

ITF SAFEGUARDING ADULTS POLICY

As part of its stated purpose of “ensuring the long-term growth and sustainability of tennis”, the International Tennis Federation (ITF) places great importance on safeguarding and we believe that everyone – whether a competitor, official, administrator or volunteer – has the right to enjoy tennis in a safe and inclusive environment.

We are committed to creating a culture where safeguarding responsibilities and procedures for raising concerns are widely understood and embedded in all ITF events and activities. Safeguarding must run as a ‘golden thread’ throughout our core values to ensure that everyone, at all levels of the game, continues to have a positive experience in tennis.

This Policy sets out, in relation to safeguarding all Adults in tennis, our standards and expectations of everyone in the ITF and all those involved in its activities.



David Haggerty
ITF President

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1. INTRODUCTION

What is safeguarding?

Safeguarding is the action taken to promote the welfare of all participants by people and organisations, working together to prevent and eliminate the risks of injury or harm to their health and development. All participants must facilitate safe and effective care, and where necessary take positive action to prevent harm. Safeguarding is everyone's responsibility.

Adult Protection is a set of actions or activities that are required to ensure the safety of an Adult who has suffered, is at risk of, or is suffering significant Harm. This usually involves referring incidents and concerns, sometimes urgently, out to Statutory Authorities, e.g. the police or Government agencies so that Adults can be protected.

2. OUR COMMITMENT

The International Tennis Federation (ITF) is committed to safeguarding all Adults participating in tennis tournaments, events, projects and programmes that it delivers or sanctions and rejects all forms of harassment, abuse, violence and exploitation. Embedding safeguarding best practice in all activities is essential to achieving our ambition of "Delivering Tennis for Future Generations".

3. DEFINITIONS

- Abuse refers to the acts of commission or omission that led to a Child or Adult experiencing Harm (see the ITF Safeguarding Policies for further information).
- Adult: any person aged 18 years and over.
- Child/Children: everyone aged under 18 years.
- Code refers to the ITF Safeguarding Codes of Conduct as set out in the ITF Safeguarding Children Policy and ITF Safeguarding Adults Policy.
- Covered Person refers to anyone bound by the ITF Safeguarding Policies.
- Harassment: Any unwanted conduct that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.
- Harm refers to the improper negative impact or consequences arising from Harassment, Abuse, poor practice, or other improper conduct by an individual.
- Independent Tribunal (or "Tribunal") refers to an independent and impartial tribunal appointed and operating in accordance with the Procedural Rules Governing Proceedings before an Independent Tribunal Convened Under ITF Rules, which is empowered to determine disputes, challenges, appeals and other matters referred to it under the ITF Rules.
- ITF: The International Tennis Federation, which is the world governing body for the sport of tennis.
- ITF Competitions: any circuit, tournament or tennis event owned, managed and/or sanctioned by the International Tennis Federation.
- ITF Internal Adjudication Panel ("IAP" or "Panel"): a panel of ITF-appointed members, appointed and operating in accordance with the Procedural Rules Governing Proceedings before an IAP Convened Under ITF Rules, which is empowered to determine disputes, challenges, appeals and other matters referred to it under the ITF Rules and Regulations.
- ITF Rules means the rules, regulations, codes and policies of the ITF (as amended from time to time).
- ITF Safeguarding Policies means the ITF Safeguarding Children Policy and ITF Safeguarding Adults Policy
- ITIA: International Tennis Integrity Agency
- NA: National Associations.
- Police: means police or law enforcement agencies tasked with the prevention and detection of crime, whether domestic or international (for example, Interpol).
- Provisional Suspension means a temporary bar from participating in all or specified ITF tennis activity, imposed in accordance with section 5 of the ITF Safeguarding and Case Management Procedures (SCMP).
- RA: Regional Associations.
- Safeguarding Panel: means an independent and impartial Safeguarding Panel appointed and operating in accordance with the Safeguarding Panel Procedural Rules.
- Sanction means suspension (provisional or otherwise), ineligibility, measure(s), condition(s), requirement(s), safeguard, and/or other order or consequence relating to a Covered Person (as defined below) imposed as a result of safeguarding (or related) concerns and pursuant to a conduct or disciplinary process, or under a code of conduct, disciplinary, or safeguarding policy or procedures (ITF or otherwise).
- Statutory Authorities: means any authority, agency or similar organisation with statutory or government issued powers related to protection, welfare and/or safeguarding of persons (whether children or otherwise);
- Violence refers to "all forms of physical or mental violence, injury and abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse." (Article 19 United Nations Convention on the Rights of the Child).

4. SAFEGUARDING ADULTS IN TENNIS

The ITF recognises its duty to safeguard adult participants across different tournaments, events, projects and programmes that it delivers or sanctions.

The implementation of safeguarding must be practical and bespoke for Adults in all environments, recognising that vulnerability to risk of harm in adult tennis may differ due to the diversity in participant demographics.

Vulnerability is a changeable and contextual state that may adversely affect any person, and particularly those with a physical disability or diagnosed condition such as dementia, learning difficulties or literacy issues, or those who have a lasting or temporary mental health condition such as anxiety or depression. Other factors affecting vulnerability in adult tennis may include long- or short-term physical injury, imbalance of power in relationships, cognitive and emotional maturity, susceptibility to adverse influence, physical development and education.

Some adult participants may experience personal circumstances away from tennis, such as domestic violence, poverty, substance abuse, homelessness, political instability and social exclusion, that may also have an impact on vulnerability and limit a person's ability to cope with other adverse situations. Therefore, the term "vulnerable" may apply at any time to an individual Adult or their personal circumstances.

Harassment and abuse encompass a range of acts, from deliberate conduct and exploitative behaviour to failure to act in the proper interests of any Adult which may cause them harm.

Where it is necessary to take positive action to protect any Adult, due regard will be given to their views, wishes, feelings and beliefs in deciding on any such action and their consent will be sought before initiating that action. This is termed as "making safeguarding personal" for Adults who might be vulnerable to risk of Harm. In exceptional circumstances information may be shared where an Adult has not given their consent.

The ITF will strive to embed a culture of safeguarding that creates safe and inclusive environments at all levels of the game.

