

Annual Report 2024-25



Racing Integrity
Commissioner





Racing Integrity
Commissioner

Authorised by the
Racing Integrity Commissioner

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Designed and typeset by Vetro



Letter of Transmittal

The Hon Anthony Carbines MP
Minister for Racing
Level 26, 121 Exhibition Street
Melbourne Vic 3000

I am pleased to present you with my annual report for the year ending 30 June 2025, for tabling under section 37F of the *Racing Act 1958* (Vic).

I trust that it informs the Parliament, controlling bodies, racing industry participants, and Victorian public about my racing integrity oversight role and operational activities undertaken during the reporting period.

Terrie Benfield
Racing Integrity Commissioner
30 September 2025

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Message from the Commissioner

I am pleased to present this Annual Report for the 2024-25 reporting period, having commenced in the role of Racing Integrity Commissioner on 31 May 2025.

This report reflects the work and outcomes achieved by the office under its legislative mandate to provide assurance of integrity systems across the three racing codes, and its wider role in contributing to high standards of integrity throughout racing in Victoria.

Since my appointment, I have focused on building upon the strong foundations established by my predecessors, engaging with stakeholders, and assessing the current challenges and opportunities within the racing industry's integrity landscape. The office has continued to receive and assess complaints, conduct investigations and audits, and contribute to policy development and reform through collaboration with racing bodies and regulatory agencies.

I would like to take this opportunity to acknowledge the work of former Commissioner, Sean Carroll, and the Commissioner's team during the reporting period and commend them for their continued commitment to upholding the principles of transparency, accountability, and fairness in the administration of racing integrity matters. A particular thanks to Elissa Watson who acted in the role of Racing Integrity Commissioner prior to my appointment. Her stewardship during this period ensured the continued effective operation of the role, and a smooth transition upon my commencement.

Looking ahead, I remain committed to fostering a racing environment where integrity is paramount, and where all participants and stakeholders can have confidence in the systems that support the industry.



Terrie Benfield
Racing Integrity Commissioner

Role of the Racing Integrity Commissioner

Overview

The Racing Integrity Commissioner is an independent statutory officer appointed under Part 1A of the *Racing Act 1958* (Vic).

The Commissioner is a central integrity body in the Victorian racing industry whose key focus is to provide assurance about the integrity processes and systems of Racing Victoria Limited, Harness Racing Victoria and Greyhound Racing Victoria to Parliament and the public.

The Commissioner's role also affords an opportunity to share learnings and insights from the performance of their functions with the controlling bodies, to facilitate continuous improvement in integrity across the whole racing ecosystem.

The Commissioner is a central integrity oversight body in the Victorian racing industry

Functions

Under the Racing Act, the Commissioner's functions are to:

- **conduct annual audits of the internal integrity processes and systems**, in whole or in part, of each controlling body in areas identified by the Commissioner or the Victorian Racing Integrity Board (VRIB)
- **conduct audits outside the subject matter of the annual audit** if requested by a controlling body
- **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 about the integrity processes and systems** of a controlling body
- **refer complaints about certain matters**, including suspected criminal conduct and breaches of the rules of racing, to other specified bodies
- **investigate matters referred** by the Minister, 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** to the complainant and, as appropriate, the Minister, VRIB or relevant controlling body
- **conduct own motion inquiries** that do not relate to any specific complaint and may include an investigation into systemic issues in racing
- **make recommendations following the investigation of any complaint, inquiry or matter** to, as appropriate, the Minister, VRIB or relevant controlling body
- **direct the Victorian Racing Tribunal (VRT) to hear and determine an appeal** made by a person against a penalty imposed under the rules of a controlling body of a fine of \$250 or less if the Commissioner considers it is in the public interest for the appeal to be heard
- **notify the Independent Broad-based Anti-corruption Commission (IBAC)** of any matter suspected of involving corrupt conduct.

... facilitate continuous improvement in integrity
across the whole racing ecosystem



Year in Review

Enquiries and complaints

Enquiries

An enquiry is a request for information or report made by a racing participant, industry stakeholder or member of the public, about the Commissioner's role and functions, a controlling body's processes and systems, a suspected breach of the rules of racing, or other Victorian racing integrity concern. An enquiry may or may not proceed to a complaint.

Each year, the office receives numerous enquiries from people seeking to make a complaint about matters that fall outside the Commissioner's investigation and referral functions. Where possible, assistance is provided to redirect the complaint to an appropriate body who can deal with the concerns.

