

Edocs:

12 November 2019

Judge Terry Martin SC
Inquiry Chair
Level 6, 41 George Street
Brisbane QLD 4000

Dear Judge Martin

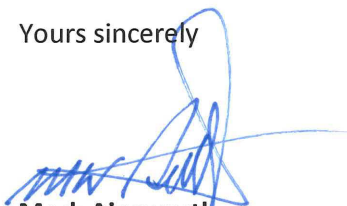
I refer to your letter of 31 October 2019 regarding the *Inquiry into animal cruelty in the management of retired racehorses in Queensland* and your invitation to the Queensland Racing Integrity Commission (the Commission) to provide a written submission addressing the questions raised in your letter, as well as the request for specific information regarding the role of the Commission.

The Commission's Submission (**Attachment 1**) addresses and details a number of key themes and issues, including:

- The Commission's scope and responsibility, specifically its functions and powers in relation to the racing industry at large and retired racing animals;
- The current self-funded welfare activities and programs which support end of career opportunities for retired racing animals;
- The collaboration efforts between the Commission and other relevant agencies and organisations to support retired racing animals;
- The engagement and enforcement response undertaken by the Commission's intelligence and investigation units; and
- Key strategic Commission documents and relevant forms for the Inquiry's reference.

Should you have any further enquiries, please contact Mr Paul Brown, Director Office of the Commissioner [REDACTED]

Yours sincerely



Mark Ainsworth APM
Acting Racing Integrity Commissioner

Queensland Racing Integrity Commission
Submission to the Independent Inquiry
into Animal Cruelty in the Management
of Retired Racehorses in Queensland

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Introduction

The Queensland Racing Integrity Commission (the Commission) is an independent statutory body established under the *Racing Integrity Act 2016* (the RIA 2016), whose main purposes are: to maintain public confidence in the racing of animals for which betting is lawful; to ensure the integrity of all persons involved with racing or betting; and to safeguard the welfare of all animals involved in racing.

The Commission's scope and responsibility for the welfare of racing animals is limited to their time as a licensed racing animal, with the Commission's functions and powers outlined under section 10 of the RIA 2016. The Commission's work is further supported by the relevant Rules of Racing for each of the three codes (thoroughbred, harness and greyhound racing).

The Commission works in partnership with the racing industry to monitor racing activities (including the welfare of racing animals), uphold the rules of racing, and make sure that everyone has the opportunity to participate on an even playing field. The Commission manages and maintains the following:

- Provision of race day stewards and some race day officials to supervise up to 1,571 race meetings annually across all three codes;
- Veterinary and animal welfare services including the Equine Welfare Program, Greyhound Adoption Program, and race day welfare supervision and sample collection;
- The Licensing of 5,924 licensed participants and 1,752 trainers;
- Racing animal registration applications, with 13,488 made in 2018/2019;
- An Integrity Investigations Team, which investigates offences, enforces the Rules of Racing and investigates animal welfare complaints including matters pertaining to prohibited substances, testing of human participants, and carries out kennel and stable inspections and licence checks;
- Working directly with, and supporting the work of the Queensland Police Service's Racing Crime Squad; and
- Management of the Racing Science Centre, which performs prohibited substance testing and associated professional services, with 19,985 animal samples tested in 2018/19.

When the Commission was initially established, the staffing model and budget provided by government was intended to meet the functions outlined in s10 of the RIA 2016 only. Despite this, the Commission has self-funded welfare activities and programs to support end of career opportunities for racehorses to assist both the owners in regards to their key responsibilities, as well as complement the work being done in the greyhound racing space with the Greyhound Adoption Program.

As well as the introduction of the above-mentioned programs, the Commission has also provided education and engagement and has managed 30 cases in relation to concerns reported to the Commission by members of the public and/or licensed participants regarding retired racehorses through its Report Something portal. These complaints are investigated by the Integrity Investigations Team of the Commission.

The Commission's Response

The Inquiry has invited the Commission to respond to the following questions:

I. Should welfare standards for retired racehorses be defined in terms of quality of life or length of life, or both?

The Commission does not have legislative responsibility for retired racehorses (thoroughbred or standardbred). Further, under the Rules of Racing for each race code, it is a requirement that an industry participant, who has oversight of a racehorse, adheres to the relevant rule as outlined:

- Thoroughbred, AR 51: “*within one month of retiring a named horse Racing Australia must be notified by the manager of the horse or their agent by lodging the relevant form*”;
- Harness, AR 96A: “*within one month of retirement the owner or trainer must notify the Registrar by lodging the relevant form*”.

Once retired, a racehorse is under the jurisdiction of the *Animal Care and Protection Act 2001* (the ACPA 2001), administered by the Department of Agriculture and Fisheries (i.e. Biosecurity Queensland). Powers under the ACPA 2001, are conferred to prescribed entities such as the Royal Society for the Prevention of Cruelty to Animals (RSPCA). However, if a Commission officer (i.e. Steward and/or Authorised Officer) attends and enters a licensed person’s property and there is a retired racehorse on that property, the officer does have authority to act on matters of animal welfare concern.¹ Appendix 1 outlines a Memorandum of Understanding between the Commission, RSPCA and Biosecurity Queensland to support this.

The Commission does support the racing industry by assisting in the provision of retirement options for racing animals through both the Equine Welfare Program and the Greyhound Adoption Program. Specifically, the Commission’s Animal Welfare Strategy (Appendix 2) acknowledges that the responsibility for ensuring the welfare of racing animals during their career is shared between a wide number of stakeholders, including racing animal owners, racing regulators, trainers, industry participants, veterinarians and breeders. It is also a responsibility shared with other organisations, including other government agencies responsible for upholding the ACPA 2001.

In regards to defining welfare standards, at the strategic level, the Commission maintains that any of its animal welfare programs are underpinned by the following five animal welfare provisions:

1. Good nutrition: Provide ready access to fresh water and a diet to maintain full health and vigour.
2. Good environment: Provide shade/shelter or suitable housing, good air quality and comfortable resting areas.
3. Good health: Prevent or rapidly diagnose and treat disease and injury, and foster good muscle tone, posture and cardiorespiratory function.
4. Appropriate behaviour: Provide sufficient space, proper facilities, congenial company and appropriately varied conditions.

¹ Under the Memorandum of Understanding (see Appendix 1) between the Commission, RSPCA and Biosecurity Queensland, each agency agreed that they will provide advice and assistance to each other as required, for example where, in carrying out respective functions, an agency becomes aware of information pertaining to issues of animal welfare which may fall under the authority of one or more of the other agencies. This Memorandum of Understanding is currently in final stages of renewal. Further, under s175 General Powers of the RIA 2016, Authorised Officers, once having entered a property, may inspect and respond to animal welfare concerns regarding an animal. The Thoroughbred Rules of Racing (AR 20, AR 22, AR 51, AR 78) and Harness Rules of Racing (AR 15, AR 15A, AR 218, AR 218A) also provide stewards with powers to respond to mistreatment of a horse on a licensed property.

5. Positive mental experiences: Provide safe, congenial and species appropriate opportunities to have pleasurable experiences.

With respect to the question about whether welfare standards for retired racehorses should be defined in terms of quality of life or length of life, or both, the Commission's position is that, ideally, standards should support quality of life for the longest possible time.

II. Is there still an argument for the commercial slaughter of horses, if performed appropriately and humanely?

The Commission's legislative responsibility is to safeguard the welfare of any animal while it is involved in racing. Commercial slaughter of horses falls outside of the Commission's legislative remit.

A key objective of the Commission's Animal Welfare Strategy is to '*Minimise the 'wastage' of racing animals*' through the promotion of more informed breeding and increased participant responsibility for welfare and end of career alternatives. The Commission is of the view that all racing animals, as far as reasonably practicable, should be afforded an appropriate chance at being rehomed after their racing careers.

The Commission acknowledges that rehoming may not always be achievable, for reasons such as injury or illness, an unsuitable temperament for rehoming, or lack of demand for rehomed horses. In such circumstances, professional and humanely performed euthanasia may become an option considered by owners. Commercial operations may provide affordable access to such services. Such access may reduce the likelihood of other animal welfare issues including horse abandonment or neglect. However, any operation that is permitted to oversee the death of a horse, must be expected to do so in a manner that is humane. The RSPCA policy for Humane Killing (Appendix 3) defines humane killing, stating that it must be without pain, suffering or distress.

III. Should racehorses be an exception?

The Commission believes that all horses should be treated equally and maintains that the life of a racehorse should not be held on a higher plane to other horses. The provision and application of the ACPA 2001 provides clear guidance to the industry and those in charge with caring for animals, such as retired racehorses.

IV. Are you aware of any gaps or inadequacies in the regulatory arrangements for managing the welfare of retired racehorses?

As outlined in previous responses, under s10 of the RIA 2016, the Commission does not have a legislated remit in regards to managing the welfare of retired racehorses. A retired racehorse is under the jurisdiction of the ACPA 2001, administered by the Department of Agriculture and Fisheries. Officers from agencies such as Biosecurity Queensland and the RSPCA have powers to act in the interests of animals under the ACPA 2001.

