



SAFEGUARDING PROGRAM

2026





Dear Members of the ATP community,

I am pleased to introduce our new Safeguarding Program. This document is more than just a set of guidelines; it is a reflection of our commitment to the safety, dignity and wellbeing of individuals around the globe involved in ATP tournaments.

ATP aims to set the example by taking responsibility for protecting participants in our sport. This will be accomplished by our Safeguarding Program through policies, procedures and standards based on our core values that uplift the reputation of tennis globally.

Safeguarding is everyone's responsibility. Take up the spirit of the Safeguarding Program and play a role to ensure that all ATP tournaments remain safe for everyone. In this way we will continue to build our culture of safety and respect in our tournaments.

Eno Polo

CEO

SAFEGUARDING CONTACTS

For additional questions or support, contact Andrew Azzopardi, Director of Safeguarding at andrew.azzopardi@atptour.com or on +44 7354 843986.

How to make a report:

Please report anything you witness, experience, or suspect that threatens your physical or emotional safety or wellbeing or that of someone else. All reports will be handled with care and confidentiality.

Make a formal report

- File a report with the ATP Safeguarding Team by emailing: safeguarding@atptour.com
- Report to a Tournament Designated Safeguarding Officer or an ATP staff member onsite.

Scan the QR code



Report Anonymously

- Submit a report anonymously via RealResponse secure portal
- Send a message via SMS or WhatsApp to +1 (904) 372 1287
- Scan the QR code



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INTRODUCTION

1.1 What is safeguarding?

Safe Sport International states that “safeguarding is the way we keep children and all adults safe in sport”. It defines safeguarding as all the policies, procedures and actions that an organisation takes and puts in place to ensure that anyone working on their behalf, and anyone benefitting from the work they are doing, does not come to any harm, either intended or unintended, as a result of this work taking place. It includes both policies and procedures and the culture within the organisation that either promotes or hinders best safeguarding practice.¹

The International Olympic Committee defines “safe sport” as “an environment where athletes can train and compete in healthy and supportive surroundings; an environment which is respectful, equitable, and free from all forms of harassment and abuse.”²

The International Tennis Federation (ITF) defines “safeguarding” as “the action taken to promote the welfare of all participants by people and organizations working together to identify, prevent and eliminate the risks of injury or harm to their health and wellbeing. This means ensuring that preventative measures are effective, and where necessary positive action is

taken to protect participants from harassment, abuse and exploitation.”³

On “safeguarding children”, the ITF states that it is “the action taken to promote the welfare of children by people and organizations, working together to prevent and eliminate the risks of injury or harm to their health and development. This means ensuring children grow up with the provision of safe and effective care, and where necessary taking positive action to protect them from harassment, abuse and maltreatment.”⁴

For ATP, safeguarding comprises the actions taken by ATP and its tournaments to create a safe environment for all persons who are involved in tournaments (including players, player support teams, staff and volunteers), especially children, adults at risk and persons with lived experience of abuse.



¹ Source: safesportinternational.com

² Source: olympics.com/athlete365/safe-sport

³ Source: [ITF Safeguarding Children Policy 2023](#)

⁴ Source: [ITF Safeguarding Children Policy 2023](#)

1.2 Purpose

ATP's purpose is to inspire on the court and to serve beyond it. ATP strives for excellence to create an unforgettable experience in a safe environment for those involved in ATP tournaments by ensuring that every individual working in and around a court is respected and their dignity is safeguarded. This includes players, player support teams, staff and volunteers.

ATP's Safeguarding Program is implemented by adopting the following standards:

Policies and procedures: which aim to raise awareness and inform Covered Persons of their responsibilities and expected behaviors to create a culture of safety and respect.

Prevention: support Covered Persons to attend safeguarding training, implement a safe recruitment policy, sign up to the ATP Safeguarding Code of Conduct (Section 2.1.B) and for tournaments to promote safeguarding and its reporting mechanisms during events.

Response: to address, where appropriate, allegations in a professional and timely manner by investigating and acting against persons who violate the Safeguarding Program or who pose a credible safeguarding risk, as determined by the ATP Safeguarding Advisory Panel.

While safeguarding is everyone's responsibility, the Program highlights specific roles to lead the implementation of the safeguarding standards effectively and with integrity.

1.3 Scope and Application

This Program applies to all Covered Persons. The Safeguarding Program is designed to foster an increasingly positive and safe sporting environment.

ATP has implemented the Safeguarding Program to create a culture where everyone involved in our sport participates in preventing harm or abuse. The Safeguarding Program establishes systems which respond to allegations of abuse, harassment, domestic violence and poor practice. These systems aim to minimize the risk of potential abuse, harassment, domestic violence and poor practice from a holistic perspective. The ATP Director of Safeguarding will investigate any concerns or behaviors that may breach this Safeguarding Program as stipulated in the Safeguarding Procedures (Section 2.1.C). This includes behaviors which may have taken place either at, or away from a tournament. For incidents that occur off-site, the ATP Director of Safeguarding will determine whether a case should be investigated.

The ATP is committed to monitor and evaluate its safeguarding journey. The monitoring and evaluation will take place in collaboration with key stakeholders, especially people with lived experience of abuse or harm. The ATP will seek feedback from players, tournaments, staff and other relevant stakeholders.

The Safeguarding Program will come into force on 1 January 2026 and will be reviewed by 31 July 2027. ATP reserves the authority to continuously evaluate and tailor the Safeguarding Program. As such, ATP retains the right, in its sole

discretion, to amend, modify, or waive any provision of the Safeguarding Program from time to time. No amendment, modification or waiver in any case by ATP or any designee thereof of any portion of the Safeguarding Program, including the Procedures, shall invalidate any sanction or other safeguarding

measure or decision issued or taken hereunder. Any question regarding the interpretation or application of the Safeguarding Program will be determined by the ATP in its sole discretion. The Safeguarding Program does not diminish or otherwise affect ATP's rights under its governing documents or the ATP Rulebook, or otherwise.

1.4 Core principles

Trauma-informed care

The Safeguarding Program is rooted in trauma-informed care principles, aiming to prevent recurring traumatic experiences and restore a sense of safety, power, and self-worth. The Program aims to prioritize the wellbeing of everyone involved in ATP tournaments, particularly all children, adults at risk and any person with lived experience of abuse.

Shared responsibility

Safeguarding is everyone's responsibility. All Covered Persons are expected to uphold the principles of the Safeguarding Program and collaborate to ensure a safe professional tennis environment during ATP tournaments.

Champion safety

ATP treats safeguarding concerns and allegations seriously, striving for prompt responses.

Work together

ATP collaborates with other organizations, in and beyond tennis, to enhance safeguarding standards and best practice.

