

Racing
Integrity
Commissioner

—
Annual Report
2019–20



Racing Integrity
Commissioner



Celebrating 10 years of the
Racing Integrity Commissioner

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Letter to the Minister

The Hon. Martin Pakula MP

Minister for Racing

Level 36, 121 Exhibition Street

Melbourne Vic 3000

Dear Minister,

I am pleased to present to you my Annual Report for the year ending 30 June 2020 for presentation to Parliament, in accordance with section 37F(1) of the *Racing Act 1958*.

This report documents the performance of my functions, exercise of my powers and integrity related issues determined to be in the public interest.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Sal Perna', with a stylized flourish at the end.

Sal Perna AM

Racing Integrity Commissioner

Vision, Mission, Strategic Objectives and Values

Our Vision

A Victorian Racing Industry in which Thoroughbreds, Standardbreds and Greyhounds compete to the best of their natural ability, free from the influence of crime and corruption.

Our Mission

To promote the highest standards of integrity assurance in the Victorian Racing Industry.

Our Strategic Objectives

- Enhance public confidence in the integrity of Victorian racing.
- Develop leadership in racing integrity assurance.
- Enhance existing racing integrity assurance processes and systems.

Our Values



Integrity —

We will be accountable, fair and transparent.



Independence —

We will act impartially, without fear or favour.



Leadership —

We are committed to being at the forefront of integrity assurance.



Professionalism —

We are dedicated to achieving excellence.



Engagement —

We will develop successful partnerships built on trust.

The Racing Integrity Commissioner

The *Racing Act 1958 (Vic)* (Racing Act) establishes the statutory position of Racing Integrity Commissioner.

Mr Sal Perna AM is the current and inaugural appointee to the role of the Racing Integrity Commissioner (Commissioner). Mr Perna commenced as Commissioner on 1 March 2010 for an initial two-year term and the Governor in Council has since extended Mr Perna's appointment on four consecutive occasions, with the current term of appointment extending to February 2021.

The Commissioner's role is to provide independent oversight of integrity related matters across the Victorian Thoroughbred, Harness and Greyhound racing codes, including the three controlling bodies that regulate each respective code: Racing Victoria (RV), Harness Racing Victoria (HRV) and Greyhound Racing Victoria (GRV).

Our functions

The Racing Act guides the functions of the Commissioner and consequently those of the Commissioner's staff – the Office of the Racing Integrity Commissioner (ORIC). The Commissioner's key functions are set out in section 37B of the Racing Act to:

conduct annual audits of the internal integrity processes and systems of each controlling body in areas identified by the Commissioner, by the Commissioner in consultation with each controlling body, by the Victorian Racing Integrity Board (VRIB), or by the Commissioner in consultation with VRIB

- **conduct audits** outside the subject matter of the annual audit if a controlling body requests that such an audit be conducted
- **conduct audits** of the internal animal welfare processes and systems of each controlling body to the extent that they relate to integrity in racing
- **investigate complaints** made about the integrity processes and systems of a controlling body
- **refer complaints** to Victoria Police, Independent Broad-based Anti-corruption Commission (IBAC), a relevant controlling body, Victorian Commission for Gambling and Liquor Regulation, relevant government agency or VRIB
- **investigate** matters referred by the Minister for Racing, VRIB or a controlling body

- **investigate** public interest complaints that relate to the conduct of a controlling body or an employee, officer or member of a controlling body
- **report the findings** of any investigations conducted into complaints that have not been referred to other bodies
- **conduct own motion inquiries** that do not relate to any specific complaint and may include an investigation into systematic issues in racing
- **make recommendations**, if appropriate, following the investigation of any complaints, inquiry or matter to the Minister, VRIB or the relevant controlling body
- **direct the Victorian Racing Tribunal** (VRT) to hear and determine an appeal made by a person against a penalty imposed on the person under the rules of a controlling body if the penalty imposed is a fine of not more than \$250 and the Commissioner considers that it is in the public interest for the appeal to be heard
- **perform any other functions** conferred on the Commissioner under the Racing Act.

Under the Racing Act, the Commissioner may:

- **use additional powers** while conducting certain investigations or inquiries, such as summons and examine specified classes of persons, in accordance with section 37BA. These powers are sometimes referred to as 'Board of Inquiry' or 'coercive' powers
- **take evidence** on oath or affirmation in accordance with section 37BD
- **disclose integrity related information**, as appropriate, to specified persons and bodies in accordance with section 37E.

Detailed information about the Commissioner's functions and powers can be found in Part 1A of the Racing Act, available at www.legislation.vic.gov.au

About ORIC

The Commissioner is supported by employees of the Department of Jobs, Precincts and Regions, who enable the Commissioner to perform his functions and exercise his powers.

All employees report directly to the Commissioner in relation to their specific areas of responsibility.

The key responsibilities of the team include:

- investigating complaints and information
- managing the systems and processes for the collection, collation, analysis and dissemination of intelligence and information
- producing intelligence reports, presentations and data analysis
- managing the Case Management System
- project management
- conducting audits
- policy development
- business continuity planning
- strategic and business planning
- risk management and compliance
- developing training programs
- office operations (such as finance, human resources and procurement)
- submitting annual reports.

Annual declarations

Staff complete annual declarations and adhere to the 'no betting policy' throughout their employment at ORIC. The Commissioner personally reviewed all staff declarations in the 2019–20 reporting period.

Privacy and data protection

Compliance with the Public Interest Disclosure Act

The *Public Interest Disclosure Act 2012* (Vic) encourages and assists people in making disclosures of improper conduct by public officers and public bodies and provides protection to people who make disclosures in accordance with its provisions. It establishes a system for the matters disclosed to be investigated and recommends actions to be taken.

Reporting procedures

ORIC is not empowered by legislation to receive disclosures under the Public Interest Disclosure Act. Disclosures of improper conduct or detrimental action by the Commissioner or employees of ORIC may be made directly to IBAC:

Independent Broad-based Anti-Corruption Commission
GPO Box 24234
Melbourne VIC 3000
Toll free: 1300 735 135
Website: www.ibac.vic.gov.au

Alternatively, disclosures of improper conduct or detrimental action by employees of ORIC may be made to the Protected Disclosure Coordinator of the Department of Jobs, Precincts and Regions:

James Kelly
Public Interest Disclosure Coordinator
Executive Director, Ministerial and Portfolio Services
Level 5, 1 Spring Street
Melbourne Vic 3000
Telephone: 03 8392 6978
Email: james.kelly@ecodev.vic.gov.au

Freedom of Information

The *Freedom of Information Act 1982* (Vic) extends, as far as possible, the right of the public to access information in the possession of the Victorian Government and other bodies.

During the 2019–20 reporting period, one Freedom of Information (FOI) request was received. The Commissioner was not in the possession of the requested information.

Making a request

ORIC accepts payment of the FOI application fee by cheque or money order, made payable to the Department of Jobs, Precincts and Regions.

Requests for documents in the possession of ORIC, enclosing a cheque or money order for the application fee, should be addressed to:

Freedom of Information
Racing Integrity Commissioner
PO Box 24034
111 Bourke Street
Melbourne Vic 3001

Further information regarding FOI can be found in the Commissioner's Part II Information Statement, available at

www.racingintegrity.vic.gov.au

or on the Office of the Victorian Information Commissioner's website at <https://ovic.vic.gov.au>

Finances and administration

ORIC is funded through the Department of Jobs, Precincts and Regions and the State Budget. As ORIC is administratively supported by the Department of Jobs, Precincts and Regions, detailed reporting relating to the financial performance, governance, workforce data and other disclosures are contained within the annual report of the Department of Jobs, Precincts and Regions.

Risk management

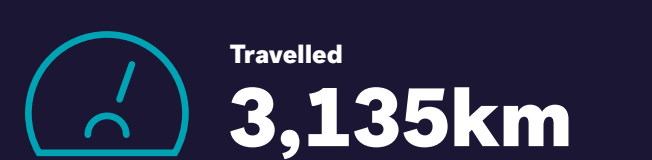
The operations of ORIC take a risk management approach, which was adopted following an enterprise-wide risk assessment and development of a risk register. This risk assessment uses methodology based on International Risk Management – Guidelines ISO 31000: 2018.

The *Public Interest Disclosure Act 2012* (Vic) encourages and assists people in making disclosures of improper conduct by public officers and public bodies...



2019–20 at a glance

The powers and functions of the Commissioner under the Racing Act provide the framework for the operations undertaken by the Commissioner each year. Key operational activities undertaken in the 2019–20 financial year are set out in detail. The Commissioner’s operations are summarised against the relevant provisions of the Racing Act in the ‘Operations snapshot’ section of this report.



To host **12** roadshows in regional Victoria and metropolitan Melbourne



Met with **2,606** stakeholders from **831** organisations

.....
Since **2010** met with **21,260** stakeholders



.....
Since **2012** travelled over **27,000** kilometres to host **100** roadshows across regional and metropolitan Victoria, with **968** attendees



Delivered **3** presentations to **25** apprentice jockeys



Conducted race day operational visits to **36** country race meetings and **24** metro race meetings



97



60

Undertook **97** operational visits including **60** to race meetings across the **3** codes, as well as hearings of the RADB, VRIB, wagering service providers and racing laboratory visits



21



450

Delivered **21** presentations to **450** attendees

Since **2010**, **8,079** people attended presentations by the Commissioner



341

↑ 14.4% increase

Received, assessed and responded to **341** information reports, complaints and enquiries (an increase of 14.4% compared to 2018-19)

Quarterly comparison

The table below highlights some of the operational and stakeholder management activities undertaken by the Commissioner and his office during the 2019-20 reporting period. The statistics for the first two quarters, from 1 July 2019 to 31 December 2019, represent the pre-COVID 19 period and the statistics from

1 January 2020 to 30 June 2020 represent ORIC operations during the COVID-19 period. A decline in the activities below, except for the number of meetings attended, is attributed to restrictions placed by the Victorian Government and staff inability to attend race meetings and conduct operational visits.