To ensure that information is shared and made available between relevant administering departments and agencies, the Commission is currently renewing its Memorandum of Understanding with Biosecurity Queensland and the RSPCA, to facilitate investigations into the welfare of animals not registered by the Commission to ensure the provisions of the ACPA 2001 are met (e.g. retired racing animals). A Memorandum of Understanding has also been developed with the Queensland Police Service to share information that may relate to criminal activity within the industry, i.e. the *Criminal Code*.

If an owner decides to retire a racehorse, under the Rules of Racing they must self-report to the relevant organisation within one month of doing so². In the case of thoroughbreds, this information is processed by Racing Australia (via the Single National System) and not the Commission. The retirement of standardbred horses from the harness racing industry are reported through the Commission (Appendix 4), which the Commission then enters the data provided onto the national Harness Racing system (i.e. the Harvey system).

V. Are you aware of any gaps or inadequacies in the regulatory arrangements, including the transport standards, for managing the welfare of horses in the meat processing industry?

Due to the Commission's legislated remit, the above question is not applicable to the Commission.

VI. If the Inquiry were to recommend a rehoming program for retired racehorses in Queensland, what elements should it possess to deliver greatest benefit, and how should it be funded?

Despite it not being a legislated remit of the Commission, the Commission continues to support rehoming programs under the Commission's Equine Welfare Program. The Commission supports existing not-for-profit organisations that offer rehoming services and/or provide animal welfare initiatives for retired racehorses through the Racing Animal Welfare Grants Program and its predecessor, the Equine Welfare Sponsorship Program.

Since its inception, the Program has created a number of initiatives, including:

- Sponsorship of Off the Track events to stimulate and raise the profile of thoroughbreds and standardbreds;
- A retraining clinic for standardbreds in 2019; and
- A Racing Animal Grants program, as a broader program to support the after racing life of all racing animals. The grants program funds up to \$10,000 for eligible projects that support the Commission's animal welfare objectives, and community-based organisations working in this space are encouraged to apply for funding support through this program.

The Commission notes that a number of jurisdictions have implemented, or are in the process of developing, rehoming programs for retired racehorses and believes that consideration should be given to these programs and their funding sources that would meet Queensland's needs. Programs that seek to share industry responsibility of rehoming activities amongst multiple organisations may be preferable due to the significant geographic challenge that a single agency would face in providing such services for horses in Queensland.

VII. Are you familiar with the current Federal Senate Committee in the feasibility of a National Horse Traceability Register for all horses? What impact would this have on your organisation?

In February 2019, the Commission provided initial comment to the Department of Local Government, Racing and Multicultural Affairs. The Commission outlined that key issues the Committee seeks to address may have benefit to racehorses.

² Australian Rules of Racing for Thoroughbreds (AR 51) and Harness (AR 96A) racing.

Specifically, the Commission notes the potential benefits from a biosecurity perspective, including better prevention and management of diseases such as Equine Influenza and African Horse Sickness, if a register of all horses was available for oversight purposes.

The Commission's Role

The Inquiry has requested that the Commission provide further detail regarding their role, at both a tactical and strategic level, in regards to work done to support racing animals after their career finishes.

I. Detail of any work done to care for racing animals after their racing career, as per the Commission's Animal Welfare Strategy.

At the core of the Commission's operational functions is its Compliance and Enforcement Strategy Framework, which is supported by a number of key strategies including the Animal Welfare Strategy and the Intelligence Capability Strategy (Appendix 5). Specifically, both of these strategies underpin the Commission's current arrangements for detecting, assessing, mitigating and prosecuting breaches of welfare for racehorses:

- Reporting channels for animal welfare issues including Report Something email, phone hotline and Crime Stoppers partnership;
- Triage and Matters Assessment Committee prioritisation assessment model;
- Response Memorandum of Understanding³ protocol with RSPCA and Biosecurity Queensland, and the Queensland Police Service; and
- Integrity Investigations team's response capability, including the team veterinarian.

Further, as part of the Animal Welfare Strategy, the Commission's Equine Welfare Program has sponsored a suite of events and organisations that support life after racing for thoroughbreds and standardbreds. In this financial year, the Commission will provide \$70,000 as part of the Grants Program to support not-for-profit organisations and individuals in the re-homing of racing animals.

II. Detail any reports received by the Commission relating to racehorses being taken to abattoirs or other meat processing facilities, how these matters were handled and the outcome.

The Commission does not have any jurisdiction over the operation of abattoirs in Queensland and has not investigated the operation of any abattoir in Queensland. The operation of abattoirs are under the jurisdiction of other Commonwealth and State Government departments.

Since February 2018, the Commission has received five complaints regarding retired racehorses allegedly being sent to abattoirs. Three of these complaints were in relation to matters outside of Queensland and referred to the relevant jurisdiction for action. In another case, the horses had been retired appropriately and no offences under the rules of racing had been committed. In the final case, the horse was purchased by an individual as a pet, and did not end up at the abattoir. All complaints received a full and thorough investigation to ensure that the horses had been appropriately retired from the racing industry and nil rules were breached.

Prior to the airing of the investigation on the 7:30 Report on the ABC, the Commission had not received any complaints about the treatment of animals within abattoir facilities. However, the Commission is

³ The Memorandum of Understanding with Biosecurity Queensland and the RSPCA is in the final stages of renewal. Processes remain in place to ensure information received by the Commission is received in an appropriate manner by the relevant agency.

aware than an investigation into the alleged animal welfare matters raised in the 7:30 Report is currently under investigation by Biosecurity Queensland and the Queensland Police Service.

III. [Detail of any reports received by the Commission about retired racehorses, how these matters were handled and the outcome.](#)

Since 2018⁴, the Commission has managed 30 cases (2018 n=9; 2019⁵ n= 21) regarding retired racehorses. Of those 30 cases, five had multiple queries regarding the same animal/s and/or property. All but one matter has been finalised.⁶ The following outcomes can be reported:

- Four cases where an Animal Welfare Direction was given by a Commission officer. In each of these cases, complainants have contacted the Commission with concerns regarding the appearance and welfare of racehorses, including retired racehorses residing on relevant properties. One of these matters has not been finalised.⁷
- Nine cases where education and engagement was undertaken by Commission officers to resolve the matter. Advice may have included, for example, that the incident reported by the complainant was a civil matter, or should be referred to the Queensland Police Service (i.e. potential Fraud), or that nil rules were actually breached. Two of these cases were regarding retired racehorses allegedly sent to abattoirs.
- Thirteen cases were investigated and then referred to their relevant agencies. For example, the RSPCA and/or Biosecurity Queensland. In approximately⁸ three of these cases, the relevant agency was already aware of/managing their own investigation. Three of these cases were regarding retired racehorses allegedly sent to abattoirs.
- There was one case where the horse had not been appropriately 'retired' on the national systems by the owner before attempting to sell.
- There were three cases where potential animal welfare breaches were investigated with nil further action. One of these cases was classed as vexatious, due to a disgruntled neighbour. Other investigations found nil mistreatment of horses.

IV. [Confirmation of the Commissions role in managing retirement notifications for racehorses in Queensland \(Thoroughbred and Standardbred\) and a copy of relevant procedural documents.](#)

Under the national Rules of Racing for each code, the owner is required to self-report if their animal is to be retired. In the case of thoroughbreds, the owner forwards this information directly to Racing Australia, where it is managed on their national database. With regards to standardbreds, the owners submit a Form R25A / Notification of Deregistration or Death of a Standardbred (Appendix 4) to the Commission. The Commission then facilitates the release of the information into a national Harness Racing database.

⁴ Data available is reliant on the ICMS complaints process which was introduced in 2018. Reports made prior to the introduction of ICMS are currently under review by the Operational Intelligence Unit.

⁵ As at 30 October 2019.

⁶ Matter is not finalised due to ongoing investigation. Aspects of matter have been referred to the Queensland Police Service for investigation.

⁷ Ibid.

⁸ Data is an approximate, because it is only known if relevant agency was already aware of the issue and if it is recorded as part of the assessment/closing notes by the Operational Intelligence Unit.

V. Limitations on the Commission's ability to ensure good welfare outcomes for retired racehorses.

The key limitation for the Commission is its statutory limitations, given that the Commission's scope and responsibility for the welfare of racing animals is limited to their time as a licensed racing animal with the Commission's functions and powers outlined under section 10 of the RIA 2016.

The Commission's staffing model and budget was initially intended to meet the functions outlined in s10 of the RIA 2016. The Commission has since further developed its own capabilities and self-funded welfare activities and programs to support the retirement of racehorses to assist both the owners in regards to their key responsibilities, as well as, complement the work being done in the greyhound racing space with the Greyhound Adoption Program. However, the capacity to expand these welfare services and programs further is restricted by the potential impact on the Commission's core business functions as outlined in the submission's introduction.

Conclusion

In consideration of the Commission's legislated remit, and the continued internally funded welfare programs that include retired racehorses, the Commission is doing more than it is obliged to do, but not as much as the Commission aspires to do. As outlined in the Commission's Animal Welfare Strategy, the Commission understands that promoting rehoming opportunities and better welfare outcomes for retired racehorses will have an impact on the industry.

The Commission's Animal Welfare Strategy promotes aspirational goals relating to rehoming for the racing industry.