1.5 Definitions

For the purpose of the Safeguarding Program, the following terms are defined as follows:

Abuse. A violation of an individual's human and civil rights by another person. The following types of abuse may be caused as a result of deliberate actions, negligence, omission or ignorance: sexual, physical, psychological, neglect, bullying or online abuse.

Adult. Any person eighteen (18) years old or older.

Adult at risk. An adult who is or may need community care services by reason of mental health, age, illness or disability and who is or may be unable to take care of themselves or protect themselves against harm, abuse, harassment, exploitation or poor practice. It also includes any person on the receiving end of a power imbalance (physically, mentally or financially).

Adult protection. A set of actions or activities that are required to ensure the safety of adults who are either at risk of, or have suffered, or are suffering from harm.

ATP Safeguarding Course. ATP's safeguarding course which aims to give the basic knowledge, skills and tools to fulfil this shared responsibility to develop a culture of safety and respect for all ATP tournament participants. The course will include, among other things, topics on safeguarding child safety, domestic violence and power imbalances in sport.

ATP tournaments. A tournament that is part of the ATP Tour or Challenger Tour.

Bullying. Deliberately hurting a specific person either physically, verbally, psychologically or

socially. It involves a real or perceived power imbalance where one person has power or strength over another. It can be carried out by one person or several people who are either actively or passively involved.

Child. Any person under the age of eighteen (18) years old.

Child protection. A set of actions or activities required to ensure the safety of children who are either at risk of, or have suffered, or are suffering from harm.

Covered Person. Any person subject to this Safeguarding Program, including ATP employees and contractors; ATP Directors; ATP designated officials; any player competing at an ATP tournament; Tournament Directors; ATP Sponsors and partners; Player Support Team members (including, but not limited to: coaches, agents, managers, physios, strength and conditioning coaches, health care providers, family members, and guests or similar associates of a player); Tournament personnel (including, but not limited to: staff, officials, volunteers, contractors, sponsors, healthcare providers, members of the media, tournament guests); and any persons accredited by the tournament.

Cyberbullying. The use of technology or electronic communication to bully a person.

Domestic violence. Acts of physical, sexual, psychological or economic violence that occur within the family or domestic unit or between former or current spouses or partners, whether

the perpetrator shares or has shared the same residence with the victim.⁵

Emotional or psychological abuse. Any unwelcome act including confinement, isolation, verbal assault, humiliation, intimidation, infantilization, or any other treatment which may diminish the sense of identity, dignity, and self-worth.

Harassment. Any unwanted, offensive, or abusive conduct or behavior which is repeated, sustained or systematic and which, intentionally or unintentionally, is prejudicial to the dignity, integrity, wellbeing or job security of the person to whom it is directed, and/or creates a humiliating, intimidating or hostile environment.⁶ Harassment does not necessarily need to be repeated, sustained or systemic. A single incident can constitute sexual harassment. It includes, but is not limited to:

- a) Sexual harassment: Unwanted sexual advances, comments, requests or behavior that, intentionally or unintentionally, creates an uncomfortable or hostile environment.
- b) Verbal harassment: Offensive, derogatory or belittling comments, jokes or language intentionally or unintentionally targeting an individual's dignity.

It may also include psychological harassment which is intimidation, bullying or behavior that

intentionally or unintentionally undermines an individual's dignity, self-esteem or confidence.

Harm. The negative impact or consequences arising from abuse or poor practice.

Neglect. The failure of a person with a duty of care towards a person to provide a minimum level of care to such person, which failure is causing harm, allowing harm to be caused, or creating an imminent danger of harm.

Online abuse. Online behavior that has a threatening, intimidating, harassing or humiliating effect on a person.

Physical abuse. Any deliberate and unwelcome act –for example, punching, beating, kicking, biting and burning – that causes physical trauma or injury. Such act can also consist of forced or inappropriate physical activity (e.g., training types or loads that are inappropriate based on age, physique, injury or pain; forced alcohol consumption; or forced doping practices).

Person with lived experience of abuse. Any person who has personally experienced abuse or harm. (Some organizations use the term victim or survivor).

Poor practice. The failure to meet the basic standards of integrity that can reasonably be expected from everyone. Failure to abide by the rules and standards set out in the Safeguarding Program can constitute poor practice. Poor practice can also include, among other things insulting, denigrating or disparaging another

⁵ Source: Council of Europe Convention on preventing and combating violence against women and domestic violence (2011)

⁶ Source: [Policy on Respect and Dignity in the Council of Europe](#)



person; using obscene, profane or derogatory language; spreading malicious or defamatory rumors; inappropriate touching or other physical conduct which does not rise to the level of abuse or harassment; isolated incidents of disrespectful behavior which, if repeated, sustained or systematic, might amount to abuse or harassment.

Safeguarding. The actions taken by ATP to create a safe environment for everyone at ATP tournaments, particularly children, adults at risk and persons with lived experience of abuse.

Safeguarding Procedures. Means the procedures set forth in Section 2.1.C.

Sexual abuse. Any conduct of a sexual nature, whether non-contact, contact or penetrative, where consent is coerced/manipulated or is not or cannot be given.

Statutory authority. Any authority, agency or similar organization with statutory or government-issued powers related to protection, welfare and/or safeguarding of persons (whether children or adults), including the police.

Violence. All forms of physical or mental violence, injury and abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse.

SAFEGUARDING STANDARDS

In order to implement an effective prevention program, ATP has established these safeguarding standards describing the minimum required level of safeguarding provisions at any ATP tournament.

No ATP tournament shall violate any provision of these standards. A violation of these standards will be presented to the ATP Standards Committee by the ATP Director of Safeguarding, and the ATP Standards Committee shall review and determine such case in accordance with the procedures set forth in the ATP Rulebook.

2.1 Standard One: POLICIES AND PROCEDURES

Every ATP tournament shall ensure that its staff, volunteers and all other agents comply with all the ATP safeguarding policies and procedures listed in this section.

A. Policy Statement

The Safeguarding Program aims to establish a safe environment for everyone involved in ATP tournaments, particularly children, adults at risk and persons with lived experience of abuse.

Covered Persons commit to follow the Safeguarding Program at all times. Alleged violations, whether this either takes place at a tournament or off-site or off-season, may be investigated by the ATP Director of Safeguarding.

B. Code of Conduct

This Section outlines the expected behaviors and Prohibited Conduct of all Covered Persons.

I. *All Covered Persons commit to:*

- 1) Support the right of all persons to participate in ATP tournaments safely and respectfully.
- 2) Follow the Safeguarding Program, including not engaging in Prohibited Conduct (as set forth in *Section II* below), as well as any other applicable policies established by tennis organizations and governing bodies.
- 3) Act with integrity, honesty and respect toward the sport and its participants.
- 4) Complete the ATP Safeguarding Course according to each respective role, as directed by the ATP.
- 5) Not tolerate abusive behavior, including sexual, physical or psychological abuse, domestic violence, neglect, bullying or cyberbullying.
- 6) Cooperate with ATP in making tournaments safe and inclusive and cooperate with any investigations conducted or authorized by the ATP Director of Safeguarding.
- 7) Uphold fair play and integrity, promoting a safe environment both on and off the court.

