstream ECEC settings. An example is the School

Readiness Funding program, which aims to address educational disadvantage by funding initiatives focused on 'access and inclusion', 'communication' or 'wellbeing'. This may be used to fund cultural events and initiatives; however, in light of the diverse cultures and identities present in schools, it often does not specifically target Aboriginal cultures. The fact that schools must 'opt-in' on culture demonstrates a clear lack of systematic investment in it and of cultural safety.

There is a need to ensure the cultural safety and humility of all educators, teachers and school staff, in the mainstream ECEC sector to ensure the safety of Aboriginal children. As recommended previously for non-Aboriginal staff working in ACCO-led early learning services, all educators, teachers, school staff and Koorie support staff should have undertaken, or undertake immediately upon work commencement, comprehensive, mandatory cultural safety training. Such training should also be embedded in the vocational training curriculum and academic training to set strong foundations in early learning staff and raise expectations. During employment there should be mandated ongoing professional development with regular adequacy assessments. These measures would ensure cultural safety training is undertaken prior to employment, on an ongoing basis, and is successfully undertaken for all staff in contact with Aboriginal children. To enable cultural safety, and related training, ratios in mainstream ECEC settings also need to be amended to allow for quality education, safety and workforce development, including in cultural safety, as a standard measure. This requires a greater investment into the ECEC workforce on an ongoing basis.

Current compliance processes fail to ensure that ECEC providers are upholding their cultural safety obligations under Child Safe Standard 1. Those charged with assessing how ECEC providers are applying the Child Safe Standards rarely have the cultural understanding and skills to adequately assess a provider's compliance with cultural safety requirements. In addition, when assessing compliance in ACCOs, their lack of cultural safety skills can create unsafe environments for Aboriginal and Torres Strait Islander children and staff. VACYPA's members reported that assessors often fail to understand self-determination that underpin ACCOs' ways of working, and focus on regulatory outputs, as opposed to genuine safety outcomes. They are often overly prescriptive, rigidly applying Western standards and disregarding localised Aboriginal approaches to child-rearing. Too often, little respect is shown for cultural practices, including Acknowledgments of Country and cultural humility toward staff and community members. Also, they frequently overlook cultural authority and the flexibility ACCOs exercise to uphold safety. Targeted cultural safety training must be mandated within the curriculum and professional development of ECEC assessors and regulators, enabling them to adequately assess compliance with safety standards in both mainstream and self-determined, ACCO-led contexts and behave appropriately in schooling environments. Aboriginal educational practices do not fit neatly into Western frameworks, and assessors require a much better understanding of self-determination and ACCO ways of working.

Over the longer-term, regulatory compliance mechanisms must shift their auditing of Child Safe Standard 1 and cultural safety more broadly, placing greater emphasis on embedding cultural safety in ECEC. VACYPA and VACYPA members strongly believe cultural safety monitoring and compliance assessment must be Aboriginal-led and carried out by Aboriginal assessors, preferably Traditional Owners, who can attest to cultural appropriateness on their Country. Cultural Safety should not remain a principle but must be embedded in regulation and audited like any other standard.

To achieve this, ACCOs should be funded for dedicated cultural auditing positions to ensure cultural safety requirements in mainstream ECEC contexts are met and that culture and language are taught appropriately. These standards can only be appropriately assessed by Aboriginal people, preferably Traditional Owners, as it is not appropriate for non-Aboriginal assessors to determine cultural safety compliance. Funding ACCOs to lead cultural audits of mainstream ECEC services would strengthen accountability and guarantee genuine cultural safety.

Recommendation 13: The Victorian and Federal Governments should ensure child safety regulations and compliance assessments include cultural safety as a cornerstone standard to ensure the safety of Aboriginal

children in mainstream ECEC contexts. Cultural safety regulations should be developed and audited by Aboriginal assessors (preferably traditional owners) with dedicated roles funded in ACCOs to this effect.