Quarter	No. of organisations met	No. of meetings attended	No. of people met	No. of presentations conducted	No. of race meetings attended	No. of other operational visits conducted
Jul 19-Sep 19	206	219	573	6	18	12
Oct 19-Dec 19	288	242	1,030	4	29	13
Total Jul 19-Dec 19	494	461	1,603	10	47	25
Jan 20-Mar 20	204	189	572	10	13	12
Apr 20-Jun 20	133	311	431	1	0	0
Total Jan 20-Jun 20	337	500	1,003	11	13	12

Operations

Inquiries and investigations

During the 2019–20 reporting period, ORIC undertook a number of inquiries and investigations into a variety of matters.

In July 2019, ORIC received information through its Integrity Hotline that a person was offering ex-racehorses, gratis, on Gumtree in breach of a policy. The caller was concerned the animals were entire, would be used to breed and then be destroyed. The matter was referred to the controlling body for investigation. The seller was identified and charged with breaching the rules of the controlling body.

In July 2019, ORIC received information relating to a trainer experiencing financial difficulty and racing 'unsound' animals. The matter was referred to the relevant racing code and the Royal Society for the Prevention of Cruelty to Animals (RSPCA). RSPCA and the racing code undertook a joint investigation. While no breaches of the rules of racing were identified, the racing code worked with the participant to address personal welfare issues and referred them to a relevant agency for assistance. This case demonstrated the ability of integrity officials to work with a variety of agencies and authorities across several jurisdictions to achieve a positive outcome.

In August 2019, ORIC received information through the Integrity Hotline relating to a trainer who was mistreating their animals. The matter was referred to the relevant racing code and RSPCA. RSPCA and the integrity official from the relevant racing code attended and conducted a joint investigation. No breaches of the rules of racing were identified; however, the participant was given guidance about appropriate living conditions and cleanliness standards. The racing code took action against the industry participant for other unrelated matters. This case demonstrated the importance of the Integrity Hotline for reporting matters without fear of retribution and the ability of integrity officials to work with a variety of agencies to achieve a positive outcome.

In November 2019, ORIC reviewed and assessed expert legal opinion about breeding and syndication compliance concerns in one of the controlling bodies. A review was undertaken with the assistance of the Australian Securities and Investments Commission (ASIC) and key participants in the Victorian Racing Industry (VRI), resulting in a formal referral to the relevant racing code, that code's national body and ASIC. The national body advised that this issue merits negotiation with the Commonwealth Government and have taken the lead on the matter.

In December 2019, ORIC received information through its Integrity Hotline from an owner based interstate, alleging that a Victorian based syndicator was providing false syndication documents and withholding prizemoney. The matter was referred to the relevant racing code. The racing code advised that the information provided vital corroboration in an existing joint investigation with the Victorian Commission for Gambling and Liquor Regulation involving other complainants.

In January 2020, ORIC received information about committee members allegedly breaching a racing club's Constitution. While the matter was assessed as not falling within the Commissioner's jurisdiction, the complainant was provided with advice regarding relevant bodies, including Consumer Affairs Victoria and the Victorian Dispute Settlement Centre. This highlighted the value of ORIC being a centralised office for advice and the importance of inter-agency information sharing arrangements, networking and stakeholder engagement.

In February 2020, ORIC received a complaint from an industry participant based overseas stating that animals from their country that race in Victoria are always given the outside barrier to prevent them from being competitive. The complainant alleged this was corruption, bias and a lack of integrity. The complainant was advised on the code's electronic barrier drawer system, related independent audits and the state controlling body's policy on manual barrier draws.

In March 2020, ORIC received a complaint about a racing industry participant using social media to commit breaches of the rules and possible criminal offences against a member of an animal activist group. The matter was referred to the relevant racing code for investigation and advice on the potential of criminal offences being committed so Victoria Police could be advised. The matter was investigated and assessed, and no criminal offences were identified. The industry participant was charged and penalised for breaching the rules of the relevant code regarding social media usage.

In March 2020, ORIC received a complaint that a trainer had returned from overseas and attended morning track work, failing to self-isolate in accordance with the Commonwealth Government's mandatory self-isolation curfew and consequently putting the VRI at risk of contracting COVID-19. ORIC urgently referred the matter to the relevant racing code and Victoria Police Sporting Integrity Intelligence Unit. ORIC further made an urgent request to the Australian Border Force, in accordance with an existing Memorandum of Understanding, to obtain the industry participant's travel information. It was quickly ascertained that the member had arrived prior to the compulsory curfew times and had not breached the COVID-19 protocols. The pace at which the matter was resolved is an example of the importance of robust information sharing arrangements, stakeholder relationships and the positive working relationship between ORIC and law enforcement agencies.

In April 2020, ORIC received a complaint that employees of a corporate media organisation were still allowed on track during the COVID-19 restrictions, gaining an advantage on 'in-play' betting markets by being on track when the remainder of the punting public were not. The complainant was interviewed, and it was ascertained that the complaint related to two tracks in Victoria and others interstate. The complaint was referred to the relevant controlling bodies, Victorian Commission for Gambling and Liquor Regulation, Tabcorp and the relevant interstate integrity body.

Illicit drug use

According to the Australian Criminal Intelligence Commission's most recent National Wastewater Drug Monitoring Program, data indicates that consumption of the three major illicit stimulants – methylamphetamine, cocaine and methylenedioxymethamphetamine (MDMA) – has increased in capital city and regional sites, albeit not consistently, since August 2016.

Throughout the 2019–20 reporting period, the Commissioner received an increase in reports relating to participants using illicit substances in comparison to previous years. These matters were disclosed to the relevant racing codes and law enforcement agencies.

Industry participants using illicit substances can pose a number of integrity risks, including:

- increasing the risk of an animal in their care being contaminated with an illicit substance, which may result in testing positive to a prohibited substance
- potential association with organised crime figures increasing the risk of corrupt activities, which may impact the integrity of racing.

Prohibited substances

Throughout the 2019–20 reporting period, the Commissioner received a number of reports that related to the use of prohibited substances across all three racing codes.

ORIC continues to engage with the codes, law enforcement agencies and relevant government agencies to increase intelligence holdings in relation to the use, manufacturing and trafficking of prohibited substances to proactively identify emerging trends and risks.

Audits

Section 37B of the Racing Act provides for the Commissioner to conduct an annual audit of the internal integrity processes and systems of each of the three racing controlling bodies in areas identified by the Commissioner, or by the Commissioner in consultation with each controlling body.

In addition to this annual audit, ORIC also undertakes an annual audit of the private interests and declarations of integrity officials within each controlling body.

Since the inception of ORIC in March 2010, annual audits have been conducted in the following integrity aspects of the VRI.

Audit	Year undertaken	Outcome
Declarations of private interests and betting account registers	Annually	Anomalies addressed
Integrity risk management	2019–20	76 recommendations in total pending completion
End to end management of investigations	2018–19	12 recommendations made to each racing code
Integrity processes and systems relating to animal welfare	2017–18	22 recommendations made to each racing code
Controls to manage 'undesirables' (persons who pose a risk to racing)	2016–17	12 recommendations pending completion
Drug swabbing processes	2015–16	11 recommendations; fully implemented
Career management of integrity officials	2014–15	59 recommendations fully implemented
Race day animal identification	2013–14	9 recommendations; fully implemented
Industry compliance with submission and verification of private interest declarations and implementation of previous Commissioner recommendations	2012–13	13 recommendations; fully implemented
Drug sampling policies and box and barrier draws	2011–12	34 recommendations; fully implemented
Review of existing integrity systems and processes	2010–11	6 recommendations; fully implemented

Operations *(cont.)*

Annual private interests and betting accounts audit

During 2018–19, ORIC conducted its annual audit of the three codes' Private Interests, Probity and Conflict of Interest, Gifts and Benefits and Betting Account Declarations. The audit involved collaboration with the relevant department heads of the controlling bodies including Integrity, Human Resources and Internal Auditors, to seek input into the Single Code of Practice (SCOP) Part A introduced in 2010 and assess the format, suitability and accuracy of information recorded in the codes' online declarations portal.

This audit is a key measure to ensure minimum integrity standards (for personnel performing integrity related roles and specified employees from the three racing codes) are maintained.

The Commissioner identified that the SCOP, while still relevant and noting no change to his intent, was overdue for assessment and modification to ensure it remained relevant in the contemporary VRI integrity compliance environment.

The Victorian Government introduced laws to strengthen integrity standards, providing independent oversight and a robust disciplinary framework. This included the phasing out of the Racing Appeals and Disciplinary Boards (RADBs) and introduction of the VRT and VRIB, which both commenced on 1 August 2019. These are important changes in the integrity landscape and, as such, the SCOP and relevant reporting systems require revision to ensure ongoing compliance, transparency and accuracy in reporting.

The specifically developed online declaration system, which was introduced in 2016 to reduce the number of clerical errors and procedural anomalies and as a tool to enable greater scrutiny and management practices to be maintained, is subject to review by the controlling bodies. This review is required to stay up to date with the growth in the numbers of personnel performing integrity related roles and specified employees from the three racing codes and to ensure the system correctly captures the required data to comply with the revised ORIC SCOP.

The concurrent annual audit of integrity officials' Private Interests, Probity and Conflict of Interest, Gifts and Benefits and Betting Account Declarations, and random audit of betting account data, is underway and will be completed in the 2020–21 financial year. The resultant reports will provide the codes an opportunity to address deficiencies in the online reporting system to ensure compliance with the Commissioner's unchanged intent and commitment to ensuring the highest possible integrity standards.

Animal welfare processes and systems audit

The functions of the Commissioner were expanded from 4 May 2016 to include the ability to conduct audits of the internal animal welfare processes and systems of each controlling body to the extent that they relate to integrity. This legislative change arose from the 2015 Own Motion Inquiry into Live Baiting in Greyhound Racing in Victoria.