The Commission understands that sometimes the supply of racehorses to be rehomed is greater than demand and the Commission, through its sponsorship of off-the-track events and venues, has aimed to increase demand for retired racehorses. The Commission's work in equine welfare seeks to complement, and build upon, the constructive actions of industry in managing racing animals. Primarily, this has been achieved to date by supporting programs run by not-for-profit entities and it would be anticipated that similar models, which seek to invest in a range of sensible programs across Queensland, may provide value across the State within a constrained funding environment.

As part of the Commission's work in supporting retired racing animals, the Commission will continue to collaborate with, and make information available to, a number of government agencies through the development of Memorandums of Understanding. The Commission already works closely with Biosecurity Queensland and the RSPCA to facilitate investigations into the welfare of animals not registered by the Commission to ensure the provisions of the ACPA 2001 are met. Further, criminal activity will be addressed through the Commission's close partnership with the Queensland Police Service.

Decisions to expand responsibilities of the Commission should be done through the appropriate parliamentary process. Given the Commission's current range of responsibilities and powers, expanding current capability will require a business model that includes a cost benefit analysis to determine costings and resource requirements to ensure the Commission can meet its current core business, as well as any new responsibilities, and to ensure that any direction taken creates the best possible welfare outcomes for all animals that have ceased their participation in the racing industry.

Appendix 1: Memorandum of Understanding: Queensland Racing Integrity Commission, RSPCA and Biosecurity Queensland.

Memorandum of Understanding

made at Brisbane on the day of 2017

Between these agencies

**State of Queensland acting through Biosecurity Queensland, Department of
Agriculture and Fisheries**
ABN 66 934 348 189
(BQ)

And

Royal Society for the Prevention of Cruelty to Animals (Queensland) Limited
ABN 74 851 544 037
(RSPCA)

And

Queensland Racing Integrity Commission
ABN 64 838 583 571
(QRIC)

Background

Safeguarding animal welfare in Queensland is the responsibility of several different agencies.

Biosecurity Queensland (BQ) under government administrative arrangements is the lead agency for animal welfare in Queensland, which includes portfolio responsibility for administration of the *Animal Care and Protection Act 2001* (ACPA). BQ develop, monitor and enforce animal welfare policy, legislation and standards and educate the community about animal welfare.

The RSPCA is an independent, non-government, community-based charity that provides animal care and protection services and has a tradition in Queensland of enforcing animal welfare legislation. The ACPA provides the Director-General of BQ with the powers to appoint officers from the RSPCA to exercise powers under the ACPA as Inspectors. The RSPCA is also actively involved in promoting new legislation where required and for developing and promoting policies for the humane treatment of animals that reflect contemporary values and scientific knowledge.

The Queensland Racing Integrity Commission (QRIC) is a statutory authority established under the *Racing Integrity Act 2016* (RIA). A function of the QRIC is to safeguard the welfare of any animal involved, whether directly or indirectly and whether lawfully or unlawfully, in racing; and to prevent animal cruelty. The QRIC also has the function of licensing participants for a code of racing, and ensuring their ongoing suitability for licensing.

In the context of welfare investigations, it is important to note that the legislation enables the agencies to pursue welfare investigations and impose penalties by different legal avenues. The training requirements and welfare expectations for a licensed individual under the RIA or rules of racing are higher than for a member of the general public under the ACPA. Likewise, the penalty and burden of evidence required under the rules of racing may vary to those under the ACPA. Therefore, in some situations it is appropriate for joint investigations to be conducted; or alternatively, breaches of either Act to be pursued separately by different legal avenues.

For the purposes of ensuring timely and effective management of welfare cases, BQ, the RSPCA and racing control bodies in Queensland have been working on the development of a Memorandum of Understanding (MOU) since 2013. However, in 2015, the Queensland Greyhound Racing Industry Commission of Inquiry was established following revelations of live-baiting in the industry. The Commission investigated how widespread the practice of live-baiting was; and what changes to governance or compliance arrangements were required to ensure regulatory effectiveness. In the report released on 1 June 2015, a recommendation was made that Memoranda of Understanding between the RSPCA, BQ (a service of DAF), the QRIC and the Queensland Police Service (QPS) should be established. The recommendation specified that the Memoranda were to include a protocol to provide for the reporting of instances of breaches of the ACPA, *Criminal Code Act 1899*, the *Racing Act 2002* and the rules of racing.

The QPS have powers to uphold animal welfare legislated in the *Police Powers and Responsibilities Act 2000* and to conduct investigations relating to serious animal cruelty under the *Criminal Code Act 1899*. However, individual agreements between QPS and the relevant agencies are already in process or established, and do not require duplication within this MOU. Therefore, the QPS will not be an agency included in this memorandum.

Another premise of animal welfare is freedom from disease. Both BQ and the QRIC have responsibilities imposed on them in relation to disease outbreak prevention and control, under the *Biosecurity Act 2014* and rules of racing respectively. In the context of this MOU, there is a mutual recognition by both agencies of their common responsibility in minimising the impact of any disease outbreak; and the importance of good communication between both parties to ensure this outcome. Under Section 22 of

the *Public Service Act 2008*, the QRIC is considered a department for the purposes of legislation and this formally enables sharing of confidential information between BQ and the QRIC relating to biosecurity matters under Section 493 of the *Biosecurity Act 2014*.

Purpose

The Purpose of this MOU is an expression of intent of the agencies in relation to ensuring that information relating to animal welfare incidents (past or present) which have been, are or will be investigated by any of the parties to this MOU, is shared appropriately between them (subject to legislative and policy requirements) so that:

- each matter is resolved efficiently with the best possible outcome for the animals involved;
- any complaint regarding the welfare of an animal received by an agency can be triaged;
- the QRIC can be better informed when considering licence applications for participants for a code of racing;
- any welfare complaint which is directed to multiple agencies can be investigated jointly, or a lead organisation assigned, as is most appropriate; and
- welfare investigations in process can be transferred from one agency to another, if required (for example for resourcing reasons, or if the case involves breaches of multiple Acts).

Operative Provisions

1. Definitions and interpretation

1.1 Definitions

In this MOU:

ACPA means the *Animal Care and Protection Act 2001*.

Agency/Agencies means Biosecurity Queensland, the Queensland Racing Integrity Commission or RSPCA.

Biosecurity Queensland's Obligations means the obligations of Biosecurity Queensland specified in this Memorandum in relation to administration of the *Animal Care and Protection Act 2001* and *Biosecurity Act 2014*.

BQ means Biosecurity Queensland.

Commencement Date means the date of signing by all agencies.

Confidential Information means information that is by its nature confidential and:

- (a) is designated by an agency as confidential; or
- (b) the recipient knows or ought to know is confidential,

but does not include information which:

- (c) is or becomes public knowledge other than by breach of this MOU;
- (d) is in the possession of the recipient without restriction in relation to disclosure before the date of the receipt from the discloser;
- (e) has been independently developed or acquired by an agency;
- (f) is required by law to be disclosed.

Contact Officer means the contact person for each agency specified in the Memorandum details.

Funds means the amount of appropriation to be transferred between the agencies (if any) as discussed in the MOU.

GST means a goods and services tax or any similar tax, levy or impost imposed by the Commonwealth of Australia.

GST Law means *A New Tax System (Goods and Services Tax) Act 1999 (Cth)*.

Memorandum of Understanding (MOU) means this document and any schedules attached to this document or added from time to time.

Notice means each communication in connection with this Memorandum (including each notice, consent, approval, request and demand).

Purpose means the Purpose and object of this Memorandum specified in this Memorandum.

QRIC means the Queensland Racing Integrity Commission.

Queensland Racing Integrity Commission's Obligations means the obligations as defined by the *Queensland Racing Integrity Act 2016*.

Representative means an employee, agent, officer, director, contractor, subcontractor or other authorised representative of an agency.

RIA means the *Racing Integrity Act 2016*.

RSPCA means the Royal Society for the Prevention of Cruelty to Animals (Queensland).

RSPCA's Obligations means the obligations specified in this Memorandum in relation to administration of the *Animal Care and Protection Act 2001* through its appointed Authorised Officers under the *Animal Care and Protection Act 2001*.

Rules of Racing mean the Rules that govern the three codes of racing in Queensland, including national and local rules.

1.2 Interpretation

In this MOU unless the context indicates a contrary intention:

- (a) a reference to a document (including this MOU) is to that document as varied, novated, ratified or replaced from time to time;
- (b) a reference to a statute includes its delegated legislation and a reference to a statute or delegated legislation or a provision of either includes consolidations, amendments, re-enactments and replacements;
- (c) a word importing the singular includes the plural (and vice versa), and a word indicating a gender includes every other gender;
- (d) a reference to an agency, clause, schedule, attachment or annexure is a reference to an agency, clause, schedule, attachment or annexure to or of this MOU, and a reference to this MOU includes all schedules, attachments and annexures to it;
- (e) includes in any form is not a word of limitation;
- (f) a reference to \$ or dollar is to Australian currency; and
- (g) if a word or phrase is given a defined meaning, any other part of speech or grammatical form of that word or phrase has a corresponding meaning.

2. Term and termination

2.1 Term

This MOU will continue for a period of two years from the date of signing, subject to an initial review of the MOU after 3 and 6 months of operation, or by exception.