5. SCOPE

A **Covered Person** is bound by this safeguarding policy (**Policy**), and is defined as any Adult who:

- Receives accreditation for and/or otherwise competes, coaches, officiates, works at, or otherwise participates in any tennis tournament, event or activity organised or sanctioned by the ITF;
- Holds a valid IPIN registration to enter or compete in any ITF tennis tournament and/or participates in a tennis tournament, event or activity organised or sanctioned by the ITF ('Player');
- Is a parent, legal guardian or chaperone of a Player;
- Is a coach, trainer, manager, agent, team staff, medical, paramedical personnel, therapist or any other Person supporting, working with, treating or assisting any Player participating in or preparing to participate in a tennis tournament, event or activity organised or sanctioned by the ITF;
- Attends, resides at, is employed or is contracted in any way to provide services at an ITF Regional Training Centre;
- Participates in an ITF Touring Team in any capacity;
- Is an ITF employee or ITF-appointed consultant;
- Holds an ITF or ITF-recognised Officiating or Coaching certification or qualification;
- Attends, whether by payment or otherwise, any ITF tournaments, events or activity;

- Acts as an ITF contractor or volunteer; or
- is otherwise involved in the administration of or preparation for any ITF tournaments, events or activity.

Each of the above Covered Persons is deemed, as a condition of their participation in the activities described above, to have agreed to be bound by this Policy, and to have submitted to the authority of the ITF to enforce this Policy, including any consequences for breach thereof, and to the jurisdiction of the hearing panels identified in the ITF Safeguarding and Case Management Procedures to hear and determine cases and appeals brought under this Policy.

6. CORE PRINCIPLES

Our core principles reflect the organisational and individual responsibility for safeguarding in international tennis, and promoting the welfare and wellbeing of all participants as follows:

- The welfare of every participant is of paramount importance.
- Safeguarding is everyone's responsibility.
- All participants regardless of colour, race, nationality, ethnic or national origin, age, gender, sexual orientation, disability or religion have the right to protection from harassment, abuse, violence, exploitation and poor practice.
- All participants have the right to participate, enjoy and develop through tennis, in a safe and inclusive environment, free from all forms of harassment, abuse, violence, exploitation and poor practice.
- All participants should feel safe, respected and valued in all our activities and engagement.
- All Covered Persons must be alert to the signs of abuse and neglect and report their concerns to ensure that all participants receive effective protection.

7. SAFEGUARDING LEGISLATION AND GUIDANCE

The ITF is an international organisation based in the UK. As such, the legal framework in this policy is consistent with UK legislation. This policy applies to all Covered Persons defined at Point 5 above.

The International Bill of Human Rights is a combination of the Universal Declaration of Human Rights 1948 (**UNDHR**) and the International Covenants adopted by the United Nations General Assembly in 1966 (**International Covenants**). The International Bill of Human Rights sets out the civil, political, economic, social and cultural rights that everyone is entitled to and has been ratified by governments in many countries. The UN Human Rights system uses different mechanisms to monitor how the world ensures that everyone has access to their rights. Many of the Articles set out in the UNDHR and the International Covenants underpin the Core Principles and provisions laid out in this Safeguarding Policy.

The majority of the ITF's tournaments, events and activities are international. Hosting countries will have their own legislation and Covered Persons shall comply with all relevant criminal laws in country when working at ITF sanctioned tournaments, events and other tennis activities. Applicable criminal laws will take primacy over provisions laid out in this policy.

The 2025 Constitution of the ITF includes that the ITF respects, promotes and has regard for the safety and well-being of participants in the sport, including, in particular, children and vulnerable adults; (Article 2.2.7).

Each Member National Association (NA) must incorporate local safeguarding policies equivalent in substance to this ITF Safeguarding Adults Policy into its own rules. Each Regional Association (RA) must implement and enforce policies equivalent in substance to this ITF Safeguarding Adults Policy.

The ITF has the power to recognise and accept decisions taken by Member NAs and RAs under their local safeguarding policies. NAs and RAs must also recognise and enforce any safeguarding decision taken by the ITF and/or another NA/RA if required to do so by the ITF.

8. WORKING TOGETHER TO KEEP INTERNATIONAL TENNIS SAFE

This Safeguarding Policy is intended to enhance the safety of all Covered Persons. This Safeguarding Policy is not intended to replace or interfere with any on-court Code of Conduct matter which may be dealt with under the relevant tennis regulations by appointed Officials. However, the ITF recognises that safeguarding-related issues may also arise during on-court activity and where necessary will be subject to the provisions set out in this policy and where necessary the ITF Safeguarding and Case Management Procedures (SCMP).

Working together underpins many aspects of safeguarding Children and Adults. The ITF will work in partnership with international police and statutory authorities, Regional and National Associations, the Women's Tennis Association (WTA), the Association of Tennis Professionals (ATP), the International Tennis Integrity Agency (ITIA) and other tennis or sports governing bodies to ensure that tennis worldwide is a safe and inclusive sport for all Children and Adults.

In pursuit of this, the ITF encourages partners to:

- Adopt and demonstrate their commitment to this (or an equivalent) Policy and implement their own safeguarding procedures that are consistent with the principles described in this Policy;
- Initiate and lead investigations into allegations of abuse and poor practice of Children and Adults in tennis consistent with their national legislation and tennis regulations;
- Report any suspected infringement of this Policy to the ITF Safeguarding Team and work collaboratively with the ITF Safeguarding Manager on safeguarding matters requiring investigation to ensure investigations are conducted expeditiously and appropriately, to avoid duplication of effort or compromise of evidence gathering procedures and to manage any further risk of harm to Children and Adults in tennis;
- Share information by way of notification to the ITF Safeguarding Team of **all persons** subject to investigation (criminal or governing body disciplinary), provisional suspension, or sanction for any misconduct, abuse or poor practice relating to safeguarding Children and Adults;
- Following any necessary due diligence, formally agree between the ITF, Regional and National Associations, the WTA, the ATP, the ITIA or other sports governing body, reciprocity of a provisional suspension imposed against any person subject to investigation (whether criminal or disciplinary), or a sanction imposed resulting from any investigation relating to safeguarding Children and Adults;
- Recognise, abide by and implement any decisions made against any person under its authority under this Policy.

