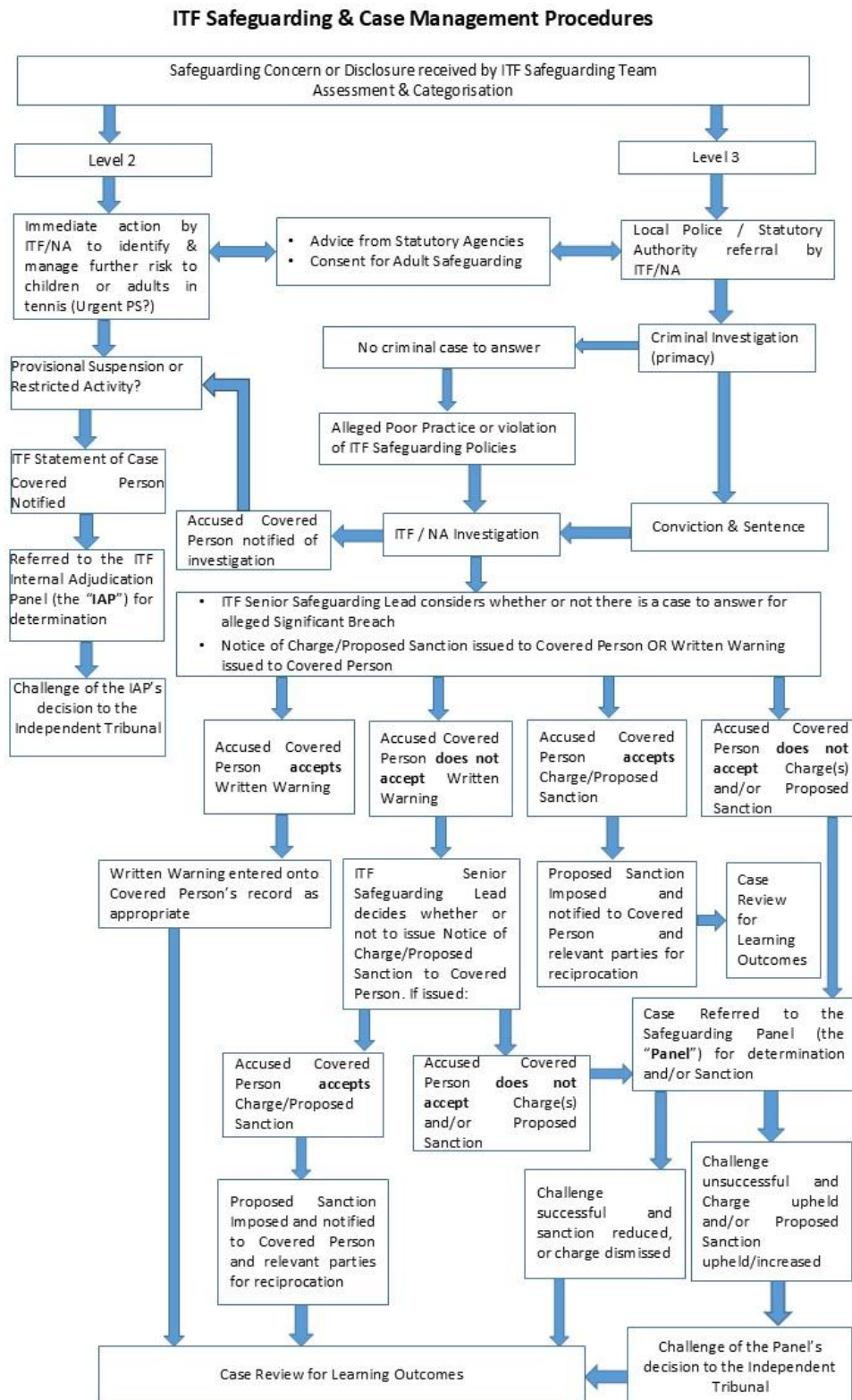


ITF SAFEGUARDING AND CASE MANAGEMENT PROCEDURES 2025

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FLOWCHART

These Procedures apply to Covered Persons as defined in the ITF Safeguarding Adults Policy and ITF Safeguarding Children Policy. The flowchart below illustrates how safeguarding reports that require investigation are managed, including cases requiring external referral to Statutory Authorities.