2.2 Termination for convenience

Any agency may terminate this MOU or reduce the scope of the Purpose or the Term at any time by giving one month's written notice to the other agencies.

2.3 Effect of termination

On termination of this MOU, all rights and obligations under this MOU immediately cease with the exception of the clauses relating to Confidentiality, Liability, Right to Information and Non-disparagement.

3. Status of this Memorandum

The agencies acknowledge that this MOU:

- (a) is not intended to be legally binding;
- (b) does not entitle or require a person to disclose information that is the subject of legal professional privilege;
- (c) does not affect the law or practice relating to legal professional privilege or privacy provisions; and
- (d) does not restrict the statutory duties, directions and powers available to the agencies.

4. Co-Operation between the agencies

The agencies agree that collaboration between them is based on mutual respect and the shared commitment to the principles of animal welfare relating to the health, safety and wellbeing of animals in accordance with the requirements of the ACPA, the RIA and the *Biosecurity Act 2014*.

The agencies will provide advice and assistance to each other as required, for example where, in carrying out their respective functions, an agency becomes aware of information pertaining to issues of animal welfare which may fall under the authority of one or more of the other agencies. In particular, if a welfare complaint or incident relating to an animal involved in racing, whether directly or indirectly, or lawfully or unlawfully is identified, then the QRIC should be informed as soon as possible. This will ensure all provisions under the RIA can be fulfilled, and is of particular importance if a licensed animal or person is involved. Likewise, the QRIC will inform the relevant agencies as soon as possible of any animal welfare complaint or incident, subject to any legislative provisions.

The agencies agree to respect the organisational policy and legislative requirements impacting upon each agency when conducting a welfare investigation; and that any joint service provision or obligation will reflect and respect these requirements. Each agency's operational guidelines for welfare investigations are included as Attachments. The agencies also agree that if an agency appointment is assigned, it will be determined based on assessment of which agency has responsibility for the relevant critical control points.

The agencies will therefore employ a collaborative and coordinated approach to the management of animal welfare incidents and appropriate licensing of individuals for a code of racing, by identifying and sharing information on past, current and potential animal welfare incidents.

5. Agreement on information to be shared between all agencies

Subject to the terms and conditions of this MOU, BQ, the RSPCA and the QRIC will share between agencies any information that is relevant to:

- the management of an animal welfare complaint or incident that falls under the provisions of this MOU; or
- the licensing of an animal or person by the QRIC.

6. Agreement on information to be shared between Biosecurity Queensland and the Queensland Racing Integrity Commission

In relation to confidential biosecurity matters, BQ and the QRIC, subject to legislative and policy requirements, will share any biosecurity information that may be of assistance in minimising the potential risk of a biosecurity incident.

7. Joint Obligations of the agencies

- To operate collaboratively across shared and overlapping jurisdictions toward a common goal.
- Where appropriate, to collaborate and agree on formulation and implementation of strategies and programs which impact on the jurisdiction of another agency.
- Provide information in relation to any issues which may impact on the Purpose of this MOU, including issues relating to animal welfare.
- When possible, information regarding any welfare complaint or investigation relevant to this MOU should be registered between the agencies as soon as possible. To achieve this, the Manager of the Racing Integrity Unit, QRIC and the Cruelty Complaints Co-Ordinators for BQ and RSPCA will liaise together, on an as needed basis.
- When possible, information regarding any biosecurity information relevant to this MOU should be shared between BQ and the QRIC as soon as possible. To achieve this, the Chief Veterinary Officer at BQ and the Director of Veterinary Services and Animal Welfare at the QRIC will liaise together, on an as needed basis
- Representatives from each of the agencies shall meet at least quarterly to discuss and address issues in common, including any operational matters that arise during the relevant quarter.

8. Biosecurity Queensland's Obligations

BQ operates under a separate Activity Agreement with the RSPCA in relation to animal welfare operational responses and responsibilities under the ACPA.

Under this MOU, BQ will share with the QRIC any information that is relevant to:

- the management of a welfare incident relating to any animal involved in racing, whether directly or indirectly and whether lawfully or unlawfully; or
- the licensing, or ongoing suitability of licensing, of a person for a code of racing, by the QRIC; or
- any emerging trends or concerns with respect to animal welfare policy, legislation, standards or compliance that are specific to the racing industry.

9. RSPCA's Obligations

The RSPCA operates under a separate Activity Agreement with BQ in relation to animal welfare operational responses and responsibilities under the ACPA.

Under this MOU, the RSPCA will share with the QRIC any information that is relevant to:

- the management of a welfare incident relating to any animal involved in racing, whether directly or indirectly and whether lawfully or unlawfully; or
- the licensing, or ongoing suitability of licensing, of a person for a code of racing, by the QRIC; or
- any emerging trends or concerns with respect to animal welfare policy, legislation, standards or compliance that are specific to the racing industry.

10. Queensland Racing Integrity Commission's Obligations

Subject to the terms and conditions of this MOU and any legislative provisions, the QRIC will share with the RSPCA and BQ any information that is relevant to:

- the management of an animal welfare investigation, or a welfare concern that falls under the provisions of the ACPA; or
- any emerging trends or concerns with respect to animal welfare policy, legislation, standards or community education that fall under the jurisdiction of the other agencies.

Subject to the terms and conditions of this MOU, the QRIC will share with BQ:

- any biosecurity information that may be of assistance in minimising the potential risk of a biosecurity incident.

11. Reporting

The agencies will promptly register any information relating to the Purpose of this MOU with the other relevant agencies. The outcome of any welfare complaint or investigation will be reported to another agency, if a written request is provided.

12. Memorandum management

- (a) Each agency nominates the Contact Officer for the purpose of this MOU.
- (b) An agency's Contact Officer is responsible for:
 - (i) receiving communications;
 - (ii) issuing and signing notices; and
 - (iii) responding to requests or directions,on behalf of that agency in relation to this MOU.
- (c) The Contact Officers, or any Representative appointed by each Contact Officer, will meet no less than biannually for the purpose of discussing the performance of this MOU. These meetings will be separate and in addition to the meetings required under the Joint Obligations of the agencies.
- (d) Minor updates which do not affect the operation or validity of the MOU may be undertaken at any time with the updated information forwarded to the other agencies and appended to this MOU.

13. Funding

Any costs incurred by an agency associated with meeting their agreed roles and responsibilities under this MOU, will be met by that agency.

Any joint or shared costs between the agencies will be negotiated and agreed in writing as required.

14. Media release

An agency will not, and will ensure that its Representatives do not, make any public comment on any investigations that may jeopardise any legal proceedings, pending or current or may compromise a person's rights under law.

Where an agency is appointed the lead agency in a joint investigation or operation, the other agencies will not make public comment without first consulting the lead agency. However, the lead agency should include acknowledgement of the other agencies in any media releases.

15. Confidentiality

- 15.1 Confidential Information disclosed according to this MOU must only be used for the purpose for which it was disclosed.
- 15.2 Each agency must treat all Confidential Information owned by another agency as confidential and must not, without the prior written consent of the other agency, disclose or permit the same to be disclosed to any third party.
- 15.3 Each agency must ensure that its employees, officers and agents comply with the obligations of confidentiality imposed upon it by this clause.
- 15.4 Each agency's obligations under this clause survive termination of this Agreement.
- 15.5 Each agency agrees to comply with the Australian Privacy Principles set out in Schedule 1 of the Privacy Act 1988 (cth).

15.6 Exceptions

An agency may disclose Confidential Information:

- (a) with the other party's prior written consent;
- (b) to a professional adviser, financial adviser, banker, financier or auditor if that person is obliged to keep the information disclosed confidential;
- (c) to any of its Representatives who are bound to keep the information confidential and to whom it is necessary to disclose the information;
- (d) to comply with the law, or a requirement of a regulatory body;
- (e) to the responsible Minister administering the Department or the agency and their personal and departmental advisers;
- (f) in response to a request by the Parliament or a Committee of the Parliament of the State of Queensland; or
- (g) where disclosure is required to be made in accordance with established governmental policies, procedures or for public accountability purposes.

16. Right to Information

- 16.1 The RSPCA acknowledges that documents held by BQ and the QRIC are subject to the *Right to Information Act 2009* which may compel disclosure in certain circumstances. Reports and other written information provided to BQ and the QRIC will be treated in confidence. However, in the event that an application is made under the *Right to Information Act 2009*, the agencies will consult with each other prior to the release of documents held by any agency.
- 16.2 Subject to Clause 15, no agency will disclose any Confidential Information belonging to another agency relating to the MOU without prior approval in writing from the other agency which can be conditionally given.
- 16.3 Notwithstanding this duty of confidentiality, the agencies may disclose details of this MOU to their solicitors, auditors, insurers or accountants for the purposes of obtaining advice.
 - (a) Subject to subclause (b), the agencies acknowledge that this MOU will not limit the principle and/or legislation relevant to the *Right to Information Act 2009* for members of the public or industry-based organisations;

(b) The agencies agree that all information shared is presumed to be information the disclosure of which may reasonably be expected to be of concern to the providing party, such that all recipient agencies are obliged to consult with the providing party under Section 37 of the *Right to Information Act 2009*.

17. Seizures

Contracts for support with seizure of animals including transport and subsequent boarding and care must be signed prior to commencement.