The scope of the ORIC audit in 2018 was to review the animal welfare integrity systems of RV, HRV and GRV. A comprehensive examination of the following was completed for each racing code:

- legislation
- rules
- policies and procedures
- integrity welfare frameworks
- position descriptions of officials performing animal welfare roles relating to integrity
- capacity development of staff and participants in respect to animal welfare integrity.

A set of principles for animal welfare integrity was developed during the audit process, with a focus on a framework to design and assess the animal welfare integrity systems of a racing controlling body.

The principles would:

- define 'good animal welfare'
- describe how 'good animal welfare' will be achieved
- drive improvement in animal welfare across the industry
- develop the capacity of industry participants to deliver the desired animal welfare outcomes
- detect instances of compromised animal welfare
- detect poor behaviour by industry participants in respect to animal welfare through appropriate sanctions
- decrease the number of surplus animals that are generated throughout the lifecycle of the animal
- disclose the industry's performance in animal welfare to ORIC, RSPCA Victoria and the community.

Based on this framework, the audit resulted in a total of 22 recommendations for each of the three racing codes to ensure strong animal welfare integrity.

The matters arising from this audit are still in progress and will be finalised during the 2020–21 financial year.

End to end management of investigations

In the 2018–19 reporting period, the Commissioner’s annual audit focused on the end to end process of the management of investigations within the three codes, as they relate to integrity and/or integrity related animal welfare matters.

*Integrity remains one of the most important aspects of the racing industry in Victoria. The continued development and improvement of integrity processes and practices will enhance the reputation and transparency of the codes.*¹

The audit found that the standard of investigations within each code was high and made 12 recommendations that could further improve processes and standards. This remains in progress and is expected to be completed in the 2020–21 financial year.

Integrity risk management

The key objective of the 2019–20 audit was an assessment of the integrity risks each code identified and the effectiveness of their systems and processes to manage those risks.

The audit found that ‘All three Codes have mature and professional Integrity Departments (ID) lead by renowned industry experts and comprising specialist personnel across the key integrity areas of intelligence, investigations, analysis, veterinarian services and animal welfare.’²

The audit made 76 recommendations across the three codes. This work remains in progress and is expected to be completed in the 2020–21 financial year.

Recommendations

Since the Commissioner commenced his role in 2010, a total of 218 recommendations have been made under the Act (this does not include the recommendations made as a result of the audits conducted since 2018). A total of 214 (or 98 per cent) of the Commissioner’s recommendations were implemented as per the following table.

‘The Commissioner, and the Commission staff, are continuing to actively think about integrity matters and not just going through an annual process. Well done!’

Roadshow industry participant

Code/body	Number of recommendations made	Number of recommendations implemented	Percentage
RV	45	45	100
GRV	62	62	100
HRV	59	59	100
Government	38	34	90
Others	14	14	100
Total	218	214	98

¹ Audit Report into the end to end management of investigations 2019, SportsLawyer, page 3.

² 2019–20 Audit, Integrity Risk Management, Executive Summary, page 10.

Information and intelligence

ORIC has a customised Case Management System that records, manages and reports on information and intelligence received in the form of complaints, information reports and enquiries. Own Motion Inquiries, special inquiries, investigations and referrals from the Minister for Racing and controlling bodies are also managed in the Case Management System.

Complaints

During the 2019–20 reporting year, ORIC received 79 complaints. These complaints comprised allegations involving a range of issues, including:

- action and behaviour of other participants
- animal welfare
- corruption
- ownership and syndication disputes
- wagering and race fixing
- actions/activities of clubs and officials
- bullying and harassment
- inappropriate behaviour of stewards.

How were the complaints received?

A total of 92 per cent (73) of all complaints were received overtly, while the remaining 8 per cent (6) of complaints were received anonymously.

Complaints were received predominantly by email, via ORIC's Integrity Hotline or in telephone calls to ORIC, as follows:

- 52 per cent (41) received via email
- 28 per cent (22) received via the Integrity Hotline
- 16 per cent (13) received via a telephone call.

The remaining 4 per cent (3) of complaints were received via referral, mail or meeting directly with the Commissioner.

What did the complaints relate to?

Of the 79 complaints, 72 related to the controlling bodies as follows:

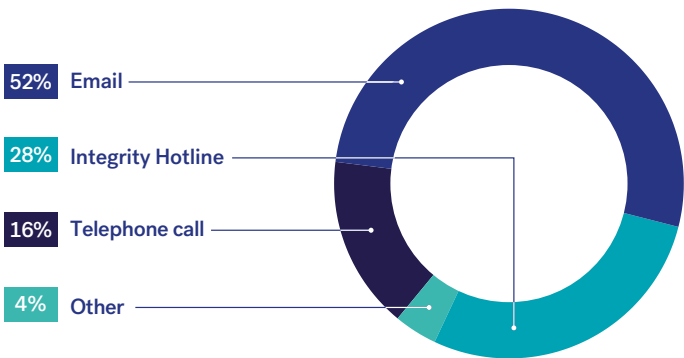
- 54 per cent (43) of complaints involved RV
- 29 per cent (23) of complaints involved GRV
- 8 per cent (6) of complaints involved HRV.

The remaining 9 per cent (7) did not relate to controlling bodies.

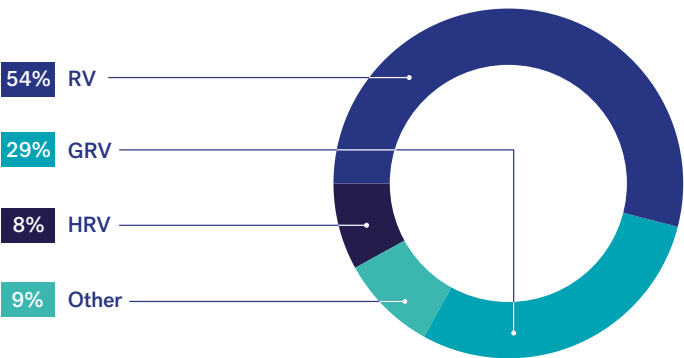
What do the complaints tell us?

Overall, the number of complaints increased by 18 per cent (12) when compared to the previous financial year. Complaints increased for both RV and GRV, rising 39 per cent (12) and 28 per cent (5) respectively, while HRV related complaints decreased by 54 per cent (7).

How were the complaints received?



What did the complaints relate to?



Code	2010 – 2011	2011 – 2012	2012 – 2013	2013 – 2014	2014 – 2015	2015 – 2016	2016 – 2017	2017 – 2018	2018 – 2019	2019 – 2020
GRV	14	9	5	9	21	30	25	14	18	23
RV	16	5	6	10	12	25	19	39	31	43
HRV	8	3	7	3	11	5	6	10	13	6
Other	4	0	4	2	3	4	3	4	5	7
Total	42	17	22	24	47	64	53	67	67	79

What were the outcomes of the complaints?

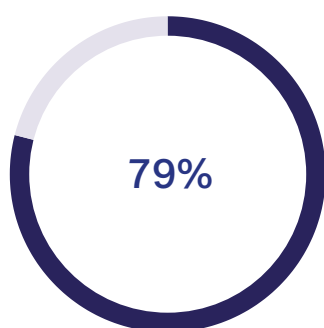
A total of 79 complaints were received, of which 77 were completed. Several complaints involved multiple allegations. Of the 77 complaints, there were 82 allegations, of which 12 per cent (10) were determined to be within the Commissioner's jurisdiction. Of these, 90 per cent (9) were either disproven or found unsubstantiated.

Of the remaining allegations:

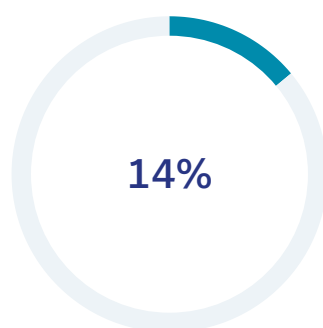
- 79 per cent (57) were deemed to be outside the Commissioner's jurisdiction
- 14 per cent (10) were unable to be investigated, as the complainant failed to reply to ORIC's request for further information
- 7 per cent (5) were deemed to be for information purposes only.

As a result of the 79 complaints received, ORIC referred and/or disclosed to a controlling body or government agency on 24 occasions for information and/or investigation purposes. Two complaints received during the 2019–20 financial year remained under investigation as at 30 June 2020.

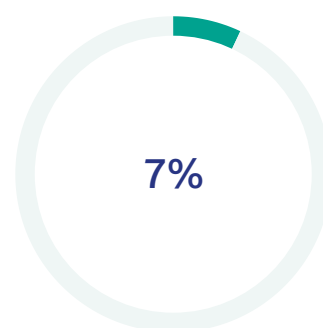
Outcomes of complaints



Outside the
Commissioner's
jurisdiction



Complainant
failed to reply



For information
purposes only

Information and intelligence *(cont.)*

Information Reports

An Information Report (IR) is a term applied to a document or computer entry recording information and/or intelligence received by ORIC.

During the 2019–20 reporting period, ORIC recorded 118 IRs. These IRs related to a number of issues:

- use of prohibited substances
- animal welfare
- alcohol/substance abuse by participants
- behaviour of participants
- criminal behaviour and criminal offences
- conflicts of interest
- breaches of the rules of racing.

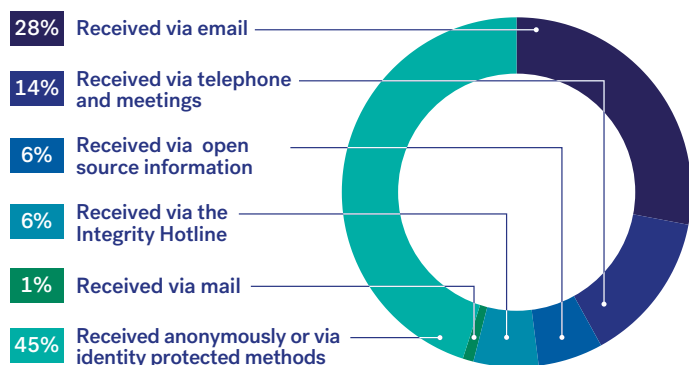
How were the IRs received?

