

# City Community Tennis Child Safety Policy 2025-2026

## Purpose

City Community Tennis is committed to providing a safe environment for all children and young people. We are committed to providing the safest environment possible for children and young people to participate in tennis activities at the facilities we manage. We uphold the [NSW Government Child Safe Standards](#) and as a Member Affiliate of Tennis Australia also uphold the [Tennis Australia Safeguarding Children Code of Conduct](#) and Member Protection Policy which have been developed specifically to protect the health, safety and well-being of all children and adults participating in Australian tennis programs, activities, events or services. The Code of Conduct and Member Protection Policy outlines the behaviour standards required of all of our staff as well as the employment screening and child safety risk management processes that we use.

We ensure that staff always act in the best interests of children and young people, take all reasonable steps to keep them safe, and promptly respond to any concern regarding the safety or development of children in our care. We are committed to the ongoing training of our staff in child safety and risk management. The City Community Tennis Child Safety Policy (Policy), our Safeguarding Children Code of Conduct and other risk management procedures detail how we meet our commitment and obligations to prevent child abuse and ensure the safety, welfare and well-being of the children and young people for whom we provide a service.

## Statement of Commitment to Safeguarding Children

City Community Tennis is committed to ensuring the sport of tennis is a safe and friendly environment for children and young people. We are committed to maintaining an environment that is child-safe and child-friendly where children feel respected, valued and encouraged to reach their full potential.

- City Community Tennis is committed to the safety and wellbeing of every child who takes part in our activities, programs, events or services
- City Community Tennis is committed to providing children with positive and nurturing experiences
- City Community Tennis will support families and communities to promote the healthy development and wellbeing of all children
- City Community Tennis will strive to ensure that children are protected
- City Community Tennis will strive to ensure that children are not exploited, abused or harmed during their involvement in our activities, programs, events or services
- City Community Tennis will listen to children and address any concerns they raise with us
- City Community Tennis will ask for consent from children and their parent or guardian before we seek out or provide information about them to any other individual or organisation
- City Community Tennis might not ask for consent to disclose information to police, regulatory authorities or relevant statutory child protection agencies in the event we have concerns about the safety or wellbeing of a child
- All children, whatever culture/language or religion, shall be able to participate in tennis in a fun and safe environment

## Our Commitment to parents and care

City Community Tennis is committed to supporting parents and carers to protect their children

- City Community Tennis will offer assistance that builds on a family's strengths and make up, is sensitive to their culture and religious beliefs and empowers them to meet the changing needs of their children
- City Community Tennis is committed to communicating honestly and openly with parents and carers about the wellbeing and safety of their children
- City Community Tennis will promote and distribute information about our child-protection commitment to children and parents as part of an introduction to our services and programs
- City Community Tennis will aim to be transparent in our decision-making, with parents and guardians, as long as doing so does not compromise the safety of a child or breach any confidentiality

## Our Commitment to Ensuring a Child-Safe Organisation

- City Community Tennis is committed to using best practices standards in the recruitment, screening and employment of any persons in a position of authority
- City Community Tennis will work to create an environment in which children are safe and feel safe in all of our programs, activities, events or services
- City Community Tennis will strive to ensure that persons in a position of authority do not harm, abuse or exploit children who are involved in our programs or services

## Scope

City Community Tennis provides tennis services to children and young people such as tennis court hire, tennis coaching, competitions, social tennis, school holiday tennis camps and other tennis events at the following City of Sydney tennis facilities: Prince Alfred Park Tennis Courts, Beaconsfield Park Tennis Courts, St James Park Tennis Courts, Alexandria Park Tennis Courts and the St James Park Tennis Courts. This Policy applies to all City Community Tennis facilities and employees (full-time, part-time, casual, temporary students on placement, volunteers, and contractors). We may also deliver tennis services to children and young people outside these facilities with partner organisations and at local community organisations, schools, child care centres and other tennis centre facilities.