Animals must not be removed from site without the approval of the lead investigator and the drawing up of an agreed management plan for joint approval; and animals must be available for client inspection pursuant to Section 151 of the ACPA or Section 185 of the RIA.

The contractor must supply the lead agency with a register of subject animals on a monthly basis within 14 days of the end of the previous month. The contractor will advise the lead agency of any births and deaths relating to the subject animals within 7 days of such births or deaths.

Invoices for all costs incurred must be supplied in writing on a monthly basis within 14 days of the end of the previous month.

18. Liability

The agencies agree that they enter into this MOU and the Purpose entirely at their own risk and without exception.

19. Dispute resolution

If there is an issue between the agencies in relation to the application of the MOU, the agencies will together act in good faith to resolve the issue in a timely manner. The agencies agree that any dispute arising during the course of this MOU is to be dealt with by a process of escalation through each agency's respective management hierarchy.

20. Non-disparagement

The agencies agree to take no action during and after the Term of this MOU which is intended, or would reasonably be expected, to harm any other agency or its reputation or which would reasonably be expected to lead to unwanted or unfavourable publicity to any other agency.

21. General

21.1 Assignment

An agency must not assign, novate or subcontract the whole or any part of this MOU without the prior written consent of the other agency, such consent not to be unreasonably withheld or delayed.

21.2 Notices

Each communication between the agencies (including each notice, consent, approval, request and demand) in connection with this MOU must be in writing and delivered to the address specified in the Memorandum details (or any other address notified from time to time) by hand, posted by pre-paid post, or sent by facsimile transmission or email.

21.3 No relationship

Nothing contained in this MOU will be taken as giving rise to any employment, agency, partnership or joint venture relationship between the agencies.

21.4 No fettering

Nothing contained in this MOU will fetter, act as an estoppel or as an agreement about the exercise of discretion or the making of a decision or subordinate legislation under any law by the State of Queensland and its representatives or officers.

Memorandum Details

Agency details

Biosecurity Queensland

Agency Name: State of Queensland acting through the Department of Agriculture and Fisheries (Biosecurity Queensland)
ABN: 66 934 348 189
Street Address: Level 2, 41 George Street, BRISBANE QLD 4000
Contact Officer Name: Dr Jim Thompson, Chief Biosecurity Officer
Contact Officer Postal Address: GPO Box 46, BRISBANE QLD 4001
Contact Officer Telephone: [REDACTED]
Contact Officer Email: [REDACTED]

RSPCA

Agency Name: Royal Society for the Prevention of Cruelty to Animals QLD Inc
ABN: 74 851 544 037
Street Address: 139 Wacol Station Rd, WACOL QLD 4076
Contact Officer Name: Mr Mark Townend, Chief Executive Officer
Contact Officer Postal Address: Locked Bag 3000, ARCHERFIELD BH QLD 4108
Contact Officer Telephone: [REDACTED]
Contact Officer Email: [REDACTED]

Queensland Racing Integrity Commission

Agency Name: Queensland Racing Integrity Commission
ABN: 64 838 583 571
Street Address: Level 2, 60 Kingsford Smith Drive, ALBION QLD 4010
Contact Officer Name: Mr Ross Barnett APM, Racing Integrity Commissioner
Contact Officer Postal Address: PO Box 15666, CITY EAST QLD 4002
Contact Officer Telephone: [REDACTED]
Contact Officer Email: [REDACTED]

Signed for and on behalf of the **State of Queensland acting through the Department of Agriculture and Fisheries ABN 66 934 348 189 (Biosecurity Queensland)** by

JIM THOMPSON a person duly authorised to act in that behalf in the presence of:

D. Rainbird
Signature of Witness

Debbie RAINGIRD
Name of Witness in full

[Signature]
Signature

Date: 4/6/17

Signed for and on behalf of the **Royal Society for the Prevention of Cruelty to Animals QLD Inc ABN 74 851 544 037 (RSPCA)**

MARK TOWNEND a person duly authorised to act in that behalf in the presence of:

Alison
Signature of Witness

ALISON HAIR
Name of Witness in full

[Signature]
Signature

Date: 14/6/17

Signed for an on behalf of **Queensland Racing Integrity Commission ABN 64 838 583 571**

ROSS BARNETT a person duly authorised to act in that behalf in the presence of:

[Signature]
Signature of Witness

JODIE SIEBERT
Name of Witness in full

R Barnett
Signature

Date: Ross Barnett
COMMISSIONER
30/5/17

Appendix 2: Queensland Racing Integrity Commission Animal Welfare Strategy



QUEENSLAND RACING
INTEGRITY COMMISSION



Animal Welfare Strategy

2016-2020

Prepared by: Queensland Racing Integrity Commission (QRIC)

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March 2018

Foreword

In February 2015, the Queensland community was shocked when footage of live baiting in the greyhound industry was televised. Commissions of Inquiry were held in several states, with the each Commission finding that acts of animal cruelty were indeed systemic in the greyhound industry and that general welfare standards, particularly with respect to 'wastage' of animals bred to race, did not meet public expectations.

Queensland was the first state to respond, with the Queensland Greyhound Industry Commission of Inquiry (MacSporran) report published in June 2015. Adoption of the MacSporran recommendations resulted in the introduction of new legislation in the form of the *Racing Integrity Act 2016* and the establishment of the Queensland Racing Integrity Commission (QRIC); with a clear mandate to uphold and improve the welfare of animals involved in racing in this state and to show zero tolerance to animal cruelty or neglect. The establishment of the QRIC provides an unprecedented opportunity to develop a multi-disciplinary approach to animal welfare and improve welfare standards for the three codes of racing in Queensland.

In general, Queensland racing industry participants do strive to provide high standards of animal welfare. There is a strong focus on providing optimal nutrition and health, and minimising injuries to enable racing animals to perform at their best. However, animal welfare, and the adoption of evidence based policy, is of increasing importance for public confidence in the industry. There is increased pressure on all animal industries to transition towards transparency, accountability and adoption of improved standards of animal welfare (Cobb, 2014). This is particularly so in the racing industry which is under intense scrutiny (Fiedler, 2016). There is a clear need for the regulatory and research focus in the racing industry to include integrity and animal welfare, as well as performance. The welfare initiatives outlined in this Strategy and the Sampling and Analytical Services Strategy will support the industry, by addressing underlying issues that contribute to under-performance and 'wastage' in racing animals.

Ensuring the welfare of racing animals is a goal the diverse stakeholders in the racing industry and the Queensland public embraces. However, it will only be through informed discussions, ethical and evidence-based decisions, education and effective implementation that we can achieve this goal. The QRIC looks forward to working with all stakeholders in advancing and improving welfare outcomes for racing animals.

IN CONFIDENCE

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Purpose

The QRIC Animal Welfare Strategy (AWS) is one of the core components of the QRIC Compliance and Enforcement Framework. It defines what animal welfare means in the racing industry context and details how the QRIC will fulfil its obligations under the *Racing Integrity Act 2016 (RIA)*. One of these obligations is to safeguard the welfare of all animals involved in racing. The AWS, along with the Communications Strategy, Intelligence Capability Strategy, Workforce Development Strategy and Sampling and Analytical Services Strategy, outline the approach the QRIC will adopt in the Compliance and Enforcement Framework to safeguard animal welfare in the Queensland racing industry.

The responsibility for ensuring the welfare of racing animals is maintained at an appropriate level is shared between a wide number of stakeholders, both within the QRIC and the industry, including animal owners, racing regulators, trainers, industry participants, veterinarians and animal breeders. It is also a responsibility shared with other animal welfare organisations, in particular the agencies responsible for upholding the *Animal Care and Protection Act (2001)*. The AWS outlines the ways in which the QRIC will engage with these diverse stakeholders to safeguard animal welfare and avoid duplication of effort.

The *RIA* also outlines an obligation to maintain public confidence in the racing of animals in Queensland, for which betting is lawful. However, while the use of animals for the purpose of racing is legal in Australia, there is an associated expectation that the welfare of these animals meets appropriate standards (White, 2016). Although science has a role to play in providing sound, defensible standards of welfare practice, general community concerns also contribute to acceptable and ethical welfare standards (Hemsworth, 2015). The AWS outlines a plan to:

- align QRIC processes with best practices in the field of animal welfare
- ensure that those people who fail to align with acceptable welfare practices are penalised or barred from the industry
- engage with the community to ensure the 'social licence' for racing is retained.

The breadth and depth of the Strategy necessarily requires a comprehensive suite of enabling activities that must be planned and coordinated to ensure maximum benefit for the limited resources the QRIC has at its disposal. This Strategy and the accompanying Implementation Plan in Attachment 2, provides the framework to achieve these improvements in the welfare of racing animals.