9. REVIEW

This Policy and associated policies will be reviewed annually unless an incident, new legislation, statutory guidance or safeguarding case recommendations suggest the need for an interim review. This Policy will be available to view or download from the ITF website.

10. SAFER RECRUITMENT

The ITF operates a Safer Recruitment Policy and is committed to ensuring that Covered Persons who are recruited by the ITF to work with vulnerable groups in all aspects of ITF tennis activity are appropriately qualified for that role.

This means that, where necessary, they will be required to undergo Criminal Records Checks through the Disclosure and Barring Service at Enhanced level in UK (or the equivalent Overseas Criminal Records Check in their country of origin) before being allowed to work. Covered Persons will be provided with safeguarding training commensurate with their engagement and understand their responsibilities to safeguard Children and Adults.

If third party organisations or partners provide tennis activities, tournaments and events on behalf of the ITF, such organisations must commit to the ITF Safeguarding Policy and minimum safeguarding standards. These standards will be set out in guidance prior to delivery and may be referred to in any contract or service level agreement.

11. ITF SAFEGUARDING ROLES AND RESPONSIBILITIES

Senior Safeguarding Lead

The Senior Safeguarding Lead:

- Is a senior member of executive staff who actively champions safeguarding and ensures that ITF safeguarding policies and procedures are regularly discussed by the ITF Board of Directors;
- Takes strategic responsibility for ensuring there are effective lines of communication between the Board and ITF staff who hold specific strategic and/or operational responsibility for safeguarding;
- Requests adequate resources for developing, implementing and reviewing safeguarding practices;
- Ensures that ITF Staff who hold specific strategic and/or operational responsibility for safeguarding have access to advice, support and regular reflective clinical supervision;
- Is responsible for the strategic planning of safeguarding in the ITF.

Safeguarding Manager

The Safeguarding Manager:

- Has overall responsibility for implementation of the Policy and relevant procedures across the organisation, including the development of robust reporting and case management structures.
- Is responsible for coordinating the ITF response to investigations of all safeguarding cases with the police and statutory authorities and conducting investigations of alleged violations of this Policy.
- Has responsibility for the recruitment, training and education of ITF Designated Safeguarding Officers and provides incident or case management support to those with designated safeguarding responsibilities in Regional or National Associations.
- Is responsible for the promotion and education of safeguarding to all Covered Persons.
- Works closely with HR to ensure the Safe Recruitment and training of all ITF Staff deployed to work with Children in any ITF activity.
- Is actively involved in suitability reviews of UK DBS and Overseas Criminal Records checks which contain disclosures of criminal offences or information relevant to safeguarding.
- Has overall responsibility for safeguarding across the organisation including the development of robust safeguarding and welfare arrangements for programmes located away from the London Headquarters such as ITF Regional Training Centres and ITF Touring Teams.
- Promotes safeguarding in all areas of ITF activity such as ITF World Tennis Tours, other ITF Tennis Tours, ITF International Team Competitions and ITF Development Department activities, working collaboratively with all internal and external stakeholders to ensure safeguarding is embedded.

- Is appropriately trained and qualified to carry out those functions necessary to ensure the ongoing safety and protection of Children and Adults by providing training, advice and support through various means of the ITF's communication networks.

ITF Safeguarding Team

The ITF Safeguarding Team are appropriately trained ITF staff dedicated to supporting the implementation of this Policy and relevant procedures across the organisation, including reporting and case management.

Responsibilities will include:

- Providing training, advice and support through various means of the ITF's communication networks.
- In the absence of the Safeguarding Manager, provide incident or case management support to ITF Staff and those with designated safeguarding responsibilities in Regional or National Associations.
- Supporting investigations of serious safeguarding cases with the police, statutory authorities and investigations of alleged violations of this Policy.
- Supporting the development of a dedicated player welfare function.
- Administration of the ITF Workforce Development Records of Safe Recruitment and training of all ITF Staff deployed to work with Children.
- Administration of UK DBS and Overseas Criminal Records checks.

Designated Safeguarding Officers

Appropriately trained Designated Safeguarding Officers (DSO) may combine this role with other duties to support the Policy, by:

- Acting as a first point of contact for safeguarding matters at ITF tournaments, events or activities.
- Identifying and managing safeguarding risks before and during those tournaments, events or activities.
- Being the first point of contact to respond to reported safeguarding incidents and concerns.

A Designated Safeguarding Officer may be a member of the ITF Safeguarding Team, ITF staff or appointed in locality to act on behalf of the ITF for a specific tournament, event or activity.

Executive Directors, Heads of Department and Senior Managers

Special responsibilities for safeguarding policy, procedures and systems are given to management and those involved in the recruitment, selection and training of staff. Executive Directors and their senior staff are responsible for ensuring compliance with ITF safeguarding, safer recruitment and safe working practices in their day-to-day operation within their departments and projects.

All Covered Persons

The ITF expects all Covered Persons to commit to complying with this Policy as part of their roles, including:

- Providing safe environments for all participants;
- Identifying those who may need extra help or who are suffering, or at risk of suffering, harm;
- Taking appropriate action immediately required to protect participants from harm;
- Reporting any concerns related to safeguarding;
- Cooperating with the ITF Safeguarding Manager and Designated Safeguarding Officers, to deal with concerns.

12. DISABLED PARTICIPANTS IN TENNIS

Under the Equality Act 2010, a person with a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on their ability to do normal daily activities is classified as disabled. Participants may have additional needs caused by their disability.

Covered Persons delivering tennis activities for the ITF have a responsibility to ensure that tennis environments recognise those needs and make reasonable adjustments as necessary to safeguard those participants for the duration of the activity.

Because a disability is not always immediately obvious, information in relation to disabilities should be obtained in advance of participation in any activity. This information must be treated with the strictest confidence (in line with the ITF's data protection policies and procedures) and shared only with those Covered Persons responsible for the safety and wellbeing of those disabled participants.

13. WHEELCHAIR TENNIS

The ITF's wheelchair tennis mission is to create opportunities for wheelchair athletes to play and compete at all levels of the sport. As such, this Policy will apply to all ITF wheelchair tennis activity and must be read in conjunction with the ITF Wheelchair Tennis Regulations and Classification Rules.