A total of 55 per cent (65) of IRs were received overtly, including:

- 28 per cent (33) via email
- 14 per cent (17) via telephone and meetings
- 6 per cent (7) via open source information
- 6 per cent (7) via the Integrity Hotline
- 1 per cent (1) via mail.

A further 45 per cent (53) of IRs were received either anonymously or via identity protected methods.

How were the IRs received?



What did the IRs relate to?

Of the total number of IRs, 92 per cent (108) related to the controlling bodies, with 53 per cent (62) related to RV, 20 per cent (24) related to GRV and 15 per cent (18) related to HRV. One per cent (1) related to all three codes and 3 per cent (3) involved both HRV and RV.

The remaining 8 per cent of IRs related to international racing codes (1), interstate codes (5), government agencies (3) and a wagering service provider (1).

What were the outcomes of the IRs?

Several IRs included multiple allegations. Of the 118 IRs completed, there were 129 allegations made. The outcomes of the allegations were:

- 18 per cent (23) were disproven or unable to be substantiated
- 14 per cent (18) were not within the Commissioner's jurisdiction
- 8 per cent (10) were substantiated or partially substantiated.

A total of 60 per cent (78) were recorded for information purposes only.

As a result of the 118 IRs received, ORIC referred and/or disclosed to a controlling body or government agency on 105 occasions for information and/or investigation purposes.

In addition, ORIC referred and/or disclosed 10 IRs to interstate racing integrity bodies or codes.

What do the IRs tell us?

The total number of IRs increased by 7 per cent (8) from the 2018–19 reporting period, when ORIC received 110 IRs.

IRs increased for both HRV and GRV, rising 29 per cent (4) and 26 per cent (5) respectively, while RV related IRs decreased by 5 per cent (3).

Information Reports	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
GRV	2	20	16	5	85	32	37	20	19	24
RV	17	30	97	12	21	27	30	33	65	62
HRV	0	10	15	14	22	9	16	20	14	18
Other	4	3	8	1	17	8	3	7	12	14
Total	23	63	136	32	145	76	86	80	110	118

Enquiries

An enquiry refers to a request made to ORIC for advice or assistance, or questions, comments and opinions on current issues, mainly as a response to media reports.

How were the enquiries received?

During the reporting period, ORIC received 144 enquiries. Of these:

- 68 per cent (98) were from the public
- 18 per cent (26) were from industry participants and employees
- 5 per cent (7) were from the media
- 4 per cent (5) were from integrity personnel (including Stewards) of individual codes
- 3 per cent (4) were from other government agencies.

The remaining 2 per cent (4) were from law enforcement bodies and other sporting codes.

Prominent themes included enquiries regarding racing rules, issues relating to ownership and syndication, wagering and animal welfare concerns.

The majority of enquiries – 85 per cent (122) – were received via email (63) and telephone (59).

Which code did the enquiries relate to?

Of the 144 enquiries, 79 per cent (114) related to controlling bodies with:

- 42 per cent (60) related to RV
- 15 per cent (22) related to multiple controlling bodies
- 12 per cent (17) related to HRV
- 10 per cent (15) related to GRV.

A further 8 per cent (11) of enquiries were non-specific, 4 per cent (6) related to an interstate code or overseas jurisdiction and 3 per cent (5) related to wagering service providers. The remaining 6 per cent (8) of the enquiries related to government agencies, other sporting codes and community groups.

Racing Integrity Hotline

The Racing Integrity Hotline (1300 227 225) is provided through an independent third-party organisation, Stopline Pty Ltd. The hotline is an important integrity assurance tool, allowing members of the public and/or racing industry participants to report integrity related information anonymously through an alternative means rather than contacting ORIC directly.

The hotline is staffed by a team of personnel trained to receive information in the strictest of confidence. Importantly, it allows a complaint to be made or information to be passed on to ORIC anonymously if the caller chooses.

During the 2019–20 reporting period ORIC received 87 integrity hotline reports from Stopline, comprising non-disclosures and disclosures. (Non-disclosures refer to reports that do not fall within the Commissioner's jurisdiction.) A large number of non-disclosures related to civil disputes, for example ownership or syndication.

The number of disclosures received via the Integrity Hotline decreased by 10 per cent in comparison to the 2018–19 financial year. However, disclosure numbers for the 2019–20 reporting period were twice the annual average since inception.

Disclosures contain integrity related information involving, for example, animal welfare, use of prohibited substances, breaches of rules and procedures, bullying and harassment, race fixing and corrupt conduct.

Enquiries	2010 – 2011	2011 – 2012	2012 – 2013	2013 – 2014	2014 – 2015	2015 – 2016	2016 – 2017	2017 – 2018	2018 – 2019	2019 – 2020
GRV	8	13	14	22	108	49	22	14	15	15
RV	17	18	34	33	33	34	38	40	59	60
HRV	7	10	14	9	13	5	14	6	14	17
Other	15	15	27	30	30	55	42	36	30	52
Total	47	56	89	94	184	143	116	96	118	144

Racing Integrity Hotline	2010 – 2011	2011 – 2012	2012 – 2013	2013 – 2014	2014 – 2015	2015 – 2016	2016 – 2017	2017 – 2018	2018 – 2019	2019 – 2020
Disclosure	14	11	28	4	34	24	20	33	85	79
Non-disclosure	14	9	21	5	4	3	1	24	12	8
Total	28	20	49	9	38	27	21	57	97	87

Information and intelligence *(cont.)*

Website

The Commissioner’s website (www.racingintegrity.vic.gov.au) is a central repository for information relating to ORIC and provides information such as the Commissioner’s role, links to public documents published by ORIC, advice on how to lodge a complaint with ORIC or provide integrity related information, and ORIC’s media policy and media releases.

During the 2019–20 reporting period, the website attracted 4,328 visits, with 3,158 visitors from 42 countries. Of these visitors, 87 per cent (2,738) were from Australia and 70 per cent of the Australian visits (1,927) were from within Victoria.

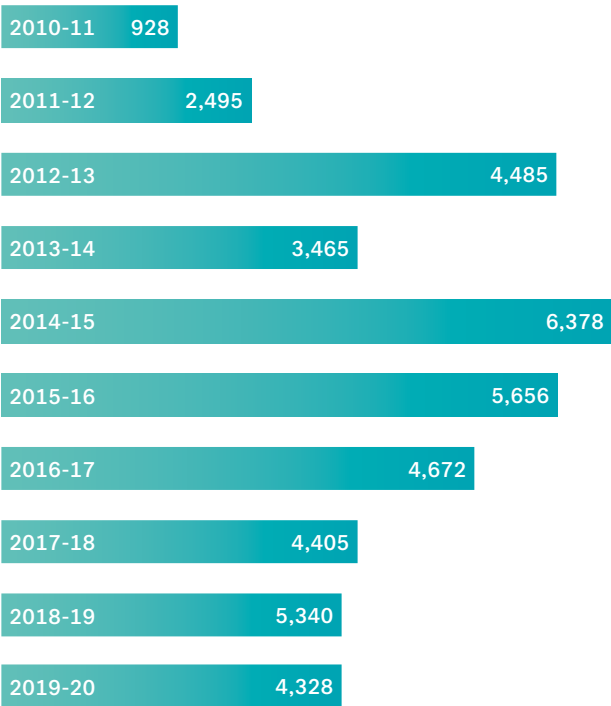
An analysis of the visits to the website show that, during the 2019–20 financial year, the majority of visits were in relation to seeking advice/assistance, media releases, the functions and powers of the Commissioner, publications such as annual reports and frequently asked questions.

Traffic was directed to the website via four methods:

- 65 per cent of visitors used a search engine
- 18 per cent went directly to the website
- 15 per cent were referred from other websites
- 2 per cent linked to the website from social media.

People spent an average of two minutes on the website and accumulated 10,392 page views reviewing the site’s content.

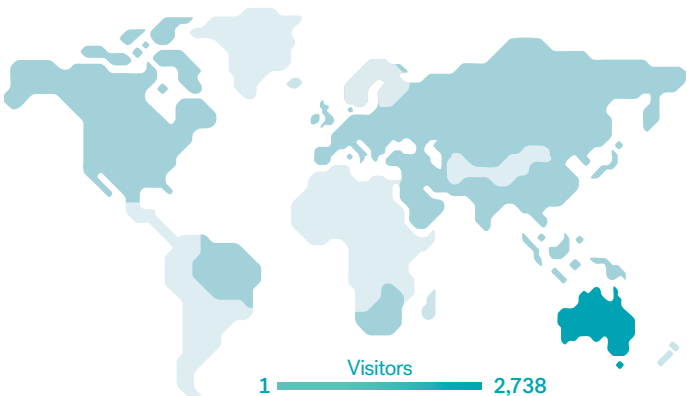
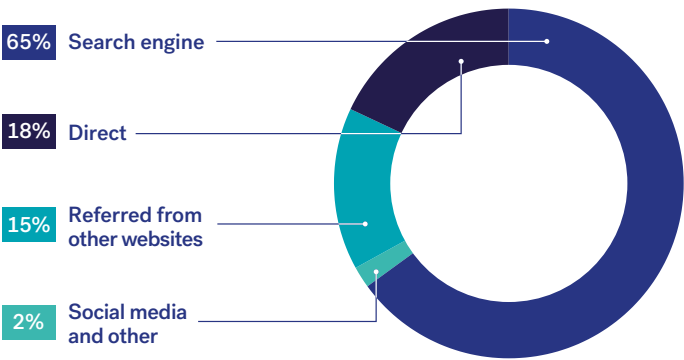
Website visits per year



Directing the Victorian Racing Tribunal

One of the functions of the Commissioner (section 37B of the Racing Act) is to direct the VRT to hear and determine an appeal made by a person against a penalty imposed on the person under the rules of a controlling body, if the penalty is a fine of no more than \$250 and the Commissioner considers that it is in the public interest for the appeal to be heard.