What are integrity processes and systems?

Integrity processes and systems of a controlling body include any process or system that is necessary to safeguard the integrity of the Victorian racing industry on, or off, the track.

Service issues, including administrative error and slow response times, are not integrity processes and systems.

Complaints

The Commissioner recognises a complaint as being made when substantive information is received from a person who has demonstrated an intention to make a complaint about a matter within the Commissioner's jurisdiction.

The Commissioner can receive complaints in multiple formats, including via the dedicated integrity hotline which can receive anonymous complaints, online webform, and email.

Referrals

The Commissioner may refer certain types of complaints to specified external bodies under the Racing Act – see *Referrals and Disclosures*.

Complaints the Commissioner can investigate

Under the Racing Act, the Commissioner can only investigate:

- complaints about the *integrity processes and systems of a controlling body*
- *public interest complaints* that relate to the conduct of a controlling body or an employee, officer or member of a controlling body
- complaints referred by the *Minister, VRIB or a controlling body*.

What is a public interest complaint?

Any complaint that the IBAC has determined falls within its jurisdiction under the *Public Interest Disclosures Act 2012* (Vic) (PID Act) is a public interest complaint. If the Commissioner considers a complaint could be a public interest complaint, it must be referred to IBAC for assessment.



Other complaints

The Commissioner is not an appeal or review body and cannot determine legal rights, claims or remedies between a licensed or registered person and controlling body or other industry participant. Therefore, the Commissioner is unable to deal with complaints about:

- decisions made in stewards' inquiries and by the VRT, or determinations made by other tribunals and courts
- commercial or contractual disputes between participants and other persons, including a controlling body.

Assessment

All complaints are acknowledged and recorded on a central database so that systemic or recurrent issues can be identified. Each complaint is assessed to decide whether:

- it raises serious issues that require immediate action or safeguarding
- the Commissioner is the most appropriate body to address the issues raised
- it is about the integrity processes and systems of a controlling body
- IBAC needs to be notified
- it needs to be referred to another body
- it is currently being, or has already been, considered by the Commissioner or another body
- it is appropriate to address the issues informally
- it needs to be formally investigated.

As part of the assessment, the Commissioner may seek further information or documents about the complaint by contacting:

- the person who made it, to obtain more detail and find out what outcome is sought
- the relevant controlling body to find out about any relevant integrity processes or systems that are in place, and/or seek information about any dealings it has had about the issues raised.

Complaint outcomes after investigation

The Commissioner has no enforcement powers and cannot lay charges under the rules of racing or any law.

The Commissioner may only take one of the actions outlined below to address the issues raised by a complaint.

Make recommendations

Recommendations can only be made to the Minister, VRIB or relevant controlling body if a complaint has been investigated by the Commissioner.

Informal resolution

The Commissioner may address issues without making a recommendation, including through stakeholder liaison, engagement and education, or via the audit process.

Take no further action

The Commissioner may decide to take no further action because a complaint:

- has been referred to another body
- is being, or has already been, dealt with by another body or the Commissioner's office
- the person to whom the complaint relates is not or has never been a licensed or registered participant
- it is not practicable to deal with it due to the effluxion of time
- it is not in the public interest to investigate or deal with the complaint
- the complaint is frivolous, vexatious, misconceived or lacking in substance.

A decision to deal with a complaint informally, or take no further action, does not prevent the Commissioner from considering the matter at a later time.

2024-25 Reporting

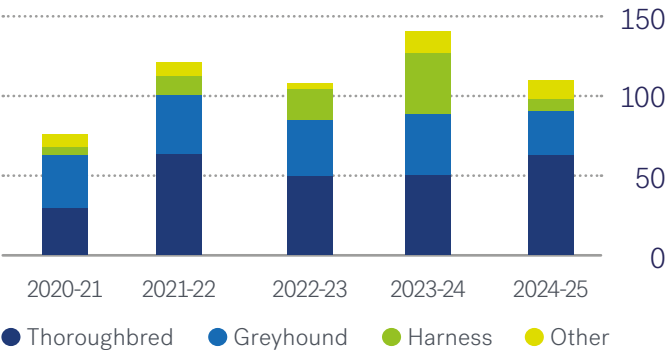
Complaints and Investigations

The total number of complaints received in 2024-25 (110) through informal avenues and formal reporting mechanisms is down 23% compared to last year. A total of 5 complaints were escalated for investigation, all of which remain in progress.