Further guidance for safeguarding best practice may be issued by the ITF in relation to issues such as supervision, accessibility, transport, travel, accommodation, playing facilities, tournament environment and programmes to ensure the appropriate level of care for all players, including wheelchair tennis players.

14. ITF TOURNAMENTS AND EVENTS

As per Section 7. above all Regional Associations and National Associations are required to implement their own safeguarding policies and procedures consistent with national safeguarding legislation and tennis regulations in the host territory.

Where an incident of harassment or abuse is alleged concerning a Covered Person at an ITF tournament or event, the ITF will encourage and support the relevant National Association and/or Regional Association to investigate and resolve the allegation in the first instance by implementation of the applicable local safeguarding policies and procedures. In the absence of such policies and procedures, or for any of the reasons stated at section 25 below, the ITF will assume jurisdiction to ensure that all safeguarding concerns are investigated and sanctioned as appropriate.

All ITF tournaments and events will have a locally nominated Designated Safeguarding Officer (**DSO**) who will be responsible for dealing with all safeguarding incidents or concerns. DSO contact details will be made available on the Tournament Factsheet prior to arrival.

This Policy must be read in conjunction with Organisational Requirements and the Regulations for each ITF Tour or Competition.

International Olympic Committee (IOC) and International Paralympic Committee (IPC) Events

The IOC and IPC recognise the International Tennis Federation as the world governing body of tennis. All ITF statutes, practice and activities must be in conformity with the Olympic Charter and IPC Handbook. The ITF assumes the responsibility for the control and direction, whilst maintaining its independence in the governance of tennis at the Olympic Games, and wheelchair tennis at the Paralympic Games respectively.

The IOC Framework for Safeguarding Athletes and Other Participants from Harassment and Abuse and IPC Games-Time Reporting Procedure covering the Paralympic Games, will be in force for the duration of the Olympics and Paralympics respectively for participants in those events. An ITF Designated Safeguarding Officer will work closely with the designated IOC/IPC Safeguarding Officer to deal with all safeguarding incidents or concerns reported in relation to tennis or wheelchair tennis at the Olympic Games and Paralympic Games.

Where an incident of harassment or abuse is alleged between Covered Persons in tennis, the incident shall be resolved by the appropriate procedure under this safeguarding policy.

15. UNDER 18'S PARTICIPATING IN ADULT ENVIRONMENTS

Children under the age of 18 years participating in a predominantly Adult tennis environment can be vulnerable to sexual abuse and exploitation through imbalances of power.

To address this risk the ITF applies the "Relationship of Trust" doctrine. This provision seeks to protect those Children aged under 18 who, even though they are legally able to consent to sexual activity, the imbalance of power makes such a relationship abusive and would constitute a breach of the Code of Conduct in the ITF Children Safeguarding Policy.

The ITF Children Safeguarding Policy sets out the ITF's approach to safeguarding all Children participating in tennis activity, including those who may participate in a predominantly Adult environment.

16. SAFEGUARDING TRAINING

It is important that Covered Persons working at or for the ITF receive training in safeguarding and awareness at a level commensurate with their roles. This will enable those Covered Persons to recognise the possible signs of abuse, neglect and poor practice and understand what to do if they have a concern.

In particular:

- New staff will receive a briefing during their induction by the Safeguarding Team which includes familiarisation with the ITF safeguarding policies and procedures.
- All Covered Persons will receive safeguarding training as part of their role.
- Safeguarding refresher training will be provided annually and may be delivered as e-learning.
- Additional training for Covered Persons undertaking the role of Designated Safeguarding Officers.
- Workforce development and training records will be maintained by the Safeguarding Team.

17. THE ITF SAFEGUARDING CODE OF CONDUCT

To ensure all Adults have a positive and safe experience in tennis, all Covered Persons shall be familiar with, and must abide by, this ITF Safeguarding Code of Conduct to ensure they model positive behaviours and keep all participants safe. Adhering to safer working practice principles will also reduce the risk of allegations of abuse and neglect being made.

Any Covered Person who fails to meet their obligations or breaches this Safeguarding Code of Conduct will be deemed in violation of this policy and dealt with under the ITF Safeguarding and Case Management Procedures.

A. Covered Persons must:

- i. Exhibit positive behaviours such as good manners, respect, fair play and sporting spirit;
- ii. Ensure that the safety and welfare of all participants is paramount;
- iii. Create safe and inclusive environments in tennis;
- iv. Listen carefully to Adults, especially those who might be at risk, about their needs, wishes, ideas and concerns and take them seriously;
- v. Set and maintain professional boundaries recognising the imbalance of power and responsibility of being in a Relationship of Trust;
- vi. Work in open environments where sessions are observable and interruptible and can be monitored by others;

- vii. Only use physical contact in open environments with the consent of the participant and as necessary in a justifiable sporting context (e.g. tennis coaching or injury assessment);
- viii. Maintain appropriate open, transparent and professional relationships with all participants including engagement in online communication;
- ix. Only enter changing facilities or locker rooms as necessary during the course of training or competition or in the event of emergency or safety concerns;
- x. Only enter a person's residential accommodation with their explicit consent or in the event of emergency or safety concerns;
- xi. Treat all participants with respect and equality;
- xii. Promote fairness. Confront and deal robustly with all instances of bullying behaviour towards any participant;
- xiii. Keep written records of any incident or injury that occurs, along with details of any treatment given or action taken using official accident and incident report forms;
- xiv. Report all safeguarding concerns to a member of the ITF Safeguarding Team or Designated Safeguarding Officer immediately or as soon as practicable after an incident, recording the details on the official ITF Forms.