During the 2019–20 reporting period, no applications were received by the Commissioner to direct the VRT to hear and determine an appeal.





‘Congratulations to you and the Office of
the Racing Integrity Commissioner team.
It gives us great comfort to know that the
Victorian Racing Industry has integrity units
that compare with the best in the world ...’

Victoria Racing Club Limited

Significant events in ORIC's 10-year history



1 March 2010 to 1 March 2020



10-year statistics

The Commissioner's operations
from March 2010 to February 2020.



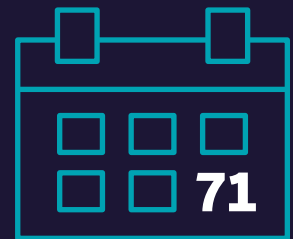
20,698

170
per month

Met with **20,698** people - an average of **2,070** people per annum or over **170** people each month.



715



71

Made a total of **715** operational visits (race meetings, RASL, RADB/VRT, wagering providers, breeders, trainers etc) - an average of over **71** visits per annum.



282

28
per annum

Made **282** presentations - an average of **28** per annum or at least two presentations every month for 10 years.



8,078



807
per annum

A total of **8,078** people attended the Commissioner's presentations - an average of **807** per annum or **67** per month.

'Please thank the Commissioner on my behalf for taking the time to read my email and I appreciate the quick response to my query.'

Year	Dates	No. of people met	No. of operational visits undertaken	No. of presentations	No. of attendees at presentations
1	Mar 2010 – Feb 2011	719	45	8	286
2	Mar 2011 – Feb 2012	791	38	19	658
3	Mar 2012 – Feb 2013	1,081	48	28	664
4	Mar 2013 – Feb 2014	1,534	66	35	1,226
5	Mar 2014 – Feb 2015	2,060	79	38	1,188
6	Mar 2015 – Feb 2016	2,466	60	32	982
7	Mar 2016 – Feb 2017	3,407	91	39	865
8	Mar 2017 – Feb 2018	2,931	66	33	622
9	Mar 2018 – Feb 2019	2,872	98	26	1,004
10	Mar 2019 – Feb 2020	2,837	124	24	583

‘We thoroughly enjoyed the opportunity to “talk shop” with John, Claire and Paula, who were genuinely interested in hearing about HERO’s evolution over the past three and half years, our success stories and challenges. We cannot thank them enough for taking time out during silly season to visit Cobe Lodge and see the program in operation...’

Operations snapshot

A complete summary of the Commissioner's operations against the framework provided by the Racing Act is set out below.

Section 37B of the Racing Act

<p>1(a) Conduct annual audits of the internal integrity processes and systems, in whole or in part, of each controlling body in areas identified–</p> <p>(i) by the Racing Integrity Commissioner; or</p> <p>(ii) by the Racing Integrity Commissioner in consultation with each controlling body</p>	<p>A total of two audits were undertaken during the period pursuant to this function.</p> <p>ORIC completed one audit regarding the declarations of private interests and betting account registers of the controlling bodies.</p> <p>ORIC completed one audit regarding the integrity risk management systems and processes that exist within the codes. The audit resulted in 76 recommendations across all codes, which are currently being reviewed.</p>
<p>1(b) Conduct audits outside the subject matter of the annual audit if a controlling body requests that such an audit be conducted</p>	<p>No requests were received from the controlling bodies to conduct an audit in the reporting period.</p>
<p>1(ba) Conduct audits of the internal animal welfare processes and systems of each controlling body to the extent that they relate to integrity in racing</p>	<p>No audit of the internal animal welfare processes and systems of each controlling body to the extent that they relate to integrity in racing was conducted.</p>
<p>1(c) Investigate complaints made about the integrity processes and systems of a controlling body</p>	<p>The Commissioner received 79 complaints. Of these, 91 per cent (72) related to the integrity processes and systems of the three controlling bodies. Of the 79 complaints, 54 per cent involved RV, 29 per cent involved GRV and 8 per cent involved HRV. The remaining 9 per cent did not relate to the controlling bodies.</p> <p>The Commissioner also received 118 IRs. Of these, 97 per cent (114) related to racing integrity matters. Of the 118 IRs, 53 per cent involved RV, 20 per cent involved GRV and 15 per cent involved HRV. A further 5 per cent related to information relevant to interstate or international racing codes, 3 per cent to HRV and RV and 1 per cent to all three codes. The remaining 3 per cent did not relate to the controlling bodies.</p>
<p>1(d) Refer complaints to controlling bodies or other government agencies for investigation</p>	<p>A total of 15 complaints were referred to a controlling body or government agency for investigation during the reporting period.</p>
<p>1(e) Investigate matters referred by the Minister or a controlling body</p>	<p>The Commissioner received four referrals from the Minister during the 2019–20 reporting period. All referrals were completed.</p> <p>The Commissioner received 18 referrals from the controlling bodies. Of these, 16 referrals were completed and two are still active.</p>

Section 37B of the Racing Act

1(f)	Report findings of investigations conducted into complaints that have not been referred to other bodies–	Of the 79 complaints received by ORIC, 77 were completed. The 79 complaints resulted in 82 allegations. Of these, 10 were investigated and completed during the 2019–20 reporting period. Complainants were advised of the findings in all instances.
(i)	to the person that made the complaint; and	
(ii)	with or without identifying the person who made the complaint or the person that is the subject of the complaint, the Minister or the relevant controlling body (as the Racing Integrity Commissioner considers appropriate)	The remaining 72 allegations arising from complaints were unable to be investigated as they were outside the Commissioner's jurisdiction, the matter was under investigation by another agency or the complainant failed to provide sufficient information to warrant investigation. Two investigations are ongoing. Controlling bodies are not automatically advised of findings in cases where the complaints were found not to be integrity related, were unsubstantiated, or where the controlling body was involved in the investigation with the Commissioner.
1(g)	Conduct own motion inquiries that do not relate to any specific complaint and may include an investigation into systemic issues in racing	The Commissioner did not conduct any own motion inquiries in the reporting period.
1(h)	Make recommendations (if appropriate) following the investigation of any complaint, inquiry or matter to (as the Racing Integrity Commissioner considers appropriate) –	The Commissioner did not make any recommendations following the investigation of any complaint, inquiry or matter to the Minister or the relevant controlling body.
(i)	the Minister; or	
(ii)	the relevant controlling body	
1(i)	Direct the Victorian Racing Tribunal to hear and determine an appeal made by a person against a penalty imposed under the rules of a controlling body if –	During the 2019–20 reporting period, the Commissioner did not receive any requests to exercise his powers under this section.
(i)	the penalty imposed is a fine of not more than \$250; and	
(ii)	the Racing Integrity Commissioner considers that it is in the public interest for the appeal to be heard	
2	Advise the Minister of any failure by a controlling body to implement or act on a recommendation made by the Racing Integrity Commissioner to that controlling body	During the 2019–20 reporting period, the Commissioner did not exercise his powers under this section.

Section 37BA of the Racing Act Powers of the Racing Integrity Commissioner conducting an inquiry

During the 2019–20 reporting period, the Commissioner did not exercise his powers under section 37BA.

Section 37E of the Racing Act Disclosure of Information

The Commissioner made 108 disclosures of integrity related information to a range of authorised bodies and agencies during the reporting period.

Q&A with the Racing Integrity Commissioner



During the year, you celebrated your tenth year as Victoria's, and Australia's, first Racing Integrity Commissioner. How did you feel?

Extremely proud. I've never taken any role I've had lightly, and this role came with additional challenges. I had to establish an office that was able to perform the functions for which it was created and add value to a significant and high profile sport. I'm confident we've been able to do that, which meant being able to balance the concerns of the general public against the needs of the racing industry – and at the same time give government confidence in our ability.

Do you have highlights?

Creating an office from literally nothing was the biggest challenge and gave the greatest satisfaction. I had nothing but the relevant legislation on my desk on the first day and the thoughts from a variety of people as to what role I needed to play and what the office would look like. I distinctly recall receiving advice about the importance of being independent but to expect 'push-back' from racing having someone look over their shoulders. He was right, but the relationship we now have with the codes is something I'm very proud of. I'm also very proud that we are used as a benchmark by other sport integrity bodies, interstate and overseas, and the role we play in being able to investigate major integrity issues such as race fixing and live baiting. Creating an integrity training program that has been attended by over 400 people is also something I view as a highlight. Having said that, the thing I'm most proud of is that we've created a small but professional unit that provides confidence to government, the general public and racing participants in an industry that contributes so much to the Victorian economy. There are many more highlights too, such as contributing to the creation of QRIC and mentoring people who have gone on to great careers.

At the time of this interview, we're still in a State of Emergency due to COVID-19. How has that impacted on the operations of your office?

The most tangible impact is not being able to conduct operational visits, such as attending race meetings and tribunal hearings, and visiting the racing lab and training facilities. It's also meant that we've had to stop all face-to-face interaction such as delivering presentations and conducting forums. While video conferencing has provided an alternative, in my view it's never as effective as the personal touch. Interestingly, our workload hasn't abated; in fact, it's risen in many aspects.

What other effects has COVID had?

They're numerous. It's important to acknowledge the good work of the racing codes, which have managed to keep racing going when all other sports were closed down. What's important to me is to see that the integrity standards haven't dropped, particularly when integrity staff are working from home or have been stood down or redeployed. This year our annual audit looked at the integrity systems and processes in each of the three codes. Next year we'll look at whether COVID had any impact on those systems and processes.

Your 10-year stakeholder stats indicate that your office meets with an average of 2,000 people each year and conducts an average of over 70 operational visits each year. These seem extremely high figures for a small office!

