

Racing  
Integrity  
Commissioner

—  
Annual Report  
2020–21



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 2021 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,



**Sean Carroll**  
**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 was the inaugural appointee to the role of the Racing Integrity Commissioner. Mr Perna commenced as Commissioner on 1 March 2010 for an initial two-year term. The Governor in Council extended Mr Perna's appointment on four consecutive occasions, with his final term concluding on 28 February 2021.

Mr Sean Carroll was appointed as the new Commissioner in December 2020 and his appointment commenced on 1 March 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).



# FROM THE COMMISSIONER



In preparing this annual report and reflecting on the state of integrity within the Victorian Racing Industry (VRI) throughout the 2020–21 year, it is essential we acknowledge the significant impact that the COVID-19 pandemic continues to have, not only within the racing community but across all facets of society and business.

Unlike any other influence that I can recall, it has fundamentally changed the way in which business, sport and the community interact.

The manner in which the VRI responded during these unparalleled times speaks volumes to the commitment and the resilience of all connected to our sport, who worked so hard to ensure racing in Victoria continued at a time when other sports and industries faced significant disruption. This was only possible through the three racing controlling bodies applying and enforcing robust biosecurity protocols, while maintaining the high level of integrity the Victorian public has come to expect of the VRI. I wholeheartedly support the three codes' COVID-19 compliance programs and congratulate them on their efforts.

At the Office of the Racing Integrity Commissioner, we value our engagement with everyone who contributes to the VRI, whether as a racegoer, participant or employee. Our relationships are a fundamental component of our strategy. By strengthening our connections across the VRI and, importantly, the public, we seek to maintain confidence and transparency in the integrity of all aspects of the industry. To achieve this, we took proactive measures to be more visible at race meetings, track work and in the media.

I am proud of the continued partnership we maintain with animal welfare agencies, particularly with Dr Liz Walker and her team at RSPCA Victoria. As the incoming Racing Integrity Commissioner, I am committed to working closely with the racing industry to ensure the three controlling bodies maintain focus on animal welfare, especially on the retraining and rehoming programs for retired horses and greyhounds.

I would like to thank the integrity staff and board members/directors from the three controlling bodies, as well as all racing participants, not only for welcoming me into the role of Racing Integrity Commissioner, but more so for their support and cooperation since my commencement. I also wish to thank the staff of the Victorian Government Solicitor's Office, who continue to support my office.

I would like to take this opportunity to thank and acknowledge the work of former Racing Integrity Commissioner, Sal Perna AM, who in February this year resigned after almost 10 years in the role. With his establishment of the Office of the Racing Integrity Commissioner, Sal made a significant contribution to the VRI. In taking over the baton from Sal, I am the benefactor of a well-established platform I can now build on during my tenure. I wish Sal all the best in the next chapter of his career.

Finally, I extend my appreciation and personal thanks to all of the ORIC staff for their dedicated contribution to overseeing the integrity of the VRI over the past 12 months, despite all the challenges presented.

All the best in racing.

**Sean Carroll**  
**Racing Integrity Commissioner**

# 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 under the Racing Act.

All employees report 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 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 and presentations
- office operations (such as finance, human resources and procurement)
- submitting annual reports.

### 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, including animal welfare, 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

- **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 may or may 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 examine material, documents or other things or 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](http://www.legislation.vic.gov.au)

# 2020-21 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 2020-21 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.



**1,365**  
**424**

Met with **1,365** stakeholders  
from **424** organisations



**8**

Delivered **8** presentations



**60**

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



**290**

Received, assessed and responded to **290** information reports, complaints and enquiries

## Quarterly comparison

The table below highlights some of the operational and stakeholder management activities undertaken by the Commissioner and his office during the 2020–21 reporting period.

The COVID-19 pandemic presented many challenges to ORIC, including a limited ability to attend race meetings and other

operational visits due to COVID-19 restrictions, as highlighted in the table below. Should these restrictions continue into the new financial year, ORIC will implement a proactive plan developed to address stakeholder engagement.

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 20–Sep 20	143	279	507	3	2	0
Oct 20–Dec 20	98	155	308	1	0	0
<b>Total Jul 20–Dec 20</b>	<b>241</b>	<b>434</b>	<b>815</b>	<b>4</b>	<b>2</b>	<b>0</b>
Jan 21–Mar 21	101	172	293	3	6	3
Apr 21–Jun 21	82	171	257	1	5	4
<b>Total Jan 21–Jun 21</b>	<b>183</b>	<b>343</b>	<b>550</b>	<b>4</b>	<b>11</b>	<b>7</b>



# Commissioner's Review

## Since commencing as Racing Integrity Commissioner on 1 March, I have had a rapid yet exciting introduction to the VRI.

In succeeding Sal Perna AM, the inaugural Racing Integrity Commissioner who established ORIC in 2010, I see this report as a unique opportunity to introduce myself and 're-introduce' the purpose and function of my role and that of ORIC.

In my first few months, I attended many race meetings and visited track work, stables and kennels. This provided an invaluable opportunity to meet a range of participants, gain an understanding and appreciation of the integrity issues facing the industry and, most importantly, identify where I can add the most value. I would like to thank everyone for making me welcome and taking the time to discuss their various roles and expectations of integrity.

Throughout these visits, I was asked many questions. The most common centred on my focus and what I hope to achieve in my role as Racing Integrity Commissioner. While it is still very early in my tenure, I see these questions being answered by the participants themselves, who are crucial to driving the integrity agenda forward. In having these important conversations, the overwhelming message is that they want a level playing field across their code, and to ensure that no one gains an advantage due to any integrity breach.

I am inspired by the passion and hard work of those I meet across the industry, from the thoroughbred trainers at the new multi-million-dollar training facilities at Cranbourne to the trainers at small private kennels at Pearcedale. I am impressed with the commitment and dedication of the integrity staff at each of the controlling bodies, who strive to regulate their codes well and maintain the integrity of the VRI. Their drive in protecting racing integrity is essential to the success of the industry and I look forward to working with them in the future.

