



Domain Tennis Centre Child & Youth Safeguarding Policy

1. Purpose

The Domain Tennis Centre (DTC) is committed to providing a safe, positive and inclusive environment where all children and young people feel respected, welcomed and are protected from harm.

This policy outlines the standards, behaviours and reporting pathways that support a strong child-safe culture at DTC and ensure alignment with our legal obligations and the safeguarding standards set by Tennis Australia.

2. Scope

This policy applies to all adults and children involved in DTC activities, including:

- Board and Committee members
- Employees and volunteers
- Coaches, assistant coaches and contractors
- Court hirers delivering junior programs
- Members, parents and guardians
- Visitors participating in children's activities

It applies to all DTC settings and programs including coaching, competitions, squads, events, travel, online communication, and any activity involving contact with children and young people.

This policy exists to ensure that children and young people involved in DTC activities are safe, respected, and able to raise concerns, and that DTC responds to those concerns in a child-focused and culturally safe manner.

Concerns or complaints that do not involve children or young people are managed under the DTC Member Protection & Complaints Policy.

2A. Third-Party Activities and Use of DTC Facilities

DTC facilities are used by independent third-party organisations, operators, hirers and contractors. These parties may conduct their own activities at the Centre, including activities where children and young people are present.

Where a third party organises or delivers activities involving children, that organisation retains responsibility for supervision, safety and safeguarding within its own programs and for meeting its own child-safety obligations.

As a condition of using DTC facilities, third parties are responsible for ensuring their staff and representatives comply with relevant laws, professional standards and their own organisational policies while operating at the Centre.

Third parties must also comply with any reasonable safety or access conditions included in lease, hire or service agreements.

These arrangements support a safe environment at the Centre while maintaining each organisation's responsibility for its own operations.

If a DTC worker, volunteer or representative becomes aware of conduct that raises concerns about a child's safety while third-party activities are occurring, they must report the concern through DTC's reporting pathways so that appropriate action can be taken.

3. Legal Compliance Requirements (State-Regulated Obligations)

DTC is a regulated organisation under the Child & Youth Safe Organisations Act 2023 (Tas). This means we must meet state-mandated child-safety obligations that apply to all organisations working with children, not just sporting bodies.

These legal obligations sit above Tennis Australia policies and local club processes, and must be followed in addition to tennis-specific safeguarding expectations.

Under the Act, DTC is required to:

- Follow the Child and Youth Safe Standards
- Comply with the Reportable Conduct Scheme
- Notify the Office of the Independent Regulator (OIR) of serious child-safety allegations within 3 days
- Maintain evidence of compliance and cooperate with OIR oversight

This policy sets out DTC's high-level commitment to meeting these legal requirements and ensuring a safe environment for all children and young people.

4. Principles

DTC is committed to maintaining a child-safe culture built on the following principles:

- Children's safety and wellbeing comes first in all decisions and actions.
- Children have the right to feel safe, respected and included in every DTC activity.
- Adults share responsibility for safeguarding children and maintaining appropriate boundaries.
- Risks to children are proactively identified and reduced through safe practices, environments and supervision.
- Concerns must be acted on promptly, with appropriate reporting and follow-up.
- Children are supported to speak up, with clear, age-appropriate information about who they can talk to.
- Safeguarding is an ongoing commitment, requiring continuous awareness and improvement.

5. Roles & Responsibilities

5.1 Board

- Sets and monitors a strong child-safe culture
- Ensures compliance with Child & Youth Safe Standards, and the Reportable Conduct Scheme
- Cooperates with oversight by the Office of the Independent Regulator (OIR)
- Receives quarterly child-safety reports
- Ensures appropriate delegations, resourcing and external investigation support

5.2 General Manager

- Implements this policy and maintains evidence of compliance
- Acts as the Head of Entity for the purposes of the Tasmanian Reportable Conduct Scheme
- Manages screening and training registers (RWVP, mandatory training)
- Receives and documents all child-safety concerns
- Conducts immediate risk assessments and takes interim protective action

- Notifies OIR of reportable conduct within 72 hours
- Supports external investigations by providing relevant information when required
- Provides quarterly child-safety reporting to the Board

5.3 Member Protection Information Officer (MPIO)

The MPIO is a volunteer role that provides a confidential and supportive first point of contact for anyone seeking information or guidance about raising a child-safety or member-protection concern.