- 8) Respect their position of trust, maintain appropriate boundaries and keep up-to-date with any required safeguarding training.
- 9) Promptly report any safeguarding concern, Safeguarding Program breaches, misconduct, abuse, harassment, domestic violence, exploitation or poor practice through ATP's designated reporting channels (see Section 2.3.I).
- 10) Abide by all applicable laws and regulations concerning safeguarding, child protection, adult protection and domestic violence.
- 11) Inform the ATP Director of Safeguarding if they are being investigated by the police or social services on any behavior constituting either a criminal offence or a safeguarding concern.
- 12) Handle safeguarding concerns, reports and investigations in accordance with the confidentiality framework set forth in Appendix 1.



II. *Prohibited Conduct*

It is a violation of the Safeguarding Program for Covered Persons to engage in Prohibited Conduct or violate any applicable criminal or civil laws. The following behaviors are “Prohibited Conduct” under the Safeguarding Program:

- 1) Violent conduct: Any violent, dangerous or threatening conduct, which includes any act or attempted act to commit murder, assault, battery, kidnapping or false imprisonment, sexual assault, child abuse, possession of child abuse images, domestic violence, harassment and any other conduct that the ATP Safeguarding Advisory Panel deems a risk for children, adults at risk and persons with lived experience of abuse.
- 2) Child abuse: Any form of child abuse.
- 3) Harassment or sexual harassment: Any form of abuse, harassment, exploitation or poor practice, including sexual, physical or psychological abuse, neglect, bullying or cyberbullying.
- 4) Domestic violence: Physical, emotional or psychological domestic abuse.
- 5) Non-consensual sexual contact: Any physical contact with another person of a sexual nature without consent.
- 6) Retaliation: No retaliation, attempting to retaliate or victimizing those reporting concerns or participating in investigations.
- 7) Interference with an investigation: Tampering with evidence, intimidating

witnesses, discouraging participation in investigations, publicizing confidential information, coercion or bribing, or failing to adhere to restrictions or sanctions.

- 8) Intentional false reports: Knowingly reporting false events.
- 9) Abuse of trust: Exploiting personal relationships to abuse, control or manipulate any professional relationship.
- 10) Failure to disclose: A Covered Person must promptly disclose to the ATP Director of Safeguarding if they become aware that any Covered Person faces criminal or civil charges related to any Prohibited Conduct listed above, and provide the ATP Director of Safeguarding any related documentation.

No statute of limitation of any conduct listed under the Prohibited Conduct will prohibit the ATP or its designee from investigating, assessing and adjudicating any alleged misconduct committed by a Covered Person, regardless of when the misconduct or alleged misconduct occurred.

C. Safeguarding Procedures

I. ATP Director of Safeguarding Initial Assessment

- 1) When a safeguarding incident is reported or referred to the ATP, the ATP Director of Safeguarding will complete an initial assessment which may include the following, in the sole discretion of the ATP Director of Safeguarding:

- i) whether the information should be shared with statutory agencies (e.g. the police or social services);
- ii) whether a safeguarding investigation is required; if so, the ATP Director of Safeguarding will appoint a lead investigator (which could be the ATP Director of Safeguarding, an ATP member of staff or an external investigator, depending on the complexity of the report);
- iii) whether an interim safeguarding order (*Section III* below) should be issued;
- iv) what support is needed by any persons affected by the alleged abuse (including people with lived experience of abuse or harm and witnesses); and
- v) which body (the Deciding Body) will conduct the hearing. In general, subject to the discretion of the ATP Director of Safeguarding, an allegation of poor practice will be heard and determined by the tournament. An allegation of abuse, harassment, exploitation or similar matter will be heard and determined by the Safeguarding Advisory Panel. With respect to any matter for which a tournament is the assigned Deciding Body, at any time prior to an order being issued, the ATP Director of Safeguarding may re-assign such matter to the Safeguarding Advisory Panel, if the ATP Director of Safeguarding determines, in their discretion, that it is necessary or advisable to do so.

Any allegation that takes place at a tournament that falls outside the scope of the Program will be handled by tournaments, unless otherwise stated by the ATP Rulebook.

- 2) The Director of Safeguarding shall have the authority to investigate and collect evidence on any matter that they reasonably believe may constitute a safeguarding concern, irrespective of whether a formal report or complaint has been submitted.
- 3) When the ATP becomes aware of an investigation being carried out by the police or social services or another statutory agency, such investigation will take precedence over ATP's safeguarding investigation.
- 4) If a report is received regarding behavior covered by this Program that allegedly occurred outside the premises of an ATP tournament, the ATP will first notify and cooperate with the relevant police departments before determining whether to initiate an internal investigation. This includes, but is not limited to, allegations of abuse, harassment, or domestic violence. The ATP Director of Safeguarding, in their discretion, will determine whether the matter will be investigated by the ATP.

II. Reports Received by Tournaments

- 1) Any safeguarding incident raised at a tournament will be referred to the tournament DSO, who will:

- i) gather relevant information on the report received and share such information with the ATP Director of Safeguarding, and
- ii) inform the Tournament Director.

III. Interim Safeguarding Order

- 1) An interim safeguarding order may be issued at any time by and at the discretion of the ATP Director of Safeguarding relating to any person who may pose a risk of harm to others. The ATP Director of Safeguarding shall consider the following factors when determining the need for an interim safeguarding order:
 - i) whether an individual may be at risk of harm,
 - ii) whether the matter is of a serious nature, and
 - iii) whether an order is necessary or desirable to complete an appropriate investigation.
- 2) An interim safeguarding order may include:
 - i) withdrawal of credential(s) for one or more ATP tournaments,
 - ii) removal from one or more ATP tournaments, including withdrawal of access to official venues, e.g., hotels.
 - iii) revocation of accreditation and denial of access to one or more ATP Tour and ATP Challenger Tour tournaments, even as a spectator,
 - iv) any other safeguarding measure deemed appropriate by the ATP Director of Safeguarding.

- 3) When an interim safeguarding order is issued, the ATP Director of Safeguarding will promptly notify the subject of the order, the Safeguarding Advisory Panel Chair, the ATP Chief Legal Officer, the ATP Senior Vice-President of Rules and Competition, and, on a need-to-know basis, any other relevant parties, e.g., tournaments.
- 4) The subject of an interim safeguarding order may contest against the order within twenty-one (21) days of the letter of notification by providing written notice to the ATP Chief Legal Officer.
- 5) The ATP Chief Legal Officer or their designee has the power to revoke or modify any interim safeguarding order at any time. All interim safeguarding order will remain in place unless and until revoked or modified either by the ATP Chief Legal Officer or their designee, or the ATP Safeguarding Advisory Panel. All interim safeguarding orders and contests thereto are to be reviewed by the ATP Chief Legal Officer or their designee. The ATP Chief Legal Officer or their designee may decline to take action with respect to any interim safeguarding order.
- 6) The person who issues, amends, revokes or confirms an interim safeguarding order will be informed by the Safeguarding measures guide (Appendix 4).