Complaints received by code

| CODE | 23/24 | 24/25 |
|--------------|------------|------------|
| Thoroughbred | 51 | 63 |
| Greyhound | 39 | 28 |
| Harness | 37 | 8 |
| Other | 15 | 11 |
| Total | 142 | 110 |

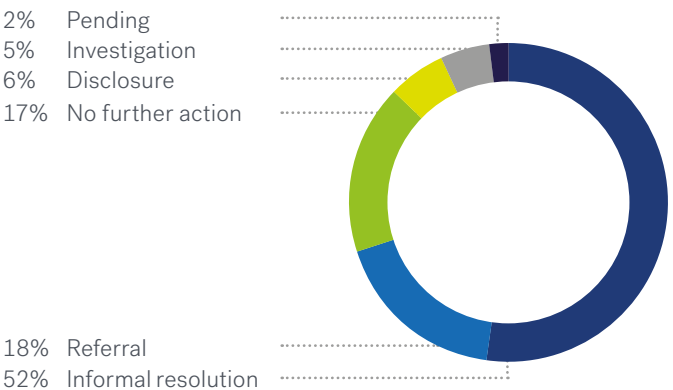
5-year trend in complaints received



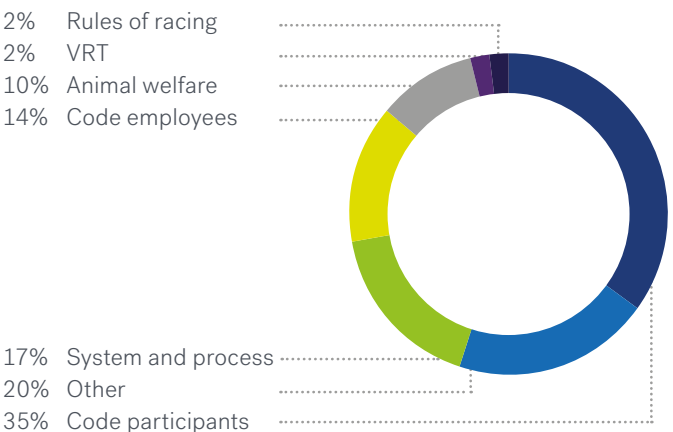
Of the 110 complaints received during 2024-25:

- 2 were pending assessment as at the end of the reporting period
- 57 were finalised via informal resolution
- 27 did not fall within the Commissioner's investigation function and resulted in referral (20) or disclosure (7) to another body
- 19 required no further action, usually because another body was already dealing with the matter or had taken action
- 5 proceeded to investigation by the Commissioner

2024-25 Complaint Outcomes



2024-25 Complaints by Category



Directions made to the VRT

In 2024-25, the Commissioner received two requests to direct the VRT to hear and determine an appeal against a fine imposed under the rules of a controlling body of \$250 or less.

One request was received outside the legislated timeframe for an appeal request to be made.

The Commissioner declined to exercise their power in relation to the other request after determining that it was not in the public interest for the appeal to be heard.



Referrals and Disclosures

Referral of complaints to other bodies

Under the Racing Act, the Commissioner may only investigate complaints about integrity processes and systems, public interest complaints, and matters referred by the Minister, VRIB or controlling body.

The Commissioner is empowered to refer complaints to a nominated external body, where they relate to or involve:

- A contravention of the rules of a controlling body: *the relevant controlling body*
- A criminal matter: *Victoria Police*
- Corrupt conduct: *IBAC*
- A contravention of any Act or subordinate instrument in connection with the integrity of racing: *the relevant government agency*
- An internal integrity matter: *VRIB*
- Animal welfare processes and systems of a controlling body: *the relevant government agency*.

Once a complaint is referred to another body, the Commissioner no longer has jurisdiction over the matter, or how it is handled by that body. However, the Commissioner seeks to monitor systemic issues and support continuous improvement in Victorian racing integrity processes and systems by requesting to be kept informed of any action taken by another body when a complaint is referred.

Disclosure of information

The Commissioner can disclose integrity related information, as appropriate, to:

- a controlling body
- VRIB
- VRT
- the Minister
- state and federal police
- IBAC
- a range of other racing, integrity, law enforcement, regulatory and other agencies prescribed under the Racing Act.

