

ITF Whistleblowing Policy

Introduction

This policy applies to all employees of the ITF. Other individuals performing functions in relation to the ITF, such as the Board of Directors, agency workers and contractors, are encouraged to use it as necessary.

It is important to us that any fraud, misconduct or wrongdoing by ITF team members at any level is reported and properly dealt with. We therefore encourage all individuals to raise any concerns that you may have about the conduct of others in the business or the way in which the business is run. This policy sets out the way in which you may raise any concerns and how those concerns will be dealt with.

Background

The Public Interest Disclosure Act 1998 amended the Employment Rights Act 1996 to provide protection for those who raise legitimate concerns about specified matters. These are called "qualifying disclosures". A qualifying disclosure is one made in good faith by you if you have a reasonable belief that:

- ❖ a criminal offence;
- ❖ a miscarriage of justice;
- ❖ an act creating risk to health and safety;
- ❖ an act causing damage to the environment;
- ❖ a breach of any other legal obligation; or
- ❖ concealment of any of the above;

is being, has been, or is likely to be, committed. It is not necessary for you to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. You have no responsibility for investigating the matter - it is the ITF's responsibility to ensure that an investigation takes place.

If you make such a protected disclosure you have the right not to be dismissed, subjected to any other detriment, or victimised, because you have made a disclosure.

The ITF encourages you to raise your concerns under this procedure in the first instance. If you are not sure whether or not to raise a concern, you should discuss the issue with your line manager or the Executive Director, HR.

Principles

- ❖ Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. You should be watchful for illegal or unethical conduct and report anything of that nature that you become aware of.
- ❖ Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to you.

- ❖ You will not be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training will not be prejudiced because you have raised a legitimate concern.
- ❖ Victimisation of anyone for raising a qualified disclosure will be a disciplinary offence.

Stage 1 – Raising a whistleblowing concern

If you have a genuine concern relating to any type of wrongdoing that is covered under this policy, you should raise it with your line manager. If your concern relates to your line manager, or for any reason you do not wish to approach your line manager, you should raise your concern with a more senior manager or a member of the HR team, or, in exceptional circumstances, the external point of contact (see below, for circumstances in which this may be appropriate). You can raise your concern orally, or in writing. It is important that you set out clearly:

- the details of the suspected wrongdoing;
- the names of any individuals involved; and
- and what action (if any) you are seeking.

In some cases, it may be necessary to ask you to attend a meeting to clarify the nature of your concern. This will be arranged as soon as possible. Where it is considered appropriate, a member of the HR team may also be present.

Stage 2 – Responding to your whistleblowing concern

The manager to whom you raise your concern will decide if an investigation is required and, if it is, the most appropriate person to conduct it. The relevant manager will write to you confirming that they are conducting an investigation and the timescale for completion.

The level of investigation and time this will take will vary depending on the nature of the suspected wrongdoing.

Following the investigation, the relevant manager will inform you in writing, as quickly as possible after completion of the investigation, of the outcome and any next steps or action that will be taken. While we aim to provide you with comprehensive feedback, in some cases this may not be possible, for example where data protection rules apply or there are sensitive issues that need to remain confidential.

Stage 3 – Appeal

If you are not satisfied with how your concern has been dealt with, you should appeal to a more senior manager than the manager who handled the original concern or the HR team.

You can raise your appeal orally, or in writing. It is important that you set out clearly the grounds of your appeal, ie the basis on which you consider that your original concern has not been satisfactorily dealt with.

In some cases, it may be necessary to ask you to attend a meeting to clarify the nature of your appeal. This will be arranged as soon as possible. Where it is considered appropriate, a member of the HR team may also be present.

The relevant manager will consider your grounds for appeal and review the manner in which your original whistleblowing concern was handled. You will be informed in writing of the outcome as quickly as possible

Confidentiality and anonymity

We want you to feel comfortable about raising a whistleblowing concern openly and actively encourage you to do so.

Where you raise a whistleblowing concern openly, we will maintain your confidentiality as far as possible. If we need to identify your identity to anyone, we will notify you beforehand.

Alternatively, you may decide to raise a whistleblowing concern anonymously. You can do this via this link: [Whistleblowing Form - Formstack](#).

We encourage anonymous reporting over remaining silent. Although we will investigate any concern that is reported anonymously as best we can, an anonymous report is likely to be more difficult for us to investigate and we will not be in a position to provide you with any feedback.

Our commitment to you

You have the right not to be subjected to any detrimental treatment (including being unfairly penalised, disciplined or dismissed) because you have raised a whistleblowing concern.

If you raise a whistleblowing concern in accordance with this policy, we will ensure that you are treated with respect and provided with adequate support and protection.

If you are told not to raise or pursue a whistleblowing concern, or you believe that you have been subjected to detrimental treatment because you have raised a whistleblowing concern, you should report the matter to a senior member of staff or the HR team. In the alternative, you can raise it under our Grievance Procedure (see separate policy) if it applies to you.

Any such behaviour will not be tolerated and will be treated as a disciplinary offence.

If we find that anyone has knowingly raised false allegations, this will also be treated as a disciplinary offence.

Raising your whistleblowing concerns externally

We encourage you to raise your whistleblowing concerns internally in the first instance.

However, if your concern relates to the CEO or President (or, for some other reason, you believe that it is not appropriate or desirable for you to report to a member of ITF staff), an independent confidential reporting service has been established (*confidential email address: whistleblowing@itftennis.com*) staffed by a person nominated by the ITF Remuneration Committee (whose remit includes management of the ITF Whistleblowing policy).

The appointed person will be someone outside the organisation who understands the ITF structure and operations but who is not directly involved in ITF business day to day nor employed by the ITF. Please refer to Stage 1 of the process above for the information that you should include in your message.

Please also note the '*confidentiality and anonymity*' clause within this policy.

Stage 2 and Stage 3 of the procedure included in this policy will be followed and (if you have waived anonymity) you will be contacted by either the appointed external person or the Chair of the Remuneration Committee to whom the matter will be referred. If required, they will in turn bring the complaint to the attention of the Board of Directors. Our external employment law solicitors may provide advice relating to procedure only.

Any investigation undertaken will be conducted by an independent agency and their report will be presented to either the Remuneration Committee or the Board of Directors for final decision and the Chair of the Remuneration Committee will be responsible for communicating relevant outcomes plus the appeal procedure to you.

Finally, if you feel that appropriate action has not been taken, you should report the matter to the correct prescribed body or person (see list on [GOV.UK](https://www.gov.uk)) who may carry out their own investigation in to the concern raised

You should seek advice if you are thinking of raising your concern with the media as you will not have protection under whistleblowing laws unless certain conditions are met.

End.