Recommendation 14: The Victorian Government should mandate comprehensive cultural safety training for all workers in mainstream ECEC settings, as well as safety regulators and assessors, prior to, or immediately at start of employment, with additional training provided to assessors on self-determination in ACCO-led ECEC services. It should also make comprehensive cultural safety training mandatory in all ECEC vocational courses and early education academic curriculum.

Embedding culture and language in mainstream early learning settings

Culture and traditional languages in the mainstream curriculum are fundamental to the wellbeing of Aboriginal children and their ability to develop a strong sense of identity. Language and cultural teaching should be funded equitably and continuously across Victoria to ensure access to all Aboriginal children. Local conversations need to take place between ACCOs and Traditional Owners Groups or Registered Aboriginal Parties to determine who is best placed to lead language and culture work, in schools, including in ECEC in their local area; this should not be for the Department of Education to decide. Also, a grant system is not appropriate to ensure culture and traditional languages are embedded in schools, as this creates a selective, non-systematic funding environment against the universal rights of Aboriginal children. Investment must be planned with a bigger cultural shift in mind and move past tokenistic initiatives. Additionally, the Yoorrook Justice Commission recommended to integrate truth-telling in the educational curriculum, and whilst we realise the terrible impacts of European invasion is a delicate learning topic for young children, it is essential to acknowledge history and share truths in an age-appropriate way from a young age to initiate respectful, understanding, and empathetic relationships.

KPSA roles, which are ACCO-led and managed, work well because they are community-driven and grounded in cultural engagement. These roles provide genuine support on the ground, offering cultural sessions for children and parents, and intervening when attendance issues arise. In contrast, roles like KESO, which are government roles, have become remote and hands-off, moving away from their original purpose of working closely with community members to support Aboriginal and Torres Strait Islander children on their education journey. VACYPA's members also noted that, while programs like LOOKOUT may be effective for children in out-of-home care, they typically require ACCOs to initiate involvement for Koorie children. They often fail to make critical linkages between children and ACCOs when support is needed, leaving gaps in nurturing care within mainstream education settings. There is need for Koorie support roles to be based in ACCOs and service the mainstream ECEC sector statewide to ensure cultural safety and engage closely with young Aboriginal children and their families. These roles should be outcomes-based and non-prescriptive positions to enable ACCOs to define responsibilities according to local needs. Schools must also better engage and collaborate with ACCOs in planning for Koorie children, rather than making decisions that disadvantage children, such as imposing modified timetables before they even commence school. Such behaviours are isolating and discriminating.

Recommendation 15: The Victorian Government should implement a systematic approach to embedding Aboriginal culture and traditional languages in the mainstream education curriculum, including ECEC, as a fundamental right and determinant of wellbeing for Aboriginal children. In addition, truth-telling must be integrated into the curriculum from early years to foster respect, empathy, and understanding. These initiatives require sustained and universal funding that guarantees cultural and language teaching for all Aboriginal children across Victoria. Decisions on who delivers this work must occur locally and be made by ACCOs and Traditional Owner Groups or Registered Aboriginal Parties.

Increasing participation, including for Aboriginal children in OoHC

AECD data shows that, although there has been improvement, only 35.6% of Aboriginal children in Victoria commencing school at the age of 5 are developmentally on track in all domains. While this is ahead of the

national average (34.3% for 2021), there remains significant work to do to achieve the 2031 Closing the Gap target of 55% (SNAICC, 2023). Participation in childcare and kindergarten is therefore essential for Aboriginal children to meet those milestones before mandatory schooling starts. We know that Victorian Aboriginal children and young people have more challenges with learning, lower grade achievements, and leave school earlier. In addition, Aboriginal children in out-of-home care have extra stresses that increase their risk of disengaging from learning. Understanding the experiences of Aboriginal children in care with education begins with connecting and deep listening (VACYPA, 2022) and understanding the patterns of a system that is not working for them, to better counter those trends. Yet, we are not doing our best efforts in Victoria to improve this participation, with physical and financial access being key barriers, as well as access for more vulnerable children, including those who live outside of home under a child protection order.