Later this year, the ORIC team will develop our five-year Strategic Plan for 2021–26. It will provide a clear statement of purpose to the racing industry of our direction and goals to ensure continued high standards of integrity. The plan will be developed in consultation with the VRI, including the three controlling bodies and key stakeholders such as trainers, owners, jockeys, drivers, VRIB and animal welfare groups.

Finally, I take this opportunity to encourage all participants to report any integrity concerns they may have within the industry to either their controlling body's integrity department or to ORIC directly.

### Own motion inquiry

To ensure public confidence in integrity standards is maintained, in April I conducted an 'own motion' inquiry into the conduct of RV Stewards and withdrawal of charges in a high profile prosecution at the VRT. Given the significant industry, public and media interest in what occurred, I released a public summary of my findings and recommendations. I also did this to provide leadership for the high level of transparency that I expect from the VRI, which is a foundation for continued public confidence. I acknowledge RV's cooperation and professionalism throughout the inquiry.

### Annual audit of integrity processes and systems

Given the magnitude and impact of the COVID-19 global pandemic on all Victorians, it is important that I take this opportunity to reflect on the impact the pandemic continues to have on the racing industry. The continuation of racing has played its part in providing Victorians with a sense of normality, albeit at times with no public crowds. This ensured that a critical industry could continue to provide enjoyment to racing fans through broadcast race meetings. It also allowed for the sustained employment of thousands of Victorians and provided critical safeguarding for animal welfare.

The controlling bodies continue to be agile in their response to the pandemic, regularly adapting their processes to ensure high integrity standards are maintained while adhering to robust health protocols. Any potential change to integrity controls creates a possible exposure and opportunity for the infiltration of corruption, criminal activity or rule breaches to gain an advantage.

To assess the resilience of the racing industry's integrity processes and systems to the COVID-modified operating environment, the annual audit undertaken by ORIC for 2020–21 focused on how the three controlling bodies operated and maintained their integrity functions during the pandemic.

This audit considered risks under the following key integrity focus areas:

- race fixing
- doping of animals and riders/drivers
- illegal betting, bribery and corruption, and conflicts of interest
- participant welfare
- participant behaviour
- animal welfare
- training and education.

The controlling bodies' commitment to integrity is evidenced by their maintenance of pre-pandemic integrity resourcing levels and, in some cases, increased staffing. This is despite extended workforce stand-downs in other parts of their business units and the trend of staffing reductions in integrity units in other sports. It will be important for the controlling bodies to monitor the mental health and fatigue of their integrity staff in the coming months, as they continue in their front line role to uphold integrity and biosecurity controls.

The assessment from the audit is favourable and the controlling bodies are to be congratulated for maintaining such high standards of integrity processes and systems. It is also pleasing that our auditors reported that 'the main focus of the industry and each of the codes during COVID-19 was on participant safety, from a health and wellbeing perspective'<sup>1</sup>.

## Partnering with Victoria Police

During 2020–21, the racing industry saw substantial increases in wagering turnover. Much of this was channelled to online facilities and away from usual face-to-face and on-course operations, due to enforced outlet closures under public health restricted activity directions. Anecdotally, the controlling bodies and law enforcement agencies consider that the increased wagering revenue from racing is due to the absence of competing betting products when other Australian and international sporting codes were mandated to shut down.

Importantly, there is no evidence to suggest that this upturn was caused by the involvement of corrupt influences, including the potential influence of unregulated organised betting operations outside Australia.

While this is pleasing, it cannot be taken for granted. Given the significant financial rewards that the racing industry provides – by way of prize money and increased betting pools – any uplift in wagering also increases financial incentives and the potential for corruption and criminal infiltration.

The association between corruption and sport has a long history. In 2008, a review of the VRI conducted by Judge Gordon Lewis AM found criminal activity had been rampant and there had been a tolerance of money laundering. Judge Lewis made several recommendations, including the appointment of a Racing Integrity Commissioner. He also recommended that the relationship between Victoria Police and the thoroughbred, harness and greyhound controlling bodies be significantly strengthened to tackle crime in the racing industry<sup>2</sup>.

All three racing codes introduced operational integrity units and Victoria Police established the Sporting Integrity Intelligence Unit. However, there has been no industry-wide assessment of the impact of their presence on clandestine criminal elements, which are difficult to detect. Following discussions with Victoria Police command, we agreed that there is value in us working together to gain a detailed understanding of the potential for and extent of any criminal involvement in the racing industry. This will enable Victoria Police to make an informed assessment of what police response, if any, is required.

As a result, ORIC partnered with Victoria Police to establish a project that assesses criminality across the racing industry. From 1 July 2021, this will involve two police officers being seconded to ORIC for six months. They will work alongside dedicated investigative and analytical resources within my office, as well as with the controlling bodies and broader industry, to review and better understand the integrity risks posed by criminal elements within Victorian racing.

This initiative represents an excellent opportunity for ORIC and Victoria Police to provide a unique insight into racing, to better support the controlling bodies and promote integrity within the industry. I look forward to reporting on the findings in our 2021–22 annual report.

## Integrity education

I believe that integrity education is the cornerstone of any integrity framework for all sporting codes. I am committed to ensuring quality integrity education is available to all racing integrity officials and participants through my involvement in the VRIB's Integrity Training Steering Committee. On this committee, which is chaired by Elizabeth Clarke AM, I am joined by representatives from all three controlling bodies. Our goal is to improve integrity education across the racing industry.

Key priorities are securing funding for a recognised integrity qualification and identifying suitable education providers that can add this course to their scope so that it can be offered to all VRI integrity staff in the future. I am also keen to see integrity training provided to all racing participants, to improve their industry knowledge and standards.

<sup>1</sup> 2020–21 ORIC audit by Suiko Consulting.

<sup>2</sup> Lewis, Judge G.D. (2008) A Report on Integrity Assurance in the Victorian Racing Industry, <https://racingintegrity.vic.gov.au/news-and-publications/publications/lewis-report>

# Operations

## Inquiries and investigations

### During the 2020–21 reporting period, ORIC initiated a number of inquiries and investigations into integrity related matters across the VRI.

