

11 June 2015

Mr Gavin Jones
Australian Consumer and Competition Commission
GPO Box 3131
Canberra ACT 2601

Dear Mr Jones

Thank you for providing the Australian Childhood Foundation (ACF) with the public submissions pertaining to our application to register a Certification Trade Mark (CTM) for our Safeguarding Children Program (SCP). As previously discussed ACF would like to provide some additional comments based on the submissions received.

We appreciate the feedback contained in the submissions and respect the considered responses from the organisations. ACF recognises that safeguarding children and young people is a complex and vexed issue within the community, with emerging evidence that is consistently building our knowledge base on strategies that aim to strengthen the capacity of organisations to understand and implement methodologies that protect children and young people from abuse and harm.

It is important to note that the Safeguarding Children Program is a unique voluntary accreditation scheme for organisations which have a duty of care to children and young people whilst delivering a service or activity to them and/or their families. It systematically builds the capacity of organisations to enhance and maintain a collective culture that promotes the protection of children and young people from abuse and exploitation by staff, volunteers or other relevant related individuals. At this stage there is no national or jurisdictional regulatory compliance related to the standards. In addition, all engagements are built on the establishment of a partnership between the organisation and ACF, which forms the basis for the execution of the safeguarding approach to the ultimate accreditation of the organisation under the Safeguarding Children Program.

The Safeguarding Children Program is an accreditation program that is applicable to all organisations across any sector that delivers a service or activity to children, young people or their families. ACF has a broad client base from a vast array of sectors, including, education, health, religious dominations, corporate and community-based. The standards have applicability to all sectors and ACF are encouraged by the uptake from non –traditional sectors actively engaged in strengthening their commitment to protecting children and young people from abuse and harm.

ACF welcomes an open market and is not seeking a CTM for a primary competitive market edge, rather to instil with committed organisations a sense of credibility about the achievement of accreditation and to value-add to the organisation's overall risk management approach in keeping children and young people safe. ACF strongly supports choice within the market and welcomes collaborative working arrangements with other providers.

Please feel free to contact me to discuss in further detail any of the matters raised.

Yours sincerely



Dr Joe Tucci
CEO