

KIDSAFE

The Child Accident Prevention Foundation of Australia

Submission to Productivity Commission

Review of Standards and Accreditation



child safety is no accident

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1. Executive Summary

As a charity concerned with the practical application of safety-related standards to the community, Kidsafe's submission focuses on a small number of practical issues related directly with our capacity and that of families to rely on and use the results of the process being reviewed.

Kidsafe has been instrumental over the last 27 years in helping to reduce the level of serious childhood injuries and deaths resulting from unintentional injury in Australia. The number of deaths from these unintentional injuries has reduced from over 700 a year to fewer than 300. However, recent research in NSW has shown that injury remains the major cause of death for children aged 1 to 17 years of age as well as accounting for over 58,000 admissions each year to hospitals throughout Australia.

This reduction has been the result of a combination of advocacy for regulatory change, active promotion and education of improved safety behaviour and use of standards etc, and the supply of practical services and advice to families "on the ground".

This submission addresses three issues of concern to Kidsafe. These issues relate to the first two areas for analysis in the Commission's Issues Submission.

a) Time needed to agree amendments

From a consumer's point of view, the key issue is to be aware of improvements to standards and the structure and purpose of standards quickly and simply. The submission discusses this issue in more detail and some of the constraints which we believe contribute to the issue.

b) Participation

Kidsafe believes the current structure of Committees is sound and secures the broadest contribution to and compliance with standards. However, for a key consumer group such as Kidsafe, this poses issues of cost and availability. The Standards Australia submission also addresses some key aspects of the issue.

c) Coverage

There are two aspects of this issue that concern Kidsafe

- *Specific Standards vs. Product Standards* – Many standards relate to specific aspects or attributes of products. Although important, these are of limited direct benefit to consumers, as consumers are seeking guidance on the overall safety of products in simple layman's terms. Consumers need to be aware of what is safe and what is not safe.

- *Inconsistent application across states and territories* – This is an important issue for organisations such as Kidsafe, but more importantly a very real issue for families. Goods are bought and sent interstate and people travel. Inconsistent application of rules or setting of standards has a significant impact on consumer behaviour, especially for the safety issues for which Kidsafe spends so much time and energy trying to gain consistent improvements in behaviour across Australia.

2. About Kidsafe

Kidsafe is the Child Accident Prevention Foundation of Australia. Kidsafe was founded in 1979 with Commonwealth Government support, but is an independent charity, relying on government and private sector grants and sponsorships, community donations and fund raising to support our work.

Kidsafe's aim is to reduce the incidence and severity of unintentional injuries and death to children.

In the last 27 years, the number of unintentional injury deaths each year to children has reduced from over 700 to under 260. However, recent NSW research confirms that injury remains the largest cause of death for children between the ages of one and eighteen. Most of these injuries are unintentional, but few are true "accidents" that could not be foreseen.

Kidsafe fulfils its role through a combination of

- *Advocacy* – both direct involvement with government and industry to achieve improved safety standards, regulations and enforcement of improvements in safety environments for families
- *Publicity* – media and direct campaigns for the active dissemination of information to families. This involves TV and print advertising, news and current affairs, both sponsored and daily news editorial.
- *Services* – ranging from Infant Restraint Loan Services, Restraint hire, fitting and checking to demonstration safety houses, shop fronts selling safety-related devices for families and our Playground Advisory Unit. We also provide free information services to families, community talks programs and permanent and one-off safety displays.
- *Interventions* – specific safety programs cover all major injury causes, and utilise Kidsafe's extensive network of services, etc to deliver effectively.
- *Research* – Kidsafe's research role is limited, generally focusing on the research needed to support specific intervention programs.

Kidsafe is at the coal face – we deal directly with families through an integrated network of services, materials and partnerships. These sustained partnerships vary across the government, business, and community sectors.

3. Issues and Comments

a) Time needed to agree amendments

Kidsafe's experience is that there seem to be extensive time periods between the identification of the need for a standard or a change in a standard and the eventual agreement on and promulgation of the standard.

We believe this may be the result of the composition of committees, with a very broad membership being both a strength and a weakness, especially when tied to the consensus approach to accepting or agreeing upon standards.

The normal outflow of this structure seems to be a focus on input from the technical experts (generally industry members or regulators) to provide solutions and other members review the proposed changes for practical application, consistency, etc. This approach seems to be sound in practice, but it does frequently result in extensive delays in final consensus.

b) Participation

For organisations such as Kidsafe, participation is important, as we are at the "coal-face" and deal directly with consumers, both in providing services to them and in obtaining feedback from them.

A number of Kidsafe senior staff are representatives on various Standards Committees. The person and their location are dependant on where Kidsafe's expertise lies. Our aim is to ensure that the best knowledge and experience is made available to each committee in which we are asked to participate.

Unfortunately, as a charity, Kidsafe has very limited resources to allocate to travel or to the time required to participate effectively in these committees. Most committee members represent commercial entities with a vested interest in participation or governments with a specific funded role in regulation.

We believe that community organisations such as Kidsafe would be able to provide much more effective input if we are specifically funded to support both travel costs to committees and the time required to attend and to properly prepare.

As community representatives supporting the Government's role as regulator and overseer of the system of standards, we suggest that the Commonwealth is the logical provider of funding to support the participation of community organisations.

c) Coverage

Two areas of coverage concern Kidsafe

i) Specific Standard vs. Product Standard

Consumers need to know if a particular product is safe or not. Standards relating to aspects of products, whilst necessary for the safe manufacture of goods for sale, are difficult to describe to consumers and often of limited use to them.

There is also great difficulty in identifying exactly what does or does not have mandatory standards, voluntary standards, or standards covering specific aspects of a good or service. Consumers and providers of information like Kidsafe need ready access to be able to fully utilise the great reservoir of information and support available through the standards process.

ii) Inconsistent application across states and territories

Kidsafe's greatest concern lies in the varying application of standards across states and territories. This is exemplified by Appendix b3 – Inconsistencies Between Jurisdictions in the Commission's recent review of the Australian Consumer Product Safety System.

Consumers travel across states and territories and buy and send goods to family and friends interstate. Varying standards across states cannot be readily applied in practice.

Kidsafe's role is largely to help change safety-related behaviour. This can only be achieved over time, multiple interactions and the provision of very consistent messages and information by a variety of trusted professionals. Inconsistent application of safety-related standards across Australia makes this task even more difficult than it would otherwise be.

How can we convince a family that one standard should apply in the ACT and another in NSW or Victoria? Which is the safe one?

4. Conclusion

Kidsafe is very supportive of the current system and its capacity to support the continual improvement of safety standards in Australia, without imposing undue constraints and regulations on the community.

The issues raised in this submission provide our practical feedback on a number of specific issues that we believe would help to further improve the process and application of standard setting and promulgation.