Action 1.2 of the *Wungurilwil Gapgapduir* Strategic Action Plan prescribes that we should provide adequate support to Aboriginal families so their children can participate in early learning and schooling. DE's role in this is to share data and information with parties on the education of Aboriginal children, such as the rates of school attendance, modified timetables and early exits. This data is deemed necessary to inform the development of local workplans with ACCOs and improve the inclusion of Aboriginal children in education, including those in OoHC. However, to date, this data has not been shared with DFFH or VACYPA, and we are still seeking to obtain DE's active contribution to this action. We hope to be able to collaborate further with DE to devise ways to increase educational participation and developmental outcomes for Aboriginal children, in particular for those in out-of-home-care and in vulnerable situations, or else these children will continue to be marginalised.

ARACY actually warns us about lack of data, noting that “despite Australia’s robust data infrastructure, too many children remain invisible, especially those in child protection, out-of-home care, and the youth justice system. These children, often the most at risk, are underrepresented or missing entirely from the statistics that guide policy and funding. Researchers, Government agencies, Children’s Commissioners and Guardians, and service providers alike all encounter similar challenges in accessing comprehensive information on children’s experiences.” It highlights that the key data issues include fragmented and inconsistent data systems that prevent children’s experiences from being tracked across time, services, and identity factors such as disability, cultural background, gender diversity, and care experience; and limited reporting on wellbeing indicators - including mental health, discrimination, and safety - and lack of longitudinal data, which obscures the long-term impacts of early disadvantage and the effectiveness of interventions (2025).

The *Let Us Learn* report (CCYP, 2023) recommended that DE strengthen data collection for pre-school age children in out-of-home care through routinely collecting kindergarten attendance data to determine participation rates; developing measures to track and evaluate the connection between improved attendance at kindergarten and school readiness, including successful transition to primary school; and advocating nationally for children in care to become an identified equity group in the Australian Early Development Census (AEDC) to determine additional supports required to improve their school readiness. In 24-25, DE updated that they started collecting and tracking attendance data for children supported through the Early Start Kindergarten program, which includes children in out-of-home care; that it has been implementing a new IT system called Arrival to start collecting attendance data from sessional kindergarten services; that it has been exploring analysis of exiting data sets for children in out-of-home care to better understand and support their transition to school, as well as carrying out the AEDC advocacy targeted census date. VACYPA looks forward to receiving some of these data sets and work more closely with DE in to better understand ACCOs roles in increasing Aboriginal children’s early learning participation (CCYP, 2025).

We note that there may be opportunities to develop an integrated planning model for children aged 0-5 who are in OoHC that could integrate early learning with child protection services, family services, and health and wellbeing services, preferably delivered for the child by their local ACCO. These OoHC Coordinator positions would ensure Aboriginal-led, holistic care for pre-school children on protection orders, or at risk of being involved

in the child protection system and alleviate disadvantage as a wellbeing and prevention initiative. The OoHC Student Support Group (SSG), which seeks to bring together key people involved with supporting the child's inclusion in a kindergarten program, should also be mandated for pre-school children, as opposed to being only recommended, and should be routinely implemented. The OoHC SSG could be ACCO-led and form part of the ACCO OoHC Coordinator function to ensure the group is Aboriginal-led and lead the development of the Individual Education Plan for children in OoHC.

We also encourage DE to continue to fund and expand Koorie engagement support programs delivered by ACCOs, like the *bupup balak wayipungang*/KPSA, program, to increase participation of young Aboriginal Children in early schooling. As previously stated, these roles create strong linkages between families and the ECEC sector, mainstream and Aboriginal-led. KPSAs engage children across regions in early learning and are effective in supporting culturally safe environments for them and their families. Roles like KESO, which sit within DE, should be revised to be much more hands-on and closely engage with Aboriginal children and their families on the ground, as well as with the KPSAs and OoHC Coordinator to collaborate on ensuring cultural safety and encouraging and enabling attendance.

