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**WTA:**

**Submission to the  
Independent  
Review Panel**

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**Independent  
Review  
of Integrity  
in Tennis**

**APPENDIX**

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# *Submission to Independent Review Panel*



1. The Women's Tennis Association (WTA) is the worldwide professional tennis tour for women. It is the highest level of professional tennis for women. The 2017 season includes 55 events that occur in 31 countries. In 2016, over 480 million fans watched the WTA on television and digital channels around the world. While the number of events on the WTA has remained fairly consistent over the past 10 years, the television and digital broadcast of WTA matches has increased exponentially with over 2,600 hours of live coverage now available.
2. Integrity of the game and the players is critical to the success and reputation of the WTA as well as its individual tournament and player members. Knowing this, over 10 years ago, the WTA took the initiative to review its anti-corruption policies and procedures. While this review found that women's tennis was extremely "clean," the WTA decided that it did not want to be complacent and must continually strive to do more to ensure that the sport remain of the utmost integrity and free of corruption as well as the suspicion of corruption.
3. As this zero tolerance approach to combating corruption was shared by the other tennis governing bodies, a collaborative effort that is still underway today was begun with the hiring of outside experts to conduct an environmental review of the threats posed to professional tennis by gambling. This in turn led to creation of the Tennis Integrity Unit (TIU) and implementation of a unified Tennis Anti-Corruption Program (TACP) in 2008, funded entirely by the tennis governing bodies.
4. Since the TIU was created, the WTA has continued to work closely with the other tennis governing bodies to assure that the TIU is fulfilling its mission with the resources available, which resources have grown year over year in correlation to the perceived risk of corruption.
5. The WTA's efforts to combat corruption extend beyond its financial support for the TIU. In particular, the WTA recognizes the importance of education for all those involved in the sport. The WTA's multi-pronged efforts to address integrity risks include: (a) player, tournament and staff education, including required on-line integrity and WTA rule modules, player meetings with TIU investigators, regular player notices and Supervisor training; (b) adoption and enforcement of rules specifically aimed at mitigating the risk of corruption such as required use of web filtering at tournaments to restrict access to internet gambling sites, prohibition on the issuance of credentials to persons who work for gambling companies that accept tennis wagers, prohibition on gambling companies accepting tennis wagers on a tournament website or at a tournament site, and a requirement that all media areas be gambling-free zones; (c) assistance with investigations by the TIU; (d) management's and in-house counsel's active participation on the Tennis Integrity Board and as a Professional Integrity Officer; (e) creation of a centralized, on-line WTA credentialing system; (f) continual review and updating of security guidelines and security consultation with events; (g) a social media reporting process for players receiving unwanted approaches; and (h) player support services.

6. The WTA also strives to provide a calendar from which players can choose a schedule which allows for their optimum health and fitness for competition thereby enabling them to participate fully in WTA events. This was a core goal of the 2009 Roadmap. The Roadmap implemented circuit structure changes to address, among other things, rampant player injuries and subsequent withdrawals, insufficient rest breaks, and flat prize money. These changes included stronger penalties for late withdrawals, a longer off season, and increased prize money, all of which can minimize situations in which integrity can be compromised.
7. The WTA examined the effects of the Roadmap in 2012 and found that considerable improvements had been made in player commitments, withdrawals, court calls, medical time outs and retirements/walkovers. One of the biggest successes post-Roadmap was a 51% increase in the amount of prize money awarded at WTA events in 2012 as compared to 2008, which resulted in players ranked 150+ on average earning from \$16,000 to \$700,000 more per year.
8. The WTA Code of Conduct mandates that players give their best efforts in every match and players risk penalties for failure to adhere to this requirement. It should be noted, however, that apart from match-fixing concerns, which may produce some evidence, the ability to determine whether an athlete has or has not given best efforts on a given day is limited and extremely subjective. This is naturally the case in any sporting event.
9. Players annually agree that they are solely responsible for ensuring their health and fitness to play WTA sanctioned events. Thus, no matter how much the WTA becomes aware of a player's injuries or illnesses through the course of treatment at events, the player possesses her full health information and remains the best person to judge her physical limitations. To take away a player's discretion to make this judgement would dramatically alter the relationship between the WTA and player.
10. The WTA annually reviews its rules and adopts changes to better address issues such as those mentioned above which could affect integrity. For example, beginning in 2012, tournaments were prohibited from releasing match data from the grounds of the tournament until 30 seconds after the actual occurrence of the incident of match play (except as included within the television broadcast or live audio/video internet stream). In addition, beginning in 2016, if there is a Main Draw vacancy before Qualifying is completed, then the order of the two highest-ranked lucky losers is drawn randomly. A ban on the use of electronic devices by players on court has also been put in place. These are but a few of the many examples of the WTA's proactive efforts to assure the sport's integrity.
11. Currently, the WTA is in the midst of another circuit structure review and embarking upon a complete re-draft of its rules. The circuit structure concepts being explored would result in higher player earnings, greater ranking mobility for players, and better alignment with the ITF Pro Circuit to create a clear path for rising players, and would further optimize player fitness and health for competition. In the discussions to date, the WTA stakeholders agree that the WTA must continue to evolve in order to remain the global leader in women's professional sport.

12. Accessibility to watching matches is important for the fans, and media rights are an important revenue stream for the WTA members. The growth in broadcast over the past three years is a direct result of the WTA's agreement with PERFORM, which aggregates WTA tournament media rights for delivery across linear, digital and over-the-top (OTT) offerings. This agreement was the largest live media rights and production venture in the history of the WTA and in women's sports as of 2014, and part of a greater strategic initiative to increase the exposure of, and fan access to, the WTA in a controlled and monitored manner.
13. Through the WTA's media agreement with PERFORM, streaming rights are only licensed to regulated betting houses. By virtue of these agreements, we obtain information and cooperation from the betting houses that are essential to combating corruption.
14. Similarly, the WTA's agreement with the ATP for the provision of live WTA and ATP match data to IMG for onward distribution to legal gambling operators includes joint obligations to pursue unofficial data resellers and target, discourage, and prevent courtsiders from coming to matches. The security teams of the WTA and individual tournaments make considerable efforts to police courtsiding and work collaboratively with outside law enforcement agencies.
15. The WTA appreciates the work of the Independent Review Panel (IRP). The information and witness statements that have been submitted to the IRP by the WTA and its stakeholders, including former and current staff, players, agents, Board members and tournament directors, should have provided the IRP with the necessary background and insight to assess the specific integrity issues relevant to women's tennis.
16. The integrity of the sport of tennis and the players is critical to the fan support and marketability of professional tennis. The WTA is in favor of a continued uniform approach to the handling of corruption and related matters, and is committed to working with the other tennis governing bodies in the efforts to promote even greater integrity in professional tennis. To truly be effective and embraced by the athletes, events, and fans, the WTA believes that such efforts must appropriately reflect the realities of the sport and be proportionate to the actual risks at hand.