1. INTRODUCTION

- 1.1 For safeguarding to be effective it is vital that the ITF can support and enforce the conditions laid out in the ITF Safeguarding Policies. These Safeguarding and Case Management Procedures (the 'Procedures') play a crucial role by establishing a clear structure within which complaints, concerns and enquiries are handled for both Children and Adults. They explain how a specific case will be handled after it is reported to the ITF and provide a clear course along which more complex or serious matters will progress.
- 1.2 The Procedures will also ensure that important decisions surrounding safeguarding cases for Children and Adults respect the needs of those who require protection by the ITF and the needs of those who are subject to a complaint or investigation. This will ensure that cases are dealt with in a robust and fair manner.
- 1.3 The ITF's duty towards Children and Adults has moral, ethical, contractual and legal elements. This is recognised in the ITF Safeguarding Policies which use current UK safeguarding legislation and guidance as a basis in conjunction with articles set out in The United Nations Convention on the Rights of the Child (UNCRC, 1989) and International Bill of Human Rights.
- 1.4 Much of the ITF's duty in the protection of Children and Adults is met by Covered Persons working directly for or on behalf of the ITF, and through the development of safeguarding best practice across worldwide tennis in partnership with Regional and National Associations (RAs and NAs). Safeguarding is a process of early intervention and risk prevention, to stop situations escalating and in some situations when a Child or Adult has been harmed or is likely to be harmed, that intervention is paramount to ensure their immediate protection and safety.
- 1.5 Countries hosting ITF tournaments, events and activities with Children and Adults internationally, will also have their own national and local safeguarding legislation relating to the protection of Children aged under 18 years and Adults who may be at risk of Harm. Depending on the seriousness of the case, and any subsequent investigation being undertaken by the Police or Statutory Authorities, it is recognised that such an investigation will ordinarily (but not necessarily in all instances) take primacy over an investigation conducted under these Procedures.
- 1.6 This does not prevent the ITF, RAs or NAs from working together with the Police or Statutory Authorities in taking such action as is necessary in line with these Procedures, to prevent further risk of Harm to other Children or Adults participating in tennis activities. This action may be taken against a Covered Person or an organisation required to comply with the ITF's safeguarding standards.

2. DEFINITIONS

- 2.1 The following definitions are used in these Procedures:
 - **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 Children Safeguarding Policy and ITF Adult Safeguarding 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.
- **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 Adults Policy and ITF Safeguarding Children Policy.
- **ITIA:** International Tennis Integrity Agency.
- **NA:** National Association.
- **Police:** means police or law enforcement agencies tasked with the prevention and detection of crime, whether domestic or international (for example, Interpol).
- **Procedures (or SCMP):** means these Safeguarding and Case Management Procedures.
- **Provisional Suspension** means a temporary bar from participating in all or specified ITF tennis activity, imposed in accordance with section 5 of these Procedures.
- **RA:** Regional Association.
- **Safeguarding Panel:** means an independent 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 above) 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).
- **Significant Breach** refers to any breach of the Code by a Covered Person that has caused risk of Harm to a Child or Adult, or placed a Child or Adult at risk of suffering Harm, and/or means the Covered Person poses or may pose a risk of Harm to Children or Adults in a tennis environment. Such conduct may fall below the prosecutorial threshold for charging a criminal offence, or (if prosecuted) not result in a conviction in criminal proceedings. Risk or potential risk of Harm in a tennis environment may be evidenced by conduct that took place outside of a tennis environment.
- **Statutory Authorities:** means any authority, agency or similar organisation with legal 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).

3. SAFEGUARDING CASES

3.1 General

3.1.1 The Safeguarding Team may answer general safeguarding queries from individuals within tennis and from members of the public. Examples of this activity may include suitability checks of records which contain disclosures of criminal offences, advice and guidance on best practice, risk assessment, safeguarding planning and policy implementation in any ITF Tennis activities involving Children.

3.2 Categorisation of cases

3.2.1 A safeguarding case will be categorised as Level One, Level Two or Level Three (dependent on its specific circumstances) and will receive the appropriate response from the Safeguarding Team. Cases may at any time during an investigation be reviewed and re-categorised up or down (for example, where a Level Two allegation is investigated, and information of a more serious nature is disclosed, leading to the case being re-categorised as Level Three).

3.2.2 The ITF Safeguarding Manager will regularly brief the ITF Senior Safeguarding Lead on the progress of all safeguarding cases reported to the ITF. The ITF Senior Safeguarding Lead must be involved in the key decision-making processes relating to all Level Two and Level Three cases to ensure the appropriate oversight in the management of those cases.

Level One

3.2.3 A safeguarding case involving a minor breach(es) of the Code, or a case requiring a response from the ITF Safeguarding Manager or Safeguarding Team involving the management of risk to the welfare of Children or Adults, but where there is no allegation that the ITF Safeguarding Manager considers might reasonably amount to a Significant Breach of the Code or that requires immediate intervention to protect a Child or Adult.

3.2.4 Level One cases are not referred to the IAP or Safeguarding Panel. The ITF Safeguarding Manager will not impose any Sanction upon an individual or organisation for a Level One case but may recommend an alternative course of action.

Level Two

3.2.5 A safeguarding case which the ITF Safeguarding Manager deems necessary for investigation and/or referral to the IAP and which may result in any of the following:

3.2.5.1 Imposition of a Provisional Suspension on any Covered Person either in exclusivity or reciprocity to action taken by an RA/NA, the ITIA, the ATP, the WTA, or any other recognised national or international sport governing body, or any other relevant body;

3.2.5.2 A determination that a Significant Breach of the Code has occurred; or

3.2.5.3 Action by the ITF against any Covered Person or tennis organisation to mitigate the risk of Harm to any Child or Adult participating in a tennis environment.