ACCOs also mentioned that there is a much greater need for specialised roles in mainstream ECEC settings, and in other childhood support services like playgroups, to allow for the early diagnosis of cognitive challenges and learning disabilities in young Aboriginal children. ACCOs have experienced that children come out of the sector undiagnosed, who would have benefited from early diagnosis followed by targeted support from specialists before they reach school age, in order to optimise their abilities and wellbeing at school. ARACY also recommends increasing the number of mental health and wellbeing professionals in early childhood education and care services and schools, as an early and sustained wraparound support for children's holistic mental health and wellbeing to support resilience. It states that expanding access to qualified professionals will enable early identification and intervention, reducing long-term impacts on learning and wellbeing (2025).

Recommendation 16: The Victorian Government should urgently improve routine collection of early learning participation data for Aboriginal children, in particular for children in out-of-home care and track developmental outcomes. On this basis, the Department of Education should regularly share data with local ACCOs and collaborate on local plans to improve inclusion and cultural safety for Aboriginal children.

Recommendation 17: The Victorian Government should develop and fund an integrated planning model for children aged 0–5 in out-of-home care that combines early learning, child protection, family services, and health supports, delivered by local ACCOs. This model could include dedicated OoHC Coordinator positions to provide holistic, culturally safe care and lead Individual Education Plans for children. The OoHC Student Support Group (SSG) should be mandated for pre-school children and routinely implemented, with ACCOs leading coordination to ensure cultural authority and continuity of care.

Recommendation 18: The Victorian Government should expand Koorie engagement and specialist support roles by continuously funding and expanding ACCO-led programs like Koorie Pre-School Assistant (KPSA) roles and revise Koorie Engagement Support Officer (KESO) roles to be more hands-on. Investment is also needed in specialised roles within mainstream ECEC settings and playgroups to enable early diagnosis of cognitive challenges and learning disabilities, alongside increasing access to mental health and wellbeing professionals.

Optimising referrals to Aboriginal supports in mainstream ECEC settings

Schools are the highest reporters to child protection services for concerns about children, responsible for reporting 34.8% of all children reported, and 28.3% of all Aboriginal children reported (DFFH, 2025). In 2023–24, 69% of child protection reports made by DE regarding Aboriginal children were closed immediately at intake. In the same year, The Orange Door, a mainstream intake service for family support, received 273 referrals from DE, of which 212 were identified as valid new clients. This data gives clear evidence that schools are overreporting

in Victoria, and seldom seek to leverage other support systems for children and families they have concerns for. A lack of available data on referrals to ACCOs seems to suggest there is no policy in place for schools to refer concerns to ACCOs below mandatory reporting thresholds.

DE must address the overreporting behaviour of educators. A lack of cultural safety and understanding of Aboriginal child rearing practices influences this behaviour with Aboriginal children being reported at 4 times the rate of non-Aboriginal children. Aboriginal children reported are also 7 times more likely to be investigated, 9 times more likely to be substantiated and 22 times more likely to enter Out-of-Home Care (OoHC) than non-Aboriginal children. To put it bluntly, in the current covertly racist system, the more we report Aboriginal children to mainstream child protection services, and the more they end up in OoHC. More than half of those reports are made when the children are aged 2 years or under, during those years of early childhood care and education. This is why managing reporting behaviour in schools, and importantly in ECEC, is absolutely crucial.

Action 1.3 of the *Wungurilwil Gagapduir* Strategic Action Plan prescribes that an early intervention interface and accountability with education should be put in place to address initial protective concerns with ACCOs and the implementation of appropriate non-statutory responses. As part of this work, DE is to confirm internal policies are in place to adequately respond to the needs of vulnerable children and young people in schools, and to minimise reports with statutory child protection systems, by sharing those policies with DFFH and VACYPA. We would strongly welcome greater engagement, transparency and access to policies and their implementation to support DE. This will be a key enabler to VACYPA's policy work for these actions and will assist us in supporting DE and DFFH in their endeavours, as well as supporting VACYPA members. DE is also to develop and agree on a compliance strategy to implement a policy that ACCOs are to be informed whenever there are protective concerns for an Aboriginal child or young person, and we welcome an update on the progress of new policies, their implementation and monitoring.