As a consequence, ORIC sought additional investigative and intelligence gathering resources, which will come into effect from July 2021. While the increase in resources had an immediate impact on intelligence holdings within ORIC, they will also play a vital role in the Victorian Police secondment.

Listed below are examples of types of matters ORIC managed over the year:

#### Animal welfare

ORIC views stakeholder engagement as an essential way to better understand and investigate matters of animal welfare as they relate to integrity across the VRI. A greyhound meeting held at Ballarat in April was abandoned after a greyhound was injured in the first race and subsequently euthanised. Immediately upon GRV learning of this incident they requested an independent investigation. To ensure a level of independence that would satisfy the needs of the VRI, the Commissioner had general oversight of the independent investigation. The investigation was conducted thoroughly, in a timely manner and provided appropriate recommendations.

The issue of animal traceability across the VRI remains a priority and ORIC will continue to work with the three codes to ensure transparency in this space. Also, ORIC will continue to work closely with animal welfare groups such as RSPCA Victoria to maintain effective animal welfare controls.

#### Anti-doping and race fixing

There is no place in the VRI for the illegal doping of animals. In the 2020–21 reporting period, ORIC received information relating to allegations of doping, both illicit and performance enhancing, as well as suspected race fixing. ORIC investigates these allegations to assess accuracy, at which time the information is supplied to the relevant Integrity Services Department and/or the Sporting Integrity Intelligence Unit as deemed appropriate.

The anti-doping testing program for each code continued to operate at a high standard according to the findings of the 2020–21 Annual Audit. Any reports of alleged race fixing received by ORIC are assessed and referred to the Sporting Integrity Intelligence Unit and/or the relevant code. This proved successful given the recent success HRV and Victoria Police had in investigating and prosecuting allegations of race fixing.

#### Participant behaviour

ORIC expects all participants to maintain the highest standards of behaviour within the rules of racing and relevant legislation.

During the year, ORIC dealt with a number of issues relating to participant behaviour. An example of this occurred after ORIC received a complaint relating to inappropriate betting by a racing industry employee. The information was analysed and inappropriate betting identified. ORIC then forwarded this information to the relevant racing code. ORIC will continue to work with the three racing codes to ensure compliance with the Code of Conduct and Betting Declaration restrictions that apply to employees within integrity services in each code.

During the 2020–21 reporting period, ORIC commenced an own motion investigation in relation to the matter of the withdrawal of charges against Richard Laming, Marnu Potgieter and MD Zeyaur Rahman by RV and the behaviour of the Stewards involved. The Commissioner provides an outline of this matter on page 10.

#### Participant integrity

In June, ORIC received a request from one of the codes to conduct an independent investigation relating to an allegation about a race day official. This referral was made immediately to ORIC upon the code identifying an integrity concern regarding the race day official. The official was questioned in relation to those initial concerns by the Commissioner, pursuant to section 37BB of the Act. It is anticipated the investigation will be completed during the 2021–22 reporting period.

## 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 post Covid 19	2020-21	pending completion
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

As a result of the 2019-20 annual private interests and betting accounts audit, the single Code of Practice (SCOP) Part A was updated in September and circulated to the codes for comment. After consultation with the codes, a small number of amendments were made to the SCOP to provide for clarity. ORIC will continue to work with the codes to streamline the requirements under SCOP A.

The Annual Private Interests and Betting Accounts Audit is a key measure to ensure high integrity standards for personnel performing integrity related roles and specified employees from the three racing codes.

The SCOPs are important to the integrity landscape. As such, the SCOP and relevant reporting systems require revision to ensure ongoing compliance, transparency and accuracy in reporting. ORIC proposes to review all SCOPs with the codes and VRIB to ensure these align with integrity plans and are current and relevant.



## 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
- welfare roles relating to integrity
- 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 objectives of the principles are to:

- 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, animal welfare groups and the Victorian 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.

This audit will be finalised during the 2021-22 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<sup>3</sup>.*

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 activity remains in progress and is expected to be completed in the 2021–22 financial year.

## Integrity risk management

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

*The Commissioner supported the finding in the audit that 'All three Codes have mature and professional Integrity Departments (ID) led by renowned industry experts and comprising specialist personnel across the key integrity areas of intelligence, investigations, analysis, veterinarian services and animal welfare<sup>4</sup>.'*

The audit made 76 recommendations across the three codes, which were under consideration during 2020–21 and will be finalised in the 2021–22 reporting period.

## Integrity risk management post COVID-19

The topic selection for the 2020–21 audit presented itself with the impact of COVID-19 on the VRI. The key objective of the audit focused on material changes in integrity risk management before and after the COVID-19 pandemic. The report is in the final stage of completion and preliminary findings are favourable. Further information relating to this audit can be found in the Commissioner's Review on page 10.

## Recommendations

Since the Commissioner's role commenced in 2010, 394 recommendations have been made under the Act (this does not include the recommendations made as a result of the 2020–21 audit in Integrity Risk Management Post COVID-19). A total of 300 (or 99 per cent) of the Commissioner's recommendations were implemented as per the following table:

### Finalised recommendations – three racing codes

Code/body	No. of recommendations	No. of implemented	No. rejected / not implemented	Comments
RV	74	74	0	100% implemented
GRV	88	88	0	100% implemented
HRV	86	86	0	100% implemented
Govt	38	34	4	89.47 % implemented
Others	14	14	0	100% implemented
<b>Total</b>	<b>300</b>	<b>296</b>	<b>4</b>	<b>98.81 % implemented</b>

Note: ORIC and the codes are finalising these recommendations.

<sup>3</sup> Audit Report into the end to end management of investigations 2019, SportsLawyer, page 3.

<sup>4</sup> 2019–20 Audit, Integrity Risk Management, Executive Summary, page 10.

# Information and intelligence

## During 2020–21, ORIC implemented a new Case Management System (CMS).

It contains sophisticated technology that allows ORIC to enhance its:

- reporting requirements
- ability to identify trends and emerging risks
- data collection and analysis
- ability to function remotely
- efficiency
- intelligence collection and analysis.

