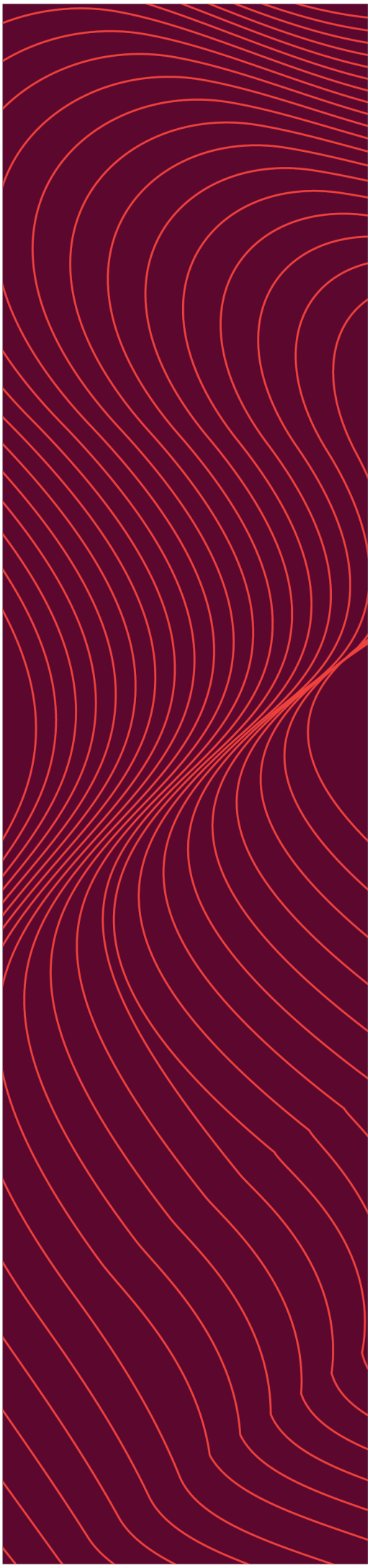
LATROBE CITY COUNCIL

Latrobe City Council's Submission to:

Legislative Council Select Committee's Parliamentary Inquiry into Early Childhood Education and Care Sector in Victoria

November 2025



Executive Summary

Latrobe City Council (Council) welcomes the opportunity to contribute to the Legislative Council Select Committee's Parliamentary Inquiry into the Early Childhood Education and Care (ECEC) Sector in Victoria. With more than 30 years of continuous service delivery and a long-standing role as one of 26 Victorian Local Government Early Years Managers, Council is suitably placed to provide an experienced, regionally grounded perspective on the strengths and challenges of the current system.

The Council manages 22 standalone preschools and three integrated early learning centres, serving more than 1,500 children annually from six weeks of age until they begin school. These early years education facilities are located across the four main Latrobe City towns of Traralgon, Morwell, Moe, and Churchill, as well as in six rural small towns. Council's early years services employ over 200 staff and consistently meet or exceed the National Quality Standard. Council also provides critical regional inclusion services, including the Kindergarten Inclusion Support (KIS) program and Preschool Field Officer (PSFO) program, giving Council a comprehensive view of workforce capability, training gaps, service quality, and system pressures across the Gippsland region.

Council is a child safe organisation, with all programs aligned to the Victorian Child Safe Standards. Council supports vulnerable families, provides universal and targeted early years services, and has strong internal governance that prioritises safety, quality, and equity.

Drawing on this depth of operational experience, Council provides the following submission, structured around the Inquiry's Terms of Reference. The analysis is supported by 17 targeted, evidence-based recommendations informed by Council's extensive experience as a regional Early Years Manager and community leader.

Recommendations:

1. Apply stronger, timely consequences for repeated service provider non-compliance;
2. Mandate annual training in child-safe standards, active supervision, and behaviour guidance;
3. Strengthen coordination between service regulation by Quality Assessment and Regulation Division (QARD) and training regulation by Australian Skills Quality Authority (ASQA);
4. Require ASQA to undertake regular, rigorous audits of Registered Training Organisations (RTOs) delivering ECEC qualifications;
5. Restore RTO responsibility for assessing student competence during placement;
6. Publish a public list of high-performing, audited RTOs for use by services, councils, and students;
7. Mandate annual professional development requirements for all educators;
8. Increase investment in public and not-for-profit ECEC provision;
9. Expand QARD's regional monitoring resources to improve responsiveness and coverage;
10. Establish a statewide long-term strategy supporting the viability of public and not-for-profit ECEC providers;
11. Create a dedicated funding stream for councils to develop local tailored place-based ECEC workforce attraction and retention strategies;
12. Provide state-funded ongoing professional development to support retention and capability;
13. Incorporate educator wellbeing and workload indicators into statewide performance reporting;
14. Require a minimum of two educators to be present in any children's space at all times;
15. Reduce the staff-to-child ratio for 3–5-year-olds from 1:11 to 1:8;
16. Strengthen proactive and unannounced regulatory monitoring across all provider types; and

17. Remove or restrict the “under the roofline” ratio averaging provision.

Submission

(a) Adequacy of Current Quality and Safety Standards Across ECEC Service Types

Council’s operational experience found that while the National Quality Framework provides a strong baseline for comparing childcare quality, its real-world enforcement is inconsistent, particularly across the private sector where regulatory penalties and follow-up are uneven.

Council’s early years educators report that more frequent oversight is needed to identify risks early. Current rates of unannounced inspections are too low to maintain consistent vigilance. Victoria should lead nationally by requiring annual unannounced visits for every service, rather than the current 3–4-year cycle.