DE is responsible for engaging with ACCOs to develop an updated Out-of-Home Care Education Partnership Agreement. This refers to the Out-of-Home Care Education Commitment with DFFH, but should also include the Early Childhood Agreement for Children in Out-of-Home Care. In mid-2026, DE will be expected to provide data showing an increased number of referrals from schools and the education system onto ACCOs to demonstrate effective implementation of policies. Judging by the rates of reporting in early learning years for Aboriginal children, it is critical that DE also focus efforts into the ECEC space to ensure providers are able to comprehend and successfully implement the policies seeking to reduce child protection reporting and significantly increase referrals to ACCOs for concerns regarding Aboriginal children.

Truth-telling will soon be mandated as part of the education curriculum. We encourage DE, individual schools and their staff to continue their education on racism and its covert forms, to better understand the issues faced by Aboriginal children, young people and their families. There is a need for the mainstream system to better comprehend Aboriginal rearing and education practices, as well as the social determinants of health that affect families. Local Aboriginal-led preventive and early intervention services are much better placed to support Aboriginal families than the child protection system and are a key early pathway to preventing statutory intervention. Schools can become a getaway for Aboriginal families to obtain the support they need, as opposed to being the greatest reporter leading to statutory interventions. We strongly encourage this approach form a key element of the updated Out-of-Home-Care Partnership Agreement and any future version of its Aboriginal Education Strategy.

Recommendation 19: The Victorian Government should implement clear referral policies in mainstream ECEC services that support access to ACCOs services for vulnerable Aboriginal children and their families. These policies should ensure ACCOs are informed whenever protective concerns arise for Aboriginal children below mandatory reporting thresholds. The implementation of these policies should be actively monitored and

reported on via a compliance strategy and further committed to in updates to the Out-of-Home Care Education Commitment, and the Early Childhood Agreement for Children in Out-of-Home Care.

Recommendation 20: School staff and educators should undertake mandatory anti-racism training to improve understanding of Aboriginal child-rearing practices and highlight the systemic consequences of overreporting Aboriginal children. The implementation of these policies should be actively monitored and reported on via a compliance strategy and further committed to in updates to the Out-of-Home Care Education Commitment, and the Early Childhood Agreement for Children in Out-of-Home Care.

Conclusion

This submission conveyed three core messages. First, the ECEC sector in Victoria and across Australia requires comprehensive reform to strengthen and streamline regulations, governance and accountability mechanisms at State and Federal levels and move away from a profit-driven model to a rights-based model. Second, ACCOs, led by Aboriginal communities and grounded in local culture and languages, are best positioned to deliver early education and childhood services for Aboriginal children. When children grow up immersed in culture, they are safe, strong and supported by a caring community network. Third, where Aboriginal children cannot access ACCO or Aboriginal-led early education, there must be far greater and more effective efforts to embed cultural safety and humility in mainstream services, as without culture, there can be no safety for Aboriginal children.

This submission has provided **20** recommendations to strengthen investment in ACCOs, culture and cultural safety on both sides of the fence, which we have summarised below for ease of reference. The positive impact of implementing these would reach far beyond education settings and Aboriginal communities. It represents an investment in culture as the foundational determinant of health and wellbeing for Aboriginal children and the most effective prevention mechanism. Importantly, it also constitutes an anti-racism strategy by investing in non-Aboriginal children to develop an understanding of, and respect for, Aboriginal cultures from the youngest age.

Summary of Recommendations

The table below provides an actionable summary of the recommendations provided in this submission.

