

ITF SAFEGUARDING CHILDREN 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 Children, 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 by people and organisations working together to promote the welfare of all Children. This means identifying any risk of Harm to their health and development and where necessary taking positive action to prevent that Harm. Safeguarding children is everyone's responsibility.

Child Protection is a different set of actions or activities that are required to ensure the safety of a Child/Children who have suffered, are at risk of, or are 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 Children can be protected.

Safeguarding in Sporting Activities for Children

Sport plays an important role in society. Governing bodies and sports organisations must strive to ensure that all participants have a positive experience. Safeguarding in sport may be referred to internationally as "Safe Sport" or "Child Protection" programmes.

Harassment, abuse and violence encompass a range of acts, from deliberate conduct through to failure to act in the proper interests of the welfare of any Child which may cause Harm. Children are more vulnerable

to abuse than Adults. Factors affecting that vulnerability include imbalance of power, cognitive and/or physical development, emotional maturity, education and susceptibility to influence and exploitation.

In disability sport, Children with Special Education Needs or Disability (SEND) and physical dependency through disability can be especially vulnerable. Research shows that disabled Children are three times more likely to suffer abuse or mistreatment than able-bodied Children (Sullivan & Knutson 2000).

The risk of abuse or exploitation is also increased if a Child experiences domestic violence, poverty, mental health issues, substance abuse, homelessness, political instability and social exclusion.

2. OUR COMMITMENT

The International Tennis Federation (ITF) is committed to safeguarding all Children 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.
- 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. SCOPE

A **Covered Person** is bound by this safeguarding policy (**Policy**), and is defined as any person (Adult or Child) 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.

5. CORE PRINCIPLES

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

- The welfare of every Child is of paramount importance.
- Safeguarding is everyone's responsibility.

- All children, 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 children 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.
- Children 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 children receive effective protection.

6. POLICY AIMS

The Policy aims to:

- Promote the safer recruitment of Covered Persons and partners working directly with Children.
- Provide information for all those working with Children to ensure the adherence to safer working practice principles and create a culture of vigilance.
- Ensure that Covered Persons meet their Child protection obligations and responsibilities through embedding a culture of reporting concerns about those at risk of, or subjected to, harassment, abuse violence or poor practice.
- Promote robust procedures to identify and remove individuals from tennis who pose a risk to Children.
- Promote environments where Children feel safe and included, are treated with respect, and empowered to protect themselves.
- Demonstrate to all children and their parents/carers, our Partners and all Covered Persons, the ITF's commitment to safeguarding.

7. SAFEGUARDING LEGISLATION AND GUIDANCE

The ITF is an international organisation with its headquarters in the UK. As such, the legal framework in this policy is consistent with UK legislation.

The United Nations Convention on the Rights of the Child (UNCRC) 1989 is an international agreement, which defines anyone under the age of eighteen (18) as being a Child, protects the rights of Children and provides a Child-centred framework for the development of services for Children. The UNCRC has been ratified by governments in many countries to ensure that Children's rights are recognised, and that Children are protected.

The majority of the ITF's tournaments, events, activities and engagement with Children are international, and hosting countries will have their own legislation relating to the protection of Children. 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 Children Policy into its own rules. Each Regional Association (RA) must implement and enforce policies equivalent in substance to this ITF Safeguarding Children 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. The ITF will work in partnership with international police and statutory authorities, Regional Associations, 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 participants.

In pursuit of this, the ITF encourages all 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 and the International Safeguards for Children in Sport¹ framework;
- Initiate and lead investigations into allegations of abuse and poor practice of Children and Adults in tennis within their own jurisdictions and 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 on safeguarding matters requiring investigation to ensure that 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 any interim or final decisions taken under safeguarding policies that result in a suspension or ineligibility to participate in tennis activities;
- Following any necessary due diligence, co-ordinate and communicate between the ITF, Regional Associations, National Associations, the WTA, the ATP, the ITIA or other sports governing body, about the potential 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 Children in all aspects of ITF tennis activity are appropriately qualified for

¹ <https://safeinsport.org/8-safeguards/>

that role. This means that, where necessary, they will be required to undergo Criminal Records Checks through the Disclosure and Barring Service at Enhanced and/or Barred level in UK (or the equivalent Overseas Criminal Records Check in their country of origin) before being allowed to work with Children.