IV. *Investigations*

- 1) The investigation lead appointed by the ATP Director of Safeguarding shall have

the powers to investigate the safeguarding concern or incident.

- 2) All Covered Persons shall cooperate fully with any investigation related to any safeguarding concern. A Covered Person's failure to cooperate fully with any investigation of a safeguarding concern may result in an adverse inference against the Covered Person in any case referred to a Deciding Body.
- 3) Any information gathered by an investigation that, as determined by the investigation lead, alleges a crime that falls under a mandatory reporting law in the country where the concern is raised, will be referred to the police, or relevant civil authority, as soon as reasonably possible.

V. *Exceptional Material*

- 1) In principle, all evidence submitted to the Deciding Body should be seen by the investigator and the subject of investigation subject to the limitation set forth below.
- 2) In exceptional circumstances, the investigator might, in its discretion,



decide that some information should not be disclosed to the subject of investigation for one or more of the following reasons:

- i) Sharing the information to the subject of investigation could place someone at risk of harm;
- ii) Sharing the information could be unlawful or could be a criminal offence.

- 3) In this situation, the investigator shall send a written request to the ATP Chief Legal Officer, who will determine whether the information should be redacted (in whole or in part) or whether a summary of the material should be provided as an alternative.

VI. *Safeguarding Advisory Panel Procedures*

- 1) If the ATP Director of Safeguarding or designee concludes after an investigation that a violation of this Program has occurred, the ATP Director of Safeguarding shall provide a written “Notice of Safeguarding Offence” to the subject of investigation. The Notice of Safeguarding Offence should include the findings of the investigation (which may be in an anonymized form).
- 2) The subject of the investigation will have fourteen (14) days to respond to the Notice of Safeguarding Offence with any written defenses or other representations to be made to the Safeguarding Advisory Panel (Panel). The subject’s response shall be delivered in writing to the ATP Director of Safeguarding.
- 3) Following the receipt of any written defenses or other representations from the subject of investigation, or the expiration of the fourteen (14) days, the ATP Director of Safeguarding may:
 - i) Determine that no safeguarding order is necessary, or
 - ii) Make further enquiries or investigations as it determines to be necessary, or
 - iii) Refer the matter to the Panel.
- 4) If the ATP Director of Safeguarding determines that no safeguarding order is necessary after consideration of the defenses and other representations of the subject of the investigation, the ATP Director of Safeguarding shall provide written notice of that decision to (i) the subject of investigation, (ii) the ATP Chief Legal Officer, and (iii) any other relevant parties.
- 5) When a case is referred to the Panel, the ATP Director of Safeguarding shall provide the Panel and the subject of the investigation with a copy of the Notice of Safeguarding Offence, any written defenses or other representations provided by the subject of the investigation and any evidence from the investigation that should be considered by the Panel.
- 6) The Panel shall determine whether there were any violations of the Program as described in the Notice of Safeguarding

Offence on the basis of written submissions and documentary evidence, except where the it determines that an in-person or remote hearing is necessary or the subject of the investigation requests an in-person or remote hearing. Any hearings will be conducted on a private and confidential basis.

- 7) The Panel shall determine all procedures for the conduct of the case. The case will be determined based on the preponderance of evidence presented before it.
- 8) If the Panel determines that any violation(s) of the Program occurred, it may decide to impose any sanction(s) or other safeguarding measure, for a specific period of time or for an indefinite period, that it deems necessary or appropriate in accordance with Section VII below.
- 9) The Panel shall issue a written “Safeguarding Decision” to the subject of the investigation and the ATP Director of Safeguarding which sets out (i) their findings as to whether any violation(s) of the Program occurred, (ii) the sanctions applicable, if any, as a result of such findings and (iii) rights of appeal, if any, available under this Program.

VII. Sanctions or Other Safeguarding Measures:

When determining an alleged safeguarding incident or misconduct, the Deciding Body will use the Safeguarding measures guide

(Appendix 4) to assist them in finalizing any decisions.



1) Tournament

When a tournament is acting as the Deciding Body, it may impose any of the following sanctions:

- i) A written notice informing a Covered Person that they violated the Safeguarding Program and informing them that any future violations may result in a more severe sanction.
- ii) A requirement for a Covered Person to attend a specific training course prescribed by the tournament DSO.
- iii) A requirement for a Covered Person to be supervised or mentored for a specific period of time.
- iv) A requirement for a Covered Person to meet regularly with a mentor as prescribed by the tournament DSO.

If, after a safeguarding investigation, a tournament decides to issue any measure which imposes sanctions which surpass these guidelines the Tournament Director needs to inform the ATP Director of Safeguarding with their decision and written reasons.

2) Safeguarding Advisory Panel (Panel)

When the Panel is acting as the Deciding Body, it may impose any of the following sanctions:

- i) Any of the measures described in Section VII.1 (i) through (iv).
- ii) Temporary or permanent revocation of accreditation and denial of access to all ATP Tour and ATP Challenger Tour tournaments.
- iii) Suspension from attending any ATP tournament, even as a spectator.
- iv) Other possible sanctions:
 - No contact orders
 - Rehabilitation program
 - Any other sanction or safeguarding measure deemed necessary or appropriate by the Panel

3) Appeals

- i) The subject of an investigation may appeal a Decision of the Panel by sending a written “Notice of Appeal” to the ATP CEO within twenty-one (21) days of receipt of the Decision. The notice of appeal must include the grounds for the appeal.
- ii) The ATP Director of Safeguarding may appeal a Decision of the Safeguarding Advisory Panel by submitting a “Notice of Appeal” to the ATP CEO within ten (10) days of receipt of the Decision. The Notice of Appeal must include the grounds for appeal and supporting evidence or reasoning for challenging the decision.
- iii) Upon receiving such notice of

appeal, the ATP CEO shall appoint an independent, external body with no affiliation to the organization, to act as the Appeal Board for safeguarding cases. The Appeal Board shall set a date and place for the hearing and inform all parties accordingly.

- iv) If both the subject of an investigation and the Director of Safeguarding fail to timely send a Notice of Appeal to the ATP CEO, the Decision becomes final and binding, and the subject of the investigation is deemed to have accepted the Decision and waives (i) any right to any hearing or other consideration of the Decision by the ATP and (ii) any right to file any appeal, claim, arbitration, lawsuit or litigation concerning the Decision in any court or tribunal, including the Court of Arbitration for Sport, regarding the Decision.
- v) The Appeal Board shall not overturn any portion of the Decision unless the Appeal Board determines that the Panel abused its discretion regarding any findings or sanctions in the Decision. Any sanction imposed by the Panel will remain in place till the final decision of the appeal.
- vi) The Appeal Board shall conduct the hearing on appeal in accordance with the following:
 - a. **Burden of Proof.** The ATP Panel has the responsibility to prove the violation by a preponderance of the evidence. The ATP Director of Safeguarding, or their designee, will present evidence to the

Appeal Board.