Principles

The QRIC Animal Welfare Strategy (2016-2020) is based on the following four guiding principles:

Principle	Rationale	Implications
<p><u>Transparent, Accountable Leadership</u> QRIC leaders will ensure transparent, accountable governance of the racing industry.</p>	<p>QRIC is committed to providing transparency and accountability with respect to animal welfare in the racing industry, in alignment with the Queensland Greyhound Racing Industry Commission of Inquiry recommendations. Transparency and accountability is essential to regain and maintain public confidence in the racing industry.</p>	<ul style="list-style-type: none"> • Core data is made available to the general public on key welfare issues such as incidents and injuries and prohibited substances. • Processes to enable the identification and traceability of animals through all stages of the lifecycle (all codes) will be introduced to enable data on 'wastage' to be obtained. • Compliance activities such as kennel and stable inspections and investigated welfare complaints will be included in the annual report. • The findings of research commissioned by QRIC to address identified welfare concerns will be published in the public domain.
<p><u>Collaboration</u> QRIC will forge strong working relationships and collaborate with industry, state, national and international racing authorities, and other welfare agencies.</p>	<p>Animal welfare issues in the racing industry are the responsibility of numerous jurisdictions. Effective collaboration will enhance QRIC's ability to:</p> <ul style="list-style-type: none"> • be an effective, intelligence-led organisation; • deliver continuous improvement in animal welfare through external initiatives (e.g. legislative change, industry advisory committees); • obtain validation and support for QRIC's strategic direction, policies and procedures from external experts (e.g. QRIC Animal Welfare Committee); • drive cultural change within industry by working alongside industry bodies to communicate and obtain support for changes in welfare standards. 	<ul style="list-style-type: none"> • Information sharing MOUs will be signed with the RSPCA/BQ and Queensland Police Service, as recommended in the Commission of Inquiry. • QRIC staff will be active members on external welfare committees and advisory groups. • QRIC will strive to identify synergies and potential for cross-jurisdictional solutions to emerging animal welfare issues. • QRIC will foster partnerships with research institutions, to identify areas of research alignment that may benefit the Animal Welfare Strategy • QRIC will facilitate voluntary uptake of increased welfare standards by the industry.
<p><u>Cultural Change</u> Cultural change amongst both industry participants and QRIC staff is key to driving improvements in animal welfare.</p>	<p>Cultural change is integral to the continued operation of racing's 'social licence'. Individuals must be held accountable for the ethical and humane treatment of their animals. Cultural change amongst industry will be supported by increased education and regulation activities.</p> <p>Cultural change within the QRIC will be achieved through increased education of staff and changes in governance to</p>	<p>Industry level:</p> <ul style="list-style-type: none"> • New Licensing categories will be introduced to ensure animals are under the care of a licenced participant during all stages of the lifecycle. • Education on evidence-based, best practice will be linked to licensing requirements. • Compliance with welfare standards will be actively monitored by kennel and stable

	strengthen and improve the systems and processes that uphold animal welfare.	<p>inspections and prohibited substance testing.</p> <ul style="list-style-type: none"> • Non-compliance matters will be addressed by a range of penalties, or by prosecution in cases of animal cruelty. <p>QRIC level:</p> <ul style="list-style-type: none"> • Adherence with QRIC policies and procedures will be required to ensure QRIC staff uphold the highest levels of integrity. • Governance structure will ensure that ethical and evidence-based decisions underpin operations that impact animal welfare. • Formal training to improve the general knowledge of core welfare concepts amongst all staff.
<p><u>Evidence-based Standards</u> QRIC will develop and implement evidence-based, scientifically supported welfare standards that align with national and international developments in animal welfare.</p>	<p>Animal welfare standards support the voluntary uptake of good welfare practice, and the regulation of animal welfare through compliance assessment and enforcement. Welfare standards should be based on sound science, research and practical experience.</p>	<ul style="list-style-type: none"> • Animal welfare standards will be developed to address welfare issues of strategic importance to the racing industry in Queensland. • QRIC will strive to align the welfare standards with the latest scientific research. • QRIC will initiate or collaborate on research studies that support informed decision-making or address gaps in scientific knowledge. • Inspections will move towards welfare assessments that evaluate resources, management and animal-based measures (eg behaviour/human-animal interaction).

Scope

The functions of the QRIC are detailed in section 10 of the *Racing Integrity Act 2016 (RIA)*, and define the scope of the AWS. Functions of the QRIC that relate to animal welfare include:

- promote animal welfare and prevent animal cruelty, by educating, providing information for, and working with, participants;
- safeguard the welfare of any animal involved, whether directly or indirectly and whether lawfully or unlawfully, in racing;
- to oversee the integrity of race meetings, including matters preliminary to race meetings;
- to keep records that provide for the identification and monitoring of animals;
- to work collaboratively with entities responsible for investigating and prosecuting offences; and
- to identify opportunities for cooperative partnerships with entities to improve compliance and integrity in the racing industry.

The QRIC will address these requirements by:

- Raising animal welfare standards and nurturing compliance across the lifecycle of a racing animal through education, awareness and competency-based licensing;

- Targeting compliance and enforcement effort at registered racing animals and their welfare while involved in racing or training, or activities associated with racing or training;
- Collaborating with, and making information available to, Biosecurity Queensland and the RSPCA to facilitate their investigations into the welfare of animals not registered by the QRIC to ensure the provisions of the *Animal Care and Protection Act* are met (eg. retired racing animals);
- Promoting responsible breeding and transition of retiring racing animals into new careers; accompanied by proactive monitoring of data regarding breeding numbers, life-cycle tracking and injury and euthanasia rates to monitor welfare and wastage and improve public confidence in the industry.

Key Definitions

Welfare

The QRIC defines animal welfare using the following five animal welfare provisions (Mellor, 2016^{a,b}):

- 1. Good nutrition:** Provide ready access to fresh water and a diet to maintain full health and vigour
- 2. Good environment:** Provide shade/shelter or suitable housing, good air quality and comfortable resting areas
- 3. Good health:** Prevent or rapidly diagnose and treat disease and injury, and foster good muscle tone, posture and cardiorespiratory function
- 4. Appropriate behaviour:** Provide sufficient space, proper facilities, congenial company and appropriately varied conditions
- 5. Positive mental experiences:** Provide safe, congenial and species-appropriate opportunities to have pleasurable experiences.

The five provisions will underpin, and assist the development of, a suite of products under the AWS, including development of minimum requirements for facilities, socialisation guidelines for greyhounds, and robust inspection criteria.

'Wastage'

Maintaining a 'social license' for the racing industry through the provision of levels of racing animal welfare that meet society's evolving expectations is paramount. 'Wastage' (the loss of animals from the racing pool without appropriate consideration of available retirement options) is an ongoing challenge. The QRIC acknowledges that the term 'wastage' is an emotive term that is widely used by the media, activists, industry and researchers and that the definitions of 'wastage' may differ significantly between those groups. Therefore, where possible, the QRIC will report on reductions in 'wastage' in concise terms relating to overbreeding and the unnecessary euthanasia of animals that are suitable for rehoming, and avoid the use of generalised terminology.

'Wastage' in the context of the AWS specifically refers to the categories of animals listed below:

- Animals bred for the industry that are never raced and are not rehomed
- Retired animals that are suitable for rehoming but are not rehomed
- Retired animals that are not suitable for rehoming.

While this strategy acknowledges the fundamental importance of 'life-time' tracking of racing animals, it is noted that currently the accuracy and detail of the data available to monitor these categories varies between the three codes of racing, with a clear need identified to improve systems and processes to access such data for monitoring purposes.

In addition, the QRIC is actively promoting awareness of appropriate retirement options for all racing animals, as well as providing an adoption service for retired greyhounds, and does not consider animals successfully retrained and rehomed as 'wastage'.

The QRIC also recognises that there are circumstances, related to disease and injury, where euthanasia is in the best welfare interests of an animal. Losses of animals under these circumstances are an unfortunate but unavoidable consequence of training and racing at peak levels of performance. Notwithstanding this, the QRIC actively promotes industry uptake of training methods and advances in racing animal health care that minimise such losses.

Objectives

As articulated in the QRIC Compliance and Enforcement Framework, the QRIC Animal Welfare Strategy has three primary objectives for the first four years of the QRIC's operation.

Objective 1: Minimise 'wastage' of racing animals.

The QRIC will minimise 'wastage' of racing animals through promotion of more informed breeding and increased participant responsibility for welfare and end of career alternatives.

Objective 2: Maximise career opportunities for all racing animals.

The Animal Welfare Strategy needs to find the balance between providing sufficient animals to support a competitive racing industry and reducing 'wastage', by maximising career longevity for all racing animals.

Objective 3: Enhance welfare and safety of racing animals.

The welfare and safety of racing animals will be enhanced through evidence-based welfare standards, provision of proficient race day veterinary services and timely, proactive investigation of animal welfare complaints.

Measures of Success

Progress towards the strategic objectives of the AWS, and overall outcomes of the Compliance and Enforcement Strategy and Framework, will be measured by:

- Development of and progress towards optimal target breeding numbers for all codes of racing.

- Number of retired racing greyhounds rehomed annually through the Greyhound Adoption Programme.
- Introduction of formal monitoring of retirement data with a view to reducing euthanasia rates over time.
- Industry participant perception of and sentiment towards the racing industry and QRIC.
- Community perception of and sentiment towards the racing industry and QRIC.

Foundations for Success

The targeted welfare objectives listed above will be underpinned by a focus within the QRIC on increasing training and awareness of animal welfare amongst all people involved in the racing industry, and improving processes for monitoring and reporting issues relating to animal welfare. These organisational changes and industry initiatives will lay the foundations for the successful implementation of this Strategy and include generating cultural change, adopting improved systems, fostering strong relationships and ensuring good governance.