Level Three

- 3.2.6 A safeguarding case that meets the definition of a Level Two case and also requires immediate intervention to protect a Child or Adult who has suffered significant Harm or is at risk of suffering significant Harm. These cases will be referred to Police and/or Statutory Authorities and may require intervention from Police and/or Statutory Authorities to take the appropriate protective and investigative action.
- 3.2.7 The referral out to the Police or Statutory Authorities may be notified directly by the Safeguarding Team or in partnership with the relevant RA/NA.
- 3.2.8 The ITF may also receive notification of such cases involving Covered Persons directly from: national or international sporting organisations; the Police or Statutory Authorities; or from RAs/NAs.

4. CASE MANAGEMENT PROCEDURES

4.1 Initial Action

- 4.1.1 The responsibility of the ITF Safeguarding Manager (or their designee) shall be to oversee the management of all safeguarding cases considered under these Procedures.
- 4.1.2 When a safeguarding report is received it will normally be acknowledged within 24 hours. This initial contact is essential as the informant may have further information to provide that has not yet been documented.
- 4.1.3 Once all immediately-available information has been reviewed and assessed, the case will be categorised.
- 4.1.4 Where a case is categorised as Level Three, if not already done so, an immediate referral will be made to the relevant Police or Statutory Authorities.
- 4.1.5 In cases where a referral to the Police or Statutory Authorities is necessary and an Adult is deemed to be at risk of significant Harm, their consent to refer the matter to the Police, Statutory Authorities or other relevant organisations, will be sought. In certain circumstances such information can be shared without consent, such as (but not limited to) when the Adult does not have the capacity to consent, it is in the public interest to protect other people from Harm, or a crime may have been committed.
- 4.1.6 If the ITF Safeguarding Manager deems the case necessary for investigation and/or referral to the IAP they will initiate an investigation and the case will be categorised as a Level Two or Level Three case (depending upon whether immediate intervention has also been deemed necessary).
- 4.1.7 Consideration will also be given to whether any application by the ITF Safeguarding Manager for the Provisional Suspension of a Covered Person from all or specified tennis activities is necessary.
- 4.1.8 A safeguarding case file will be opened and all information, actions, tasks and resolutions throughout the case will be maintained in a secure, auditable format.

4.2 Allegations against ITF staff

- 4.2.1 Any safeguarding allegation against ITF staff must be reported immediately to the ITF Safeguarding Manager (or the ITF Senior Safeguarding Lead if the allegation is against the ITF Safeguarding Manager).
- 4.2.2 When an allegation is made against a member of ITF staff, in addition to any steps taken under these Procedures, ITF HR procedures must be followed.

5. PROVISIONAL SUSPENSIONS

5.1 A Provisional Suspension may be imposed on a Covered Person at any time after an allegation has been received and where it is necessary and proportionate in the circumstances for any of the following reasons:

- 5.1.1 To manage or prevent a risk of Harm to any Child or Adult making an allegation or to whom an allegation relates;
- 5.1.2 To manage or prevent a risk of Harm to any other Child or Adult;
- 5.1.3 To preserve the integrity of **any** investigation being conducted against the accused Covered Person, whether that be an ITF investigation or an investigation by any other organisation including an NA/RA, another sporting organisation, the Police or a Statutory Authority;
- 5.1.4 Where any Covered Person's failure to comply with a request made by the ITF in the course of its investigation hinders or prevents the progress of any investigation;
- 5.1.5 To preserve the integrity and/or reputation of any ITF Competition, the ITF and/or the sport of tennis;
- 5.1.6 In reciprocation of any Provisional Suspension imposed by any RA or NA, the ITIA, the ATP, the WTA, any other recognised national or international sport governing body, or any other relevant body under its safeguarding rules, or otherwise imposed for safeguarding reasons or in circumstances that suggest the Covered Person might present a risk of Harm to any one or more Child(ren) or Adult(s) in a tennis environment.

5.2 Imposing a Provisional Suspension

- 5.2.1 The ITF Safeguarding Manager will present to the ITF Senior Safeguarding Lead a Statement of Case detailing the safeguarding concern and any relevant information that can be included, with a recommendation for the next stage of action. The ITF Senior Safeguarding Lead will consider the information contained in the Statement of Case and decide whether it is necessary and proportionate to impose a Provisional Suspension for one of the reasons set out at 5.1 above. If they decide that it is necessary and proportionate, the matter will be referred to the IAP by the ITF Safeguarding Manager with a recommendation from the ITF Senior Safeguarding Lead that a Provisional Suspension is imposed. If they decide that it is not necessary and proportionate, a Provisional Suspension will not be sought.