B. Covered Persons must not:

- i. Engage in unfair or unethical conduct including any attempt to injure, disable or intentionally interfere adversely with the preparation or competition of any participant in tennis;
- ii. Discriminate against any participant based on disability, race, ethnicity, gender, nationality, religion, age or sexual orientation;
- iii. Make unwelcome sexual advances towards or have any sexual contact with any person (including but not limited to online communication);
- iv. Engage in sexual harassment or abuse of any person, for example, by making unwelcome advances, requests for sexual favours or engage in verbal or physical conduct of a sexual nature (including but not limited to online communication);
- v. Use pornographic, lewd or sexually explicit imagery or content including photographs, videos, audio, recordings or words to harass or abuse any person;
- vi. Use any electronic communication to send any inappropriate, sexual or otherwise harmful text messages or social media messages to any person;
- vii. Use a Relationship of Trust or any authority, supervision or control, to further personal, financial or business interests in a way that causes or would be likely to cause detriment to the best interests of any person;
- viii. Engage in any verbal or physical harassment, bullying, threatening or abusive conduct towards any person that would cause them to suffer emotional or psychological harm (including but not limited to online communication);
- ix. Slap, hit, punch, kick or use any other type of violence, action or activity that causes or may cause physical harm to any person;
- x. If aged 18 years or over, share a hotel room or any other bedroom in residential accommodation with any Child in a tennis environment, unless they are the Child's parent or legal guardian;
- xi. Neglect their duty of care in respect of, hinder, prevent or otherwise negatively influence the handling of any safeguarding allegations made against any Covered Person (including themselves), or act in any way so as to cause, enable or allow a safeguarding allegation not to be reported, recorded, or acted upon;
- xii. Fail to comply with, or in any way obstruct, any instruction or request made by the ITF or person appointed by the ITF in furtherance of an ITF or local safeguarding investigation;
- xiii. Engage in retaliation, or attempt to engage in retaliation, against any other person who a) reported an incident or safeguarding concern or b) participated in any safeguarding investigation or subsequent proceedings.

- xiv. As a Covered Person conduct themselves in a manner that will reflect unfavourably on any ITF tours, team competitions or events owned or sanctioned by the ITF, any player, any official or the game of tennis.

18. POOR PRACTICE & CATEGORIES OF ABUSE

This is not an exhaustive list of abusive behaviours or poor practice. Instead, it is an illustrative guide as to the type of issues which could give rise to a safeguarding concern as each case will be unique.

Poor practice – behaviour by a Covered Person which falls below the ITF’s required standards and may be in breach of the ITF Safeguarding Code of Conduct. Poor practice may not be immediately dangerous or intentionally harmful but could cause risk of harm to person.

Examples of poor practice could include failing to provide safe training or competition environments, inappropriate training methods, inappropriate use of the Internet and online communication or social media apps and platforms, working in a tennis environment while under the effects of drugs or alcohol, smoking, swearing or acts of aggressive behaviour in front of others.

This is not an exhaustive list of abusive behaviours or poor practice. Instead, it is a guide as to the type of issues which could give rise to a safeguarding concern.

Categories of Abuse – Abuse encompasses a range of deliberate maltreatment, conduct or failure of a Covered Person to act in the appropriate manner that protects all participants in tennis.

Self-neglect – this covers a wide range of behaviour: neglecting to care for one’s personal hygiene, health (failing to take prescribed medicines or refusing treatment of injuries) or surroundings such as personal dwellings or accommodation. An extreme example of self-neglect would be behaviour such as hoarding.

Physical abuse – physically hurting or injuring a another by hitting, kicking, shaking, throwing, burning, biting, scalding, suffocating, drowning, poisoning, misuse of medicines or otherwise causing them Harm. In a sporting context, physical harm or injury may also be caused by excessive, inappropriate or dangerous training methods or insisting a player or athlete participates whilst injured, thus causing the injury to worsen. Other signs of physical abuse may include unexplained injuries or injuries on parts of the body that are non-accidental or could only have been caused by another person.

Sexual Abuse – forcing or enticing a person to take part in sexual activities, including the use of harassment or coercion. Activities may involve physical contact, including assault by penetration (for example, rape or oral sexual acts) or non-penetrative acts such as masturbation, kissing, rubbing, inappropriate touching outside of clothing and sexual harassment such as sexual teasing and innuendo.

Sexual abuse may also include non-contact activities, such as indecent exposure, forcing or enticing a person to watch or be involved in making and sharing indecent images of themselves (often referred to as ‘sexting’) or engaging in live stream online self-abuse via webcam or witnessing sexual activity to which the person has not consented. Sextortion is a type of online blackmail where someone threatens to share sexual pictures, videos, or information about a person if they fail to send sums of money and/or engage in coercive online sexual activity.

Emotional abuse – the persistent emotional maltreatment of a person such as to cause severe and persistent adverse effects on their mental and psychological wellbeing. It may the person feel that they are worthless

or unloved, inadequate, or valued only insofar as they meet the needs of another person. Coercive control is often reinforced by intimidation, threats of harm, verbal abuse, isolation or withdrawal from services or supportive networks.

It may feature age or developmentally inappropriate expectations being imposed on a person by setting levels of sporting performance they are clearly not able to achieve resulting in blaming and humiliation. It may involve bullying (including cyber bullying), and a constant fear of negative consequences during interactions, training or competition. Emotional abuse is almost always involved as a harmful factor in all other types of abuse and maltreatment.

Neglect – The persistent failure to meet basic medical, physical and/or psychological needs of a person, likely to result in the serious impairment of their health or development. Neglect may involve failing to:

- Provide adequate food, clothing, shelter and heating;
- Protection from physical and emotional harm or danger;
- Ensure adequate access to appropriate health social care or educational services;
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a person's basic emotional needs. In elite tennis and sporting environments, psychological and emotional neglect may be exacerbated by adverse reaction from key Covered Persons (such as coaching staff, parents or carers) to a player's perceived poor performance.

Domestic Abuse and coercive control – Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members, regardless of gender or sexuality. This can encompass, but is not limited to, psychological, physical, sexual, financial and emotional. It includes so called 'honour' based violence, female genital mutilation (FGM) and forced marriage, and is clear that victims are not confined to one gender or ethnic group.

Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim. Intending to make a person subordinate and/or dependent by isolating them, exploiting their resources and capacities for personal gain, depriving them of their independence, resistance and means to escape by regulating their everyday behaviour.

Discriminatory Abuse – abuse which centres on a difference or perceived difference particularly with respect to colour, race, nationality, ethnic or national origin, age, gender, sexual orientation, disability or religion which are protected characteristics of the Equality Act. Abusive behaviour may include forms of harassment, visual representation, verbal or physical abuse.

In serious cases discriminatory abuse may constitute a criminal offence perceived by the victim or any other person as being motivated by prejudice, discrimination or hate often referred to as a "Hate Crime".

Organisational / Institutional Abuse – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within a club or organisation that cause harm.