They are. Staying relevant and understanding racing is critical to our roles. You can't do that sitting in an office in the CBD. It's only by doing things like going to early morning track work, meeting breeders and syndicators, visiting kennels and watching international horses arrive at the airport that we can truly understand the racing industry. Coming from a non-racing background, I'm fascinated watching how a race meeting is conducted, from the time the animals arrive at track to the time they leave and everything in between. I have high regard for those involved in the integrity work who ensure, every race meeting, that there's an even playing field and the public can be confident of that. It's only by observing their work that I gain that confidence. We greatly enjoy the interactions and what we learn from every person we meet.

This year you did your 100th roadshow. Was that significant to you?

Very much so. The presentations provide the attendees with an opportunity to ask questions and hear my views. They are an important educational and awareness tool. The stats indicate that I've made almost 300 presentations to around 8,000 people over the 10 years. This says to me that we haven't taken the foot off the pedal in engaging with people.

You've also called for a dedicated and specialist police unit to be created for the purposes of racing. Do you still hold that view?

The Victoria Police Sporting Integrity Intelligence Unit has become a major stakeholder since its creation in 2013. It has been involved in and led a number of significant racing investigations. The relationship we have is the best it's ever been and I'm grateful for that. The next step in my view is that the unit becomes self-sufficient so that it retains the intelligence function but also includes an investigations capability with additional investigators who understand racing. While there's no need to re-invent the racing squad, there is a need to have detectives who understand racing and can use the strong 'race-fixing' laws available to them.

The Weir investigation dominated the media headlines, as did the ABC 'abattoir' story. Do significant media reports impact on integrity?

We know that media stories have impact. The annual surveys we undertake with both the general public and racing participants tell us that. This year, when respondents were asked which media stories they could recall, 721 stories related to Thoroughbred racing and 276 of those related to Darren Weir. The next highest stats related to Jarrod McLean, mentioned 57 times. In 2019, 25 per cent of respondents told us that their attitudes had worsened due to media coverage; this year it was 39 per cent. The media has a significant reach and it's bound to have an effect. When the ABC ran the live baiting story in 2015, we estimated that subsequent media reach was around 33 million people over the next 12 weeks. When the Weir story broke in January 2019, we estimated the reach was more than 100 million people over the following four weeks.

'I have high regard for those involved in the integrity work who ensure, every race meeting, that there's an even playing field and the public can be confident of that.'

Q&A with the Racing Integrity Commissioner *(cont.)*

Does the media's interest in racing and its subsequent reach concern you?

No. The key issue isn't the media's interest and reach; it's the topic of the story. If the story is because of a successful investigation by the code, then that's a positive result. Whenever one of the codes detects someone doing the wrong thing it's a positive, especially if it's the result of a joint investigation with the police. The negative side is when a media report is about something that the racing code wasn't aware of. Thankfully, that doesn't occur too often.

Awareness of your role remains quite strong. Do you put much effort into that?

Not directly. I've never had an intention to publicise or advertise myself. Public awareness is usually as a result of a media interview or comment, publication of the result of a report or through the various forums I present at. For the past three years, the general public survey shows that awareness of my role has been at 30 per cent. I think that having one in every three people aware the role exists is a good result. The racing industry participant survey tells me that around 80 per cent of racing people know about my role. I also think that's a good result.

Your current term ends early in 2021. Have you thought about whether you'll continue in this role after that?

I have. I've given it great thought as I love this role and the opportunities and experiences I've had. The 10-year anniversary and COVID-19 have both been catalysts for thinking about my future. I've achieved many of the things I set out to do and I'm more confident than ever that the racing bodies are strong in their approaches to integrity. Their successes in major investigations in recent years bear testament to that. Their relationship with law enforcement is better than it's ever been, and early indications are that the new Victorian Racing Integrity Board will further enhance integrity in racing. Internally, we're looking at taking our abilities to the next level with the development of a new Case Management System. For all of these reasons, it's probably the right time for someone else to take over the role.

With that in mind, what will retirement look like?

I'm not planning to retire. My aim is to continue my roles on the Board of the International Tennis Integrity Unit and the Advisory Board of the National Basketball League. Beyond that, I have no other plans at this stage.

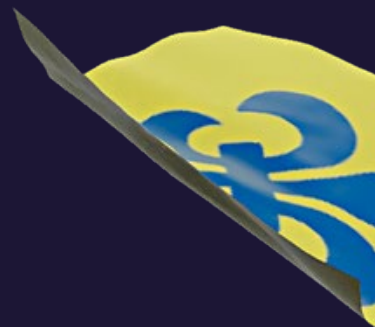
Will you look for another racing related role or sports integrity role?

I've worked in the integrity space for 47 years now, so it's the subject I know best. Sport has always been a passion so that will remain an attraction. I've also greatly enjoyed community and philanthropic roles and I get a kick out of mentoring, training and public presentations. All these areas provide both challenge and job satisfaction and will always be of interest. They say that when one door shuts, another opens. I'm looking forward to seeing where that new door leads me.

What will you miss the most?

Working with dedicated and hard-working people. I've had the pleasure of leading a team of people who've never flinched from the challenges and maintained a sense of humour in times of adversity. I'll miss interacting with people I've met with and worked with in the codes who are tasked with the most important aspect of racing, and I've had great support from all three Ministers during my tenure and from their departments. I'll also miss the collaboration and engagement with key stakeholders. And it goes without saying that I'll miss climbing up Stewards' towers, watching races from the starting barriers and kennels, sitting in the mobile barrier car and visiting and speaking to racing people, who are the lifeblood of this industry.

‘I’m more confident than ever that the racing bodies are strong in their approaches to integrity. Their successes in major investigations in recent years bear testament to that.’



Strengthening integrity

Strategic priorities

Each year, the Commissioner identifies a range of activities to enhance the integrity of the VRI through key priorities. In the 2019–20 financial year, these were:

- capability development
- environmental scanning
- investigations, audits and reviews
- education and awareness
- corporate management
- special projects.

To meet these priorities a total of 135 activities were identified, of which 101 were completed, 11 are a work in progress, one has been discontinued and 22 have been carried over into the 2020–21 financial year.

In addition, ORIC undertakes activities that are considered 'business as usual'. While these are not included in each year's business plan, they are reported against and undertaken every year. In the 2019–20 financial year, there were a total of 57 'business as usual' activities.

Working with stakeholders

Stakeholder engagement is at the core of the Commissioner's business. Every day, across all activities, the Commissioner and his staff engage with people who are in some way connected to ORIC's purpose, across the various aspects of the VRI and more broadly the sports integrity community. The quality of these relationships determines how well ORIC delivers on its vision of a VRI in which Thoroughbreds, Standardbreds and Greyhounds compete to the best of their natural ability, free from the influence of crime and corruption.

Stakeholder engagement and familiarisation are vital to ensuring ORIC:

- improves information flows by tapping into local and informed knowledge
- develops informed policies, projects, programs and services
- stays abreast of current and emerging issues
- remains alert to the views of stakeholders
- enhances public confidence by creating awareness of existing integrity safeguards within the VRI
- remains current and relevant within the racing sector.

For stakeholders, engaging with ORIC also presents opportunities to contribute to policy and program development, have their issues and ideas heard and acted on, participate in decision-making processes and be a driving force behind integrity reform.

Key stakeholders

ORIC has adopted a consultative approach to integrity reform, which includes engaging:

- general public
- the controlling bodies and their state, interstate and international counterparts
- law enforcement agencies
- media
- racing industry bodies, including owners, trainers, jockey and driver associations and unions
- regulators
- wagering service providers
- Racing Analytical Services Limited (RASL)
- members of the judiciary, including the Victorian Civil and Administrative Tribunal (VCAT) and RADB/VRT members
- ancillary bodies such as the Australian Transaction Reports and Analysis Centre, the Australian Taxation Office and the Office of the Chief Examiner
- racing clubs
- national coordinating bodies (including Racing Australia, Greyhounds Australasia and Harness Racing Australia)
- internal stakeholders including Department of Justice and Community Safety and Department of Jobs, Precincts and Regions (Sport, Recreation and Racing and Office of Racing)
- Office of the Minister for Racing
- VRIB
- Australian Pesticides and Veterinary Medicines Authority.

These relationships ensure the Commissioner is kept apprised of emerging integrity related issues within the VRI and is well placed to address those issues in accordance with his legislative mandate.

Information exchange

Since commencement in March 2010, ORIC has formed effective working relationships with the VRI, state and federal law enforcement agencies and other organisations of relevance to integrity.

One measure of the success the Commissioner has had in this regard is the development and implementation of formal information sharing arrangements to enhance the ability of authorities to identify and investigate integrity related matters integrity related matters within the racing industry. The Commissioner's efforts ensure the body of agreements facilitating exchange of information continues to grow on a state, national and international level.

The Commissioner has a number of agreements in place relating to information exchange and facilitation of cooperation between the Commissioner and other parties.

In November 2019, the Commissioner entered into an agreement with the Office of the Chief Examiner and commenced discussions with the Therapeutics Goods Administration on the development of an agreement.

In June 2020, the Commissioner entered into a formal agreement with the Queensland Racing Integrity Commissioner (QRIC).

Meetings and presentations

During the 2019–20 reporting period, the Commissioner and his staff met with 2,606 people from 831 organisations. On average, ORIC met with 217 people per month.

Presentations by the Commissioner to the racing industry, other stakeholders and the general public formed a key component of this year's engagement program. A total of 21 presentations were made during the year to 450 attendees, which included presentations to representatives of organisations such as the Australian Institute of Professional Intelligence Officers, Victoria Police, Steward and jockey training programs, sporting clubs, racing clubs, industry bodies, community and service organisations, and the general public.

Since commencing operations in March 2010:

- the Commissioner and his staff have met with 21,260 people
- a total of 8,079 people have attended presentations by the Commissioner.