City Community Tennis is committed to:

- Upholding the United Nations Convention on the Rights of the Child (1990)
- Building a culture of child safety within our organisation by embedding the NSW Child Safe Standards into practice over time
- Meeting our responsibilities to ensure the safety and welfare of children, and taking reasonable measures to prevent abuse of children in line with child safety and protection legislation
- Actively promoting safety and working towards reducing all environmental and situational risk factors that lead to risk of children and young people being harmed
- Ensuring appropriate child safety risk management plans and systems are in place
- Actively promoting safety and working towards reducing all environmental and situational risk factors that lead to risk of children and young people being harmed.
- Timely reporting and investigation of concerns of possible abuse, harm or neglect of a child by appropriately independent and skilled investigators
- Storing and maintaining records in line with relevant child safety and protection legislation
- Cooperating with relevant authorities on the provision of information around reportable conduct
- Ensuring that employees working with children are suitable and supported through fit for purpose recruitment and selection processes such as
- appropriate Working with Children Checks in place and verified
- the provision of a regular program of child safety training and induction to ensure employees are aware of their legal responsibilities and are confident in reporting known, suspected or alleged child abuse, misconduct or inappropriate behaviour

## Operational Procedures

This Policy should be read in conjunction with other City Community Tennis operational procedures including but not limited to

- Safeguarding Children Code of Conduct
- Tennis Australia Member Protection Policy
- Tennis Australia Coach Resource Kit for Safeguarding Children
- Child Safety Risk Management Plan
- Human Resource Policy for Child Safe Recruitment
- Child Safety Complaint Management Policy & Procedure for Reportable Conduct

## Employee Conduct

All Employees have a responsibility to adhere to this Policy and any associated organisational policies and procedures which outline acceptable and unacceptable behaviour. Employees are required to hold a Working with Children Check and must adhere to the behaviour standards outlined in the Safeguarding Children Code of Conduct at all times. Breaches of the Code or the NSW Child Safe Standards can lead to disciplinary action including termination of employment.

## Recruitment and employment

City Community Tennis will meet legal requirements to ensure that only people with valid Working with Children Checks are engaged in child-related work. The Working with Children Check is an essential part of our recruitment and screening process to prevent people who pose a risk to the safety of a Child or Young Person from being employed or engaged in child-related work. The Director and Compliance Officer are responsible for ensuring that

- all recruitment and employment procedures are carried out in accordance with the Child Protection (Working with Children) Act 2012, the Child Protection (Working with Children) Regulation 2013 and our Human Resources Policy and Procedures
- Working with Children Checks have been carried out and verified for designated roles before hiring a prospective employee, and not continuing to employ, in child-related work, a person that has been identified as disqualified as a result of failing to qualify for a Working with Children Check renewal

## Employee Training and induction

Training and induction in child safety policies and procedures ensures that all employees understand that the safety of children and young people is the responsibility of everyone. Employees will be provided appropriate training to ensure that they understand our commitment to the safety of children and young people, and that everyone has a role to play in protecting them from abuse. Our aim is that all employees (in addition to parents/carers and children or young people) feel confident and comfortable in discussing any allegations of child abuse or child safety concerns. Staff are trained in how to detect potential signs of abuse, what constitutes reportable conduct, how to minimise risks of abuse and how to report abuse. All employees must undergo training and induction in child safety and the NSW Child Safe Standards, our Safeguarding Children Code of Conduct and child safety risk management. Employees must undertake any training that has been identified as required for their role.

## Child safety risk management

Identifying risks to children and young people and implementing controls to mitigate these risks is an essential factor in keeping children safe. Our risk management plan documents how the safety and welfare of children and young people participating in tennis events, programs and services delivered by City Community Tennis are managed where children and young people are expected to attend or be present.

## Reporting abuse and responding to child safety concerns

Information outlining how a child, parent or family member, or community member can make a complaint will be provided at all staffed tennis facilities and on our website. We employ a suitably trained Child Safety and Member Protection Information Officer who the general public and employees can contact. All employees must comply with legal requirements and adopted procedures and report known, suspected or alleged child abuse, misconduct or inappropriate behaviour to our Child Safety Officer.