1. Cultural Change

Cultural change is the process by which interventions are used to influence underlying attitudes and establish new behavioural patterns. Cultural change to improve animal welfare can be driven by a range of methods such as education, incentives or regulation (Main, 2012). Many roles within the Queensland racing industry have had a traditional reliance upon on-the-job training, with techniques and knowledge passed on from one generation to the next. This is likely to have contributed the continuance of out-dated, unacceptable practices, such as live baiting (ABC, 2016). There is also the perception that racing regulation, including contentious welfare issues such as the use of the whip, is discussed within a “racing bubble” that does not incorporate views from outside the industry (Graham, 2016). Therefore, a cultural change to ensure the adoption of evidence based standards and policies across the industry will be important.

Behaviour change can best be driven by adopting a range of policy tools, both regulatory and non-regulatory (House of Lords, 2011). Research shows uptake of recommended management practices is more likely if socio-psychological factors, such as stakeholder awareness of problems and perception of responsibility, are addressed (Ritter, 2016). The QRIC will need to ensure the industry accepts that it is accountable for the ongoing public and government support for racing and that participants embrace the concept that they are responsible for the long term welfare of their animals, including providing the opportunity for them to have alternative careers after retirement.

The QRIC will approach this in a number of ways.

i. Raise awareness of animal welfare

One of the most important aspects for achieving cultural change is provision of a compelling and consistent educational campaign (Knott, 2008). The QRIC will raise awareness of best practice for animal management and monitoring through the provision of formal and informal education and training, combined with an understanding of behaviour change frameworks.

ii. Ethical, evidence-based policies

The QRIC will introduce or review welfare-related policies or standards, to ensure they align with current understanding of best practice. Codes of practice will also be reviewed to ensure they meet

ethical standards and reflect evolving societal concerns. This will clarify expectations of appropriate behaviour and provide the framework for both education and enforcement. Meeting these standards and codes will be a condition of licensing for participants, and employment for regulators or contractors.

iii. Industry engagement

The QRIC will prioritise direct engagement with industry stakeholders, supported by an understanding of behavioural drivers in the industry, with a view to encouraging voluntary compliance with welfare standards and guidelines and compliance with the welfare provisions of the Animal Care and Protection Act. This, combined with the evidence-based approach above, will provide a compelling and motivating case for change.

iv. Regulation

The QRIC will actively monitor industry compliance with welfare standards. Welfare concerns will be addressed by providing either targeted education to the participant on the issue, and/or through applying a penalty. The QRIC will also strengthen the efficiency and effectiveness of its enforcement capabilities to ensure that those who are unwilling to meet the standards expected of the industry are prevented from participating.

2. Systems

In order for the QRIC to meet its legislative requirements and to effectively deliver the AWS, there is a requirement for powerful data keeping tools and processes. These requirements will be met by several systems, which may need further optimisation or development to enable effective results.

i. Registration Systems

The QRIC will implement a Customer Relationship Management (CRM) tool to enhance animal identification and reduce duplication and inefficiencies. The CRM will enhance the QRIC's ability to meet requirements under section 10 of the *RIA* to keep records that provide for the identification and monitoring of animals. These records will enable 'wastage' in the industry to be effectively monitored and managed, thereby supporting one of the key objectives of this Strategy. There is currently a transition in all codes towards life-time tracking of racing animals, although the specific requirements for registration vary depending on the code of racing.

ii. Licensing System

The QRIC will implement a Customer Relationship Management (CRM) tool to enhance participant identification and reduce duplication and inefficiencies. This will support the introduction of robust licensing standards to enhance integrity (see Licensing Strategy). Licensing has a pivotal role in both voluntary uptake of welfare standards by participants and enforcement of compliance with welfare standards. The CRM will eventually support the effective implementation of competency-based licensing in which licensees are required to demonstrate relevant knowledge and experience of managing key animal welfare issues.

iii. Intelligence Case Management System

The QRIC will develop and adopt an Intelligence Case Management System (ICMS). This system will be used to register and triage all welfare complaints and incidents that are reported or investigated by the QRIC (see Intelligence Strategy). The ICMS may also be of assistance with life-cycle tracking of animals and licensing.

iv. QRIC Quality Assurance System

The QRIC will establish and implement quality assurance measures that support the consistent identification, referral and redress of animal welfare issues. Appropriate second and third level controls will ensure that policies and standards are followed and the expectations of the community and requirements of the QRIC are met.

3. Relationships

Animal welfare is a complex issue involving a wide range of interested parties, each with a unique perspective on racing animal welfare. There is a need to satisfy community, industry, policy and scientific demands regarding the welfare of racing animals. Therefore, developing strong relationships with the following organisations is important for the success of this Strategy.

i. Industry

The QRIC will strive to forge a strong relationship with industry participants, to facilitate the voluntary adoption of welfare standards, rather than rely on compliance and enforcement. The QRIC will also communicate to the industry the benefits of the strategies and policies it adopts, to generate cultural change and support for welfare initiatives.

ii. Community

The QRIC will establish an active public profile that transparently communicates to the community the QRIC's values and focus. There is a significant difference in the framing of welfare debates between print and social media, with each medium providing different narratives and perspectives (Graham, 2016). Therefore, QRIC welfare initiatives and outcomes must be communicated by a variety of mediums to enable the community to access balanced information and facilitate informed debate on welfare issues.

iii. Veterinarians

The QRIC will support the veterinary community to make evidence-based and ethical decisions. Veterinarians provide an indispensable service to the racing industry, both by providing veterinary services on race days and treatment of animals off the racetrack. Veterinarians are trained in animal behavior, nutrition, medicine and infection control, and are in a unique position to identify and provide advice related to welfare or biosecurity. They are also in an ideal position to advocate for the welfare of racing animals and highlight emerging issues. Conversely, the unethical provision of veterinary medicines or treatments is a risk to the welfare and integrity in the racing industry (Campbell, 2013). Supporting the veterinary community will both enhance welfare outcomes and reduce possible risks.

iv. Research Community

The QRIC will proactively engage with the research community to ensure it receives the scientific support it needs to make evidence-based policy. The QRIC will promote and facilitate research that addresses emerging industry issues as these research findings can support the development of policies, provide incentive for behavioural change, improve the welfare of racing animals and deliver innovation. The QRIC will aim to increase its involvement in both publicly funded and commissioned research and the promotion of the benefits of research to the industry.

v. Other Regulators or Industry Bodies.

The QRIC needs to be an involved and influential leader in racing industry forums. The QRIC will continue to work with other equine and canine racing industry groups to lobby for issues of common

importance, such as biosecurity or trade, to maximize welfare outcomes for racing animals. In particular, a strong partnership with Racing Queensland is important for delivering welfare initiatives.

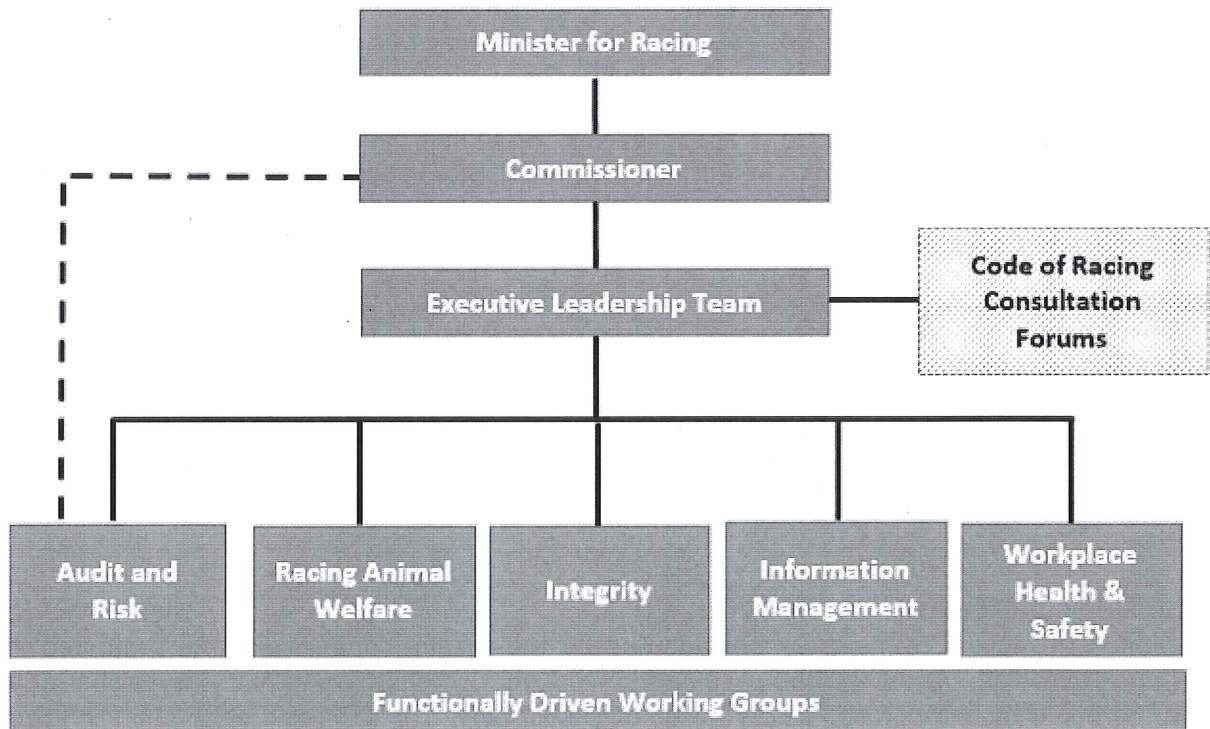
vi. Government

The QRIC will continue to nurture a transparent and open relationship with the government, so that ministerial support and confidence in the racing industry, along with an understanding of the benefits the racing industry provides to the Queensland community, are maintained. Animal welfare outcomes will be monitored and reported to government via a range of channels.