The release of the new CMS also gave ORIC an opportunity to conduct a full review of all intelligence holdings. This led to the establishment of a new categorisation process. The result was a far better understanding of the type of information that ORIC is receiving and enhancement of the ability to identify emerging risks and trends.

The new CMS is utilised by a number of sporting organisations and racing codes worldwide. It has been customised to ensure that ORIC can continue to record, manage and report on information and intelligence received in the form of complaints, information reports (IRs) and enquiries. Own motion inquiries, special inquiries, investigations, and referrals from the Minister for Racing and controlling bodies are also managed in the CMS.

### COVID-19 impact

During the 2020–21 reporting year, there was a reduction in the number of IRs and enquiries received by ORIC (-18 per cent).

ORIC recognised this impact and introduced a proactive intelligence collection plan to identify and analyse relevant information through avenues of enquiry, including:

- VRT decisions
- Steward reports
- open-source material.

To assist with this process and help drive the proactive intelligence collection plan, ORIC employed a Senior Intelligence Analyst in September. This appointment greatly enhanced ORIC's proactive intelligence collection and enabled a greater focus on the identification of potential integrity risks and trends across the VRI.

To record and analyse this material, ORIC developed an 'Intelligence Entity' within the CMS. Intelligence Entities created during 2020–21 totalled 691. The established intelligence collection plan proved highly successful and will continue in the future. Although COVID-19 resulted in a number of challenges for the VRI, ORIC responded by enhancing information collection opportunities that will provide greater understanding of integrity risks facing the industry.

The additional resourcing and easing of COVID-19 restrictions resulted in a major increase in IRs prepared during quarter four of this reporting period. Over 38 per cent of IRs for the year were created during this quarter, presenting a 25 per cent increase compared to the previous reporting period quarterly average.

## Information Reports

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

During the 2020–21 reporting period, ORIC recorded 97 IRs.

These IRs related to a number of issues:

- breach of rules or regulations (35 per cent)
- criminal matters (21 per cent)
- animal welfare (19 per cent)
- code disciplinary matters (17 per cent)
- other (8 per cent).

### How were the IRs received?

A total of 90 per cent (87) of all IRs were received overtly, while the remaining 10 per cent (10) IRs were received anonymously. The methods of receipt were:

- 26 per cent (25) received via email
- 20 per cent (20) generated through open source material
- 18 per cent (17) received via the Integrity Hotline
- 11 per cent (11) received via a telephone call
- 9 per cent (9) supplied directly to ORIC
- 9 per cent (9) receiving during a meeting
- 7 per cent (6) received via mail.

### What did the IRs relate to?

Of the total number of IRs, 92 per cent (89) related to the controlling bodies, with 60 per cent (57) related to RV, 15 per cent (15) related to GRV and 10 per cent (10) related to HRV. A total of 6 per cent (6) related to all three codes and 1 per cent (1) involved both HRV and RV.

The remaining 8 per cent of IRs related to interstate racing industries (6), wagering service providers (2) and a government agency (1).

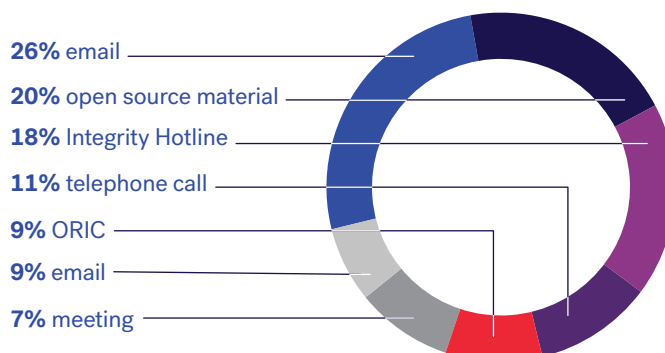
### What were the outcomes of the IRs?

As a result of the 97 IRs received, ORIC referred and/or disclosed to a controlling body or government agency on 73 occasions for information and/or investigation purposes.

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

### Intelligence capability

Due to the increased demand on intelligence holdings and new CMS, ORIC bolstered its information and analytical capability by appointing a new analyst. This increased the ability to thoroughly analyse incoming complaints and IRs, and provide detailed analysis to ORIC investigators, the codes and other agencies.



Information Reports	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
GRV	2	20	16	5	85	32	37	20	19	24	15
RV	17	30	97	12	21	27	30	33	65	62	57
HRV	0	10	15	14	22	9	16	20	14	18	10
Other	4	3	8	1	17	8	3	7	12	14	15
<b>Total</b>	<b>23</b>	<b>63</b>	<b>136</b>	<b>32</b>	<b>145</b>	<b>76</b>	<b>86</b>	<b>80</b>	<b>110</b>	<b>118</b>	<b>97</b>

# Information and intelligence (cont.)

## Complaints

During the 2020–21 reporting period, ORIC received 76 complaints. These complaints comprised allegations involving a range of issues:

- animal welfare (26 per cent)
- code disciplinary matters (25 per cent)
- processes and procedures (13 per cent)
- breach of rules or regulations (11 per cent)
- ownership/syndication (9 per cent)
- wagering dispute (7 per cent)
- criminal matter (5 per cent)
- other (4 per cent).

## How were the complaints received?

Ninety-five per cent (72) of all complaints were received overtly, while the remaining 5 per cent (4) of complaints were received anonymously.

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

- 67 per cent (51) received via email
- 16 per cent (12) received via the Integrity Hotline
- 11 per cent (8) received via a telephone call.

The remaining 6 per cent (5) of complaints relating to the codes were received via referral, ORIC's recently released webform or meeting directly with the Commissioner.