If the Allegation concerns the physical or sexual abuse of a Child (criminal offences), a report must be made to the NSW Police in the first instance. After reporting to the NSW Police, City Community Tennis should not take any action to clarify allegations or manage risks without first confirming whether or not the NSW Police will conduct inquiries or an Investigation. If the NSW Police are conducting inquiries, City Community Tennis should consult with the police officer in charge about any action it proposes to take, including clarifying the allegations and any risk management action that should be taken by City Community Tennis. This is to ensure that any police investigation is not compromised. Generally, when police are investigating the allegation, City Community Tennis should not take any action to alert the employee – directly or indirectly – to the allegation until clearance to do so is provided by the NSW Police. City Community Tennis must then notify the City of Sydney Contract Manager of an allegation of Reportable Conduct against an Employee of City Community Tennis as soon as it becomes aware following our **Child Safety Complaint Management Policy and Procedure for Reportable Conduct** to ensure processes for responding to alleged abuse and misconduct are fair, focus on child safety and meet the conditions of our Management Agreement and all laws. As a Tennis Australia Member Affiliate, City Community Tennis (or the City of Sydney) is also required to notify the Tennis Australia Integrity and Compliance Unit per the requirements of the Tennis Australia Coaches Code of Conduct and Member Protection Policy. We will also:

- remove or reduce any risk to the child and young person
- provide reports and/ or progress updates to the relevant authorities and where appropriate people involved in any incident
- provide support or make referrals for support to alleged victims, their families and affected City employees, such as helping them understand their rights and the process that will be followed in responding to allegations of reportable conduct, and assistance in accessing counselling or other support as required, and
- undertake timely reviews of organisational child safety policies, procedures and/or relevant child safety risk management plans following an incident to help drive continuous improvement.

Requirements, processes and contact details are summarised in this chart



## Confidentiality and record management

Confidentiality will be maintained at all times for any records and information relating to child safety and protection allegations and reports. Records will be maintained in secure electronic files with access password protected and strictly controlled. Directors and Child Safety managers are responsible for ensuring procedures relating to record management are followed and kept confidential to protect the child and alleged offender from potential victimisation and gossip. Access to any records will be provided to relevant authorities in accordance with the requirements of relevant child safety and protection legislation.

## Grants and contracts involving Child-Related Work

City Community Tennis also delivers tennis services to children and young people in partnership with other sporting/recreational/community organisations that provide services for the benefit of the community through signed grant agreements or contracted arrangements. Where any relevant contractual agreements include the delivery of child-related work on behalf of or in conjunction with City Community Tennis, the agreement must contain clauses outlining the organisation's responsibilities under all applicable child safety and protection legislation. Performance measures, compliance, monitoring and reporting systems related to child safety will be established in relevant agreements and through contract management processes.

## Responsibilities

Detailed responsibilities are outlined in the City Community Tennis Safeguarding Children Code of Conduct and our Management Agreement with the City of Sydney Council. All employees must be aware and act in accordance with their role and responsibilities to ensure adequate systems and processes, policies and procedures are in place and followed to prevent, detect and respond to abuse of children and young people. The City Community Tennis Director, Child Safety Officer and Compliance Officer will ensure that Child Safety Policy and Procedures comply with relevant regulations and legislation including:

- recruitment and screening practices are conducted in line with relevant child safety and protection legislation
- systems are in place for detecting and responding to reports of child safety concerns
- strict confidentiality maintained for all records and information relating to child safety and protection matters and that records are maintained and disposed of in accordance with the State Records Act 1998 and any other relevant legislative requirements

## Consultation

This Policy has been developed in consultation with the City Community Tennis Contract Manager, City of Sydney and per requirements outlined in the Deed of Variation to our Agreement for Management of Community Tennis Facilities for Child Safety and the City of Sydney's Child Safety Policy. In adopting this Policy, it is recognised that there are specific legislative and procedural requirements to be met by City Community Tennis and its employees.

