

Submission to the Child Safety Review

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For further information or questions about this submission please contact:

Katie Maskiell

Head of Child Rights Policy and Advocacy

UNICEF Australia

e: kmaskiell@unicef.org.au

m: +61 417 091 806

Australian Committee for UNICEF Limited

Suite 4.02 Building B, 33-35 Saunders Street PYRMONT NSW 2009

P: +61 2 9261 2811 F: +61 2 9261 2844 E: unicef@unicef.org.au

PO Box 488, Queen Victoria Building, NSW 1230 | ABN 35 060 581 437

www.unicef.org.au | Donation Hotline: 1300 884 233

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Executive Summary

Australia's early childhood education and care (ECEC) system plays a vital role in the development and wellbeing of our youngest citizens. While the National Quality Framework (NQF) has provided a strong foundation for quality and safety, recent reviews have made it clear: more must be done to protect children from harm and ensure families can trust the services they rely on.

UNICEF Australia welcomes the opportunity to provide a submission to the Child Safety Review, drawing on our experience working with governments across Australia to progress reforms in the early years, as well as our vast international expertise helping to deliver early childhood development and education programs, as well as lasting systems change across a variety of developing and developed contexts.

We want Australia to be the best place in the world for children to grow up and access to quality early childhood education and care (ECEC) for every child plays a central role in this. For this reason, UNICEF Australia warmly welcomes this consultation process on the suite of reforms recommended by the 2023 Review of Child Safety Arrangements under the National Quality Framework, aimed at strengthening oversight and transparency in the sector. Implementation of these reforms will go a long way to ensuring every child has access to quality ECEC and give them the best chance of thriving in life.

In our submission we respond to the policy options presented for improving child safety arrangements in education and care services while also emphasising the need for a national approach to child safety, enforceable safety standards that uphold children's rights as articulated in the United Nations Convention on the Rights of the Child, and stronger monitoring and accountability mechanisms to ensure all children are protected by the same high standards, regardless of where they live.

The Child Safety Review is an opportunity to realise the enormous and compounding benefits that come with early investment in children, particularly their early learning. This review is one of many current initiatives that UNICEF Australia is supporting in keeping with our desire to make children a national policy priority in Australia. To do this, we must recognise that their wellbeing is ensured through a variety of enablers and factors which exist not within any single area of responsibility but with many.

UNICEF Australia is eager to work with all involved to ensure children have the best start in life. Together we can ensure a greater collective wellbeing for our children, giving them the best start in life, and in the process create a truly transformative and generational change for Australian society.

Summary of Recommendations

1. Improve national regulation and independent monitoring on child safety

- *Develop and implement a nationally consistent regulatory framework for early childhood education and care (ECEC) services, aligned with the National Quality Framework (NQF) that includes uniform standards for compliance, enforcement, and reporting across all jurisdictions to ensure equitable protection for all children*
- *Replace the current state-based WWCC systems with a single, nationally administered scheme that applies consistent eligibility criteria, renewal periods, and disqualification thresholds, and is mandatory for all individuals working in child-related roles across Australia.*
- *Create a statutory, independent body tasked with monitoring child safety across all early childhood education and care services in Australia.*
- *Incorporate domain specific child-rights indicators across all critical aspects of child safety reforms with national monitoring and accountability mechanisms to ensure these are upheld.*

2. Elevate children as a national priority to improve child safety

- *Establish child safety as a national priority through the development of a National Taskforce and 10-year cross portfolio roadmap for reform of the child and youth justice systems*
- *Develop a National Children's Plan to support nationwide commitment and coordinated action on issues affecting children and young people, including embedding rights in education and care as a core priority*
- *Consult with children, their families and caregivers, at all stages of the lifecycle of the Early Years Strategy, with particular efforts made to capture the views of children whose voices are often missing.*

3. Undertake meaningful consultation with children and families on reforms

- *Consult with children, their families and caregivers, at all stages of the lifecycle of the Child Safety Review, with particular efforts made to capture the views of children whose voices are often missing.*

Detailed Recommendations

1. Improve national regulation and independent monitoring on child safety

The current regulatory framework under the National Quality Framework (NQF) has made significant strides in promoting child safety, but the 2023 Review of Child Safety Arrangements found that inconsistencies across jurisdictions continue to pose risks. Each state and territory operates under its own legislative and regulatory settings, which can lead to fragmented oversight and variable enforcement. This patchwork approach undermines the goal of a uniformly high standard of care and safety for all children, regardless of where they live.

A national approach would harmonise regulatory practices, streamline compliance for providers operating across multiple jurisdictions, and ensure that all children benefit from the same level of protection. It would also support more efficient data sharing between agencies, enabling faster identification of risks and more coordinated responses to incidents. The review emphasised that national consistency is not only desirable but necessary to close existing gaps and strengthen the integrity of the ECEC system

Recommendation

1.1. Develop and implement a nationally consistent regulatory framework for early childhood education and care (ECEC) services, aligned with the National Quality Framework (NQF). This framework should include uniform standards for compliance, enforcement, and reporting across all jurisdictions to ensure equitable protection for all children.