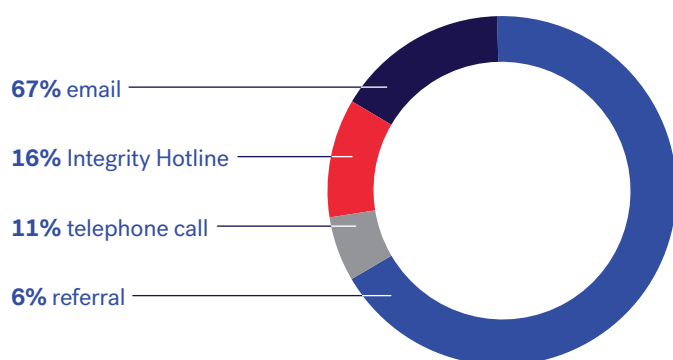
## What did the complaints relate to?

Of the 76 complaints, 68 related to an individual controlling body as follows:

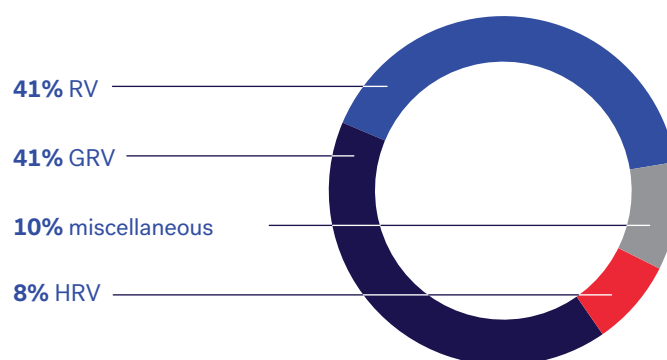
- 41 per cent (31) of complaints related to RV
- 41 per cent (31) of complaints related to GRV
- 8 per cent (6) of complaints related to HRV.

The remaining 10 per cent (8) of complaints were miscellaneous.

## How were the complaints received?



## What did the complaints relate to?



## Total no. of complaints received by code

Code	2010 2011	2011 2012	2012 2013	2013 2014	2014 2015	2015 2016	2016 2017	2017 2018	2018 2019	2019 2020	2020 2021
GRV	14	9	5	9	21	30	25	14	18	23	31
RV	16	5	6	10	12	25	19	39	31	43	31
HRV	8	3	7	3	11	5	6	10	13	6	6
Other	4	0	4	2	3	4	3	4	5	7	8
<b>Total</b>	<b>42</b>	<b>17</b>	<b>22</b>	<b>24</b>	<b>47</b>	<b>64</b>	<b>53</b>	<b>67</b>	<b>67</b>	<b>79</b>	<b>76</b>

## 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 117 enquiries.

Of these:

- 39 per cent (46) were from the public
- 32 per cent (37) were from industry participants
- 12 per cent (14) were from government bodies/agencies or law enforcement
- 6 per cent (7) were from media organisations
- 5 per cent (6) were from community groups.

The remaining 6 per cent (7) were from integrity personnel of a code, wagering service providers or were received anonymously.

These enquiries related to rules of racing and processes, animal welfare concerns, potential breaches of regulations and issues relating to ownership and syndication.

### Which code did the enquiries relate to?

Of the 117 enquiries, 85 per cent (100) related to the following industries:

- 61 per cent (71) related to RV
- 16 per cent (19) related to GRV

- 5 per cent (6) related to multiple racing industries
- 3 per cent (4) related to HRV.

The remaining 15 per cent (17) related predominantly to interstate codes or overseas jurisdictions and wagering service providers.

## 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.

During the 2020–21 reporting period ORIC received 62 integrity hotline reports from Stopline, comprising non-disclosures and disclosures. (Non-disclosures refer to reports that do not fall within the Commissioner's jurisdiction.)

The number of reports received via the Integrity Hotline decreased by 29 per cent in comparison to the 2019–20 financial year. However, this was offset by the number of direct contacts made to ORIC in the last quarter of the reporting period, which saw an 85 per cent increase in IRs compared to the average over the three previous quarters.

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 per industry	2010 – 2011	2011 – 2012	2012 – 2013	2013 – 2014	2014 – 2015	2015 – 2016	2016 – 2017	2017 – 2018	2018 – 2019	2019 – 2020	2020 – 2021
Greyhound	8	13	14	22	108	49	22	14	15	15	19
Thoroughbred	17	18	34	33	33	34	38	40	59	60	71
Harness	7	10	14	9	13	5	14	6	14	17	4
Other	15	15	27	30	30	55	42	36	30	52	23
<b>Total</b>	<b>47</b>	<b>56</b>	<b>89</b>	<b>94</b>	<b>184</b>	<b>143</b>	<b>116</b>	<b>96</b>	<b>118</b>	<b>144</b>	<b>117</b>

Racing Integrity Hotline	2010 – 2011	2011 – 2012	2012 – 2013	2013 – 2014	2014 – 2015	2015 – 2016	2016 – 2017	2017 – 2018	2018 – 2019	2019 – 2020	2020 – 2021
Disclosure	14	11	28	4	34	24	20	33	85	79	58
Non-disclosure	14	9	21	5	4	3	1	24	12	8	4
<b>Total</b>	<b>28</b>	<b>20</b>	<b>49</b>	<b>9</b>	<b>38</b>	<b>27</b>	<b>21</b>	<b>57</b>	<b>97</b>	<b>87</b>	<b>62</b>

# Information and intelligence (cont.)

## Website

The Commissioner's website ([www.racingintegrity.vic.gov.au](http://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 2020–21 ORIC undertook a major review of the existing website and, as a result, completed a redesign and redevelopment of the website to improve usability and customer interaction.

The newly designed website was launched on 1 June and, although data covering only a brief period was available, the results were promising. There were 548 visits to the website during the month of June, which was a 52 per cent increase compared to the previous year's monthly average.

ORIC's publication of the Own Motion Inquiry – Laming, Potgieter and Zeyaur Rahman report received significant interest during June, with a 995 per cent increase in visits to the website on the release date compared to the daily average.

As part of the newly designed website, ORIC implemented a reporting portal where the public can report integrity related matters directly to ORIC by completing a webform (<https://commissioner.racingintegrity.vic.gov.au/#/webform>).