Covered Persons will be provided with safeguarding training commensurate with their engagement and understand their responsibilities to safeguard Children.

If third party organisations or partners provide tennis activities, tournaments and events for Children 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 and 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 comply with this Policy as part of their roles, including:

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

12. ITF ENGAGEMENT WITH CHILDREN

12.1 Work Experience

The HR Manager and the ITF Safeguarding Manager should be informed in advance of all work experience placements or educational visits at the ITF for individuals aged under 18 years to ensure the correct level of safeguarding provision is in place and will include:

- Full written contact details of the Host Person or Organisation requesting the placement;
- Approval by the Head of Department(s) and details of planned structure in advance;

- Written parental consent for the proposed activities e.g. playing tennis, observing lab experiments;
- Risk assessments for the duration and activities;
- Joining instructions sent to Host Organiser, supervising ITF Staff and Participant.

During placements, individuals under 18 years will not have unsupervised access to or be expected to supervise Children. This Policy, including its Code of Conduct, will apply to Covered Persons overseeing those on work experience placements.

12.2 Disabled Participants in Tennis

Under the UK 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. Children with disabilities may have additional needs caused by their disability and may be particularly vulnerable to abuse.

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 or visible, 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.

Disabled Children at greatest risk of abuse are those with behaviour or conduct disorders. Other high-risk groups include:

- Children with learning difficulties/disabilities;
- Children with speech and language difficulties;
- Children with health-related conditions;
- d/Deaf Children.

12.3 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 involving those under the age of 18 years 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.

12.4 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 22. below, the ITF will assume jurisdiction to ensure that all safeguarding concerns are investigated, charged 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.

12.5 Under 18s Participating in Adult Environments

Players under the age of 18 may participate in tournaments for which Adults are also eligible.

All Covered Persons aged under 18 attending or participating in any ITF tour or team competitions or related events such as training camps will fall under provisions set out in this ITF Children Safeguarding Policy.

All Covered Persons attending or participating in ITF Tour or Team Competitions or related events such as training camps must conduct themselves in an appropriate manner during such tournaments or events.

12.6 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 to have taken place during the Olympic Games or Paralympic Games involving Covered Persons and is reported to the ITF after the conclusion of the Games, the incident shall be resolved by the appropriate procedure under the ITF Rules.

12.7 Grand Slam Player Development Programme (GSPDP) / ITF Touring Teams

The ITF Development Department oversees the administration of all Touring Teams and will ensure that all staff working with those players are appointed in accordance with the ITF Safer Recruitment policy. This policy covers all related activities undertaken in relation to each GSPDP tour. Further bespoke safeguarding guidance may be issued for each tour and both the ITF Safeguarding Manager and ITF Security Manager should be consulted in the planning of such tours.

12.8 ITF Regional Training Centres

The ITF operates Regional Training Centres (**RTCs**) internationally. The ITF Development Department oversees the administration of all RTCs in contractual agreement with National and/or Regional Associations. All RTCs will appoint a suitably trained Player Care and Designated Safeguarding Officer. Any safeguarding incidents or concerns involving Covered Persons must be immediately notified to the ITF Safeguarding Team by the RTC Player Care and Designated Safeguarding Officer or the RTC Manager/Lead.

The countries in which RTCs are based will have their own national and local legislation applicable to the protection of Children aged under 18 years. Therefore, RTCs must develop and implement their own safeguarding guidance bespoke to each country in relation to Level 3 cases (i.e. those that require referring externally to the statutory authorities). This guidance will be agreed with the ITF Safeguarding Manager and where such a case is referred out or the RTC Staff receive notification of a case from the Police or Statutory Authorities, the ITF Safeguarding Manager must be notified by the RTC Player Care and Designated Safeguarding Officer or the RTC Manager/Lead as a matter of urgency.

Where a concern or allegation falls below the threshold for referral to safeguarding authorities in those countries to investigate or Sanction, then the RTC will revert to this Policy and the actions laid out in the ITF Safeguarding and Case Management Procedures must be followed.