- 5.2.2 If a referral is made to the IAP, the Covered Person will be notified of this and given an opportunity to provide a written response to the ITF Statement of Case within a specific period before the IAP reaches its decision.
- 5.2.3 Upon application by the ITF Safeguarding Manager (or their designee), the IAP shall have authority to impose a Provisional Suspension on a Covered Person where it considers that it is necessary and proportionate in the circumstances for any of the reasons set out at 5.1 above. The Provisional Suspension may include all or specified tennis activity, including attending, receiving accreditation for and participating in any ITF Event, ITF tour or team competition (whether organised or sanctioned by the ITF) and/or ITF related tennis activity such as practice sessions, ITF training camps or coaching courses. The Provisional Suspension may be imposed with or without conditions attached.
- 5.2.4 The ITF Senior Safeguarding Lead may impose an urgent Provisional Suspension on a Covered Person without an application to the IAP and without prior notification being given to the Covered Person, where the Senior Safeguarding Lead considers that a) it is necessary and proportionate to do so for any of the reasons stated in section 5.1 above and b) the risk is such that the suspension cannot wait for an IAP to be convened and the Provisional Suspension must be imposed immediately. An urgent Provisional Suspension may be imposed with or without conditions attached.
- 5.2.5 If a Provisional Suspension is urgently imposed under section 5.2.4, then the ITF Safeguarding Manager shall submit a Statement of Case to the IAP within 7 working days for a full review and consideration of whether the imposed urgent Provisional Suspension should be ratified (with or without variation to its scope and/or conditions) or lifted. The Covered Person shall be given the opportunity to respond in writing to the Statement of Case within a specific period prior to the IAP making its decision.
- 5.2.6 Where any Provisional Suspension (including any urgent Provisional Suspension) is imposed or ratified the ITF shall notify the Covered Person in writing of the Provisional Suspension including the reason(s) for the suspension, the period for which the individual is suspended (which may be indefinite), any scheduled review period or date (if known and applicable), and any right to challenge the Provisional Suspension. Where any Provisional Suspension which has previously been imposed is lifted or varied, the Covered Person shall be notified of the IAP's decision.
- 5.2.7 A Covered Person may appeal a decision of the IAP to impose a Provisional Suspension to the Independent Tribunal under its Appellate jurisdiction. The decision of the Independent Tribunal shall be final and binding and there shall be no further right of challenge or appeal. For the avoidance of doubt, this route of appeal is the only route of challenge or appeal available under these Procedures (and any other ITF Rules) in respect of a Provisional Suspension issued under these Procedures.
- 5.2.8 A Provisional Suspension may be communicated by the ITF Safeguarding Team to RAs and NAs, other tennis or sports organisations, the Police or other Statutory Authorities or regulators as necessary and proportionate for the purposes of enforcement and/or to manage a risk of Harm to any Child or Adult.

5.2.9 The IAP may set periodic dates to review the Provisional Suspension, at appropriate intervals dependent on the case. Prior to any such review, the ITF Safeguarding Manager will submit to the IAP a written update (by way of an updated Statement of Case or otherwise if appropriate) detailing any change in circumstances and progress of any investigation or other judicial proceedings as appropriate (but without prejudicing the integrity of an ongoing investigation). The Covered Person shall have the opportunity to respond in writing to the Statement of Case in advance of the meeting of the IAP. For the avoidance of doubt, the IAP shall have authority only to review the Provisional Suspension and not to review or supervise any ITF investigation.

6. INVESTIGATIONS

6.1 Investigations will fall broadly into four main categories:

6.1.1 A criminal investigation by the Police or prosecuting authorities;

6.1.2 A Statutory Authority Child or Adult protection investigation;

6.1.3 An NA- or RA-led investigation for alleged breach(es) of the applicable ITF/RA/NA Safeguarding Code of Conduct (or equivalent document). In certain circumstances this may be supported by the ITF;

6.1.4 An ITF-led investigation for an alleged breach of the Code.

6.2 All Covered Persons are obliged to fully cooperate and comply with any safeguarding investigation and any Sanction(s) or other order imposed. If the Covered Person fails to cooperate with, impedes or obstructs an investigation, or fails to comply with any request of the ITF, Sanction or other order imposed, then this shall constitute a breach of this section 6.2 and the Covered Person may be charged with a breach of these Procedures. Any such charge would be referred to the IAP for determination as required in accordance with the IAP Procedural Rules. Any challenge to the IAP determination would be considered by the Independent Tribunal in accordance with the IT Procedural Rules under its Appellate jurisdiction.

6.3 Police and Statutory Authorities

6.3.1 If a Level Three case is referred to or received from the Police or Statutory Authorities, then the ITF Safeguarding Manager will liaise with them directly or through the relevant RA or NA to:

6.3.1.1 Assist the Police or Statutory Authorities in the investigation process by ensuring that any relevant information is shared;

6.3.1.2 Identify and manage risk to any Children or Adults in tennis or sport arising from the circumstances of the case;

6.3.1.3 Act as the liaison between the ITF, the Police or Statutory Authorities and victim or witnesses who may need support if they are still actively involved in tennis.

6.3.2 Where a Police or Statutory Authority investigation is, or has been, initiated, the ITF may decide at any point to stay or suspend its investigation until the conclusion of those proceedings. Any Provisional Suspension that is in place during the stay or suspension will remain in place while the Police or Statutory Authority investigation/proceedings are ongoing, unless otherwise determined by the IAP or Independent Tribunal.

