



Government of South Australia

Department for Education and
Child Development

15TDCSI/1359
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Mr Gavin Jones
Australian Consumer and Competition Commission
GPO Box 3131
CANBERRA ACT 2601

Office of the Chief Executive
Education Centre
31 Flinders Street
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Dear Mr Jones

Thank you for your letter of 14 April 2015 regarding the application to register a Certification Trade Mark (CTM) from the Australian Childhood Foundation (ACF).

The Department for Education and Child Development (DECD) is not familiar with the specific accreditation program offered by the Australian Childhood Foundation. Consequently, this response provides comment on the process of accreditation in the area of child safe environments generally.

DECD recognises that some organisations require assistance to put in place effective and evidence-based standards for protecting children. Organisations, such as the Australian Childhood Foundation, may be able to play an important role in building the capacity of these organisations to understand and implement strategies directed at keeping children safe and protected.

However, caution is recommended in regards to any program that purports to “accredit” best practice within organisations. This is because there is no single agreed standard that constitutes “best practice” in regards to securing the safety of children in an organisational context. There are also significant challenges in monitoring implementation of an organisation’s policies and procedures on a day to day level, particularly taking into account intervening factors such as changes in management, staffing and service delivery as well as the passage of time. Without ongoing scrutiny and support, there is a risk that an organisation may present itself as “accredited” but be ill-equipped to ensure its policy is well understood and applied consistently by all those involved in the organisation.

It is also critical that any proposed accreditation program is consistent with the obligations placed on organisations under the child protection laws of the relevant jurisdiction in which the organisation delivers services. For example, in South Australia, the *Children’s Protection Act 1993* establishes clear responsibilities for organisations with respect to developing policies and procedures to establish and maintain a safe environment for children and to ensure that appropriate reports are made under Part 4 of the Act (mandatory notification). Affected organisations are also required to lodge a statement about their policies and procedures with me as the Chief Executive of DECD.

Thank you for the opportunity to comment on this application. I would appreciate being kept informed of the progress of this matter, including the outcome of any initial or final assessment.

If you would like to discuss any of the matters raised, please contact Dr Jennifer Harvey, Manager, Strategic Care and Protection Policy by phone 8226 0736 or by email Jennifer.harvey@sa.gov.au.

Yours sincerely



Tony Harrison
CHIEF EXECUTIVE

19 May 2015