The MPIO:

- Provides general information about reporting options
- Supports individuals in understanding how and where they can raise concerns
- Refers all matters to the General Manager for action

The MPIO role is supportive only and does not carry operational responsibilities.

5.4 Coaches, Contractors & Court Hirers

- Maintain appropriate boundaries and follow child-safety requirements outlined in this policy
- Complete all screening and training before commencing
- Ensure safe supervision
- Report any concerns immediately to the GM or MPIO

5.5 Members, Parents & Volunteers

- Promote safe and respectful behaviour
- Follow DTC policies
- Raise concerns promptly where they observe unsafe conduct

6. Behaviour Standards (Adults)

All adults involved in DTC activities must uphold behaviours that protect children and support a safe, inclusive environment.

6.1 Expected Behaviours

Adults must:

- Act in the best interests of children at all times
- Maintain clear and appropriate professional boundaries including:
 - coaching interactions occur in open, visible and interruptible environments
 - physical contact is limited to what is necessary for instruction or safety
 - One-to-one coaching must occur in ways that remain observable and professionally structured, avoiding secrecy or isolation.
- Communicate with children in a respectful and age-appropriate manner
- Conduct all activities in open, visible and interruptible environments
- Use only DTC-approved communication channels, including parent-inclusive messaging
- Obtain parental consent before taking or sharing images of children
- Report any concerns about child safety or behaviour immediately to the General Manager or MPIO

Any behaviour that appears inconsistent with these standards should be raised as a child-safety concern, even where intent or impact is unclear. Concerns should be reported promptly to the General Manager or MPIO.

6.2 Unacceptable Behaviours

In sport and coaching environments, including tennis settings, the following behaviour present particular safeguarding risks and are strictly prohibited.

Adults must not:

- Engage in private, one-to-one communication with a child (including online or by phone)
- Transport a child alone without explicit parental consent
- Use physical contact except where necessary for safety or appropriate instruction
- Use aggressive, humiliating, sexualised or discriminatory language or behaviour

- Give gifts, favour a child, or engage in conduct that could be perceived as grooming
- Photograph or film children without parental consent or for personal use
- Ignore or downplay concerns about a child's safety or wellbeing

7. Screening & Recruitment Requirements

DTC is committed to ensuring that all adults who work or volunteer with children are suitable, screened and appropriately informed of their responsibilities.

7.1 Working With Vulnerable People (RWVP) Registration

A valid Working With Vulnerable People (RWVP) Registration is required for:

- Board and Committee members
- Employees
- Coaches and assistant coaches
- Volunteers involved in junior programs
- Contractors providing junior coaching or other child-facing services
- Court hirers delivering junior programs
- Any adult who regularly works directly with children at DTC

7.2 Verification & Renewal

- WWVP status must be verified before engaging in any child-facing role.
- Registrations must be renewed every five years in accordance with Tasmanian Law.
- The General Manager maintains a current WWVP Register and conducts annual validity checks.

7.3 Recruitment & Reference Checks

For new employees, volunteers, coaches or contractors working with children:

- At least two reference checks must be completed
- One referee should be a professional or prior supervisor
- Referees must be asked about any concerns relating to child safety

7.4 Adults Without WWVP

Adults without a current WWVP may only participate in child-related activities if:

- Permitted under Tasmanian law, and
- Under the direct supervision of a screened adult
- Approved in advance by the General Manager, with the reason for the exception documented

This is intended for one-off or incidental situations only and must not substitute for required screening.

8. Supervision of Children

DTC ensures children are properly supervised and supported during all Club activities.

- Children must be supervised at all times during DTC-run or approved activities.
- Activities must take place in open and visible areas where other adults can enter at any time.
- Children must not be left unattended before, during or after activities.
- Adults and children should not use bathrooms or change rooms together unless necessary for safety or support.
- Young children must be collected promptly by a parent or authorised guardian.

9. Online & Social Media Safety

DTC is committed to ensuring children are safe when communication or engagement occurs online.

- Adults must only communicate with children through DTC-approved channels and must include parents or guardians in all direct messaging.
- Adults must not engage in private, one-to-one online communication with a child.
- Online interactions must be respectful, age-appropriate and consistent with DTC and Tennis Australia safeguarding expectations.