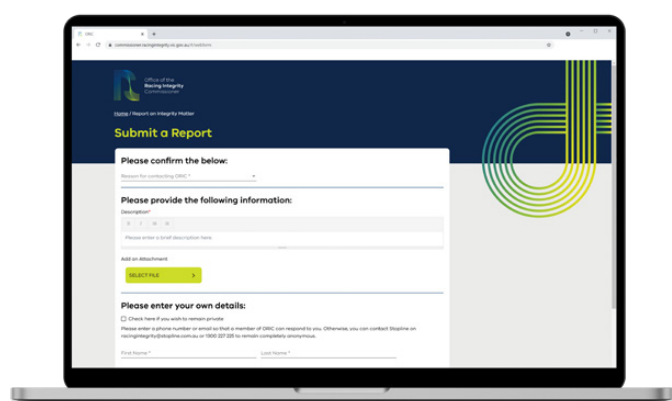
Information from the completed webform automatically creates an entry in the CMS, which enhances ORIC's ability to efficiently and effectively manage integrity matters.

## 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 2020–21 reporting period, there were no applications received by the Commissioner to direct the VRT to hear and determine an appeal. However, in his findings into his own motion, the Commissioner recommended:

*'RV to immediately (no later than seven days) inform the VRT and the Participants' barrister of Steward Vilella's conduct in contacting a witness during the course of the VRT hearing.'*<sup>5</sup>



<sup>5</sup> Office of the Racing Integrity Commissioner, Public Summary Report, [https://racingintegrity.vic.gov.au/data/assets/pdf\\_file/0018/164151/Public-Summary-Report-Own-Motion-June-2021.pdf](https://racingintegrity.vic.gov.au/data/assets/pdf_file/0018/164151/Public-Summary-Report-Own-Motion-June-2021.pdf), page 10.

ORIC will continue to work closely with animal welfare groups such as RSPCA Victoria to maintain effective animal welfare controls.



# 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

<b>1(a)</b>	<p>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 building on the integrity risk management systems and processes (conducted in 2019–20) with a focus on those risks and the impact of COVID-19. The recommendations made as a result of the audit are being reviewed and will be finalised in 2021–22.</p>
<b>1(b)</b>	<p>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>
<b>1(ba)</b>	<p>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>
<b>1(c)</b>	<p>Investigate complaints made about the integrity processes and systems of a controlling body</p>	<p>The Commissioner received 76 complaints. Of these, 89 per cent (68) related to one or more than of the three controlling bodies. Of the 76 complaints, 41 per cent involved RV, 41 per cent involved GRV and 8 per cent involved HRV. The remaining 10 per cent did not relate to the controlling bodies.</p> <p>The Commissioner also received 97 IRs. Of these, 92 per cent (89) related to racing integrity matters. Of the 97 IRs, 59 per cent involved RV, 15 per cent involved GRV and 10 per cent involved HRV. A further 6 per cent related to all three codes and 2 per cent to HRV and GRV. The remaining 8 per cent did not relate to the controlling bodies.</p>
<b>1(d)</b>	<p>Refer complaints to controlling bodies or other government agencies for investigation</p>	<p>A total of 18 matters were referred to a controlling body or government agency for investigation during the reporting period.</p>
<b>1(e)</b>	<p>Investigate matters referred by the Minister or a controlling body</p>	<p>The Commissioner received six referrals from the controlling bodies. Of these, five referrals were completed and one is still active.</p>

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## Section 37B of the Racing Act

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<b>1(f)</b>	Report findings of investigations conducted into complaints that have not been referred to other bodies–	Of the 76 complaints received by ORIC, 62 were completed. Of these, 19 were investigated or are under investigation.
<b>(i)</b>	to the person that made the complaint; and	
<b>(ii)</b>	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)	
<b>1(g)</b>	Conduct own motion inquiries that do not relate to any specific complaint and may include an investigation into systemic issues in racing	The Commissioner conducted one own motion inquiry in the reporting period, commencing in March 2021 and concluding in June 2021. The findings can be accessed on the ORIC website.
<b>1(h)</b>	Make recommendations (if appropriate) following the investigation of any complaint, inquiry or matter to (as the Racing Integrity Commissioner considers appropriate) –	The Commissioner conducted one own motion inquiry in the reporting period, commencing in March 2021 and concluding in June 2021. The recommendations can be accessed on the ORIC website.
<b>(i)</b>	the Minister; or	
<b>(ii)</b>	the relevant controlling body	
<b>1(i)</b>	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 2020–21 reporting period, the Commissioner did not receive any requests to exercise his powers under this section.
<b>(i)</b>	the penalty imposed is a fine of not more than \$250; and	
<b>(ii)</b>	the Racing Integrity Commissioner considers that it is in the public interest for the appeal to be heard	
<b>2</b>	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 2020–21 reporting period, the Commissioner did not exercise his powers under this section.

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## Section 37BA of the Racing Act

### Powers of the Racing Integrity Commissioner conducting an inquiry

During the 2020–21 reporting period, the Commissioner did not exercise his powers under section 37BA.

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## Section 37E of the Racing Act

### Disclosure of Information

The Commissioner made 81 disclosures of integrity related information to a range of authorised bodies and agencies during the reporting period.

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# 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 2020–21 financial year, these were:

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

## 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.

Stakeholder engagement will form the basis of ORIC's Strategic Plan for 2021–26, which will provide the future direction and build stakeholder confidence in the VRI. The ORIC Strategic Plan 2021–26 will be published on the ORIC website when it is finalised.

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
- collaborates with stakeholders to ensure relevance and currency of ORIC's strategic approach
- 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:

- the general public
- the three racing codes and their state and interstate counterparts
- animal welfare agencies
- international coordinating bodies
- law enforcement agencies
- media
- racing industry bodies, including owners, trainers, jockey and driver associations and unions
- regulators
- wagering service providers
- Racing Analytical Services Limited
- members of the judiciary, including the Victorian Civil and Administrative Tribunal and 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
- Sports Integrity Australia.

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 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.