Financial or Material – including theft, fraud, internet scamming, coercion in relation to an Adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or

the misuse or misappropriation of property, possessions or benefits. These types of abuse in tennis could relate to withholding prize money, excessive charges of commission by player's agent or representative and offering unnecessary services such as travel, insurance, kit and equipment at inflated prices on the promise of endorsement or sponsorship.

Modern Slavery and Exploitation

Human trafficking is a modern-day form of slavery involving the movement or recruitment of people by deception or coercion for exploitation or commercial gain. Individuals are recruited, moved or transported and then exploited, forced to work or sold. The main forms of modern slavery are: forced labour; forced criminality; forced marriage; sexual exploitation; domestic servitude. In a tennis or sporting environment a person could be exploited for sexual violence or other forms of criminal activity such as financial abuse or corruption such as match-fixing.

There are additional definitions which, whilst not included in legislation, are also relevant in safeguarding Adults these are;

Cyber Bullying – cyber bullying occurs when someone repeatedly makes fun of another person online or repeatedly picks on another person through emails or text messages, or uses online forums with the intention of harming, damaging, humiliating or isolating another person. It can be used to carry out many different types of bullying (such as racist bullying, homophobic bullying, or bullying related to special educational needs and disabilities) but instead of the perpetrator carrying out the bullying face-to-face, they use technology as a means to do it. It may be threats of violence to a person, their family or friends or abusive messages, comments or images on social media and other online methods. There are many examples of tennis players being subjected to extremely distressing personal abuse through cyber bullying and 'trolling' and it is often related to an individual's tennis performance or disgruntled persons involved betting and gambling on tennis results.

Mate Crime - a 'mate crime' as defined by the Safety Net Project is 'when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act but still has a negative effect on the individual. Mate Crime is carried out by someone the Adult knows and often happens in private. There are similarities in behaviour to that of 'Grooming' which involves a process of building a relationship to gain the trust of a victim. In recent years there have been a number of Serious Case Reviews relating to Adults with a learning disability who were murdered or seriously harmed by people who purported to be their friend.

Forced Marriage – forced marriage is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties consent to the assistance of a third party in identifying a spouse. In UK it is a criminal offence to force someone to marry. The forced marriage of Adults with learning disabilities occurs when the Adult does not have the capacity to consent to the marriage.

Radicalisation and Extremism - Radicalisation refers to the process by which a person is influenced to support terrorism or forms of extremism leading to terrorism. In this context, vulnerability means Adults who, because of their circumstance, experiences or state of mind can be groomed towards an extremist ideology.

The aim of radicalisation is to attract people to their reasoning, inspire new recruits, embed their extreme views and persuade vulnerable individuals of the legitimacy of their cause. Individuals can be drawn into

radicalisation in a number of ways. This may be direct through a personal relationship or through the use of technology to post messages, share comments, images or videos on social media and other online methods.

19. IDENTIFYING ABUSE AND POOR PRACTICE

It is not always easy to recognise abuse and it is not the responsibility of those working within a tennis environment to decide whether abuse is taking or has taken place. It *is* everyone's responsibility to act positively on any concerns they may have, or when a concern is disclosed to them.

Each case will be different, but some examples of key indicators that an Adult is being abused may include but are not limited to:

- Telling you they have been abused;
- Telling you that they have seen or been told about an abusive act;
- Unexplained or suspicious injuries such as bruising, cuts or burns, particularly if on a part of the body not normally prone to accidental injuries;
- Injuries that can only have been caused deliberately by another person;
- Injuries or marks indicating possible self-harm;
- Unexplained bruises or injuries and/or lack of medical attention when an injury is present.
- Person has belongings or money going missing.
- Fear of a particular group of people or individual.
- Person is not attending or no longer enjoying their sessions or has been missing from practice sessions and is not responding to reminders from team members or coaches.
- Unexplained changes in behaviour, such as becoming very quiet or withdrawn or displaying sudden outbursts of temper or behaviour change;
- Engaging in sexually explicit language or behaviour including unwanted sexually explicit online messages
- Distrust of those in whom such trust might normally be expected;
- Poor personal hygiene, unwashed or soiled clothing;
- Inappropriate dress for bad weather, or being unprepared for training (e.g. equipment in bad condition);
- Weight loss or weight gain for no apparent reason;
- Variations in eating patterns, including overeating or loss of appetite;
- Threats of or actual physical harm and harassment.
- Persistent blaming and shaming for poor performance.

20. MAKING SAFEGUARDING PERSONAL & A LISTENING CULTURE

Robust and transparent governance arrangements for safeguarding are essential and the ITF will take all reasonable measures in pursuit of creating a culture of openness with respect to safeguarding and how specific concerns can be reported.

The ITF will always act in the best interests of an Adult by discussing safeguarding concerns. Where appropriate and feasible taking their understanding and mental capacity into account, their views of what they would like to happen must be considered in decisions that affect them. They must also be told that the details will be passed on to the ITF Safeguarding Manager or Designated Safeguarding Officer. The ITF will always take proportionate action that does not increase the risk of harm.

21. HOW TO RESPOND TO A DISCLOSURE

When an Adult discloses that he or she has been abused or is at risk of abuse, the priority must be to protect them from further harm. In urgent cases this will mean informing the police or statutory authorities.

In such cases Covered Persons should:

- Ensure the immediate physical safety and wellbeing of the person;
- If the person is injured or in pain, seek medical attention;
- Allow the person disclosing to lead the interaction, to talk freely and at their own pace;
- Listen and limit any questioning to the minimum necessary to seek clarification only;
- Do NOT make promises to keep secrets or not to tell
- Reassure the person and take what they say seriously;
- Explain what action will be taken and who will be told to ensure they are kept safe;
- Reassure the person that they will be fully included on what happens;
- Where it is suspected that a crime has been committed, contact the police immediately and preserve any physical, forensic and other evidence;
- Notify and seek advice from the ITF Safeguarding Manager or Designated Safeguarding Officer;
- Make a full and detailed written factual record of the circumstances and what was said, heard and seen, and by whom.

22. OBLIGATION TO REPORT SAFEGUARDING CONCERNS

A disclosure is not the only way that a Covered Person may become aware of a safeguarding concern. They may witness an incident or behaviour, receive a report or discover information that causes concern that a person has suffered or might be at risk of suffering significant harm.