- Images or videos of children must not be taken, shared or posted online without the consent of a parent or guardian.
- Any online behaviour that raises concerns about a child's safety or wellbeing must be reported to the General Manager or MPIO.

10. Responding to Concerns & Reporting Requirements

DTC encourages all concerns about the safety or wellbeing of a child to be raised promptly. Concerns may relate to behaviour, supervision, communication, physical environments or interactions involving children.

10.1 Immediate Safety

If a child is in immediate danger or at risk of serious harm, **call 000** and take reasonable steps to ensure the child is safe.

10.2 Reporting a Concern

Concerns can be reported to:

- the General Manager, or
- the MPIO (for confidential support and guidance on how to report).

Concerns may be raised by children, parents, members, volunteers, staff or visitors.

10.3 What Should Be Reported

All concerns, regardless of perceived seriousness or certainty, should be reported and documented so that DTC can assess risks and ensure children's safety.

Any of the following should be reported:

- Unsafe, inappropriate or concerning behaviour by an adult
- Boundary or supervision concerns
- Bullying, harassment or discrimination affecting a child
- Online or communication issues
- Physical or environmental risks
- Any conduct or situation that makes a child feel unsafe or uncomfortable

10.4 DTC's Response

When a concern is raised, DTC will:

- listen respectfully and take the matter seriously
- ensure the child's immediate safety
- document the concern
- consider whether the matter indicates broader risks, patterns or areas requiring additional training, supervision or policy review
- determine the appropriate reporting pathway (internal, external or both)
- take interim protective steps where required
- handle the matter confidentially and respectfully

10.5 External Reporting Pathways

Depending on the nature of the concern, the General Manager may refer the matter to:

- **Tasmania Police** – for criminal behaviour or immediate risk of harm
- **Child Safety Services** – when concerns relate to a child's safety within their family environment
- **Office of the Independent Regulator (OIR)** – for reportable conduct involving a DTC worker, volunteer, contractor, coach or Board member
- **Tennis Australia** – for breaches of safeguarding or member protection requirements involving any participant, including members
- **Sport Integrity Australia (SIA)** – for integrity matters linked to sanctioned competitions, high-performance pathways, or national-level safeguarding concerns

10.6 Confidentiality and Recordkeeping

Concerns will be handled sensitively, with information shared only with those who need to know. Records will be maintained securely in accordance with DTC's governance and legal obligations. Records may be reviewed periodically in de-identified form to identify trends and inform improvements to child-safety practices.

11. Reportable Conduct (OIR Requirements)

DTC is a regulated organisation under the *Child & Youth Safe Organisations Act 2023 (Tas)* and must comply with the Tasmanian Reportable Conduct Scheme. The Scheme applies only to allegations involving DTC workers, volunteers, contractors, coaches or Board members and any other person engaged by DTC to perform work-related duties, including trainees, students or work experience participants. It does not apply to general members, parents or children.

Concerns that may involve reportable conduct should be reported as soon as possible to the General Manager (Head of Entity) or through the reporting pathways outlined in Section 10 of this policy. Individuals may also make a report directly to the Office of the Independent Regulator (OIR) if they do not wish to report the matter through DTC

11.1 What is Reportable Conduct?

Reportable conduct includes any allegation or information suggesting that a DTC worker or other person engaged in work-related duties for DTC has engaged in::

- a sexual offence against a child
- sexual misconduct, including grooming or inappropriate boundary violations
- physical assault of a child
- ill-treatment of a child
- neglect of a child
- behaviour that causes significant psychological harm to a child

. All concerns, regardless of perceived seriousness, certainty or available detail, must be reported and documented so that appropriate assessment and action can occur.

11.2 Mandatory 3 Day Notification to OIR

If an allegation appears to meet the definition of reportable conduct, DTC must:

- assess the information received
- take any immediate protective steps required
- notify the Office of the Independent Regulator (OIR) within 3 days

This legal requirement applies in addition to any Tennis Australia or internal complaint pathways.

11.3 Interim Protective Actions

Depending on the nature of the allegation, interim actions may include:

- modifying duties
- increasing supervision
- restricting contact with children
- temporary suspension from child-related activities

These measures are precautionary and do not imply wrongdoing.

11.4 Investigation Requirements

DTC is responsible for ensuring an appropriate investigation is undertaken, but will not conduct reportable conduct investigations internally.