Evidence from the Department of Education’s 2025 Rapid Child Safety Review shows that for-profit long day care services are more likely to be rated as ‘Working Towards’ and less likely to exceed the National Quality Standard compared with not-for-profits.

Council’s strong child-safe culture, dual-staffing model, and transparent incident reporting demonstrate what is possible when governance and culture support compliance. Strengthening oversight across the system would help lift all providers to these standards.

Recommendations:

1. Apply stronger, timely consequences for repeated service provider non-compliance.
2. Mandate annual training in child-safe standards, active supervision, and behaviour guidance.

(b) Quality and Oversight of Educator Training, Professional Development and Qualifications

Council regularly hosts placement students from numerous Registered Training Organisations (RTOs) and observes substantial variation in readiness, competence, and understanding of child-safe obligations. This gap arises partly because Quality Assessment and Regulation Division (QARD) and Australian Skills Quality Authority (ASQA) operate in parallel rather than through coordinated oversight. Council educators often find themselves compensating for inconsistent training quality, which increases workload and reduces time for intentional teaching.

Returning assessment responsibilities to RTOs, improving regulatory coordination, and increasing RTO accountability would lift training quality and undivided supervision of child in care.

Recommendations:

1. Strengthen coordination between service regulation by Quality Assessment and Regulation Division (QARD) and training regulation by ASQA.
2. Require ASQA to undertake regular, rigorous audits of RTOs delivering ECEC qualifications.
3. Restore RTO responsibility for assessing student competence during placement.
4. Publish a public list of high-performing, audited RTOs for use by services, councils, and students.
5. Mandate annual professional development requirements for all educators.

(c) Impacts of Victoria’s Predominantly Privatised ECEC System

Latrobe City’s regional communities and small-town populations continue to grow and rely heavily on private providers. Commercial pressures can impact staffing levels, supervision quality, and

incident reporting. In contrast, public services demonstrate stronger compliance, stability, and child-safe cultures. However, public and not-for-profit services face financial challenges due to rate capping and limited economies of scale.

A statewide commitment to strengthening public and not-for-profit delivery would help address systemic inequities and improve overall system quality.

Recommendations:

1. Increase investment in public and not-for-profit ECEC provision.
2. Expand QARD's regional monitoring resources to improve responsiveness and coverage.
3. Establish a statewide long-term strategy supporting the viability of public and not-for-profit ECEC providers.

(d) Workforce Conditions and Their Impact on Wellbeing, Retention and Service Quality

Workforce shortages affect Latrobe City and other regional areas, reducing service flexibility and limiting staff development opportunities. Councils have clear visibility of local labour markets and are well placed to lead local attraction and retention strategies, yet require funding to do so. Educator wellbeing is also a key determinant of service quality, with burnout contributing to turnover and reduced continuity of care.

Recommendations:

1. Create a dedicated funding stream for councils to develop local tailored place-based ECEC workforce attraction and retention strategies.
2. Provide state-funded ongoing professional development to support retention and capability.
3. Incorporate educator wellbeing and workload indicators into statewide performance reporting.

(e) Adequacy of Staff-to-Child Ratio Regulations

Based on Council's operational experience as a service provider, current ratios do not always support safe supervision, particularly for 3–5-year-olds, where behavioural complexity and diverse developmental needs require close supervision. Council educators consistently report that a 1:11 ratio is insufficient, particularly for children with complex needs, which our educators have observed have increased in recent years.

Recommendations:

1. Require a minimum of two educators to be present in any children's space at all times.
2. Reduce the staff-to-child ratio for 3–5-year-olds from 1:11 to 1:8.

(f) Oversight of the Department of Education and Child Safety Monitoring

Local Governments often detect private market issues first due to their regional planning and support roles. Under the Public Health and Wellbeing Act 2008 and Regulations 2009, ECEC are inspected annually by council regulators for health risks, protection, and immunisation compliance. This highlights opportunities to improve information flow between Local Governments, QARD, ASQA, and WWCC systems. Early risk detection by councils, if reported efficiently, would better protect children and enhance service support.

Recommendation:

1. Strengthen proactive and unannounced regulatory monitoring across all provider types.

(g) Other Matters: Child Safety, National Standards, and Sector Investment

Council strongly supports improved national consistency in Working with Children Checks, including real-time updates and cross-jurisdictional data sharing. Child safety must remain the foundation of all ECEC service delivery, and annual mandatory training would ensure a consistent statewide standard. Investment in place-based workforce planning would also strengthen long-term workforce stability.

Additionally, the “under the roofline” provision is routinely misused by private providers to temporarily understaff rooms. Removing this provision and maintaining per-room ratios is critical for safety.

Recommendation:

1. Remove or restrict the “under the roofline” ratio averaging provision.

Conclusion

Council values the Victorian Government’s commitment to strengthening the ECEC system and supports reforms that enhance quality, safety, workforce sustainability, and equity. Drawing on three decades of direct service delivery, strong compliance performance, and deep knowledge of regional community needs, Council provides these recommendations to support evidence-based improvement across Victoria.

Council emphasises that effective implementation will require adequate funding, strong cross-agency coordination, and recognition of the unique challenges faced by regional communities. With the right support, Victorian Government are well placed to help deliver a safer, more equitable and sustainable early childhood education and care system.

Please feel free to contact Council’s Senior Strategy and Advocacy Advisor on Advocacy@latrobe.vic.gov.au or 0459 847 411 should you wish to discuss any of the content outlined in this submission in greater detail.

Yours Sincerely,

Steven Piasente

Chief Executive Officer