- b. **Rules.** The Appeal Board must conduct the hearing in a fair and orderly manner with opportunity for each side to present its evidence as to the facts involved, and the subject of an investigation and their representative, if any, and the ATP Panel are bound to cooperate fully to this end.

- c. **Grounds for an appeal.** An appeal can be filed when a decision is deemed to be 'unsafe'. A decision may be considered unsafe for several reasons:

- **Procedural irregularities:** Significant errors or deviations from the established procedures during the investigation or decision-making process that could have affected the outcome.
- **New evidence:** Emergence of substantial new information not available during the original investigation or hearing, which could potentially alter the decision.
- **Unreasonable decision:** If the decision reached is deemed to have no reasonable basis considering all circumstances, suggesting it was arbitrary or capricious.

- **Disproportionate decision:** When the sanctions imposed are excessively severe or lenient relative to the nature of the violation, indicating a potential imbalance in judgment.

- d. **Statement of Position.** The Appeal Board may request the Panel and the subject of an investigation to state in writing their respective positions on the facts, the provision(s) of the Code allegedly violated, and the penalty specified and file the same with the Appeal Board at least three (3) days prior to the hearing, with a copy to each other.
- e. **Presentation.** The Panel and the subject of an investigation may present evidence personally or through counsel. Each party shall have the right to present and to cross-examine witnesses, and to offer documentary evidence and testimony by affidavit or deposition. Except for purposes of rebuttal, documentary evidence and affidavits shall not be admissible unless a copy is submitted at least three (3) days prior to the hearing to the Appeal Board and to the other party. Should objection be made to the introduction of an affidavit, the Appeal Board may determine in their discretion that the interests of fairness require that the individual be produced to testify at the hearing, or alternatively,

that such affidavit be excluded. In the case of the former, a reasonable continuance may be granted for production of such witness.

- f. **Hearing.** The hearing shall be closed to the public. Once commenced, the hearing shall continue from day to day until concluded, unless the Appeal Board allows otherwise. Postponements, adjournments or any form of delay shall be permitted only in the case of documented emergency and at the sole discretion of the Appeal Board. Requests for postponement shall be submitted in writing to the Appeal Board.
- g. **Record.** Each party shall have the right to have the hearing recorded or transcribed at its expense.
- h. **Interpreter-Legal Advisor.** The Appeal Board, at their discretion, make provisions for the presence of an interpreter and/or legal advisor for the hearing. The reasonable expenses of such interpreter or legal advisor shall be assumed by ATP pending the final decision of the Appeal Board and the taxing of costs as is provided in the decision on appeal.

vii) Decision on Appeal

- a. As soon as practicable after the conclusion of the hearing on appeal, the Appeal Board shall render a written decision, which

decision shall constitute the full, final and complete disposition of the issue and will be binding upon the subject of an investigation and upon all members of ATP. A copy of the written decision will be sent to the subject of an investigation, the Panel Chair and the ATP Director of Safeguarding.

- b. The Appeal Board may amend, modify or remove any sanction(s) and/or measure(s). Appellants may be subject to further disciplinary action if the Appeal Board determines that the appellant had no reasonable grounds for the appeal. Notwithstanding the foregoing, the Appeal Board may tax the losing party, whether ATP or the subject of an investigation, all reasonable costs of the Appeal, including, but not limited to, the expenses and charges of the interpreter, legal advisor and any adverse witness required upon objection to testify concerning facts originally presented by way of affidavit. If the costs are taxed against the subject of an investigation, then they must be paid by the subject of an investigation to ATP by delivery to the Panel within (10) days after receipt of the decision of the Appeal Board.

4) Reciprocal Disciplinary Measures

If the ATP Director of Safeguarding becomes aware of a safeguarding order issued with

respect to a Covered Person by another sporting governing body or similar entity, the ATP Director of Safeguarding may issue a reciprocal and substantially equivalent or lesser safeguarding order, which order may be revisited, amended or modified from time to time by the ATP Director of Safeguarding, in each case at the discretion of the ATP Director of Safeguarding.



D. Child Safeguarding Policy

ATP recognizes that the best interest of children is paramount. ATP aims to ensure that, at each ATP tournament, all children have a positive and

enjoyable experience, free from abuse, harassment, exploitation and poor practice.

The Child Safeguarding Policy applies to all tournaments organized by or on behalf of ATP that include under-18 Covered Persons and to all such under-18 Covered Persons (whether as players, sparring partners, staff, volunteers or otherwise).

I. Pre-tournament briefing

The tournament Designated Safeguarding Officer (DSO) will coordinate a pre-tournament briefing for under-18 Covered Persons and their legal guardians prior to the tournament. During this briefing, the DSO will communicate any relevant safeguarding information to under-18 Covered Persons and their legal guardians.

II. Legal Guardian consent

The DSO must ensure that all under-18 Covered Persons have submitted all legal guardian consent forms required by ATP.

III. Records of Under-18 Covered Persons

Tournaments will maintain a record, accessible to ATP and safely stored in compliance with applicable data protection laws and best practice, of all under-18 Covered Persons and their next of kin, emergency contact information, consent forms, emergency medical information, and photography consent, in each case, as supplied by such Covered Person.

E. Safe recruitment Policy

Tournaments must follow the recruitment guidelines and procedures below when

recruiting individuals for staff and volunteer roles:

- 1) Tournaments must maintain an effective screening process (which shall include reviewing relevant qualifications, experience and alignment with ATP's values according to the role) when selecting candidates for any role.
- 2) To the extent required by applicable law, candidates must undergo criminal background checks. Any concerns that are raised from the background checks must be shared with the tournament Designated Safeguarding Officer (DSO), who may seek advice from the ATP Director of Safeguarding. The Tournament Director will have the final say on any recruitment decision.
- 3) A person is only eligible to serve as a tournament member of staff or volunteer if in the preceding ten (10) years they have not been convicted of a felony or other criminal offence that could be subject to a sentence of prison time of one year or more, has not entered a plea that admits having committed such a crime, or has not entered a plea that admits the underlying facts of such a crime.
- 4) Live interviews must be carried out for positions that will interact directly with children or adults at risk. During these interviews, tournaments must promote the culture of safeguarding by including relevant questions that evaluate the candidate's understanding of

safeguarding principles and their commitment to creating a safe environment.