During the 2020–21 reporting period, ORIC either entered into or extended information sharing arrangements with the following agencies:

- VRIB
- Victoria Police
- Australian Crime Commission
- Australian Transaction Reports and Analysis Centre
- Australian Criminal Intelligence Commission
- Victorian Bookmakers' Association
- Department of Home Affairs and the Australian Border Force.

In early 2021–22 the Commissioner will enter into an additional Memorandum of Understanding with Victoria Police for the secondment of two Victoria Police members to assess the level of criminality within the VRI. The secondees will be co-located within the Commissioner's office.

## Meetings and presentations

During the 2020–21 reporting period, the Commissioner and his staff met with over 420 organisations.

Presentations by the Commissioner to the racing industry, other stakeholders and the general public formed a key component of this year's engagement program.

These presentations were made to:

- law enforcement agencies
- sports industry integrity conferences
- Steward and jockey/driver training programs
- sporting clubs
- racing clubs
- industry bodies
- animal welfare agencies
- the general public.

## Racing Integrity Operations Committee

The Racing Integrity Operations Committee (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 purpose of the Committee is to discuss and share information relating to current operational integrity trends and issues across the three racing codes.

The RIOC generally meets every six weeks, with eight meetings occurring during the reporting period.

**The Commissioner's efforts ensure the body of agreements facilitating exchange of information continues to grow on a state, national and international level.**

# Education, training and awareness

ORIC continues its commitment to education and training for integrity staff across the three racing codes and for all code employees in relation to matters of integrity.

The Commissioner made a commitment to work closely with the VRIB Integrity Training Steering Committee to develop education and training packages that are fit for purpose across a wide range of subject matters to improve integrity and investigative services within the VRI.

## 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.

In May, ORIC commenced a review of SCOP A regarding the collection of information. Consultation is being undertaken with the three racing codes as part of the review, which will be completed in the 2021-22 reporting period.

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

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

# Integrity initiatives by the controlling bodies

Each controlling body continues to play a fundamental role regarding integrity assurance in their respective codes. Collectively, their initiatives and strategies both shape and strengthen integrity throughout the VRI. Some of their key integrity initiatives in 2020–21 are outlined below as provided by the three racing codes:

## Racing Victoria

RV successfully implemented a number of strategic initiatives throughout the 2020–21 period, including:

- launching a bespoke paperless sampling application for race day sample collection
- restructuring the Stewards' team to include full time employees in both Wangaratta and Warrnambool, ensuring the ability to govern the sport across Victoria to the highest possible standard
- developing a new licensing framework to provide a more robust and streamlined licensing/registration process
- launching the Diagnostic Imaging Subsidy Program to encourage a proactive approach to injury prevention, with the goal of reducing the frequency and severity of acute and chronic injuries
- continuing investment in resourcing the Equine Welfare team to support ongoing delivery of the Equine Welfare Strategic Plan
- introducing the first online course in equine welfare to support industry learning to 4,592 participants
- communicating the recently endorsed Safeguarding Young Persons Policy and role of the Participant Protection Manager across clubs, training facilities and stables to educate young jockeys on the importance of participant protection issues and the support mechanisms offered by RV
- reorganising existing roles and functions to establish the Betting and Intelligence Unit within the Intelligence and Integrity Services team to increase the overall effectiveness of Integrity Services Division intelligence capabilities
- integrating RV's Enterprise Compliance and Risk Management Frameworks to ensure governance, risk and compliance standards are continually improved.

In addition, Integrity Services Division delivered a report titled Review into the Safety of International Horses During Spring Racing Carnival and Horses Competing in the Melbourne Cup, resulting in 41 recommendations endorsed by the RV Board of Directors.

Integrity Services Division members continued to contribute to multiple domestic and international working groups, including the International Federation of Horseracing Authorities – Horse Welfare Committee, the Equine Welfare Committee, the Asian Racing Federation Council on Anti-Illegal Betting and Related Financial Crime, the International Group of Specialist Racing Veterinarians and the Horse Industry Consultative Committee.

RV also announced a major three-year partnership with the Victorian Jockeys Association to promote equine welfare and support jockey welfare initiatives. All Victorian jockey breeches will carry the Off The Track logo, helping to promote the numerous post-racing initiatives being undertaken by RV.

## Harness Racing Victoria

In a continued effort to enhance the integrity of harness racing in Victoria, HRV developed and implemented a range of key integrity initiatives in 2020–21:

- completed and submitted their Annual Plan to the VRIB, which identifies key action items to be achieved over the next 12 months. HRV also continued to progress and complete various action items as part of their 2019–20 Road Map
- together with The University of Melbourne, conducted a world-first study into the impacts of race fixing. This study was published and presented at various forums to educate government departments and other sporting codes on several of the key findings of the study
- created three new roles at the HRV Integrity Department to increase capacity and capability in integrity related functions, including the introduction of a full time Prosecutor, in-house Betting Analyst and a second Deputy Chairman of Stewards (Industry)
- introduced new policies and amendments to the Australian Harness Racing Rules to ensure increased governance and oversight around drug administration, race day treatments, animal welfare and the reporting of serious misconduct to HRV
- undertook compliance roles at all racetracks during the COVID-19 pandemic to ensure only licensed participants and essential personnel attended race meetings and that all people present at racetracks were complying with requirements and protocols introduced by HRV and the Victorian Government. This ensured that harness racing continued throughout the pandemic and was conducted in a COVID-safe environment.

- developed and completed a new Stable Inspection Framework that outlines processes to be adopted by all Stewards when attending at registered training establishments and conducting stable inspections or animal welfare inspections
- conducted interviews with current and former trainers, some of whom were suspended or disqualified, to demonstrate the impact of rule breaches on their reputations and careers. These interviews were published on HRV's Integrity Matters webpage, which was developed and improved regularly. HRV continued to promote positive behaviours and conduct as well as educating the industry on animal welfare through the Integrity Matters forum. This platform was also utilised to provide background information on integrity staff and other industry personnel by asking the question 'What does integrity mean to you?'
- established new Memorandum of Understanding and Service Level Agreements with various government departments and agencies to improve sharing of information between HRV and other stakeholders; this will result in improved outcomes for the harness racing industry.

