

# Appendix A:

## Submissions and comments

We have consulted with the department, Bayside, Central Goldfields, Darebin, Melton, Mildura and Whittlesea, and we considered their views when reaching our audit conclusions. As required by the *Audit Act 1994*, we gave a draft copy of this report, or relevant extracts, to those agencies and asked for their submissions and comments.

Responsibility for the accuracy, fairness and balance of those comments rests solely with the relevant agency head.

We also provided a copy of the report to the Department of Treasury and Finance and the Department of Premier and Cabinet for their information.

### Responses received

Agency	Page
Department of Health	A-2
Central Goldfields Shire Council	A-5
Darebin City Council	A-6



Secretary

Department of Health

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Mr Andrew Greaves  
Auditor General  
Victorian Auditor-General's Office

Via e-mail: [REDACTED]

Dear Mr Greaves

**VAGO Proposed Report: *Enhanced Maternal and Child Health program performance***

Thank you for your letter of 6 March 2026 providing the proposed report for the *Enhanced Maternal and Child Health program performance* audit.

I welcome the findings and recommendations in the proposed report, including the identified opportunities to strengthen data quality, monitoring and reporting arrangements.

I am pleased to provide you with my department's actions in response to the audit report recommendations enclosed with this letter at **Attachment 1**.

I would like to thank your staff for their collaborative approach to conducting this audit alongside my department.

If you require further information, please contact [REDACTED], Director, Women's, Maternal and Child Health via email [REDACTED].

Yours sincerely

**Jenny Alta PSM**

Secretary

23/03/2026

**Attachment 1:** Department of Health action plan: Enhanced Maternal and Child Health program performance



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**Attachment 1 - Department of Health action plan to address recommendations from Enhanced Maternal and Child Health Program Performance**

No.	VAGO recommendation	Acceptance	Agreed management actions	Target completion date
1	<p>In consultation with Maternal and Child Health Service providers:</p> <ul style="list-style-type: none"> <li>continue to refine the design of the new client management system so that it addresses all Enhanced Maternal and Child Health program data quality issues identified in this audit and known to the department, so that the department can access the Maternal and Child Health Service data it needs for statewide monitoring and reporting</li> <li>ensure the new client management system enables service providers to capture complete and accurate data on Enhanced Maternal and Child Health program delivery, and performance and outcome measures, so that service providers can routinely monitor performance and outcomes as required by the Enhanced Maternal and Child Health program guidelines. (See Section 3)</li> </ul>	<p> <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> In part  <input type="checkbox"/> In principle                 </p>	<ul style="list-style-type: none"> <li>Ensure that ongoing work on the design and build of the new Maternal and Child Health (MCH) system addresses this recommendation.</li> <li>The Department of Health (the department) will use the implementation of the new MCH system to improve the accuracy and consistency of Enhanced Maternal and Child Health (EMCH) hours reporting, recognising that current data reflects hours recorded rather than hours delivered and is subject to system and data entry limitations.</li> <li>Alongside system implementation, the department will continue to support and educate service providers on EMCH reporting expectations, to strengthen accountability and consistency in how EMCH activity and funding use are recorded.</li> </ul>	30 June 2027

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No.	VAGO recommendation	Acceptance	Agreed management actions	Target completion date
2	<ul style="list-style-type: none"> <li>Improve its understanding of Enhanced Maternal and Child Health program demand, including why there is significant variation in the hours service providers report overall and per family.</li> <li>Review and update its Enhanced Maternal and Child Health program funding model as needed so that funding allocations align more closely to demand.</li> <li>Ensure it only provides funding to Maternal and Child Health Service providers for Enhanced Maternal and Child Health program hours delivered.</li> </ul> (See Section 4)	Acceptance <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> In part <input checked="" type="checkbox"/> In principle	Consider this recommendation in future reviews of EMCH performance management and funding arrangements, subject to: <ul style="list-style-type: none"> <li>availability of improved data resulting from the implementation and use of the new MCH system over a sufficient time period, to inform review work. Once sufficient data from the new MCH system is available over a full financial year, the department will use this data to inform any future analysis of EMCH demand and funding model settings.</li> </ul> The department will strengthen its visibility and oversight of how EMCH funding is used by MCH Service providers, including improving transparency of unspent and carried forward funds, to ensure funding dedicated to EMCH remains within the EMCH program and is available to meet family need over time.	30 June 2028
3	<ul style="list-style-type: none"> <li>Review the Enhanced Maternal and Child Health program performance and outcome measures to ensure they are specific, achievable, relevant, measurable and time bound.</li> <li>Regularly monitor and publicly report on Enhanced Maternal and Child Health program performance and outcome measures.</li> </ul> (See Section 5)	Acceptance <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> In part <input type="checkbox"/> In principle	The department will review and amend the performance and outcome measures to ensure they are specific, measurable, relevant, achievable, and time-bound, and will report on those measures that can be reliably captured and reported.	30 June 2028

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20 March 2026

Mr Andrew Greaves  
Victorian Auditor General  
Level 31, 35 Collins Street  
MELBOURNE VIC. 3000

Dear Mr Greaves

**RE: PROPOSED VAGO REPORT INTO ENHANCED MATERNAL AND CHILD HEALTH PROGRAM PERFORMANCE**

Thank you for your email correspondence regarding Central Goldfields Shire Council's input to the aforementioned report. I can confirm that there are no factual errors that require correction.

Central Goldfields Shire Council acknowledges the proposed findings of the report and welcomes systematic improvements to the EMCH program to support enhanced data collection, enabling effective monitoring and reporting of service performance and outcomes at a local level. Council also supports the development of a funding model that appropriately recognises the varying levels of need and resource capacity across council areas.

As a local government area with high levels of socio-economic disadvantage, low health literacy and service isolation, the community based intensive support offered through the EMCH program is a critical component for the ongoing health and well-being of our children and families.

We thank [REDACTED] and her team for their professionalism during the engagement period. We look forward to working with State Government on improvements to the EMCH program to ensure this program can deliver its intended outcomes.

Yours sincerely

A handwritten signature in black ink, appearing to read 'P. Harriott', is written over a light blue horizontal line.

Peter Harriott  
**CHIEF EXECUTIVE OFFICER**

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20 March 2026

In reply please quote reference:

**Ref: A8554753**

Mr Andrew Greaves  
Auditor-General  
VAGO  
Level 31, 35 Collins Street  
Melbourne VIC 3000

Dear Mr Greaves,

**VAGO proposed report - Enhanced Maternal and Child Health program performance audit**

Thank you for your letter dated 6 March 2026 (VAGO reference 35011 26) regarding the performance audit on the Enhanced Maternal and Child Health program and for providing Darebin City Council (Council) with the opportunity to review and respond to the proposed report.

Council has actively participated in the audit and values the work of the Auditor-General's office to develop the findings and recommendations outlined in the report. We acknowledge and support the findings and recommendations.

Specifically, Darebin Council endorses the recommendations relating to a review of the funding allocation model used to determine the target hours of service delivery for each council. Darebin Council subsidises the EMCH program as the funding allocation does not meet full demand for the program within our municipal catchment.

Council will continue to apply learning and enhancement to our operational delivery of the EMCH program to support families, referring services, and our practitioners. The report's findings and recommendations that are supportive of developing an upgraded fit-for-purpose system for client management will greatly assist all councils in our commitment to service quality.

Darebin Council looks forward to supporting and working with the Department of Health as they progress with any enhancements and changes to improve the EMCH program into the future.

Yours sincerely



Anne Howard  
Chief Executive Officer



the place  
to live

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