12.9 Player Accommodation / Host Families / Private Housing

This section should be read in conjunction with the World Tennis Tour Juniors Organisational Requirements. Players competing on the ITF World Tennis Tours or as part of a GSPDP Touring Team may find themselves staying in different forms of official accommodation for a particular tournament or event. This can present challenges in managing safeguarding risks and the following conditions apply:

- Covered Persons, including players aged over 18, must not share a hotel room or any other bedroom in residential accommodation with a player aged under 18 years unless that Covered Person is the Child's parent or legal guardian.
- Players aged under 18 may share a room with other players of the same sex aged under 18. All players must have their own bed.
- Players of different sexes are not permitted to share a room under any circumstances.

Players aged under 18 years should not be accommodated with host families unless:

- The host families are part of a programme operated and approved by the hosting National Association, which includes background checks, home visits and training of the host families in relation to the relevant requirements;
- The ITF, National Associations, parents and players are given a minimum of 6 weeks' notice in writing prior to the tournament for which host families are to be used to accommodate players. This notification must contain detail of the National Association's programme for host families and intended hosting arrangements for that tournament or event;
- Each player's parent or guardian must provide prior written consent to the applicable tournament organiser for their Child to be accommodated with a host family for the duration of the tournament or event concerned.

13. 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 them 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 or updates will be provided annually and may be delivered as e-learning.
- Workforce development and training records will be maintained by the Safeguarding Team.

14. RELATIONSHIPS OF TRUST / ABUSE OF TRUST

Inappropriate sexual behaviour with or towards Children is unacceptable and is likely to be unlawful. Whilst the statutory age of sexual consent can vary from country to country, for example, it is 16 years of age in the

UK, some countries may also set out that certain conduct by a person in a “position of trust” or responsibility is a sexual offence even if the Child has attained the legal age of consent.

Therefore, to address the risk of sexual abuse perpetrated by Adults exploiting an imbalance of power over a Child, the ITF applies the “Relationship of Trust” doctrine. This covers relationships between a Child and any Covered Person who cares for, advises, supervises, trains or supports the Child participating in any tennis activity. No sexual relationship of any nature should take place where such a Relationship of Trust exists.

This Relationships of Trust provision seeks to protect those Children aged under 18 who, even though they are legally able to consent to sexual activity, are still considered vulnerable to sexual abuse and exploitation through an imbalance of power. This behaviour can be especially prevalent when Children under the age of 18 years are working closely with Adult professionals such as coaches and medical staff and/or participating in a predominantly Adult environment. Irrespective of whether the sexual relationship is consensual, the imbalance of power makes such a relationship abusive and would constitute a serious violation of this Policy.

15. THE ITF SAFEGUARDING CODE OF CONDUCT

To ensure all Children have the most 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 Children 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 to safeguard Children and 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 (SCMP). For the avoidance of doubt a Covered Person an Adult or a Child.

A. Covered Persons must:

- i. Be a good role model exhibiting positive behaviours such as good manners, respect, fair play and sporting spirit in the presence and hearing of Children;
- ii. Ensure that the safety and welfare of all Children is paramount;
- iii. Create safe and inclusive environments in tennis;
- iv. Listen carefully to Children and Young People about their needs, wishes, ideas and concerns and take them seriously;
- v. Set and maintain professional boundaries when working with Children, and recognise the imbalance of power and responsibility of being in a Relationship of Trust;
- vi. Only work with Children in open environments where sessions are observable and interruptible and can be monitored by another Adult;
- vii. Only use physical contact in open environments with the consent of the Child and as necessary in a justifiable sporting context (e.g. tennis coaching or injury assessment);
- viii. Maintain appropriate open, transparent and professional relationships with Children including any engagement in online communication;
- ix. Only enter Children’s changing facilities or locker rooms or residential accommodation for the purpose of supervising players and with another Adult present, or in the event of emergency or safety concerns;
- x. Treat all Children with respect and equality;
- xi. Only provide gifts when they are equally distributed to all Children and serve a motivational or education purpose. A Covered Person is not permitted to provide a personal gift to a Child athlete.
- xii. Promote fairness. Confront and deal robustly with all bullying towards any Child or Children;
- 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 Child participating in tennis activity;
- ii. Discriminate against any Child based on disability, race, ethnicity, gender, nationality, religion, age or sexual orientation;
- iii. Make sexual advances towards or have any sexual contact with any Child (including but not limited to via online communication);
- iv. Engage in sexual harassment or abuse of any Child, 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. Show or otherwise expose a Child to any pornographic, lewd or sexually explicit imagery or content including photographs, videos, audio, recordings or words, (including but not limited to online communication);
- vi. Use any electronic communication to send any inappropriate, sexual or otherwise harmful text messages or social media messages to any Child or Children;
- vii. Engage in any verbal or physical harassment, bullying, threatening or abusive conduct towards any Child that would cause them to suffer emotional or psychological harm (including but not limited to online communication);
- viii. Slap, hit, punch, kick or use any other type of violence, action or activity that causes or may cause physical harm to a Child;
- ix. If in a Relationship of Trust or have authority, supervision or control over any Child, share a hotel room or any other bedroom in residential accommodation with any Child, unless they are the Child's parent or legal guardian;
- 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. If in a Relationship of Trust or have authority, supervision or control over any Child either (a) engage in personal electronic communication with that Child, or (b) have that Child as a 'friend' or 'follower' within personal social networking sites and apps, in either case, unless an arrangement approved by the Child's parent/legal guardian is in place and **all** communications are copied to the Child's parent or legal guardian;
- xii. 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 Child;
- xiii. 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;
- xiv. 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;
- xv. 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.
- xvi. 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.