You must act and report those concerns immediately to the relevant Police or Statutory Authorities responsible for the protective services in that country. Do not assume that other individuals will report. This will ensure the person is immediately protected, evidence is preserved and gives the best chance of a full investigation being carried out before the victim, alleged perpetrator or key witnesses leave the country.

The ITF Safeguarding Manager or a Designated Safeguarding Officer must be notified immediately after contacting Statutory Authorities or Police. There are many factors which can determine the outcome when dealing with a safeguarding concern, thus the action taken is determined on a case-by-case basis.

In the first instance a Covered Person should:

- **Recognise** – what is poor practice or abuse.
- **Respond** – by intervening or challenging if safe to do so – Do NOT allow it to continue.
- **Report** – your concerns directly to the Police **if you feel the person is in immediate danger or at risk.**
- **Report** – your concerns to the ITF Safeguarding Manager and / or a Designated Safeguarding Officer and follow their advice.
- **Record** – by making a full written record on the ITF’s safeguarding report form which can be downloaded from the ITF website.

How do I submit a report?

Any person can make a report in person to a Designated Safeguarding Officer at any ITF Tournament or event. Whilst this might be a verbal notification, where practicable a written report is the best method of reporting which can then be forwarded to the ITF Safeguarding Team.

Our safeguarding referral form is available to download from the ITF website. If this form cannot be accessed when dealing with a disclosure or a safeguarding concern, other reporting methods are detailed below.

A written record must include the following information if possible:

- The place, date and time of incident or disclosure, parties involved i.e. victim(s), the person(s) whose conduct there are concerns about, any other witnesses, person(s) reporting the concern and their contact details, person(s) to whom the concern was reported.
- A written factual record of the circumstances and what was said, heard and seen.

It is important to note that such records must be as accurate and as factual as possible as they may be used as evidence for investigations and inquiries, court proceedings, disciplinary procedures and/or quality assurance purposes.

The ITF will fully support any Covered Person who in good faith reports his/her concerns about the safety and welfare of any participant in tennis.

The ITF Website Safeguarding page at:	www.itftennis.com/safeguarding
By email to	safeguarding@itftennis.com
By telephone to	+44 (0) 208 392 4701. This is an automated voicemail service;
By SMS to	+44 (0) 7786 200690. Include ITFSAFE in the message to receive a confirmation of receipt.
In writing to:	ITF Safeguarding Manager c/o Integrity & Development Department ITF, Bank Lane Roehampton, SW15 5XZ UK
In person (at events).	Reports can be submitted to any tournament or event Designated Safeguarding Officer.
Reports submitted by any of the above methods will go directly to the ITF Safeguarding Team and will be treated with the Strictest Confidentiality.	

International Suicide Prevention – Adults and Children
<https://ibpf.org/resource/list-of-international-suicide-hotlines/>

Samaritans UK – 0116 123 or email jo@samaritans.org
<https://www.samaritans.org/branches/>

Confidential Helplines - 24/7 help for Adults at Risk
Ann Craft Trust - Minimising the risk of abuse of disabled Children and Adults at risk. – 0115 951 5400
 Email: ann-craft-trust@nottingham.ac.uk / www.anncrafttrust.org

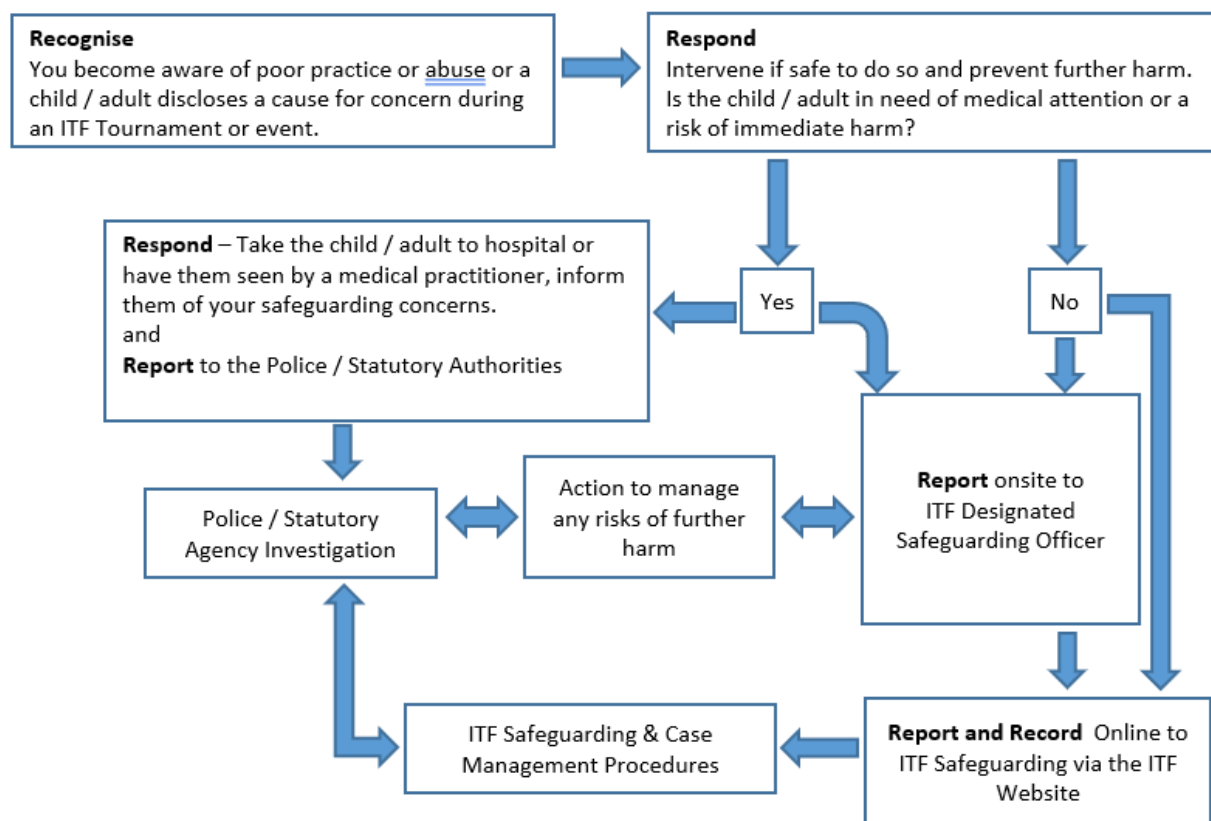
Childline – 0800 1111
 National Society for the Prevention of Cruelty to Children (NSPCC) – 0808 800 5000