6.4 **Criminal Conduct**

6.4.1 Where a Covered Person is investigated for any criminal offence relating to sexual misconduct or involving Harassment, Abuse or Violence, an investigation will be undertaken by the NA/RA/ITF into the circumstances of the offence(s) to:

6.4.1.1 manage any risk of Harm to Children or Adults, whether in tennis or otherwise; and

6.4.1.2 ascertain if any breach of the Code has been committed.

6.4.2 Any Covered Person convicted of or having entered a plea of guilty or no contest to a criminal charge relating to sexual misconduct or involving Harassment, Abuse or Violence, will be deemed to have committed a Significant Breach of the Code. Any criminal convictions, and the findings upon which such convictions were based, shall be presumed to be correct and true unless it is shown, by clear and convincing evidence, that this is not the case.

6.4.3 In the event that a Covered Person investigated for, or charged with, any criminal offence relating to sexual misconduct or involving Harassment, Abuse or Violence, is not convicted of or charged with such criminal offence, the ITF and/or relevant NA/RA may still carry out its own safeguarding investigation and review of the case to ascertain whether the Covered Person has a case to answer for a Significant Breach of the Code (or breach of the relevant NA/RA safeguarding rules and regulations).

6.5 **RA/NA-led Investigations**

6.5.1 Where RAs and NAs have their own safeguarding policies and procedures, they should initiate and lead investigations into allegations of poor practice or Abuse of Children and/or Adults in a tennis environment consistent with their national legislation and tennis regulations.

6.5.2 Where possible, information should be lawfully shared 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 any Child and/or Adult.

6.5.3 During any safeguarding investigation the RA/NA Safeguarding Lead should work collaboratively with the ITF Safeguarding Manager 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 any Child and/or Adult in a tennis environment.

- 6.5.4 Where necessary, formal agreement between the RAs and NAs, the ITF, (and any other relevant governing bodies such as the WTA, the ATP, the ITIA) should set out reciprocity conditions of a Provisional Suspension imposed against any person subject to investigation (whether criminal or disciplinary), that is necessary and proportionate to manage risk of further Harm to any Child and/or Adult in a tennis environment.
- 6.5.5 At the conclusion of an RA or NA safeguarding investigation, the ITF (and any other relevant governing bodies such as the WTA, the ATP, the ITIA) should be notified of any findings of a safeguarding breach by an individual and Sanction imposed, such as a period of suspension imposed against any person, where it is necessary and proportionate to manage risk of further Harm to any Children and/or Adult in a tennis environment.
- 6.5.6 In certain circumstances an RA/NA investigation may be supported or led by the ITF. This may include investigations where:
- 6.5.6.1 The alleged incident(s) took place during an ITF Tournament or event;
 - 6.5.6.2 The ITF is requested to assist and support by the RA/NA because of a lack of resource or expertise;
 - 6.5.6.3 where the RA/NA does not yet have in place relevant safeguarding policies and procedures;
 - 6.5.6.4 There is a real or apparent conflict of interest at local level as determined by the ITF;
 - 6.5.6.5 The investigation involves complex aspects such as, but not limited to, where Covered Persons are from multiple regional or national jurisdictions, there is requirement for a coordinated response and oversight, the incident involves more than one victim or perpetrator, or allegations are of a historic nature;
 - 6.5.6.6 Children or Adults in international tennis have suffered Harm and/or the case has caused significant public interest or in other circumstances where it is necessary to ensure that the matter is properly dealt with.
- 6.5.7 When considering any joint safeguarding investigations being undertaken by the ITF in partnership with an RA/NA, terms of reference and jurisdiction will be formally agreed before the commencement of any investigative activity.
- 6.5.8 Where an RA/NA has undertaken and concluded an investigation, the ITF may choose to initiate its own safeguarding investigation or apply to the IAP for an ITF reciprocation of any Sanction imposed against a Covered Person by an NA or RA.

6.6 International Tennis Federation Investigation

- 6.6.1 Upon receipt of a safeguarding concern relating to a Child or Adult the ITF Safeguarding Manager (or their designee), will carry out the initial action set out in section 4.

- 6.6.2 The ITF Safeguarding Manager may also convene a meeting with other key professionals for example, the ITF Legal Team, international translators or specialists in the protection of Children and Adults with additional vulnerability.
- 6.6.3 Contact should be made with the accused Covered Person as soon as it is reasonable to do so to notify them that they are subject to an ITF safeguarding investigation and inform them of the procedure to be followed (save where any notification would place any Child or Adult at risk of Harm or hinder or prejudice any Police or Statutory Authority investigation or the ITF Safeguarding Manager considers it is in the best interests of the investigation not to do so). The appropriate postal address or email address to which sensitive material should be sent should be ascertained.
- 6.6.4 The ITF reserves the right to share information about a safeguarding concern and conduct any safeguarding investigation in conjunction with any tennis organisation or other relevant authority, including (but not limited to) any Statutory Authority, RA or NA, the ITIA, the WTA and the ATP.
- 6.6.5 The ITF may at any time prior to, during or after any safeguarding investigation or proceedings conduct an assessment of the risk posed, or which may be posed, by the Covered Person, which may be in such form and prepared by such person (including a suitably-qualified external expert), as the ITF considers appropriate. This may require the ITF to disclose confidential and sensitive material to the external expert, which shall be done on a confidential basis. The Covered Person is required to participate in, and co-operate with, any risk assessment process as required. Any risk assessment obtained may be used by the ITF in relation to any safeguarding investigation or proceedings as it considers necessary and appropriate.