16. CATEGORIES OF ABUSE & POOR PRACTICE

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. Abuse of Children may be perpetrated by Adults or other Children.

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 to a Child but could cause risk of harm and is likely to set a poor example.

Examples of poor practice could include failing to provide safe training or competition environments, not paying due care and attention to players during participation or lack of supervision off court, inappropriate use of the Internet and online communication through social media platforms and apps, working with Children while under the effects of drugs or alcohol, smoking, swearing or acts of aggressive behaviour in front of Children.

Child abuse – any form of physical, emotional, sexual harassment, mistreatment or neglect by deliberate act or omission, which leads to injury or Harm of a Child aged under 18 years. Abuse encompasses a range of deliberate maltreatment, conduct or failure of a Covered Person charged with the care of a Child or group of Children to act in the appropriate manner that protects their welfare.

Neglect – The persistent failure to meet a Child's basic physical and/or psychological needs, likely to result in the serious impairment of the Child's health or development. Neglect of any Child may involve a parent, carer or Covered Person failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- Protect a Child from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate caregivers);
- Ensure access to appropriate medical care or treatment.

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

Physical abuse – physically hurting or injuring a Child by hitting, kicking, shaking, throwing, burning, biting, scalding, suffocating, drowning, poisoning, misuse of medicines or otherwise causing them Harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a Child. In a sporting context, physical harm or injury may also be caused by physical contact meant to discipline, punish or achieve compliance from a Child or excessive, inappropriate or dangerous training methods. This may include 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.

Emotional abuse – the persistent emotional maltreatment of a Child that causes severe adverse effects on the Child's emotional development. Emotional abuse may include ignoring or excluding a Child or denying a Child the opportunity to express their views by deliberately silencing them or preventing a Child from participating in normal social interaction in a sporting environment or away from sport. A Child could be

made to feel that their value or worth is dependent on their sporting success but Adults, such as Coaches and Parents, set unrealistic expectations of sporting performance the Child is clearly unable to achieve. The Child is often subjected to repeated criticism, sarcasm, humiliating words or behaviour that may include name calling or discriminatory comments intended to cause emotional distress.

Bullying (including cyber-bullying), exploitation or corruption of Children during games or training can cause lasting emotional damage to a Child. Seeing or hearing the ill-treatment of another Child can also be emotionally damaging for Children. Although a Child may suffer emotional abuse in certain circumstances, emotional abuse is almost always involved as a harmful factor in all other types of abuse and maltreatment.

Sexual Abuse – forcing or enticing a Child to take part in sexual activities, including by harassment or coercion, whether or not the Child is aware of what is happening. The activities may involve inappropriate physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and sexual touching outside of clothing.

Sexual abuse may also include continued physical contact that makes a Child obviously uncomfortable, whether expressed or not by that Child and non-contact activities, such as forcing or enticing Children to watch pornography or be involved in distribution, sharing or making indecent images (often referred to as ‘sexting’) or engaging in online self-abuse via live stream or webcam.