Implement system reforms across jurisdictions	
Recommendation 1:	The Victorian and Federal Governments should overhaul the profit-based ECEC system and invest in not-for-profit and ACCO-led models for Aboriginal families that prioritise culture, holistic care and community. Aboriginal and Torres Strait Islander children in Victoria deserve safe, culturally grounded, quality early childhood education and care as per their universal rights.
Recommendation 2:	The Victorian and Federal Governments should clarify their respective responsibilities by implementing a top-down approach that ensures both jurisdictions take full collective responsibility for child safety, development and wellbeing.
Recommendation 3:	The Victorian and Federal Governments should streamline reporting requirements and mechanisms for ACCO-led ECEC and child and family services, ensuring consistency of policies and regulations between government jurisdictions and between State departments. To this effect, develop and implement interlocking policies, compliance and reporting processes that are efficient and effective, to streamline compliance obligations and free up time for ACCOs to focus on service delivery in their communities.

Invest in ACCO-led early childhood services

Recommendation 4:	The Victorian and Federal Governments should prioritise and expand investment in ACCO-led ECEC services as the most culturally grounded and safest early learning environment for Aboriginal children, and the earliest prevention model ensuring children have strong identity and wellbeing as a core foundation.
Recommendation 5:	The Victorian Government should develop and implement cross-portfolio policies and processes between the education, health and social service departments that work towards collective outcomes for Aboriginal children, with added emphasis on those in out-of-home care.
Recommendation 6:	The Victorian Government should commit to expanding and continuously funding ACCO led ECEC services and Koorie early learning support roles to optimise the benefits of internal ACCO referral pathways for additional supports for Aboriginal children and their families.
Recommendation 7:	The State and Federal Governments should invest in integrated Early Childhood Hubs led by Victorian ACCOs to enable holistic models of care for Aboriginal children and their families, as the most effective wellbeing, prevention and early intervention mechanism. This investment should be flexible, needs-based and include integrated budgets for infrastructure and ongoing service delivery.
Recommendation 8:	The Victorian Government should fund dedicated compliance and risk management roles in ACCOs to lessen the reporting and compliance burden on service delivery staff. This would optimise capacity to work with community, minimise safety risks for children and staff, and improve programs outcomes. ACCOs have requested a minimum of 2 FTEs per organisation, also noting that this may be reduced if reporting and compliance requirements were streamlined as described under Recommendation 3.
Recommendation 9:	The Victorian Government should develop a WWC information sharing process for ACCOs and other ECEC providers to be proactively notified of individuals being currently reported, investigated or revoked from the WWC scheme. Additionally, ACCOs and mainstream services should be provided ongoing access to a database outlining any current and previously reported conducts, investigations and revocations of individuals with WWC checks.
Recommendation 10	The Victorian Government should invest in training, recruitment and retention of the Aboriginal early learning and childhood workforce by enabling culturally empowered spaces in ACCOS and minimising colonial load through cultural and wellbeing incentives, back-of-house and supervision supports, in-house traineeships and leadership mentoring, as well as external subsidized vocational training and academic opportunities. In light of the similar workforce barriers to the child and family services sector, and of the cross-portfolio approaches advocated for in this submission, the Victorian Government should consider extending the Aboriginal Sector Workforce Strategy being prepared by DDFH to include the early learning and childhood services workforce.