6.7 Investigatory Procedure

- 6.7.1 Any ITF investigation shall be conducted in line with the procedures in this section.
- 6.7.2 Any such investigation shall be conducted in a fair and impartial manner.
- 6.7.3 The ITF Safeguarding Manager may conduct the investigation themselves or designate an investigator to conduct the investigation on behalf of the ITF. This may include an external investigator nationally or internationally to conduct, or assist with, the investigation. An investigator working on an ITF safeguarding case shall be suitably trained in using the Achieving Best Evidence (ABE) interview techniques when interviewing Children and Adults.
- 6.7.4 The ITF Safeguarding Manager will be updated on the progress of the investigation every two weeks (or at such intervals as they consider appropriate) by the designated investigator (where applicable).
- 6.7.5 If it is appropriate to do so, the ITF may seek to obtain an external assessment (from a suitably qualified medical expert) of a Covered Person involved in an investigation (including the accused Covered Person), regarding their mental capacity, fitness to engage in the investigation or proceedings and/or any reasonable adjustments that may be appropriate during the investigation or proceedings (including but not limited to those related to any

medical issues). The ITF may also seek expert advice in relation to any other medical issues arising during an investigation or proceedings. This may require the ITF to disclose confidential and sensitive material to an external assessor or expert, which shall be done on a confidential basis. The same may be requested from a complainant or other individual involved in the investigation.

6.7.6 The ITF will ensure that appropriate support and expertise are in place:

6.7.6.1 to support any Child or Adult involved in a safeguarding case who has learning disabilities or other impairments;

6.7.6.2 to support effective communication with the complainant, alleged victim, witnesses, and/or the accused Covered Person during any safeguarding investigation (for example, by using translators or sign language).

6.7.7 Where possible, an interview should take place with the complainant, alleged victim and any other witnesses either in person or if appropriate by video or telephone call. The interview should be recorded via a video (or alternatively audio) with the consent of the interviewee. If consent is not provided then a transcript should be obtained or written notes of the interview should be taken. Evidence should be documented and provided for review by the relevant interviewee in transcripts or written statements.

6.7.8 The Covered Person subject to investigation may also be required to attend an interview. The interview shall be recorded via a video (or alternatively audio). Where the Covered Person is interviewed, they shall be provided with sufficient information regarding the nature of the allegation against them before being interviewed to a) enable them to seek legal representation or advice, and b) enable them to understand the allegation and prepare for the interview, save where the ITF Safeguarding Manager considers that to do so may put any Child or Adult at risk of Harm or hinder or prejudice the ITF's, another tennis body's or any Police or Statutory Authority investigation.

6.7.9 Subject to section 6.7.8 above, the accused Covered Person will not be entitled to any information or material obtained by the ITF during the course of an investigation, unless and until such time as the ITF has concluded its investigation and relies on such material as evidence to support a charge and/or other action brought against the Covered Person under these Procedures.

6.7.10 The ITF Senior Safeguarding Lead may request updates on the progress of the investigation from the ITF Safeguarding Manager at any time. In any case, the Safeguarding Manager will provide updates to the ITF Senior Safeguarding Lead every 14 days.

6.7.11 Where an external investigator has been appointed to conduct the investigation, upon conclusion of the investigation, they shall produce a final written report in English (or translated into English) setting out the procedure followed, their findings and a referenced bundle of all collated evidence. This report will be submitted to the ITF Safeguarding Manager.

7. CASE PROCEDURES

- 7.1 The ITF Safeguarding Manager is responsible for overall case management. Where necessary the ITF Safeguarding Manager may convene a Case Management Group comprised of individuals with relevant specialist expertise, skills or knowledge to advise and/or assist with an ITF safeguarding investigation or proceedings and/or the necessary Sanction(s) that should be considered.
- 7.2 Upon completion of all investigations the ITF Safeguarding Manager shall consider whether:
- 7.2.1 there is no case to answer for an alleged Significant Breach of the Code, in which case the ITF Safeguarding Manager shall recommend that (a) no further action should be taken or (b) action should be taken for a minor breach of the Code;
- 7.2.2 there is a case to answer for an alleged Significant Breach of the Code, in which case the ITF Safeguarding Manager will provide a Statement of Case and full evidence bundle of associated papers to the ITF Senior Safeguarding Lead for review, together with a recommendation that further action be taken.
- 7.3 If the ITF Senior Safeguarding Lead considers that there is a case to answer for an alleged Significant Breach of the Code, then:
- 7.3.1 If the ITF Senior Safeguarding Lead considers that the alleged Significant Breach is sufficiently serious to warrant a charge for the alleged Significant Breach under these Procedures, then they will issue a Notice of Charge (“Notice”) to the Covered Person.
- 7.3.2 If the ITF Senior Safeguarding Lead considers that the alleged Significant Breach is not sufficiently serious to warrant a charge in accordance with section 7.3.1 above, they may issue the Covered Person with a written warning, with the effect being:
- 7.3.2.1 If the Covered Person accepts the warning it will be entered onto their record as if it were a determination by the Safeguarding Panel; or
- 7.3.2.2 If the Covered Person does not accept the warning, then the ITF Senior Safeguarding Lead may decide to issue a Notice of Charge (“Notice”) to the Covered Person in accordance with section 7.3.1 above (and for the avoidance of doubt, a Written Warning issued in accordance with this section 7.3.2 will be made without prejudice to the right for the ITF to list other, more severe Sanction(s) within any subsequent Notice of Charge (see section 7.4 below)).
- 7.4 Where a Notice of Charge is issued, it will contain sufficient information for the Covered Person to understand the nature and detail of the allegation against them, which may include the Statement of Case and other evidence relied upon by the ITF in support of the charge(s) (save where the ITF Senior Safeguarding Lead considers to do so would place any Child or Adult at risk of Harm). The Notice will also contain the ITF’s proposed Sanction and explain that the Covered Person may accept the charge and proposed Sanction or choose for either or both of these to be determined by the Safeguarding Panel.