In 2021, HRV conducted a review of the standardbred rehoming program known as the HERO Program (Harness Education Rehoming Opportunities), which saw an increase in the number of re-trainers engaged by HRV to a total of 12 by the end of the financial year. This will ensure increased capacity in the ability to rehome retired racehorses and will provide a greater coverage of regional areas, ensuring more horses will be rehomed in the future. HRV also introduced a process where all applications for horses seeking to enter the HERO program include a thorough examination by HRV veterinarians to ensure a horse's suitability for the program.

HRV developed and implemented a new Equine Welfare Framework to ensure that all involved in the harness racing industry maintain the highest standards of horse welfare. This process involved an extensive consultation process, including with New Zealand Racing's Martin Burns and Professor Emeritus David Mellor. The Equine Welfare Framework captures extensive learnings from recent studies and guidelines, chief among which is the adoption of the Five Domains Model of animal welfare which focuses on nutrition, environment, health, behaviour and mental state.

HRV developed an online welfare training module for industry participants, which will be mandatory for all licensed persons to complete as part of the yearly licensing process. The training module is interactive and includes scenarios around animal welfare which are based on the HRV Equine Welfare Framework.

HRV increased resources in animal welfare functions and investigations through the appointment of an animal welfare Investigative Steward. HRV will also have increased staff to support their rehoming program with a HERO Promotions and a Communication Officer being employed.

## Greyhound Racing Victoria

GRV's Greyhound Racing Integrity Unit (GRIU) continued in 2020–21 as one of the world's leading racing integrity bodies, strengthening its capabilities to deliver a fully integrated approach to education, compliance, investigation and prosecution.

- Over the year, GRIU exercised its powers under the *Prevention of Cruelty to Animals Act 1986* (Vic) and *Domestic Animals Act 1994* (Vic), granted in early 2020, to investigate and resolve several significant greyhound welfare issues. GRIU's Authorised Officers also continued to work closely with RSPCA Victoria and internal GRV departments to investigate any matters of animal cruelty.
- GRIU Stewards worked closely with clubs and race day staff, including on-track veterinarians, to assess safe racing conditions and monitor racing fitness checks, on-track treatment for injuries and compliance with track safety requirements. GRIU also continued to deliver key elements of its Safe Racing Program, which is investing more than \$10 million over five years in a range of initiatives to reduce race injuries and fatalities. The program is underpinned by regular and rigorous data collection and analysis from all 13 racing tracks in Victoria; this data is used to identify and address safety issues both in general and track by track.
- The ongoing COVID-19 pandemic and resultant lockdowns in 2020–21 required constant changes to racing operations to maintain the code's increased calendar of events. GRIU played a key role in ensuring that only essential people attended meetings during lockdowns, that club entry health screenings were in place when required, and in enforcing the use of face masks and strict social distancing protocols in line with the regulations and advice from Victoria's Chief Health Officer.
- GRIU also continued to work with participants to ensure compliance with the Victorian Government's Code of Practice for the Keeping of Racing Greyhounds, which has been operational since 1 January.
- GRV's phone and online services for reporting suspicious activity remained a valuable resource for the GRIU. In 2020–21, 83 online notifications and 125 phone calls were received, some of which played a significant role in the investigation and successful prosecution of several serious offences.
- GRV encourages anyone with integrity or welfare related concerns about greyhound racing to contact the GRIU on 1300 227 225, online at [www.grv.org.au/report-suspicious-activity/](http://www.grv.org.au/report-suspicious-activity/) or to the Victorian Racing Integrity Board by email to: [VRIB@ecodev.vic.gov.au](mailto:VRIB@ecodev.vic.gov.au). All calls or reports are treated in strict confidence and can be made anonymously if needed.

# 2020-21 reporting

## Annual declarations

ORIC staff complete annual declarations and adhere to the 'no betting policy' throughout their employment. The Commissioner personally reviewed all staff declarations in the 2020-21 reporting period and was satisfied with the outcome.

## 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 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](http://www.ibac.vic.gov.au)

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

Executive Director, People and Culture  
Corporate Services  
Department of Jobs, Precincts and Regions  
Telephone: 0412 205 128

## 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 2020-21 reporting period, there were no Freedom of Information (FOI) requests received.

### 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 Officer  
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](http://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.

# Glossary of acronyms

<b>CMS</b>	Case Management System
<b>FOI</b>	Freedom of Information
<b>GRIU</b>	Greyhound Racing Integrity Unit
<b>GRV</b>	Greyhound Racing Victoria
<b>HRV</b>	Harness Racing Victoria
<b>IBAC</b>	Independent Broad-based Anti-corruption Commission
<b>IR</b>	Information Report
<b>ORIC</b>	Office of the Racing Integrity Commissioner
<b>RIOC</b>	Racing Integrity Operations Committee
<b>RSPCA</b>	Royal Society for the Prevention of Cruelty to Animals
<b>RV</b>	Racing Victoria
<b>SCOP</b>	Single Code of Practice
<b>VRI</b>	Victorian Racing Industry
<b>VRIB</b>	Victorian Racing Integrity Board
<b>VRT</b>	Victorian Racing Tribunal

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AUTHORISED BY  
THE RACING INTEGRITY COMMISSIONER

Level 27, 121 Exhibition Street  
Melbourne Vic 3000

PO Box 24034, 111 Bourke Street  
Melbourne Vic 3001

Telephone: 03 8684 7776  
Facsimile: 03 8684 7778

Email: [enquiries@racingintegrity.vic.gov.au](mailto:enquiries@racingintegrity.vic.gov.au)

Website: [www.racingintegrity.vic.gov.au](http://www.racingintegrity.vic.gov.au)

**Racing Integrity Hotline: 1300 227 225**

This report is available at  
[www.racingintegrity.vic.gov.au](http://www.racingintegrity.vic.gov.au)



Racing Integrity  
Commissioner

