

Regulator Performance Framework Reporting 2020-2021

Regulator model practices and supporting principles

1. Ensure regulatory activity is proportionate to risk and minimises unnecessary burden

- A proportionate approach is applied to compliance activities, engagement and regulatory enforcement actions
- Regulations do not unnecessarily impose on regulated entities
- Regulatory approaches are updated and informed by intelligence gathering so that effort is focused towards risk.

Queensland Racing Integrity Commission response

The purpose of the Queensland Racing Integrity Commission's (the Commission) compliance and enforcement function is to engage, educate and then enforce compliance with the *Racing Integrity Act 2016* and the National and Local Rules of Racing underpinning its compliance and enforcement actions and activities.

In 2020-21, the Commission focussed on reviewing and renewing its new Regulatory Strategy and Framework (the Strategy), which is based on five guiding principles: nurture voluntary compliance; evidence-based decision-making; risk-based approach; transparent governance; and a professional workforce. Foremost among these principles is a commitment to adopting a voluntary compliance approach, which ensures the Commission prioritises its resources and effort to consult with relevant stakeholders to engage and educate around issues of operating with integrity and animal welfare requirements. To give life to these five principles, four underpinning enabling strategies are being drafted, which contain objectives, priority actions and success measures. Those strategies are the Racing Animal Welfare Strategy; Integrity Strategy; Engagement Strategy; and Workforce Development Strategy.

The Commission also has an Appropriate and Proportionate Enforcement Policy which guides Commission staff in determining what type of enforcement action is appropriate in any given circumstances when voluntary compliance fails. Any enforcement action taken by the Commission will be based on the level of harm presented by the breach and the culpability level of the participant.

In 2020-21, the Commission updated its Thoroughbred Licensing Standard, which aims to achieve robust licensing processes to ensure the integrity and suitability of persons working within Queensland's racing thoroughbred industry (this Standard complements other industry Standards).

Regulator model practices and supporting principles

2. Consult and engage meaningfully with stakeholders

- Formal and informal consultation and engagement mechanisms are in place to allow for the full range of stakeholder input and Government decision making circumstances.
- Engagement is undertaken in ways that helps regulators develop a genuine understanding of the operating environment of regulated entities.
- Cooperative and collaborative relationships are established with stakeholders, including other regulators, to promote trust and improve the efficiency and effectiveness of the regulatory framework.

Queensland Racing Integrity Commission response

The Commission's three key elements of its regulatory approach: engagement, education and enforcement, known as the 3Es. They are deliberately presented and communicated in this order to emphasise the value the Commission places on working with industry and other stakeholders to build a better industry. A key deliverable for 2021-22 is the development of an Engagement Strategy which will focus on strengthening partnerships, intelligence sharing and collaboration with stakeholders and partner agencies.

The Racing Integrity Commissioner and Deputy Commissioner held four dedicated industry *education engagement* sessions in Cairns, Bundaberg, Rockhampton, and Monto in 2020-21. These sessions aimed to educate industry on the role of the Commission, including funding, structure, operational priorities, the Report Something hotline, internal and external review processes, as well as providing a forum for questions and feedback, which inform future education strategies. Presentations were also provided by the relevant Chief Stewards specific to their code of racing.

In 2020-21 the Racing Integrity Commissioner and Deputy Commissioner collectively attended and/or hosted 84 industry events to meet with stakeholders and understand their issues and priorities firsthand.

In 2020-21, the Commission also engaged with stakeholders through:

- The publication of 54 proactive media releases
- The publication of 67 media responses
- The release of 26 campaign emails to industry regarding industry related topics
- The Greyhound Adoption Program's expanding social media network, which has approximately 12,000 followers
- Information published in Race, Pace and Chase (monthly Thoroughbred, Harness and Greyhound industry magazines).