Reportable conduct matters are, by definition, serious and complex, and require specialist investigative skills. DTC will engage an independent external investigator or an appropriate external body to complete the investigation.

Investigations may be undertaken by:

- an independent external investigator, or

- an appropriate external body such as Tennis Australia or Sport Integrity Australia, where relevant.

DTC will cooperate fully with external investigators and the OIR.

11.5 Outcomes and Reporting

Following an investigation, DTC will:

- consider the findings
- determine appropriate actions based on the balance of probabilities
- implement any required child-safety, conduct or employment measures
- provide required updates and a final report to OIR

11.6 Confidentiality and Recordkeeping

Reportable conduct matters are highly sensitive. Information will be shared only with those who need to know.

DTC will retain records relating to child-safety concerns and reportable conduct for as long as required under legal, insurance and governance frameworks, and will store these records securely.

12. Training Requirements

DTC ensures that all adults involved in child-related activities understand their responsibilities and maintain safe, appropriate behaviour.

12.1 Mandatory Training for All Child-Facing Adults

The following training is mandatory for:

- Board members
- Employees
- Coaches and assistant coaches
- Volunteers involved in junior programs
- Contractors delivering junior coaching
- Court hirers delivering junior activities

Required module:

1. **Sport Integrity Australia – Child Safeguarding in Sport eLearning**
<https://elearning.sportintegrity.gov.au/>
(Create an account → enrol in “Child Safeguarding in Sport” – direct link: https://elearning.sportintegrity.gov.au/view_course/19)

This module must be completed before a person undertakes any child-related duties.

12.2 Refresher Requirements

Training must be refreshed every two years, or sooner if required by updated national standards.

12.3 General Manager Responsibilities

The General Manager will:

- maintain a Training Register
- ensure all mandatory modules are completed before engagement
- monitor renewal dates
- follow up on overdue training
- include training status in quarterly child-safety reporting to the Board

12.4 Additional Role-Specific Training

DTC may require additional training where:

- new safeguarding risks emerge, or
- updated requirements are issued by Tennis Australia, Sport Integrity Australia, or the Office of the Independent Regulator.

13. Child-Friendly Communication Requirements

DTC is committed to ensuring that children and young people understand their right to feel safe and know who they can speak to if they have a concern.

To support this:

- DTC will provide clear, age-appropriate information to children about their right to feel safe.
- Child-safe information will be visible in key areas of the Club (e.g., foyer, clubhouse, coaching noticeboard).
- A simple, child-friendly “Speak Up” message will be made available on the DTC website and in junior program materials.
- Children will be encouraged to talk to a parent, coach, the MPIO, or another trusted adult if they feel unsafe or unsure.
- All communication with children will be respectful, supportive and easy to understand.

These actions help ensure children understand their rights, know who they can speak to if they feel unsafe, and are aware of available support and reporting pathways.

14. Child Safety Compliance Checks

DTC maintains regular oversight of child-safety obligations through a combination of quarterly reporting, annual compliance checks, and immediate reporting of serious concerns.

14.1 Quarterly Child-Safety Reporting (Governance Oversight)

The General Manager will provide the Board with quarterly updates covering:

- WWC/screening status
- training completion and renewals
- any concerns or issues raised during the quarter
- visibility of child-safe information and Speak Up messaging
- any emerging risks, observed trends or repeated issues

This provides the Board with consistent visibility without shifting into operational detail.

14.2 Annual Child-Safety Compliance Check (Operational Review)

Once per year, DTC will complete a short, focused child-safety compliance check, typically taking around one hour, to confirm that:

- all screening and training requirements remain current
- child-safe information is visible and accessible across the Club
- Speak Up information is up to date on the website and junior program materials
- concerns raised over the year were responded to appropriately
- no new risks or gaps have emerged

The GM will provide a brief summary of this annual check to the Board.

14.3 Immediate Reporting of Serious Concerns

Any serious child-safety matter — including any allegation that may fall under the Reportable Conduct Scheme — must be:

- reported to the Board immediately, and
- where applicable, notified to the OIR within 3 days.

These matters cannot wait for quarterly or annual reporting cycles.

15. Document Review and Approval

Approved by: DTC Board — 16 February 2026]

Review Cycle: Every two years, or earlier if required

Next Review: 16 February 2028

Responsibility: The Board is responsible for approving this policy and any amendments.