- 5) As reasonable and available, tournaments should obtain references from previous employers or professional contacts to verify the candidate's suitability for the role and ensure there are no known safeguarding concerns.

F. Communications Policy

All communication relating to ATP tournaments, whether through face-to-face interaction or written or digital communication, by Covered Persons must be done in a professional, respectful and ethical manner. Below are non-exhaustive guidelines for Covered Persons to follow:

I. Face-to-Face Interactions

- 1) Respectful demeanor: Communicate with others with respect, courtesy and professionalism at all times.
- 2) Maintain boundaries: Adhere to appropriate boundaries and avoid behavior that may be perceived as overly familiar, intrusive or inappropriate.
- 3) Privacy and confidentiality: Respect the privacy of persons and refrain from discussing sensitive personal matters or sharing confidential information without proper authorization.
- 4) Appropriate language: Use respectful and inclusive language that avoids discriminatory or offensive terms,

ensuring a welcoming environment for all persons.

II. Written or Digital Communication

- 1) Professional tone: When communicating through emails, messaging apps or social media, maintain a professional and respectful tone.
- 2) Timeliness: Respond to digital communication promptly, acknowledging receipt and providing an estimated timeframe for a more detailed response, if necessary.
- 3) Privacy and data protection: Refrain from sharing personal contact information without proper authorization and ensure compliance with data protection laws.



2.2 Standard Two: PREVENTION

I. Accreditation process

In order to be eligible to apply for or receive a credential for an ATP tournament, individuals must:

- 1) Complete the ATP Safeguarding Course, according to each respective role, as indicated in *Section II: Safeguarding awareness* below.
- 2) Tournament staff are to complete the safe recruitment procedures described in Section 2.1E.
- 3) Read and agree to comply with the ATP Safeguarding Program, including ATP Safeguarding Code of Conduct and the Procedures.

II. Safeguarding awareness

Every person who seeks accreditation at an ATP tournament will have access to the ATP Safeguarding Course. Players, player support teams, ATP staff and tournament DSOs need to complete the ATP Safeguarding Course at least once every two years. Tournament staff or volunteers will complete a safeguarding briefing before signing that they will adhere to the ATP Safeguarding Program.

All ATP tournaments should display the ATP Safeguarding Poster (see Appendix 2) in a clear and conspicuous manner in a minimum of three (3) ATP event spaces, such as locker rooms, player areas, staff rooms, media zones, etc.

2.3 Standard Three:

RESPONSE

I. Reporting Mechanism

Any individual with knowledge of a possible safeguarding concern or of a possible breach of the Safeguarding Program is encouraged to report such possible concern or breach promptly by completing the [Safeguarding Reporting Form](#) or by using any of the following designated reporting channels:

- 1) Report to the Tournament Director or DSO through email, phone or in-person communication.
- 2) Report to ATP Director of Safeguarding, currently Andrew Azzopardi, by sending an email to andrew.azzopardi@atptour.com or by calling +44 7354 843 986. Please check the ATP website or contact ATP directly for the most current contact information.
- 3) Report via the anonymous reporting mechanism adopted by the ATP.
- 4) Reports can also be submitted by sending an email to safeguarding@atptour.com.

Any Covered Person who suspects, witnesses or becomes aware of a safeguarding concern or complaint must report it through a designated reporting channel. When a safeguarding incident is reported to ATP or to the DSO, the information shall be shared with the ATP Director of Safeguarding without delay. The ATP Director of Safeguarding will complete an initial assessment

in accordance with the Safeguarding Procedures (Section 2.1.C).

II. Safe Sport Social Media Abuse Support Program

ATP has maintained a reporting hotline for players since 2018. ATP also offers Safe Sport, a service to address online abuse targeting professional tennis players, to the top 250 ranked singles and top 50 ranked doubles players. The service, offered in collaboration with Sportradar and Arwen, integrates Artificial Intelligence (AI) moderation, education for players and investigation of harmful online comments into a single service to protect athletes.

Safe Sport is ATP's most comprehensive initiative to date to combat online abuse, a long-standing and prevalent issue in sport, and a key part of protecting player wellbeing. Safe Sport is funded by the ATP.

III. Information sharing

ATP may share safeguarding information with statutory agencies, ITF, WTA, ITIA, Grand Slams and other entities where it deems that it is necessary or appropriate to do so in order to prevent or manage risk of harm to children, adults at risk or persons with lived experience of abuse, subject to the confidentiality framework set forth in Appendix 1.

ATP intends to have regular meetings with ITF, WTA, ITIA, Grand Slams and other sports bodies to ensure, where possible, that the sports community has the necessary synergy in this delicate area of work to result in a consistent and effective outcome for all sports participants, especially the most vulnerable.

When ATP places a person on its non-credential list, ATP may share relevant details with ITF, WTA, the Grand Slams and other sport governing bodies on a need-to-know basis.

All data will be kept in accordance with the ATP Privacy Policy.

IV. Remedy plan

ATP adopts a victim-centered (or survivor-centered) approach, which means that the rights and needs of victims, survivors and persons affected by abuse are central to the Safeguarding Program. This approach aims to reduce further harm and empower and assist victims in their recovery. ATP may seek feedback from victims and survivors to explore ways to make the Safeguarding Program more victim/survivor-focused.

ATP is committed to understanding where things went wrong in abuse cases to improve

future practices and outcomes. Victims and survivors will be offered the opportunity to play a central role in this learning process by sharing their insights into the dynamics of abuse in sports.

When a person is harmed at an ATP event, ATP will fund external, independent and (in accordance with applicable law) confidential support for an appropriate number of sessions, as determined by the ATP Safeguarding Advisory Panel, with a licensed therapist. If the person harmed is an ATP player member, they can discuss support options with the ATP Director of Player Wellbeing and can be referred to an external clinical mental health service when requiring specialist trauma therapy. In such cases, in order to avoid any actual or perceived conflict of interest, ATP will appoint an external case manager who will be responsible for coordinating support options.



ROLES AND RESPONSIBILITIES

3.1 Designated Safeguarding Officer

Every Tournament Director must appoint a DSO. The DSO must have the requisite skill set and training to perform the following functions, in each case subject to and in accordance with the Procedures:

- 1) Oversee the implementation of the safeguarding standards set forth in this Section 3.
- 2) Receive and respond to safeguarding concerns or complaints related to the tournament and its staff and volunteers.
- 3) Ensure that appropriate actions are taken to manage any risks identified.
- 4) Keep the Tournament Director up to date regarding (i) the implementation of the Safeguarding Program and (ii) any concerns or complaints raised.
- 5) Liaise with the ATP Director of Safeguarding and external organizations (e.g. the police or social services) as appropriate and stipulated by the Safeguarding Program.

ATP will provide role-specific training to each DSO. The DSO will report to the Tournament Director and have a line of communication to the ATP Director of Safeguarding.