Regulator model practices and supporting principles

3. Provide appropriate information and support to assist compliance

- Clear and timely guidance and support is accessible to stakeholders and tailored to meet the needs of the target audience.
- Advice is consistent and, where appropriate, decisions are communicated in a manner that clearly articulates what is required to achieve compliance.
- Where appropriate, regulatory approaches are tailored to ensure compliance activities do not proportionately burden particular stakeholders (e.g. small business) or require specialist advice.

Queensland Racing Integrity Commission response

The Commission employed two investigative stewards and a Communications Officer to support the enforcement of equine retirement reporting and communicated with registered owners and trainers regarding their reporting obligations and moral requirements in managing retiring/ed racehorses.

In alignment with the 3Es, the Commission delivered actions within its Education Strategy, which aimed to support and promote better practice and promote public confidence in the Queensland racing industry. The use of education and awareness nurtures voluntary compliance and allows the Commission to make best use of its enforcement resources by facilitating compliance through education and awareness.

Through a calendar of formal education campaigns, industry notices and the already established networks our staff have with industry participants, the Commission ensures participants have the information they need to comply with our regulatory framework.

Existing education and awareness materials published on the Commission's website include content on:

- Biosecurity requirements
- Prohibited substances
- Greyhound socialisation and rehoming
- Identifying and treating heat stress.

Regulator model practices and supporting principles

4. Commit to continuous improvement

- Regular review of the approach to regulatory activities, collaboration with stakeholders and other regulators to ensure it is appropriately risk based, leverages technological innovation and remains the best approach to achieving policy outcomes.
- To the extent possible, reform of regulatory activities is prioritised on the basis of impact on stakeholders and the community.
- Staff have the necessary training and support to effectively, efficiently and consistently perform their duties.

Queensland Racing Integrity Commission response

Our commitment to continuous improvement is evident in the proposed replacement of our Compliance and Enforcement Framework with a new Regulatory Framework and Strategy. Our commitment is adopting a voluntary compliance approach, which ensures the Commission prioritises its resources and effort to consult with relevant stakeholders to engage and educate around issues of operating with integrity, and animal welfare requirements.

In 2020-21, a new Thoroughbred Stewards office was built at Eagle Farm racetrack taking Stewards out of the Business Operations Office at Albion and positioned them next door to the on-course stables. This allows for enhanced engagement and education between Stewards and stakeholders.

A Cadet Steward training package was delivered in 2020-21 for stewards new to the role. This training provides competencies in communication, disciplinary decisions, procedural fairness, workplace health and safety and investigations, inquiries and appeals.

Additionally, our Corporate Services team managed a rolling program of supporting improvement activities that were captured in the Workforce Development Strategic Plan, Communications and Engagement Strategy and Education Strategy. Collectively, these strategies mapped out a four-year program of work that is building internal capability and supporting the more efficient and effective delivery of our strategic objectives.

Regulator model practices and supporting principles

5. Be transparent and accountable in actions

- Where appropriate, regulatory frameworks and timeframes for making regulatory decisions are published to provide certainty to stakeholders.
- Decisions are provided in a timely manner, clearly articulating expectations and the underlying reasons for decisions.
- Indicators of regulatory performance are publicly available.

Queensland Racing Integrity Commission response

The Commission provides transparency into its enforcement activities by publishing Stewards' Reports and Internal Review outcomes on our website. Furthermore, we publish proactive industry announcements and media releases, providing detail of significant policy decisions and enforcement outcomes for the industry.

The Commission also publishes quarterly Greyhound breeding, race injury and retirement reports which includes information on injuries that occur in greyhounds, which occur during racing at all TAB and non-TAB races in Queensland.

Throughout 2020-21, the Commission started the development of an equine equivalent to the above Greyhound Report; to report on thoroughbred and standardbred data, which details injury and retirement information, including death and euthanasia. The first quarter is expected to be published on the Commission's website in 2021-22.

The Commission started publishing elevated TCO₂ levels detected in equine racing animals to increase transparency. All horses notified on this list (including past notifications) are now required to be presented by their trainers to stewards for pre-race testing for the following six race starts.