Grooming – is a process of building a relationship to gain the trust of a Child and manipulate them into thinking that sex with the perpetrator is normal or that the Child has no choice. It is often very carefully planned, and it can take place over a period of time.

Part of the grooming process will be the use of physical contact initiated and justified by the perpetrator. It may be part of a coaching activity, playful contact outside normal training e.g. tickling and wrestling or expressions of affection.

This physical contact will often cross professional boundaries and examples may include lingering or repeated embraces of a Child, asking a Child to sit in the lap of an Adult, “Cuddling” or maintaining unnecessary or prolonged physical contact during any aspect of training, travel or overnight stays.

Technology and contact via the Internet may also be used to facilitate the process of grooming for offline or online sexual abuse of Children and can be perpetrated by Adult males or females or other Children (now referred to as “Child on Child” abuse).

Perpetrators of Child sexual abuse will often gain employment or volunteer in organisations and activities working with Children for example as sports coaches, officials or administrators, medical practitioners, teachers or mentors, with the intent of building personal relationships to abuse the Children to whom the role gives them access.

Bullying – can be perpetrated by a Child or groups of Children towards another individual Child or by an Adult towards a Child which often involves an imbalance of power. Bullying can occur in any environment where Children participate including sports, education and social activities. Bullying is often persistent and can take many forms.

In sport, bullying may also include incidents of “hazing” which involve humiliating rituals such “initiation ceremonies” or involve constant derogatory comments about a Child’s sporting ability or personal performance which causes them distress.

Children can be subjected to cyber-bullying online involving the posting of extreme abusive and threatening messages, comments or images on social media and other online platforms. Persistent cyber-bullying has led to cases of Children self-harming and even committing suicide.

Bullying may take the form of physical abuse or threats of violence, physical damage or theft of personal property, or verbal and discriminatory bullying often based on someone’s difference such as race, religion or beliefs, disability, gender, gender reassignment, sexual orientation, cultural and family background.

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 Children who, because of their circumstance, experiences or state of mind can be groomed towards an extremist ideology.

Children can be drawn into radicalisation in several ways. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being drawn into terrorist-related activity. Where concerns are raised about a Covered Person(s) becoming involved with radical or extremist behaviour and activities, these must be acted on and reported either to the Statutory Authorities or Police in country or to the ITF Safeguarding Team.

Female Genital Mutilation (FGM)

This procedure (where the female genitals are deliberately cut, injured or changed, and is also known as female circumcision or cutting, and by other terms, such as sunna, gudniin, halalays, tahur, megrez and khitan, among others) is usually carried out on young girls between infancy and the age of 15, most commonly before puberty starts. It is painful and can seriously harm the health of women and girls. There is no medical reason for this to be done. It is illegal in the UK, and all women and girls have the right to say no to FGM.

Modern Slavery and Child 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. Child trafficking is abuse.

Children 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; Child slavery. In a tennis or sporting environment a Child could be exploited for sexual violence or other forms of criminal activity such as financial abuse or corruption such as match-fixing.

17. ADDITIONAL RISKS FOR CHILDREN AGED UNDER 18

LGBTQ+ Young People and sport – Some young LGBTQ+ people can experience difficulties when they reveal their sexual orientation or gender identity which can lead to bullying or emotional abuse. In recent years, the sport sector has shown a change in attitude to embed inclusive cultures.

'LGBTQ+' is an initialism widely used to refer to a community of people made up of different sexualities and gender identities. While often referred to collectively, they are all very different. A full glossary of terms can be found online at Stonewall UK's website here <https://www.stonewall.org.uk/resources/list-lgbtq-terms>.

The ITF believes that tennis should be safe and inclusive for all Children and Young People from different backgrounds, and this should be no different for young LGBTQ+ people.

To enable young LGBTQ+ people to feel safe and supported in tennis we will where possible ensure that:

- Everyone is treated with respect and implement equal opportunities;
- We work with National and Regional Associations to promote open and inclusive tennis for all;
- Gender stereotypes are challenged, and differences celebrated;
- We let Young People know that, just like with any other issues, they can talk confidentially to the ITF Safeguarding Team or Safeguarding Officers and their privacy will be respected;
- LGBTQ+ identity is made visible by encouraging participants to be themselves;
- Homophobia and transphobia committed by Covered Persons is dealt with in the same way as racism, sexism and other forms of discriminatory bullying or abuse;
- LGBTQ+ specialist services are signposted and promoted for anyone to access in tennis;
- We will work with ITF HR to ensure ITF staff have LGBTQ+ awareness training.