Working with Children Checks are a cornerstone of child protection in Australia, yet they remain inconsistent across states and territories. Each jurisdiction maintains its own system, with differing thresholds for disqualification, renewal periods, and information-sharing protocols. This fragmentation allows individuals who may pose a risk to children to exploit jurisdictional boundaries, particularly when moving between states or working in multiple locations.

The Child Safety Review highlighted the urgent need for a nationally consistent WWCC scheme. A unified system would ensure that all individuals working with children are subject to the same rigorous screening, regardless of location. It would also facilitate real-time information sharing between jurisdictions, helping to prevent individuals with concerning histories from slipping through the cracks.

Moreover, a national WWCC would reduce administrative burden for providers and educators, particularly those operating across state lines, and would enhance public confidence in the safety of the ECEC workforce. A more integrated and transparent approach to workforce screening is essential for improving child safety.

Recommendation

1.2. Replace the current state-based WWCC systems with a single, nationally administered scheme. This scheme should apply consistent eligibility criteria, renewal periods, and disqualification thresholds, and be mandatory for all individuals working in child-related roles across Australia.

Independent oversight is a critical component of any robust child safety system. While regulatory authorities play a central role in enforcing compliance with the National Quality Framework (NQF), there is growing recognition that independent monitoring will provide a necessary additional layer of accountability and transparency. Independent bodies—free from political or commercial influence—can offer objective assessments of how well services and systems are protecting children, identify systemic risks, and ensure that the voices of children, families, and educators are heard.

The 2023 Review of Child Safety Arrangements noted that while regulatory authorities are committed to child safety, their dual role as both supporters and enforcers can create tensions. Independent monitoring can help resolve this by providing impartial scrutiny of both service providers and the regulators themselves. This approach is consistent

with recommendations from the Royal Commission into Institutional Responses to Child Sexual Abuse, which emphasised the importance of external oversight in preventing harm and improving institutional responses.

Recommendation

1.3 Create a statutory, independent body tasked with monitoring child safety across all early childhood education and care services in Australia.

1.4 Incorporate domain specific child-rights indicators across all critical aspects of child safety reforms with national monitoring and accountability mechanisms to ensure these are upheld

2. Elevate children and young people as a national priority

To meaningfully improve child safety in early childhood education and care (ECEC), Australia must move beyond fragmented, jurisdiction-specific approaches and commit to enforceable, nationally consistent minimum standards. Despite the existence of the National Quality Framework, there is currently no overarching mechanism to drive coordinated, cross-sector reform for children and young people. This gap limits our ability to address systemic risks, ensure consistent compliance across providers, and uphold our international obligations under the UN Convention on the Rights of the Child.

UNICEF Australia, alongside 54 Reasons (Save the Children Australia) and the Australian Child Rights Taskforce, has proposed the development of a National Children's Plan—a long-term, cross-portfolio roadmap that would unify existing policy arrangements under a child-centred, rights-based framework. Such a plan would provide the structure and vision needed to prioritise child safety and wellbeing across all levels of government. It would include clear policy and investment commitments, implementation strategies, and accountability mechanisms to ensure reforms are translated into real-world outcomes.

One of the Plan's core policy pillars would be 'Safety' to address the most significant drivers of harm and neglect. Grounded in the four guiding principles of the Convention on the Rights of the Child—non-discrimination, the best interests of the child, the right to life and development, and the right to be heard—the Plan would promote a proactive, preventative approach to child protection. It would also support the establishment of a National Taskforce on Child Safety, tasked with coordinating reform across education, justice, health, and social services.

Finally, as reforms to the ECEC system are developed and implemented, it is essential that children and families are meaningfully consulted at every stage. Their lived experiences must inform the design of services, supports, and environments that are safe, inclusive, and developmentally appropriate. Embedding participatory processes will ensure that reforms are not only more effective but also more equitable and responsive to the diverse needs of children across Australia.

Recommendation

2.1 Establish child safety and well-being as a national priority through the development of a National Taskforce and 10-year cross portfolio roadmap for reform of the child and youth justice systems

2.2 Develop a National Children's Plan to support nationwide commitment and coordinated action on issues affecting children and young people, including embedding rights in youth justice as a core priority.

3. Undertake meaningful consultation with children and families on reforms

Finally, as we seek to improve the ECEC system, children and their families will need to be consulted with at all stages of reform. This will help ensure the system reflects children's own experiences and views on what will make a difference for their development in services, supports and material conditions, rather than existing ways of doing things or discredited assumptions about childhood and children's experiences of their lives. Doing so will result in a richer system

that is more targeted and responsive to the needs of children and their families. This will in turn ensure Australia's children are on the right pathway to grow, learn and thrive.

Recommendation

3.1. Consult with children, their families and caregivers, at all stages of the lifecycle of the Child Safety Review, with particular efforts made to capture the views of children whose voices are often missing.