3.2 ATP Safeguarding Advisory Panel (Panel)

The role of the Panel is to oversee the faithful implementation and administration of the ATP Safeguarding Program. The Panel will also review and determine safeguarding cases referred to it pursuant to the Procedures.

The Panel will consist of a minimum of six (6) and a maximum of twelve (12) individuals, including one (1) Chair.

Factors considered when selecting Panel members will be the amount of experience and demonstrated commitment to making a significant contribution to safeguarding. The persons selected will represent a range of suitable skills and cultural backgrounds.

Two (2) members of the Panel shall have at least eight (8) years' experience working or volunteering in tennis. The remaining members must be independent, which means they are not a current ATP employee, officer, director, tournament staff, player, coach or any other

person with an interest in ATP or any tournament or player that could influence their objective judgment regarding matters to be considered by the Panel (including any spouse, parent, sibling or child of any of the foregoing).

The Panel members (including the Chair) shall be appointed upon unanimous decision by ATP's EVP, People & Culture, Chief Sporting Officer and Director of Safeguarding. The CEO can at any time remove a member from the Panel. Every member of the Panel shall serve for a maximum of four (4) years, renewable once.

A majority of the Panel members entitled to vote shall constitute a quorum (so long as at least a majority of the quorum is independent), and the act of a majority entitled to vote at which a quorum is present shall constitute the act of the Panel.

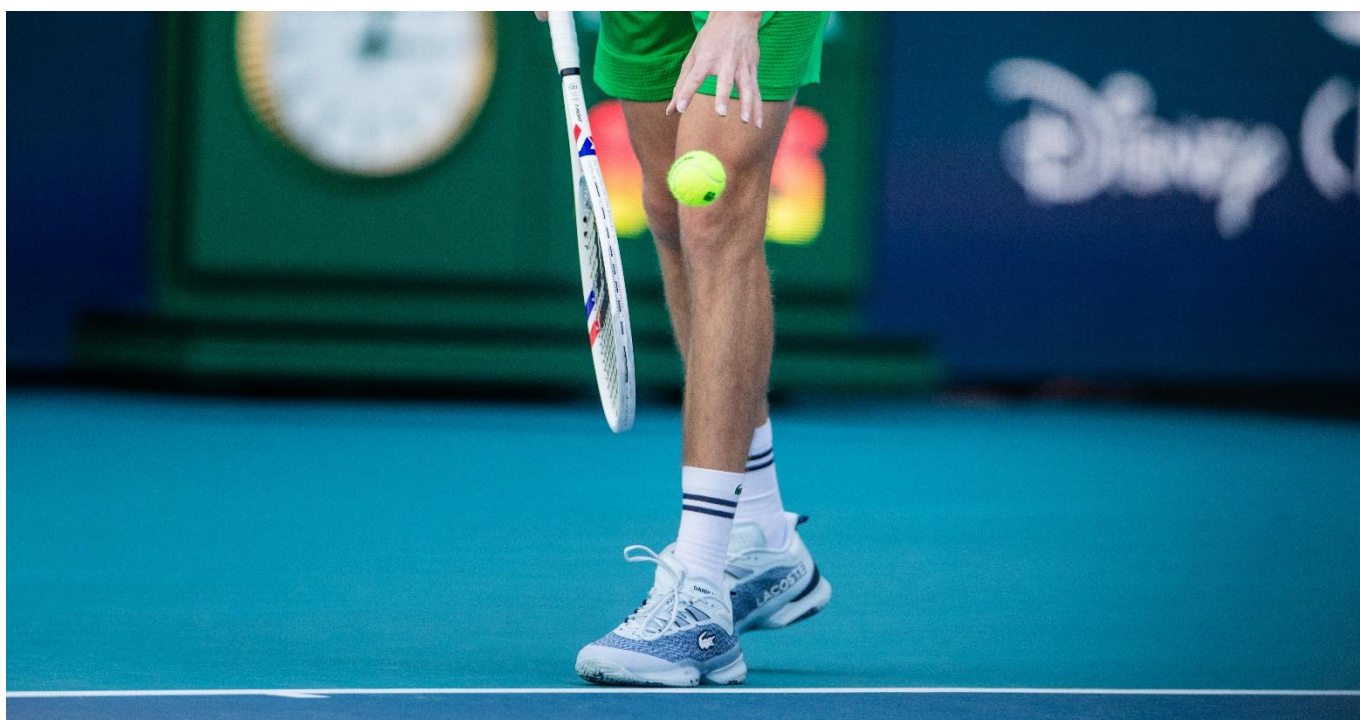
The Panel will convene whenever necessary and at least once per quarter. The ATP Director of Safeguarding will attend meetings. The Panel

may meet either in person or virtually by means of audiovisual conference.

3.3 ATP Director of Safeguarding

The Director of Safeguarding is responsible for implementing the Safeguarding Program, monitoring its effectiveness, and ensuring that all tournaments are compliant.

The ATP Director of Safeguarding has the power to investigate any safeguarding allegation or concern. The ATP Director of Safeguarding does not need to disclose grounds for the initiation of a safeguarding investigation, and the decision to investigate cannot be contested. The ATP Director of Safeguarding may delegate investigatory responsibility to a third person of its choice, e.g., the tournament DSO.



APPENDIX 1 – CONFIDENTIALITY FRAMEWORK

Personal information collected through the Safeguarding Program will be treated in accordance with applicable data protection laws and regulations. When ATP receives a report regarding a safeguarding concern, efforts will be made to maintain confidentiality regarding the details of the report, as deemed appropriate by ATP in its good faith judgement. Exceptions to confidentiality may include, but are not limited to:

- 1) When sharing information is required by law or requested by a relevant statutory agency or regulatory body;
- 2) If a person is believed to be at risk of harm, necessitating sharing of information with the relevant statutory agencies for investigation;
- 3) The Director of Safeguarding will share relevant reports or concerns with the Senior Vice President, Rules and Competition;
- 4) Where lawful and appropriate (as determined by ATP), the reporter and all those affected by the safeguarding incident will be kept reasonably informed of the progress of any investigation; and
- 5) If ATP believes there is a need to share information with external organizations, including other sporting and tennis bodies (e.g. Grand Slams, ITF, WTA and ITIA).

APPENDIX 2 – SAFEGUARDING POSTER



Please report if you personally experience, witness, or suspect any type of abuse or misconduct including:

SEXUAL ABUSE	PHYSICAL ABUSE	PSYCHOLOGICAL OR EMOTIONAL ABUSE
DOMESTIC ABUSE	ONLINE ABUSE	ANY BEHAVIOR THAT POSES A RISK TO SAFETY

How to make a report:

Please report anything you witness, experience, or suspect that threatens your physical or emotional safety or wellbeing or that of someone else. All reports will be handled with care and confidentiality.