Images and Videos of Children

Tennis should be celebrated and promoted through the safe use of photographs and videos of Children enjoying and participating in the game at all levels. Most photographs or videos of Children are taken for entirely innocent and legitimate reasons. Sadly though, some people abuse Children through taking or distributing photographs or videos.

Therefore, to safeguard Children the ITF will:

- i. Require advance written parental consent for the taking and publication of photographs or videos of Children, including for the purpose of performance analysis. This is subject always to the player image rights that Junior players grant to the ITF under the applicable Regulations;
- ii. Ensure Children are appropriately dressed in such images;
- iii. Forbid all photography in private areas, such as changing rooms, toilets, showers or bedrooms;
- iv. Encourage Children to tell us if they are worried about any photographs that are taken of them;
- v. Only use or publish photographs and videos that have been taken by a Covered Person in an official capacity;
- vi. Performance Analysis - Ensure the written parental consent and ITF Tournament Supervisor's authority is in place before the video recording of junior players takes place.

E-Safety and Social Media

Children use the Internet from a young age as part of their everyday lives. They gain access using a variety of different electronic equipment ranging from small portable devices such as mobile phones or tablets to larger devices such as laptops and gaming machines. The same devices can be used by Children for different purposes online such as communication, education, Esports & gaming, shopping and banking. Communication often involves sharing and viewing content and images via social networking sites and Apps, which may expose them to inappropriate content that causes harm or distress.

The use of technology can also cause a risk of harm to Children even if a perpetrator never meets a Child face to face. That harm includes cyber bullying and grooming.

All Covered Persons working with Children must follow the principles laid out in the ITF Safeguarding Code of Conduct in relation to online communication with Children. They should also have access to and follow the ITF Social Media Policy.

18. 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 by a Child.

Each individual case will be different, but some examples of key indicators that a Child is being abused include:

- 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 changes in behaviour, such as becoming very quiet or withdrawn or displaying sudden outbursts of temper or behaviour change;
- Children having inappropriate sexual awareness;
- Engaging in sexually explicit language or behaviour;
- 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;
- A Child that is consistently left alone or unsupervised.

19. LISTENING CULTURE

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

This includes listening to Children who have the right to be heard and where appropriate involving them in decisions that affect them. The ITF will always act in the best interests of Children and will seek their views (and in the case of a Child, the views of their parents/guardians where appropriate) as far as is feasible taking their age, understanding and capacity into account when responding to disclosures and safeguarding concerns. The ITF will always take proportionate action that does not increase the risk of harm.

20. HOW TO RESPOND TO A DISCLOSURE

When a Child 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 Child;
- If the Child is injured or in pain, seek medical attention;
- Allow the Child 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 Child and take what they say seriously;
- Explain what action will be taken and who will be told to ensure they are kept safe;
- 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.

21. 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 Child has suffered or might be at risk of suffering significant harm.

Action must be taken and those concerns reported immediately to the relevant Police or Statutory Authorities responsible for the protection of Children in that country. Do not assume that other individuals will report. This will ensure the Child 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 summary, 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 Child 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 or to the ITF Safeguarding Team using the contact details below. Whilst this might be a verbal notification, where practicable a written report is the best method of reporting.

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.

Reporting an incident or concern to the ITF:

The ITF Website Safeguarding page:	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.	