Operational visits

This year, ORIC undertook 97 operational visits. These included 60 to race meetings across the three codes, hearings of the RADB, VRT, VRIB, RASL, breeding and training facilities, and wagering service providers. Of the race meetings attended, 36 were country meetings.

Industry partnerships

The Commissioner recognises that he cannot deliver on his mandate alone and remains committed to building strong industry partnerships with organisations that ensure the effective operations of ORIC. These partnerships contribute to the integrity of the VRI by allowing those in the industry to work towards collaborative solutions to shared challenges.

Racing Integrity Operations Committee

The Racing Integrity Operations Committee (RIOC) was established by the Commissioner in 2010 to facilitate discussion of integrity related matters across the entire VRI.

The RIOC is chaired by the Commissioner, with membership comprising the Integrity General Managers and Chairmen of Stewards from each of the controlling bodies, the ORIC Manager Integrity Operations and the ORIC Manager Investigations.

The RIOC generally meets every six weeks, with seven meetings occurring during the reporting period. In total, the RIOC has met 71 times since inception and continues to be a valuable forum to share and exchange information across the three racing codes.

Integrity Council Forum

At the time when the Commissioner began his role, each of the three racing codes had its own Integrity Sub-Committee (ISC). In an effort to bring the three codes together on integrity related matters, the Commissioner initiated and chaired the first ISC Forum. That forum was held on 24 February 2012. Such was the value of the ISC Forums that they continued on for seven years, despite the change within the codes from Sub-Committees to Integrity Councils.

On 31 July 2019, Integrity Councils from the racing codes ceased to exist due to the creation of VRIB and its subsequent commencement on 1 August 2019.

The Commissioner chaired the last ISC Forum on 17 June 2019, bringing the total number of forums held to 22.

Education, training and awareness

Despite uncertain times, ORIC continues its commitment to education and training for integrity related staff across the three racing codes.

The 2019–20 financial year posed new challenges in this space, necessitating the finding of new and innovative ways to develop and deliver training opportunities for skills enhancement and sharing the extensive knowledge within the VRI.

The reporting period gave ORIC the opportunity to work in partnership with the racing codes to conduct an audit of staff attendance at ORIC's current integrity training modules and propose ideas for development of new modules. Feedback indicated a need for two topics – Mental Health, and Security and Safety Risk Assessment – to address the challenges staff face in dealing with these issues, both personally and with industry participants.

These topics were influenced by significant challenges during 2019–20, including the 2019 bushfires and the COVID-19 outbreak. To this end, ORIC is working with the racing codes, other Victorian Government training and security and safety risk providers, and organisations such as Beyond Blue to develop Module Seven.

ORIC will also continue in its efforts to create a professional integrity career development program and work with the three racing codes, educational training professionals and educational institutions, with a view to ultimately enabling integrity officials to gain formalised qualifications in their respective fields.

Roadshows

The aim of the Commissioner's roadshows is to inform stakeholders of the activities of ORIC and the VRI more broadly, and to gain insight into their views.

This year the roadshows were delivered as part presentation and part 'Q&A' information session and held at independent venues. The new approach was in response to feedback received from previous roadshow attendees.

The Q&A sessions were aimed at building on those undertaken in the previous seven years to create a greater understanding and awareness of the Commissioner's role and responsibilities, the work ORIC has undertaken and an overview of what is in place to ensure that the VRI operates free from the influence of crime and corruption.

The roadshows also provided the attendees with an opportunity to raise questions and to hear first-hand the Commissioner's perspectives on integrity in the racing industry.

A number of themes emerged during the sessions, including:

- mismanagement
- conflicts of interest
- lack of understanding in relation to prohibited substances
- live baiting
- inconsistency in penalties
- welfare of retired racehorses.

Over the past eight years, the Commissioner has travelled approximately 27,000 kilometres to host 100 roadshows across regional and metropolitan Victoria. These attracted 968 attendees including racing industry participants, the general public, wagering service providers, media and others.

During the 2019–20 reporting period, the Commissioner hosted 12 roadshows in Horsham, Bendigo, Melbourne, Cranbourne, Traralgon, Wangaratta, Mildura, Shepparton, Swan Hill, Ballarat, Geelong and Warrnambool for 45 attendees.

A total of 85 per cent of the audience comprised racing industry participants, with 38 per cent from Harness, 22 per cent from Thoroughbreds, 18 per cent from Greyhounds and 7 per cent from the controlling bodies. Fifteen per cent of attendees were general public, media and others.

Integrity initiatives

The Commissioner's role gives him the opportunity to approach integrity related issues from a holistic, industry-wide perspective that is not confined to a single code or component of racing.

This integrated and independent approach allows ORIC to play a vital role in the development and facilitation of integrity initiatives that benefit all three racing codes.

In May 2020, the Commissioner began the development and implementation of a new Case Management System. This system will provide the Commissioner with greater capability while also streamlining the complaints process and improving public access to the Commissioner's services.

Single Code of Practice

The 2008 Report on Integrity Assurance in the VRI, conducted by Judge Gordon Lewis AM and which led to the creation of the Commissioner's role, noted a lack of consistency among the racing codes in the VRI in their approaches to integrity.

To establish consistent integrity standards across the VRI, the Commissioner identified the need to develop a SCOP that embodied a set of minimum integrity standards for racing officials and industry participants in all three racing codes.

The SCOP is designed to ensure cross-code consistency across a range of current or emerging integrity related issues that are common to all three racing codes. The ultimate aim of the SCOP is to develop a complete set of standards that cover all aspects of integrity assurance in the racing industry.

The table below presents a summary of the SCOP designed to address the following integrity matters:

Single Code of Practice	Relates to	RV	HRV	GRV
Part A	Integrity standards for racing officials	Implemented 24 May 2015	Implemented 1 June 2015	Implemented 31 December 2014
Part B	Integrity standards for industry participants	Implemented 31 July 2017	Implemented 8 August 2017	Implemented 31 December 2014
Part C	Rules of racing	Implemented 1 August 2016	Implemented 1 March 2016	Implemented 23 June 2017
Part D	Drug control	Implemented 1 August 2016	Implemented 1 October 2016	Implemented 26 September 2017
Part E	Animal identification	Implemented 26 June 2017	Implemented 1 January 2017	Implemented 4 November 2016
Part F	Integrity Hotlines	Implemented 3 November 2016	Implemented 3 November 2016	Implemented 4 November 2016
Part G	Undesirables	Pending implementation	Pending implementation	Pending implementation
Part H	Animal welfare	Pending approval	Pending approval	Pending approval

Research

General Public Survey 2020

Roy Morgan Research was again engaged to conduct the General Public Survey. This is the ninth year ORIC has commissioned the survey.

The survey focuses on measuring the general public's confidence in the integrity of the VRI. It allows the Commissioner to prioritise future planning and office activities that are focused on public concern across the three racing codes.

In total, 918 online surveys were completed between 20 January and 26 January 2020. The methodology used was in line with the previous General Public Surveys conducted on behalf of the Commissioner. The sample was stratified based on age, gender and location quotas.

The survey included questions in relation to:

- respondents' personal attendance at the races over the past 12 months
- wagering activity on the three codes over the past 12 months
- confidence in the integrity of the VRI
- who should be responsible for managing staff that are involved in integrity in racing
- awareness of the Commissioner's position
- possible changes in behaviour or attitude as a result of media.

The continuing nature of the survey allows the Commissioner to gauge the impact of recent events on respondents, identify trends and ultimately develop a reliable body of social research specific to the VRI.

Racing Industry Participants Survey 2020

ORIMA Research was engaged to conduct the Racing Industry Participants Survey on behalf of the Commissioner. This is the third research of this type commissioned by ORIC. The first survey was conducted in 2017 and the second in 2019.

The Commissioner invited nine organisations that represent participants of the VRI to take part in the survey, which focused on gaining an understanding of the attitudes of VRI participants, including trainers, breeders, owners, drivers and jockeys, and identifying emerging issues. The questions used in the General Public Survey and the Racing Industry Participants Survey were the same in order to gauge if the general public and the racing industry participants shared the same views.

In total, 980 racing industry participants completed the survey between 3 March and 25 May 2020.

The table opposite presents the key results of the 2019 and 2020 General Public Surveys and the results of the 2019 and 2020 Racing Industry Participants Surveys.

Stakeholder Survey 2020

An integral part of the work undertaken by the Commissioner is the advice and service provided to the key stakeholders.

This was the sixth survey of this type commissioned by ORIC.

Roy Morgan Research was engaged to conduct an analysis of key stakeholder relationships. The purpose of the survey was to assess ORIC's performance in several key areas, in the eyes of stakeholders:

- identifying changes to procedures and processes
- effective auditing of integrity systems and processes
- management of complaints
- management of investigations
- establishing integrity standards
- helping improve the relationship between law enforcement and the industry
- providing advice, comment and input
- improving stakeholder coordination
- providing relevant training to Stewards and integrity staff
- recommending effective changes to legislation
- relationship management
- helping present the industry in the best light.

The information collected enables the Commissioner and his team to target opportunities for improvement through business and strategic planning.

The table opposite represents a comparison of the survey results between 2012 and 2020. The Stakeholder Survey was conducted between 2011 and 2014. No survey of this type was conducted between 2015 and 2018 due to operational constraints. The survey resumed in 2019.

It is anticipated that these three surveys will be conducted again in 2021.