Integrity related information is information the Commissioner has collected or been given in the course of their functions and includes information in relation to:

- the contravention, or alleged contravention, of the rules of racing
- the identity of persons alleged to have contravened the rules of racing
- complaints investigated by the Commissioner
- audits conducted by the Commissioner.

Disclosure of integrity related information with the controlling bodies and other agencies allows the Commissioner to leverage information to build a more comprehensive picture of the Victorian racing integrity landscape across all industry touchpoints.

In turn, this supports the controlling bodies to be data and evidence-led in targeting their activities. It also assists the Commissioner to raise awareness about integrity risks and vulnerabilities in the industry.



Investigations, Inquiries and Recommendations

Investigations

The Commissioner may investigate complaints about the integrity processes and systems of a controlling body and matters referred by a controlling body, VRIB or the Minister. In deciding whether to conduct an investigation, the Commissioner will consider a number of factors, including:

- the best way to address the issues raised
- the subject matter and seriousness
- whether it raises systemic issues
- whether it has already been investigated
- resourcing priorities
- whether it is in the public interest.

If IBAC has determined that a complaint is a public interest complaint, the Commissioner must investigate it, unless:

- an investigation would prejudice criminal proceedings or specified investigations
- the subject matter has already been investigated or dealt with
- there is unsatisfactory delay since the person making the complaint became aware of the matter
- the conduct does not amount to improper conduct.

Report of findings

The Commissioner must report the findings of any investigations conducted into complaints that have not been referred to other bodies to the person who made the complaint, the Minister, VRIB or the relevant controlling body (with or without identifying either the person who made the complaint or who is the subject of it).

Prior to finalising an investigation report, the Commissioner routinely provides a draft copy to any affected persons, to afford procedural fairness.

On completion of an investigation of a public interest complaint, the Commissioner must report the findings to the relevant controlling body, VRIB and the Minister. However, the Commissioner must not include any information that is likely to lead to the identification of a person who has made an assessable disclosure, or that is otherwise prohibited under the PID Act.

Inquiries

The Commissioner can initiate an own motion inquiry (inquiry) into matters that do not relate to any specific complaint and may include an investigation into systemic issues in racing.

When conducting an inquiry, the Commissioner determines the scope of the issues to be examined. Ordinarily, an inquiry will focus on what occurred, how it happened, and whether any processes or systems need changing to prevent recurrence. It may also examine the role, conduct, and accountability of individuals.

In deciding whether to conduct an inquiry, the Commissioner will consider a number of factors, including:

- whether the circumstances indicate that an issue may be systemic or widespread, and not confined to a single event, person or complaint
- the public interest in scrutinising the relevant circumstances, events and actions, to promote or maintain confidence in racing integrity
- the seriousness and nature of the issues raised, including the risk to racing integrity
- whether another body has jurisdiction to examine the issues.

Recommendations

Recommendations may only be made by the Commissioner to the relevant controlling body, VRIB or Minister as appropriate, following the investigation of any complaint, inquiry or matter.

The Commissioner may advise the Minister of any failure by a controlling body to implement or act on a recommendation made.

Investigation and inquiry powers

The Commissioner may exercise the following powers when conducting an investigation or inquiry into a controlling body or a person, club or other body licensed or registered under the rules of racing, and require a person to:

- produce a specified document or other thing; and/or
- give evidence or answer questions on oath or affirmation.

These powers can only be exercised in respect of:

- a person who is licensed or registered under the rules of a controlling body
- a member of the board of a controlling body
- an employee of a controlling body
- a member of a committee or managing body of a club registered under the rules of a controlling body
- an employee of a club registered under the rules of a controlling body
- any person who, at the time the matter which is the subject of the investigation or inquiry occurred, fell within any of the above categories.

Offences

Under the Racing Act, it is an offence to:

- fail to comply, without reasonable excuse, with a written notice to produce or attend served by the Commissioner
- fail to take oath, make affirmation, answer questions or produce documents, without reasonable excuse, when required to do so
- make false or misleading statements or produce false or misleading documents or other things to the Commissioner.

2024-25 reporting

The Commissioner conducted 5 investigations in the last year, all of which remain in progress. The Commissioner also made 34 recommendations in relation to investigations arising from previous reporting periods.

An update on the racing codes' implementation of recommendations arising from the Commissioner's 2023 review into Victorian racing industry victim support and complaint processes (Review) is provided on the following pages.