Out of hours and weekends: You can also contact confidential helplines for advice and some of these for the UK are listed below:

UK Police / Ambulance / Fire: Call 999 to report an emergency.
 or **you should try to find the equivalent service if in a different country.**

International Emergency numbers
Click: [International emergency phone numbers](https://www.anothertravel.com/travel-advice/international-emergency-phone-numbers/)
<https://www.anothertravel.com/travel-advice/international-emergency-phone-numbers/>

Making a safeguarding report to the ITF



23. CONSENT AND INFORMATION SHARING

Sometimes an Adult may not want you to act on your concerns or their disclosure. This may be because they are scared or fearful of the repercussions from taking action. It may also be because they are not aware abuse is taking place or have the mental capacity to make an informed decision based on understanding that to remain in their current situation is unsafe. Although we want to make safeguarding personal, there are some circumstances when we need to take action without an Adult's consent such as:

- There is reason to believe the Adult is still at risk of ongoing harm;
- Other people, including Children are, or may be, at risk from the person causing harm;
- It is necessary to prevent a crime, or a serious crime has been committed;
- The Adult may be under duress or being coerced;
- The alleged perpetrator has care and support needs and may also be at risk.

In these cases Covered Persons must seek advice from the ITF Safeguarding Manager or Designated Safeguarding Officer who will then consider the situation and plan the necessary action to protect the Adult.

24. WHAT HAPPENS TO MY REPORT?

All reports will be reviewed by the ITF Safeguarding Manager or Safeguarding Team and receipt is normally acknowledged within 24 hours. Every effort will be made to ensure that strictest confidentiality is maintained for all concerned when dealing with a disclosure or a safeguarding concern.

It is important to ensure that information is handled and disseminated on a 'need to know basis' only, whilst keeping those directly involved or affected informed and, where necessary, supported through the case.

Safeguarding disclosures and concerns will be acted on in accordance with the ITF Safeguarding and Case Management Procedures. Confidential, detailed and accurate records of all safeguarding reports and case management will be maintained.

The ITF will take the lead in coordinating the investigation:

- where an incident occurs at an ITF Competition over which it has primary jurisdiction;
- where requested to do so by the National Association because of a lack of resource or expertise;
- where the National Association does not have in place relevant safeguarding policies and procedures;
- where there is a potential conflict of interest at local level;
- where the investigation covers multiple national or regional jurisdictions; or
- in certain other cases, where necessary to ensure that the matter is properly dealt with.

The ITF will fully support any Covered Person who in good faith reports his/her concerns about the safety and welfare of an individual in tennis.

It will be a violation of this policy for any Covered Person to engage in retaliation, or attempt to engage in retaliation, against any other person because that person a) reported an incident or safeguarding concern or b) participated in any safeguarding investigation or subsequent proceedings.

25. DATA PROTECTION AND INFORMATION SHARING

The UK Government has issued Information sharing advice for safeguarding practitioners and describes the '7 Golden Rules' of information sharing:

- Remember that the Data Protection Act 2018 and human rights law are not barriers** to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.
- Be open and honest with the individual** (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
- Seek advice from other practitioners** if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
- Share with informed consent where appropriate** and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk.
- Consider safety and well-being:** Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
- Necessary, proportionate, relevant, adequate, accurate, timely and secure:** Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
- Keep a record of your decision and the reasons for it** – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

The ITF will follow the above guidance and may share safeguarding information with international / local Statutory Authorities or Police, Regional/National Associations, the WTA, the ATP, the ITIA and other tennis

or sports governing bodies where it is necessary and proportionate to prevent or manage risk of harm in tennis or sport to any Adult.

The ITF's privacy notices (specific to different types of player and participant) can be found at <https://www.itftennis.com/en/about-us/privacy-notices/?type=privacy-notices>. These provide more detail on how the ITF processes personal data.

26. SAFEGUARDING SUPPORT AND SUPERVISION

Dealing with a disclosure or a safeguarding concern may have an impact on the mental and physical wellbeing of those involved with victims or perpetrators. That impact may not be immediately obvious, so a critical incident debrief should be arranged by the Senior Safeguarding Lead, Safeguarding Manager and HR for everyone directly involved in the safeguarding event.

Professionals with the necessary expertise to offer clinical supervision may be part of this debrief process. It is important that anyone who feels that they need additional support, can access this confidentially through HR or the Safeguarding Team.

27. CRISIS MANAGEMENT PLAN

All media enquiries and communication with the ITF, Regional and National Associations following a safeguarding incident will be formulated by the ITF Safeguarding Team and Communications Team. Central to the communications strategy will be confidentiality and protecting the identities of any Adults involved to prevent further risk of harm.

Consideration must also be given to protecting the identity of any Covered Person against whom an allegation is made in the interests of potential sub judiciary issues and adverse publicity that could damage the reputation of the ITF and the game of tennis before any investigation has been initiated or concluded.

28. WHISTLEBLOWING POLICY

The ITF operates a Whistleblowing Policy, which can be found in the Employee Handbook. Whistleblowing refers to making a 'qualifying disclosure' under the Public Interest Disclosure Act 1998. A qualifying disclosure may include any of the following circumstances relating to:

- i. A criminal offence;
- ii. A miscarriage of justice;
- iii. An act creating risk to health and safety;
- iv. An act causing damage to the environment;
- v. A breach of any other legal obligation; or
- vi. Concealment of any of the above;

Any of the above criteria could relate to safeguarding cases. The ITF encourages all employees to raise their concerns under this Whistleblowing policy and know they are protected by law if they raise concerns in the right way.

The Whistleblowing policy clearly sets out how any 'qualifying disclosure' should be made and pathways for escalation internally to Executive Director level or externally to Law Enforcement and Statutory Agencies if it is felt the appropriate action has not been taken.

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Effective: 1 January 2025

Next review: 1 December 2025