- 7.5 Should the accused Covered Person in receipt of a Notice of Charge:
- 7.5.1 **accept the charge(s)** and proposed Sanction, the case shall be found proven, and the proposed Sanction shall be imposed without recourse to the Safeguarding Panel.
- 7.5.2 either (a) **not accept the charge(s)** or (b) **accept the charge(s) but not accept the proposed Sanction**, the accused Covered Person will have 14 days from the date of the Notice of Charge to submit their written representation for consideration by the Safeguarding Panel.
- 7.5.3 fail to respond to the Notice of Charge or fail to submit any written representation within 14 days of the date of the Notice of Charge, the charge(s) will be deemed proven, and the proposed Sanction shall be imposed without recourse to the Safeguarding Panel.

8. SAFEGUARDING PANEL DETERMINATION

- 8.1 The Safeguarding Panel shall determine the matter(s) before it in accordance with the Safeguarding Panel Procedural Rules and it shall have all such powers as are necessary to carry out its function efficiently and effectively. This includes the power to order an assessment of the risk posed, or which may be posed, by the Covered Person (to be undertaken in such form and by such suitably qualified person as approved by the Safeguarding Panel), before it reaches a determination. The Safeguarding Panel will issue such an order only where it considers that, having canvassed submissions from the parties on the need for a risk assessment, the conclusions of such a risk assessment are necessary in order fairly to determine the relevant issues.
- 8.2 Where there is a dispute of fact, the Safeguarding Panel will determine any factual matter on the balance of probabilities. Having determined the facts, the Safeguarding Panel shall consider whether the Covered Person has committed a Significant Breach of the Code (if relevant) and/or otherwise poses or may pose a risk of Harm to Children or Adults. The Safeguarding Panel shall bear in mind that its paramount consideration is to ensure the welfare of Children and Adults.
- 8.3 If (a) the Safeguarding Panel finds that a Significant Breach has occurred and/or the Covered Person otherwise poses, or may pose, a risk of Harm to Children or Adults or (b) the charge has been accepted by the Covered Person but the proposed Sanction is not accepted, in determining the appropriate Sanction the Safeguarding Panel shall have regard to all relevant factors, and specifically consider any risk posed, or which may be posed, by the accused Covered Person to Children or Adults if the Covered Person were permitted to come into contact with either Children or Adults in a tennis environment.
- 8.4 All Sanctions imposed are at the sole discretion of the Safeguarding Panel. In addition to those Sanctions set out within the Safeguarding Panel Procedural Rules, the Safeguarding Panel may impose, without limitation, any (or any combination) of the following:
- 8.4.1 a permanent suspension from all ITF Competitions or from taking part in any other capacity in tennis events and/or centres organised, authorised and/or sanctioned by the ITF, including revocation of existing entries;
- 8.4.2 withdrawal of access to and accreditation for any tennis event and/or centre organised, authorised and/or sanctioned by the ITF;

- 8.4.3 a referral to the Disclosure and Barring Service or other equivalent Statutory Agency in country, e.g. US Safesport in USA;
 - 8.4.4 a suspension from participating in or otherwise attending any tennis event and/or centre organised, authorised and/or sanctioned by the ITF for a specified period, including revocation of existing entries;
 - 8.4.5 a written warning outlining the areas of safeguarding concern which must be addressed by the Covered Person within a specified period before any access to or accreditation for any tennis event and/or centre organised, authorised and/or sanctioned by the ITF is granted;
 - 8.4.6 conditions upon any such participation or access to or approval of accreditation for any tennis event and/or centre organised, authorised and/or sanctioned by the ITF;
 - 8.4.7 a requirement that the Covered Person be supervised and/or work with a mentor for a specified period of time or permanently;
 - 8.4.8 a requirement that the Covered Person concerned undertakes approved safeguarding training or relevant education before any suspension is lifted or access to or accreditation for any tennis event and/or centre organised, authorised and/or sanctioned by the ITF is approved;
 - 8.4.9 A requirement that an assessment of the current risk posed by the Covered Person be undertaken by a suitably qualified person;
 - 8.4.10 a requirement that the Covered Person completes a supervised probationary period on reinstatement from suspension; and/or a reprimand and/or warning as to future conduct.
- 8.5 The Safeguarding Panel shall promptly issue its determination, with reasons, to the parties directly involved, the ITF Safeguarding Team and any other tennis organisation it considers appropriate.