Work to address these recommendations continues to be the subject of focused attention by each of the racing codes, including through the Victorian racing industry (VRI) cross-code implementation steering committee (Steering Committee). This Steering Committee was formed by Racing Victoria Limited, Harness Racing Victoria and Greyhound Racing Victoria in response to the Review recommendations and comprises the Chief Executive Officer of each code, and Mark Gepp as independent Chair.

In presenting the Steering Committee's 2024-25 progress update to the Commissioner, the Chair noted that each racing code has actively contributed to implementation activities with commitment to improving the racing industry. Based on current progress, the Chair expects all responses to the accepted Review recommendations will be completed and implemented by the end of 2025.

The Commissioner did not conduct any inquiries during the reporting period and did not advise the Minister of any failure by a controlling body to implement or act on a recommendation.

The Commissioner exercised fewer powers during 2024-25 and all responses were fully compliant with directions issued.

Powers exercised in the conduct of an investigation or inquiry

| Requirement | 2023-24 | 2024-25 |
|---|-----------|----------|
| Attend and give evidence | 5 | 0 |
| Produce documents and other things | 2 | 2 |
| Attend and give evidence and produce documents and other things | 8 | 0 |
| Invitation to attend | 5 | 0 |
| Total | 20 | 2 |



Summary of controlling body implementation of Review recommendations

| | | Greyhound Racing Victoria | |
|----------------|--|---------------------------|---|
| Recommendation | | Status | Commentary |
| 1 | Acknowledgement of current and historical harm and commitment to change by code leadership. | ✓ | Completed in 2023-24. |
| 2 | Establish a cross-code steering committee with an independent chair to oversee implementation of the recommendations, including sharing learnings and best practice, and consult with industry stakeholders. | ✓ | GRV continues to participate in the VRI steering committee. |
| 3 | Establish an independent restorative engagement framework and scheme for code victims. | ✓ | GRV has reviewed support services already in place and considers them to be fit for purpose. GRV has determined that it will not implement a stand-alone restorative engagement process. |
| 4 | Develop a comprehensive plan to target industry prevention of unsafe and disrespectful behaviours within the code. | ✓ | GRV has introduced a specific rule, LR61A, which makes it an offence to assault, abuse, interfere with, threaten, or harass another person. Policy changes have been embedded to GRV operations and GRV's Responding to Harmful Behaviours Guideline has been published online. |
| 5 | Mandate a code-wide, tailored education program for safe and respectful behaviours. | ✓ | A new in-person education program, which includes misconduct and inappropriate behaviour topics, has been developed. This program commenced across Club venues in July 2025. |
| 6 | Acknowledge the Commissioner as an independent reporting pathway for participant protection and child safeguarding concerns. | ✓ | Completed in 2023-24. |
| 7 | Update code processes for handling complaints about unsafe and disrespectful behaviour. | ✓ | GRV's complaints webpage and resources has been updated. |
| 8 | Ensure adequate wellbeing, participant protection, and child safeguarding supports available to all code participants and staff. | ✓ | Completed in 2023-24. |
| 9 | Develop and implement a monitoring and evaluation framework to assess how the code is addressing participant protection and child safeguarding concerns, and report annual progress to the Commissioner. | ✓ | GRV is compliant with all its regulatory reporting and evaluation obligations in accordance with the State Government's better regulation principles. |