Recommendation 11	The Victorian Government should mandate comprehensive cultural safety training for non-Aboriginal ECEC workers prior to, or immediately at start of employment, in both ACCOs and mainstream ECEC spaces. This would be aided by comprehensive cultural safety training being mandatory in all ECEC vocational courses and early education academic curriculum.
Recommendation 12	The Victorian Government should ensure equitable access to culturally safe, ACCO-led early learning services for Aboriginal children through a strategic, system-wide investment approach. This includes creating a comprehensive map of existing ACCO-led ECEC services and Koorie support roles to identify gaps and guide funding decisions. Investments should be based on a consistent, rights-based, and non-competitive funding model and expand ACCO-led childcare centres and kindergartens, as well as embedding ACCO-delivered Koorie support roles across mainstream ECEC settings on a needs-basis statewide.
Invest in culture & inclusion in mainstream services	
Recommendation 13	The Victorian and Federal Governments should ensure child safety regulations and compliance assessments include cultural safety as a cornerstone standard to ensure the safety of Aboriginal children in mainstream ECEC contexts. Cultural safety regulations should be developed and audited by Aboriginal assessors (preferably traditional owners) with dedicated roles funded in ACCOs to this effect.
Recommendation 14	The Victorian Government should mandate comprehensive cultural safety training for all workers in mainstream ECEC settings, as well as safety regulators and assessors, prior to, or immediately at start of employment, with additional training provided to assessors on self-determination in ACCO-led ECEC services. It should also make comprehensive cultural safety training mandatory in all ECEC vocational courses and early education academic curriculum.
Recommendation 15	The Victorian Government should implement a systematic approach to embedding Aboriginal culture and traditional languages in the mainstream education curriculum, including ECEC, as a fundamental right and determinant of wellbeing for Aboriginal children. In addition, truth-telling must be integrated into the curriculum from early years to foster respect, empathy, and understanding. These initiatives require sustained and universal funding that guarantees cultural and language teaching for all Aboriginal children across Victoria. Decisions on who delivers this work must occur locally and be made by ACCOs and Traditional Owner Groups or Registered Aboriginal Parties.
Recommendation 16	The Victorian Government should urgently improve routine collection of early learning participation data for Aboriginal children, in particular for children in out-of-home care and track developmental outcomes. On this basis, the Department of Education should regularly share data with local ACCOs and collaborate on local plans to improve inclusion and cultural safety for Aboriginal children.

<p>Recommendation 17</p>	<p>The Victorian Government should develop and fund an integrated planning model for children aged 0–5 in out-of-home care that combines early learning, child protection, family services, and health supports, delivered by local ACCOs. This model could include dedicated OoHC Coordinator positions to provide holistic, culturally safe care and lead Individual Education Plans for children. The OoHC Student Support Group (SSG) should be mandated for pre-school children and routinely implemented, with ACCOs leading coordination to ensure cultural authority and continuity of care.</p>
<p>Recommendation 18</p>	<p>The Victorian Government should expand Koorie engagement and specialist support roles by continuously funding and expanding ACCO-led programs like Koorie Pre-School Assistant (KPSA) roles and revise Koorie Engagement Support Officer (KESO) roles to be more hands-on. Investment is also needed in specialised roles within mainstream ECEC settings and playgroups to enable early diagnosis of cognitive challenges and learning disabilities, alongside increasing access to mental health and wellbeing professionals.</p>
<p>Recommendation 19</p>	<p>The Victorian Government should implement clear referral policies in mainstream ECEC services that support access to ACCOs services for vulnerable Aboriginal children and their families. These policies should ensure ACCOs are informed whenever protective concerns arise for Aboriginal children below mandatory reporting thresholds. The implementation of these policies should be actively monitored and reported on via a compliance strategy and further committed to in updates to the Out-of-Home Care Education Commitment, and the Early Childhood Agreement for Children in Out-of-Home Care.</p>
<p>Recommendation 20</p>	<p>School staff and educators should undertake mandatory anti-racism training to improve understanding of Aboriginal child-rearing practices and highlight the systemic consequences of overreporting Aboriginal children. The implementation of these policies should be actively monitored and reported on via a compliance strategy and further committed to in updates to the Out-of-Home Care Education Commitment, and the Early Childhood Agreement for Children in Out-of-Home Care.</p>



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**Appendix A: Intersections with *Wungurilwil*
Gapgapduir Strategic Action Plan 25-26**



**Appendix B: Submission into the development of an
Aboriginal Sector Workforce Strategy (VACYPA, 2025)**