9. CHALLENGES TO THE SAFEGUARDING PANEL'S DECISION

- 9.1 A decision of the Safeguarding Panel may be challenged to the Independent Tribunal in accordance with the Safeguarding Panel Procedural Rules and the Procedural Rules Governing Procedures before an Independent Tribunal convened under ITF Rules, save for any decision of the Safeguarding Panel that is expressed elsewhere in the ITF Rules and/or these Procedures to be final and binding and not subject to challenge.
- 9.2 Any challenge to a Safeguarding Panel's decision before the Independent Tribunal shall be limited to a supervisory review of whether (a) the Safeguarding Panel's decision was irrational (i.e. it falls outside the range of what a reasonable decision-maker might decide), arbitrary or capricious; (b) the Safeguarding Panel's decision was based on an error of law (i.e. it is contrary to the ITF Rules, properly construed, or to applicable law); or (c) the procedure that was followed in reaching the decision was unfair. The decision of the Independent Tribunal shall be final and binding and there shall be no further right of challenge or appeal under the ITF Rules.

10. OUTCOME & CASE REVIEWS

- 10.1 Upon final determination, whether by the Safeguarding Panel or the Independent Tribunal, the ITF may publish the decision or a summary of the decision, giving due consideration to issues of confidentiality and any risk of Harm to any Child or Adult that such publication may cause.
- 10.2 Notwithstanding the above case management procedures, the ITF Safeguarding Team shall review all reported safeguarding concerns and the facts (irrespective of whether further action was taken), for learning outcomes to determine whether any action to reduce the risk of further concerns is necessary.

11. CONFIDENTIALITY

- 11.1 Save as provided in section 10.1 above, all matters that are the subject of these Procedures (including investigations and all aspects of the proceedings under these Procedures) are confidential and no member of a Safeguarding Panel, Independent Tribunal, Covered Person, representative of a Covered Person (whether legal or otherwise), witness or observer (or anyone else provided with information or material under these Procedures) shall disclose to any third party any facts, material or other information relating to the proceedings (including the fact of the proceedings) unless done so in accordance with these Procedures or with the express, prior written consent of the ITF. Any material disclosed under these Procedures must be kept securely by the recipient.
- 11.2 Any hearings shall take place in private. The public and/or media shall have no right of access.

12. RECIPROCATION

- 12.1 The ITF may consider reciprocating a Sanction (including a Provisional Suspension under section 5.1.6 above) imposed on a Covered Person by an NA or RA or other tennis organisation such as the ITIA, the WTA and/or ATP as a result of a safeguarding concern. The decision to extend, modify or affirm the Sanction to any or all ITF Competitions or events is reserved to the ITF Internal Adjudication Panel.
- 12.2 When deciding whether and how to reciprocate a Sanction, the IAP will have regard to all relevant matters, including:
- 12.2.1 Whether the decision to impose the Sanction was so unreasonable as to be manifestly excessive or unduly lenient;
- 12.2.2 Whether the proceedings that resulted in the Sanction were procedurally unfair or contrary to natural justice, having regard to all the circumstances.
- 12.3 A decision by the IAP whether to reciprocate a Sanction may be appealed by the Covered Person and/or the ITF to the Independent Tribunal, which shall determine the matter in accordance with its Procedural Rules (save that there shall be no right of appeal against the Independent Tribunal's decision).
- 12.4 If the ITF imposes a Sanction under these Procedures, the ITF may request that any NA, RA or other tennis organisation extends, modifies or affirms the Sanction.

13. CHANGES TO PROCEDURES

- 13.1 These Procedures may be amended by the Board of Directors of the ITF at any time. Such amendments will come into effect on the date specified by the Board of Directors (the 'Effective Date').
- 13.2 These Procedures as amended will apply in respect of any ongoing investigation commenced prior to the Effective Date, but only in respect of conduct and/or investigatory steps taken in the investigation on or after the Effective Date.
- 13.3 Where an urgent Provisional Suspension is imposed, or an application is made to impose or extend a Provisional Suspension on or after the Effective Date, or there is a review of a Provisional Suspension imposed prior to the Effective Date, it shall be brought/reviewed under the Procedures as amended.
- 13.4 Where a charge is issued on or after the Effective Date, it shall be brought under the Procedures as amended. Where a charge has already been issued before the Effective Date, the matter will remain subject to the Procedures in force at the time of the charge, unless both parties agree to the Procedures applying as amended.

Approved: 5 December 2024

Effective: 1 January 2025

Review: 1 December 2025