| Harness Racing Victoria | | Racing Victoria Limited | |
|-------------------------|--|-------------------------|--|
| Status | Commentary | Status | Commentary |
| ✓ | Completed in 2023-24. | ✓ | Completed in 2023-24. 1 |
| ✓ | HRV continues to participate in the VRI steering committee. | ✓ | RVL continues to participate in the VRI steering committee. 2 |
| ✓ | The REF is anticipated to be operational from 1 September 2025 to 1 September 2027. | ✓ | The REF is anticipated to be operational from 1 September 2025 to 1 September 2027. 3 |
| ↻ | HRV's plan will be finalised by December 2025. So far, training courses, club signage and industry notices have been introduced. Policies and procedures have also been updated to set and reinforce expected participant behaviour, and HRV's responsibility to act on reported conduct. | ✓ | Ongoing implementation of the plan includes dissemination of awareness posters to clubs and industry workplaces, and delivery of workshops to people leaders at large employers/businesses, and country and regional club managers. 90% of participants have completed online learning which is a precondition to being re-licensed. Wellbeing musters at workplaces across the State drive conversations and promote awareness about the role of RVL's Participant Protection and Wellbeing Managers. 4 |
| ↻ | HRV has launched its participant education program, with completion a mandatory requirement for annual licence renewal. An online training program for clubs has been developed, which all committee members will complete by 31 December 2025. Training has been delivered to Stewards and will be rolled out for all HRV employees and board members by December 2025. | ✓ | RVL is engaging providers to deliver its respectful behaviours education program to participants, clubs and employees. It has also devoted resources to ensure all licensed and registered persons complete the online learning module before 31 October 2025. 5 |
| ✓ | HRV's website has been updated to reflect the Commissioner as a reporting mechanism. | ✓ | Completed in 2023-24. 6 |
| ↻ | HRV is reviewing applicable policies for Board approval by December 2025. | ✓ | Completed in 2023-24. 7 |
| ↻ | HRV's new Integrity Framework will supplement and update current policies, include a webform solution for the complaint process, and be finalised by December 2025. | ✓ | Completed in 2023-24. 8 |
| ↻ | HRV is developing a framework to support continuous improvement and ensure accountability across the industry. Annual progress reporting to the Commissioner will outline key findings and actions taken. | ✓ | RVL's internal working group monitors implementation of the recommendations and draws on subject matter expertise of staff. An annual update will be provided to the Commissioner until two years after the REF commences. 9 |

✓ Completed ↻ In progress

Audits

Overview

An examination of the internal integrity processes and systems of the controlling bodies through the conduct of an annual audit is one of the Commissioner's core functions. It facilitates the tracking of integrity improvements within the Victorian racing industry over multiple years.

2024-25 reporting

Work continued on the quantitative gap analysis of VRI integrity policies and procedures, an audit commenced in 2023-24.

There were no additional audits conducted during the 2024-25 reporting period.





Corporate Reporting

Staffing and shared services

The Commissioner receives funding and support from the Department of Justice and Community Safety (DJCS) for a range of corporate services, including information technology, risk management, human resources and finance. The Commissioner is supported in the performance of their functions by dedicated staff who are employees of DJCS assigned to the Commissioner's office.

Financial and corporate reporting

Detailed reporting for the Commissioner's office relating to financial performance, workforce data and other disclosures under the *Financial Management Act 1994* (Vic) is included in the DJCS annual report.

Freedom of information

The *Freedom of Information Act 1982* (Vic) (FOI Act) provides the public with a right to request access to information held by the Commissioner. No freedom of information (FOI) requests to access information under the FOI Act were received in 2024-25.

An FOI request must be made in writing, clearly describe the information or document sought, and be accompanied by the prescribed application fee made payable to DJCS. Enquiries about access to documents held by the Commissioner can be made to:

Freedom of Information Request

Racing Integrity Commissioner
PO Box 24034, 111 Bourke Street
Melbourne Vic 3001
Email: enquiries@racingintegrity.vic.gov.au
Phone: +61 3 8684 7776

Public sector conduct

The Commissioner and staff are bound by the Victorian public sector codes of conduct. The office maintains registers for gifts, benefits and hospitality, conflicts of interest, and annual declarations of private interests.

Public interest disclosures

The PID Act encourages and facilitates the disclosure of improper conduct and corruption in the Victorian public sector by providing protection to people who make disclosures in accordance with its provisions. Any disclosure of this type about the Commissioner or their staff may be made to either:

Independent Broad-based Anti-corruption Commission

Level 1, 459 Collins Street (North Tower)
Melbourne Vic 3000
Phone: 1300 735 135
Website: www.ibac.vic.gov.au

Victorian Ombudsman

Level 2, 570 Bourke Street
Melbourne Vic 3000
Phone: 03 9613 6222
Website: www.ombudsman.vic.gov.au

Portfolio Financial Management Compliance Attestation Statement

I, Terrie Benfield, Racing Integrity Commissioner, certify that the Racing Integrity Commissioner has been granted an exemption from the Standing Directions 2018 under the Financial Management Act and Instructions. This exemption has been granted by the Assistant Treasurer on the basis that the Racing Integrity Commissioner complies with the DJCS Portfolio Entity Financial Management Compliance Framework.

Terrie Benfield
Accountable Officer

30 September 2025



Racing Integrity
Commissioner

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