Out of hours and weekends:

International Emergency numbers

Click: [International emergency phone numbers](#)

<https://www.anothertravel.com/travel-advice/international-emergency-phone-numbers/>

For Confidential helplines and websites for advice on international child protection in different countries, this website may assist:

Click: [Child Helplines – Child Helpline International](#) or paste: <https://childhelplineinternational.org/helplines/>

UK Confidential Helplines - 24/7 help for Children

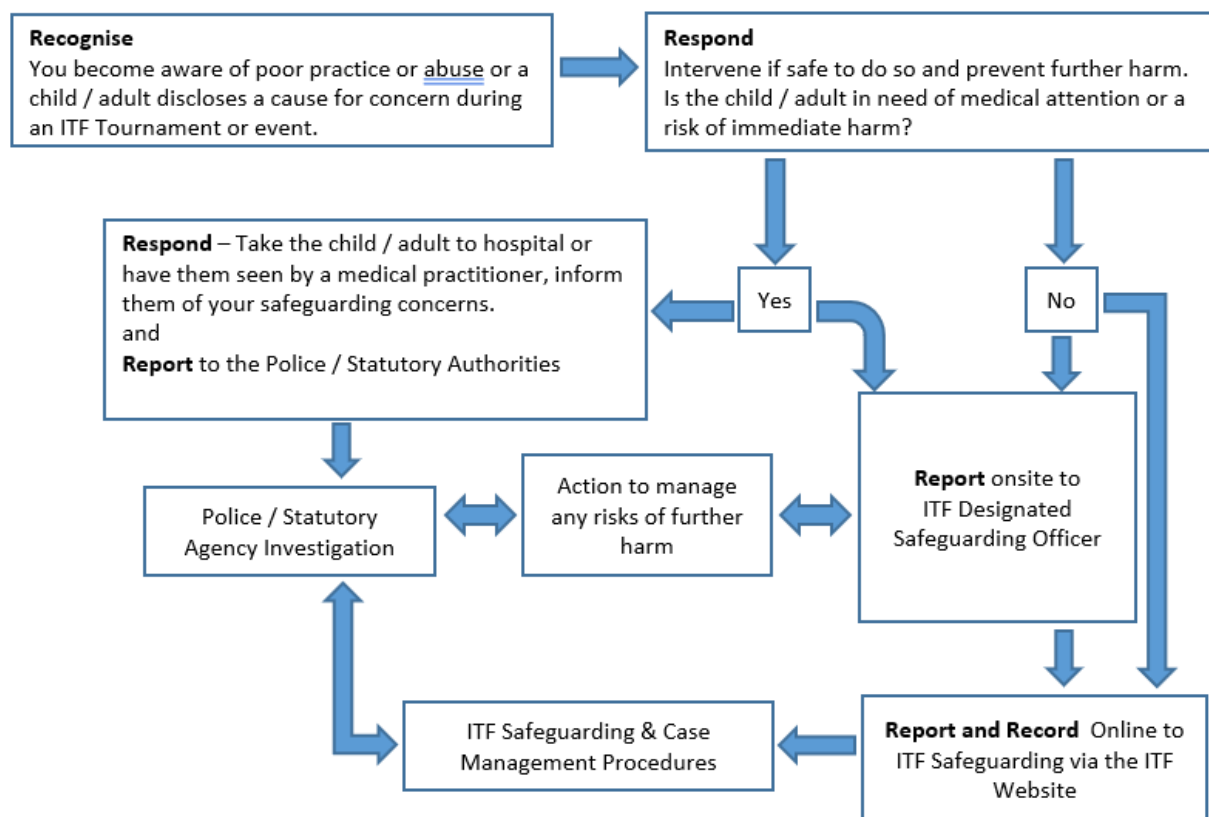
Childline – 0800 1111

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

UK - Samaritans – 0116 123 or email jo@samaritans.org

Click: <https://www.samaritans.org/branches/>

Making a safeguarding report to the ITF



22. 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 lead and/or coordinate investigations where:

- An incident occurs at an ITF Competition, Event or tennis activity over which it has primary jurisdiction;
- It is requested to do so by the National Association because of a lack of resource or expertise;
- The National Association does not have in place relevant safeguarding policies and procedures;
- There is a potential conflict of interest at local level;
- The investigation covers multiple national or regional jurisdictions; or
- It is 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 Children 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.

23. 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:

- i. **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.
- ii. **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.
- iii. **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.
- iv. **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.
- v. **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.
- vi. **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.
- vii. **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 and National Associations, the Women's Tennis Association (WTA), the Association of Tennis Professionals (ATP) and other tennis or sporting organisations, where it is necessary and proportionate to prevent or manage risk of harm in tennis or sport to Children aged under 18 years.

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.

24. 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.

25. 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 Children 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.

26. 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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