Comparison of survey results

Category	General Public Survey 2020	General Public Survey 2019	Racing Industry Participants Survey 2020	Racing Industry Participants Survey 2019
Attendance (Respondents who had attended a Thoroughbred, Harness or Greyhound race in Victoria in the past 12 months)	22%	25%	96%	90%
Betting (Respondents who had placed a bet on a race in any of the three codes in the previous 12 months)	32%	36%	81%	93%
Confidence (Respondents who had confidence in the integrity of the VRI)	38%	48%	79%	72%
Integrity independence Management of the integrity of racing (Respondents who believe a separate organisation should employ and manage people responsible for integrity in racing)	66%	63%	51%	54%
Awareness of the Racing Integrity Commissioner	30%	30%	77%	78%
Perceived changes in integrity (Respondents who believe that integrity in racing had improved in the past 12 months)	18%	21%	38%	32%
Change in attitudes towards integrity as a result of media reporting (Respondents whose opinion about integrity had changed for the better)	8%	12%	16%	19%
(Respondents whose opinion about integrity had changed for the worse)	39%	25%	17%	32%
(Respondents whose attitudes had not changed)	30%	33%	62%	46%
Media (Respondents who could recall a specific racing integrity related media story that led to their attitudes to integrity)	34%	15%	63%	84%

Stakeholder Survey results comparison

Survey comparisons	2012 Survey	2013 Survey	2014 Survey	2019 Survey	2020 Survey
Response rate	76%	86%	80%	86%	91%
Overall performance	6.7	7.4	7.6	8.3	7.9
Functional capability	6.7	7.4	7.6	7.9	7.7
Relationship management	7.5	7.8	7.8	8.8	8.3
Industry standing	6.8	7.2	7.7	8.4	7.9

Integrity initiatives by the controlling bodies

The controlling bodies continue to play the fundamental role of integrity assurance in their respective codes. Collectively, their initiatives and strategies shape and strengthen integrity throughout the VRI. Some of their key integrity initiatives in 2019–20 are outlined here.

Racing Victoria

During the 2019-20 reporting period, RV conducted a number of key initiatives:

- developed a draft of an industry led 'Spirit of Horse Racing' and consultation with key industry stakeholders, commenced as part of the Fair Racing For All initiative
- introduced an online Learning Management System to RV staff, with the plan to broaden this platform to ongoing industry participant education
- held educational seminars for industry participants including seminars for veterinarians and trainers on exercise physiology, social licence to operate and general integrity matters
- restructured the Veterinary Department to include a focus on out-of-competition sampling strategies and biosecurity protocols
- expanded the pre-race off course examination program, including pre-race veterinary inspections for six feature races and internationals
- communicated and educated industry participants on Equine Limb Injury research objectives and findings to date
- completed a Lifecycle Study of 2005 and 2010 foal crops
- endorsed the Equine Welfare Strategic Plan; projects completed and significant milestones achieved, including:
 - defined Off The Track sponsorship objectives and success measures, consolidated sponsorship agreements with key equestrian bodies and developed a sponsorship strategy for the 2020–21 financial year
 - developed a foster program in collaboration with RSPCA and Thoroughbred Breeders Victoria to provide short to medium term solutions for Thoroughbreds in need
 - supported more than 200 equestrian events and clinics through sponsorship agreements
 - introduced an Equine Welfare Advisory Council to provide guidance and an equine lens for rules of racing, new racing initiatives and key welfare issues
 - conducted an audit of 'active', 'spelling' and 'transferred' horses that have not raced or trialled for 18 months
 - developed relationships with knackeries and abattoirs, and explored initiatives to provide visibility.

In addition, the Integrity Services Department (ISD) integrated a new intelligence and case management system developed to store, collate and manage ISD's information, investigations, licensing and complaints processes.

ISD members also continued participation in a number of international committees to develop strategies to combat current and emerging issues arising in their jurisdiction, including the International Movement of Horses, International Federation of Horseracing Authorities Welfare Committee and the Asian Racing Federation Anti-illegal Betting Task Force.

Harness Racing Victoria

Integrity

In a continued effort to enhance the integrity of harness racing in Victoria, HRV developed and implemented a range of key integrity initiatives in 2019–20:

- created a three-year road map that identifies key action items to be achieved over the next three years. HRV also completed, submitted and received endorsement from VRIB for its annual plan for the next year
- together with The University of Melbourne, completed a world-first study in relation to measuring the impacts of race-fixing. This study is being peer reviewed, with outcomes to be published in the near future
- developed an online training module for the industry, which will be mandatory for all licensed persons to complete as part of the licensing process module. The training module is interactive and includes scenarios around key integrity issues such as race fixing, sexual harassment, drug administration and race day treatment, deregistration of standardbreds and animal welfare
- continued to proactively conduct surveillance and inspections to prevent, deter and detect prohibited pre-race treatment of competing horses. HRV has matters pending at the VRT as a result of the use of both physical and electronic surveillance, including the deployment of unmanned aerial vehicles (drones)
- continued its close working relationship with the Victoria Police Sports Integrity Intelligence Unit. A licensed person was charged with criminal conduct emanating from a harness racing meeting, and HRV awaits the conclusion of an outcome at the County Court regarding three other licensed persons charged with criminal conduct also resulting from a harness race
- continued to utilise former and current trainers, some of whom have been suspended or disqualified, to discuss the impact of past rule breaches on their reputations and careers through its *Integrity Matters* publication. HRV also continued to promote positive behaviours and conduct through that forum.

Animal welfare

HRV continued to increase its monitoring of standardbred horses being sold at saleyards and is investigating any horses that may be presented in poor condition. HRV engages with Victorian councils and RSPCA to ensure horses that are being rehomed or sold through the sales are in good condition. An agreement was put in place between HRV and Andrew Wilson and Co. to provide identification and sale results for standardbreds at each sale. HRV is also receiving data on horses sold through the Pakenham horse sales. HRV has been proactively following up the registration of horses sold through saleyards in Victoria.

HRV changed its internal processes and now records welfare inspections separately to stable inspections. A general welfare inspection is conducted at each stable inspection. A welfare inspection examines each horse and the conditions in which it is housed. These inspections are conducted by the HRV Animal Welfare Investigative Steward and a veterinarian, if necessary.

During the first peak of COVID-19, HRV identified the need to have support measures in place to ensure participants could access agistment during challenging times. A register was subsequently created for agistment properties. HRV anticipates this register will be a long term initiative and will assist others in need when required.

The Harness Racing Australia deregistration initiative was successful. It involved data cleansing and increased traceability of standardbreds, with 1700 horses in Victoria involved in outcomes including periods of disqualification, deregistration or having status updates during the amnesty period of 11 November 2019 to 5 January 2020.

HRV continued to take a zero tolerance approach to matters where horses were not appropriately cared for. During the reporting period, several licensed persons were issued with charges under the Australian Harness Racing Rules and directed to appear before the VRT, which resulted in outcomes including periods of disqualification.

Greyhound Racing Victoria

In the 2019–20 reporting period, GRV's Greyhound Racing Integrity Unit (GRIU) further strengthened its position as one of the world's leading racing integrity bodies by building on its fully integrated approach to education, compliance, investigation and prosecution. This included the expansion of veterinary services and integrity operations across Victoria and increased enforcement authority.

- **New Enforcement Authority:** In early 2020, GRV was granted a new authority by Animal Welfare Victoria to investigate and resolve animal welfare issues. Under the *Domestic Animals Act 1994* and the *Prevention of Cruelty to Animals Act 1986*, investigative Stewards working for the GRIU were appointed as Restricted Authorised Officers. This brings GRV into line with RSPCA Victoria powers and makes GRV the first racing body in Australia, and the only greyhound regulator in the world, to be granted such an authority. This means GRV is now able to manage the welfare of Greyhounds without having to refer matters to other agencies. This new authority is supported by RSPCA Victoria, which has a memorandum of understanding with GRV to ensure collaboration.
- **Code of Practice:** The Victorian Government's Code of Practice for the Keeping of Racing Greyhounds (the Code) became operational on 1 January 2020. Throughout 2019 and into 2020, the GRIU led an industry-wide drive to ensure participants were aware of and able to comply with their obligations under the Code. This included an online education campaign, seminars and workshops across Victoria, establishing a new Greyhound Record function in FastTrack for Victorian-bred greyhounds and the development and delivery of Establishment Health Management Plan templates for all greyhound facilities in Victoria. The Code specifies minimum standards for staffing, accommodation, management, breeding and care required to meet the physical and behavioural needs of a racing greyhound throughout its life.
- **COVID-19:** The COVID-19 pandemic required GRV to significantly change its race day operations in order to continue racing. This included a regional resourcing model to minimise travel and interaction with race day staff, restricting race day attendance to essential personnel only, health checks for entry to tracks and strict social distancing and biosecurity protocols in line with state and federal regulations and advice from Victoria's Chief Health Officer.
- **Safe racing:** GRV is committed to providing a safe racing environment for greyhounds and has invested significantly in this space over the past three years. They have a team dedicated to racing safety that is continually reviewing track design, track conditions and preparation as well as focusing on reviews of injury data. GRV works closely with Professor David Eager, University of Technology Sydney, as well as consulting with subject matter experts in track surface and track design.
- **Suspicious activity hotline:** Over the year, GRV's telephone and online hotline for reporting suspicious activity continued to be a valuable resource for the GRIU. In the 2019–20 financial year it received 145 contacts, some of which played a significant role in a number of investigations and successful prosecutions.

Glossary of acronyms

ASIC	Australian Securities & Investments Commission
FOI	Freedom of Information
GRIU	Greyhound Racing Integrity Unit
GRV	Greyhound Racing Victoria
HRV	Harness Racing Victoria
IBAC	Independent Broad-based Anti-corruption Commission
IR	Information Report
ISC	Integrity Sub-Committee
ISD	Integrity Services Department (RV)
ORIC	Office of the Racing Integrity Commissioner
QRIC	Queensland Racing Integrity Commissioner
RADB	Racing Appeals and Disciplinary Board
RASL	Racing Analytical Services Limited
RIOC	Racing Integrity Operations Committee
RSPCA	Royal Society for the Prevention of Cruelty to Animals
RV	Racing Victoria
SCOP	Single Code of Practice
VCAT	Victorian Civil and Administrative Tribunal
VRI	Victorian Racing Industry
VRIB	Victorian Racing Integrity Board
VRT	Victorian Racing Tribunal

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