Make a formal report

- File a report with the ATP Safeguarding Team by emailing: safeguarding@atptour.com
- Report to a Tournament Designated Safeguarding Officer or an ATP staff member onsite.
- Scan the QR code



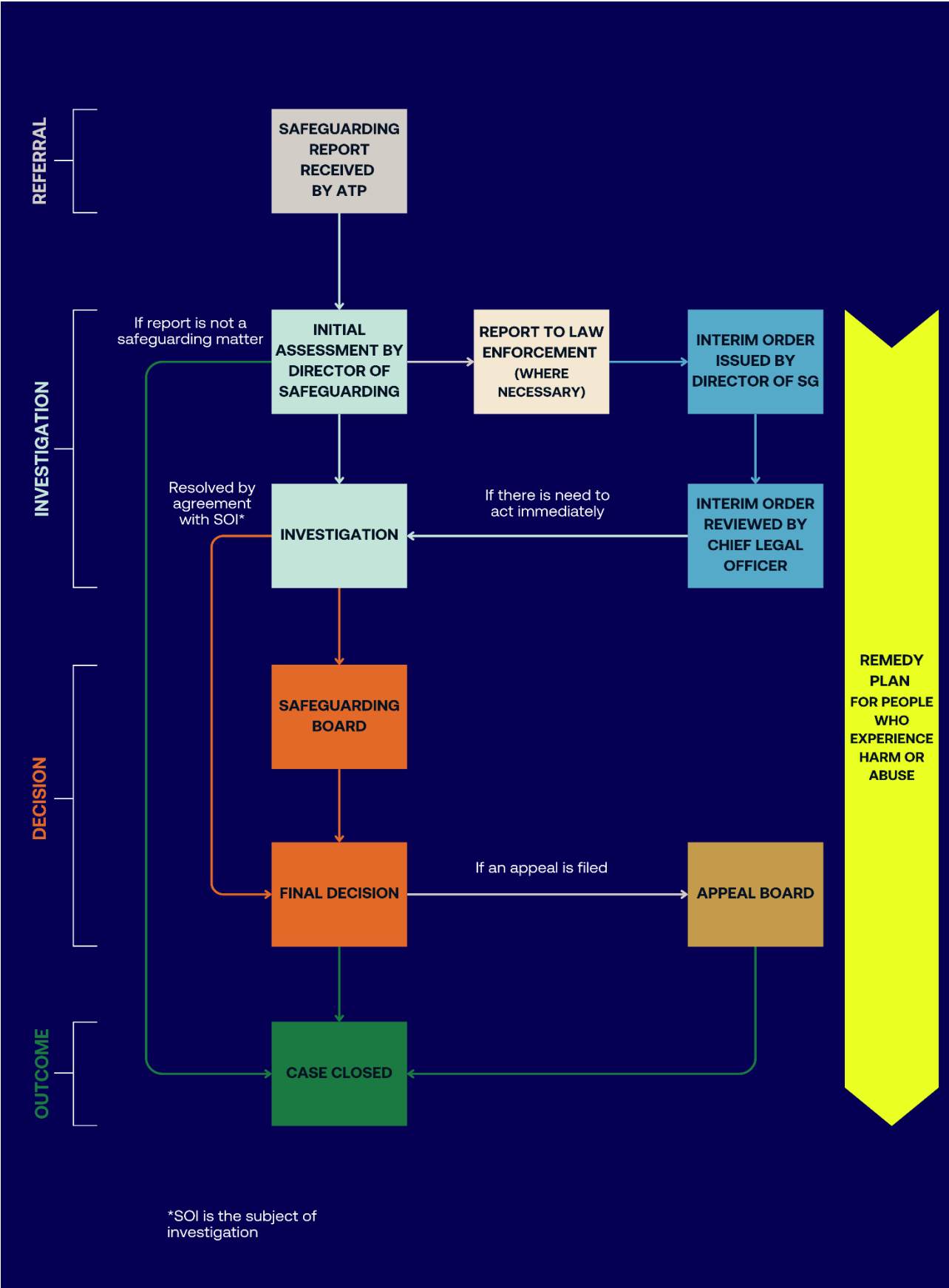
Report Anonymously

- Submit a report anonymously via RealResponse secure portal
- Send a message via SMS or WhatsApp to **+1 (904) 372 1287**
- Scan the QR code



For additional questions or support, contact Andrew Azzopardi, Director of Safeguarding at: andrew.azzopardi@atptour.com

APPENDIX 3 – SAFEGUARDING CASE FLOWCHART



APPENDIX 4 – SAFEGUARDING MEASURES GUIDE

The Safeguarding Measures Guide assists the Deciding Body in safeguarding cases. It establishes the possible safeguarding measures available to the Deciding Body in determining how best to manage any risk posed by individuals being assessed. The final discretion of any decision remains the responsibility of the Deciding Body.

Violation Category	Impact	Penalty options
Minor	Low	Written warning, mandatory training.
Minor	Moderate	Mandatory training, close supervision.
Moderate	Low/Moderate	Suspension, restrictions on access, no-contact orders.
Moderate	High	Suspension, restrictions on access, accreditation withdrawal.
Severe	Any	Permanent ban, referral to external authorities, no-contact orders.

Every safeguarding investigation must classify any concerning behavior or alleged misconduct into one of the following violation categories and its impact needs to be assessed according to the guidelines below. The maximum measure the ATP can take in a safeguarding case is the permanent revocation of accreditation and denial of access to all ATP Tour and ATP Challenger Tour tournaments.

Violation categories

- **Minor Violations:** e.g., unintentional boundary crossings or minor inappropriate behavior (e.g., offhand remarks, poor judgment in communication).
- **Moderate Violations:** e.g., repeated inappropriate behavior, non-compliance with safeguarding policies, or actions causing discomfort or distress (e.g., persistent inappropriate jokes, exclusionary conduct).
- **Severe Violations:** e.g. any form of abuse (physical, emotional, sexual or neglect), harassment, or deliberate misconduct causing significant harm or risk.

Assessing the Impact

- **Low Impact:** No direct harm but potential for discomfort or risk.
- **Moderate Impact:** Significant distress or harm to a participant's safety or dignity.

- **High Impact:** Substantial harm or risk to physical, emotional, or psychological wellbeing.

Other factors

When deciding on a safeguarding investigation, the Deciding Body will also take into account the context and intent of the behavior, for example:

- Was the behavior intentional or unintentional?
- Is there a power imbalance (e.g., a coach-player or senior-junior staff or volunteer dynamic)?
- Are there patterns of repeated behavior, or is this a first-time incident?

Mitigating and Aggravating Factors

- Mitigating *Factors*:
 - Genuine remorse or apology.
 - Immediate corrective actions taken by the individual.
 - Cooperation with the investigation process.
- Aggravating *Factors*:
 - Refusal to cooperate or deliberate attempts to obstruct the investigation.
 - Retaliation against the reporter or victim.
 - History of previous violations.