## Policy Definitions

Terms	Meaning
<b>Allegation</b>	Includes an allegation which involves behaviour that is reportable conduct, as well as behaviour that is exempt from notification to the NSW Office of the Children's Guardian, but which is required to be reported and/or investigated by City Community Tennis and/or the City of Sydney.
<b>Child/Children</b>	A child is a person aged 0-16 years.
<b>Child-Related Work</b>	Work which involves direct contact with a child or children where that contact is a usual part of and more than incidental to the work. It also includes work that is likely to involve contact with a child in connection with at least one of the 20 legislated categories of child-related work, which include: <ul style="list-style-type: none"> <li>• education and care and child minding services</li> <li>• clubs or other bodies providing programs and services for children</li> <li>• entertainment for children – includes sporting, cultural or other entertainment venues used primarily by children and entertainment services for children</li> <li>• transport services for children - including school bus services, taxi services for children with a disability and supervision of school road crossings</li> <li>• It may also include a worker who has access to confidential records or information about children.</li> </ul>
<b>Employee</b>	Any person engaged in work for City Community Tennis in any of the following capacities: <ul style="list-style-type: none"> <li>• full-time, part-time, casual, temporary and fixed term</li> <li>• volunteers</li> <li>• students on placement</li> </ul>
<b>Contractor</b>	An organisation or entity contracted to provide goods, services or programs involving child-related work on behalf of or in conjunction with City Community Tennis
<b>Direct Contact</b>	Means physical or face-to-face contact and contact online
<b>Ill-treatment of a Child</b>	Means conduct towards a child that is unreasonable and seriously inappropriate, improper, inhumane or cruel. Ill-treatment includes: <ul style="list-style-type: none"> <li>• making excessive or degrading demands of a child</li> <li>• a pattern of hostile or degrading comments or behaviour towards a child</li> <li>• using inappropriate forms of behaviour management towards a child</li> </ul>
<b>Investigation</b>	The process in which City Community Tennis:

Terms	Meaning
<b>(of Reportable Allegations or Conduct)</b>	<ul style="list-style-type: none"> <li>• gathers all relevant facts</li> <li>• manages risks to children, employees and the organisation during investigations of Reportable Conduct</li> <li>• contacts relevant authorities including NSW Police, the City of Sydney, the Office of the Children's Guardian</li> <li>• provides information to assist any relevant agencies or authorities</li> <li>• provides information to assist with employment proceedings</li> </ul>
<b>Reportable Allegation</b>	A reportable allegation in relation to an employee of City Community Tennis means: a. if the employee holds, or is required to hold, a Working with Children Check clearance for the purpose of employment - an allegation that the employee has engaged in conduct that may be Reportable Conduct, whether or not the conduct is alleged to have occurred in the course of the employee's employment, or b. if the employee is not required to hold a Working with Children Check clearance for the purpose of employment - an allegation that the employee has engaged in conduct that may be Reportable Conduct, unless the conduct is alleged to have occurred outside the course of the employee's employment
<b>Reportable Conduct</b>	<p>Reportable Conduct means the following conduct, whether or not a criminal proceeding in relation to the conduct has been commenced or concluded:</p> <ul style="list-style-type: none"> <li>• sexual offence</li> <li>• sexual misconduct</li> <li>• ill-treatment of a child</li> <li>• neglect of a child</li> <li>• an assault against a child</li> <li>• failure to reduce or remove the risk of a child becoming a victim of abuse or concealing child abuse</li> <li>• behaviour that causes significant emotional or psychological harm to a child. Examples of indicators of significant emotional or psychological harm include: <ul style="list-style-type: none"> <li>○ displaying behaviour patterns that are out of character</li> <li>○ regressive behaviour</li> <li>○ anxiety or self-harm</li> </ul> </li> </ul>
<b>Students on Placement</b>	Any person undertaking practical training as part of an educational or vocational course (other than as a high-school student undertaking work experience).
<b>Young Person / People</b>	A person who is aged 16 years or above but who is under the age of 18 years.

### Policy Review

To be reviewed annually or upon changes to any changes in legislation or processes.

Authorised by



Patrick Jensen  
 Director, City Community Tennis / Jensen's Tennis Pty Ltd  
 1 July 2025