4. Governance

Governance of animal welfare by the QRIC must be lawful, prioritised, consultative and ethical. Animal welfare is complex, and good decision-making needs to reflect the latest evidence-based research, emerging industry trends and evolving societal expectations. The QRIC governance process must balance these interests in a timely and appropriate manner that upholds public confidence and maintains the ongoing 'social licence' for racing.

The Racing Integrity Commissioner is supported in the governance of animal welfare matters by a number of internal and strategic governance bodies. The governance structure of QRIC is provided in the diagram below:



i. Internal governance

The welfare of racing animals underpins and influences all aspects of the QRIC's organisational strategies and objectives. Operational decision-making at all levels may impact animal welfare and the responsibility for animal welfare is spread amongst a large number of teams within the QRIC. Additionally, the Queensland Police Service (QPS) Racing Crime Squad is provided by the QPS to assist the QRIC in meeting operational requirements. The Racing Crime Squad consists of police officers performing investigative, detective and intelligence functions to address racing welfare and integrity-related criminal offences.

Racing Animal Welfare Committee

The Racing Animal Welfare Committee (RAWC) is comprised of senior executives and leaders from within the QRIC, as well as external stakeholders including Racing Queensland (RQ), Biosecurity Queensland, and the RSPCA. The RAWC:

- Reviews policies, industry codes, standards and processes about the welfare of racing animals;
- Reviews animal welfare governance systems and compliance and enforcement strategies;
- Monitors the effectiveness of, and identify improvements in sample collection and handling procedures;
- Monitors the effectiveness of drug control strategies and our ability to legally uphold penalties on appeal;
- Monitors welfare of animals directly in the care of QRIC;
- Identifies opportunities for process and procedural improvements, such as education, training, and equipment;
- Makes recommendations in respect to any animal welfare matter; and
- Advises and reports on any matter referred to it by the Racing Integrity Commissioner, and the Executive Leadership Team (ELT).

Executive Leadership Team

The RAWC makes recommendations to the ELT. The ELT allows senior executives from across the QRIC to present, debate and analyse strategic level issues to improve QRIC service delivery, including issues pertaining to animal welfare. The ELT will review the QRIC operational plan, which provides the framework for monitoring and reporting on the implementation progress for welfare initiatives.

Sub-Committees

Sub-committees, involving relevant subject matter experts, will be formed to address specific issues and further extend RAWC knowledge and analysis capabilities. An Animal Welfare working group, comprised of representatives from the Veterinary and Welfare, Licensing and Stewarding, Policy and Integrity Regulation units will meet regularly to discuss welfare related issues and determine options for addressing them. This working group will enable animal welfare risks and issues can be escalated to the appropriate governance committee.

Ethical Decision Making Framework

Ethical decision-making frameworks are adopted by the medical profession, and promoted in the veterinary profession. These can be used to formally work through any ethical issues that arise, to ensure there is transparency and clarity in the decision made. The QRIC will provide a framework to assist staff to make ethical decisions and to enable all factors that impacted the decision are documented. This is important to show the decision made considered all the available information at the time.

ii. Strategic governance bodies

Strategic governance of animal welfare will be influenced by a diverse range of parties, as befits the scope and depth of the topic.

QRIC-RQ Working Group

RQ is responsible for the development of the local rules of racing and for delivery of training modules for roles in the racing industry through their Training department. There is a need to ensure that the regulatory and training services RQ provides address the emerging animal welfare issues and risks identified by the QRIC. An existing working group is currently focused on delivery of the MacSporran recommendations, however, in the future there may be a need to continue this arrangement to support ongoing operational alignment.

Subject Matter Expert Forums

There are evolving societal expectations about the appropriate treatment of animals. QRIC policies and products need to consider the status of the current scientific knowledge, practical experience and public expectations. The QRIC will therefore hold subject matter expert forums as required. These forums may include scientists, industry participants and the public, all of which provide a different perspective to the issue of animal welfare.

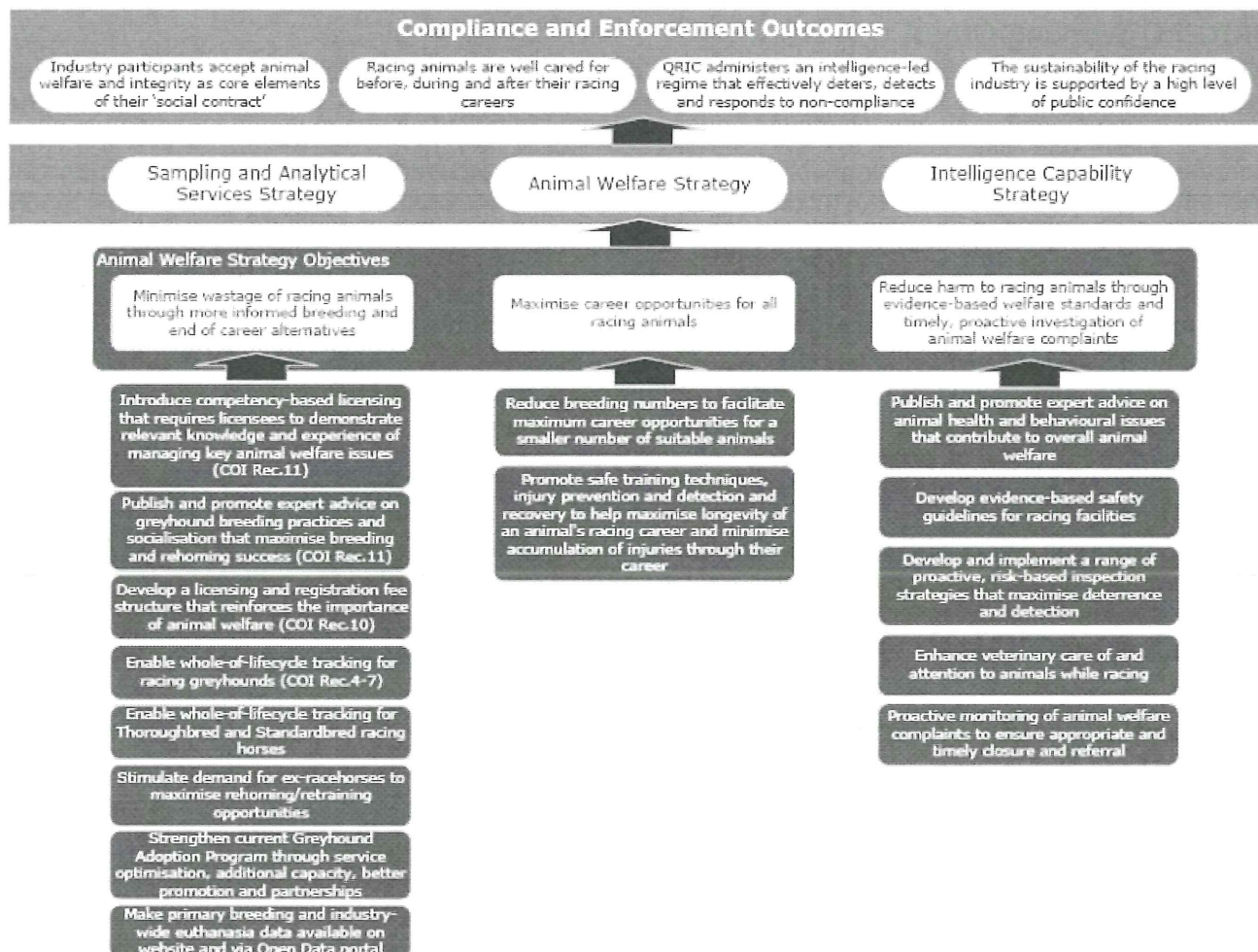
Industry bodies

The QRIC regularly liaises with peak industry bodies such as Racing Australia, Harness Racing Australia and Greyhounds Australasia. These bodies are responsible for determining the national rules of racing and the strategic direction for the industries. It is integral to the success of the Animal Welfare Strategy that the QRIC continues to be represented at these bodies.

Future Strategic Direction

The QRIC Animal Welfare Strategy 2016-2020 depicts a broad range of business changes that will drive significant improvement in the welfare outcomes of racing animals and regulation of the racing industry, particularly in the greyhound code. It reflects the risks, opportunities and priorities the QRIC encountered in its first 6-12 months of operation and will be subject to annual review to ensure its ongoing relevance and worth. It also supports the delivery of the MacSporran recommendations and lays the foundations to move towards welfare quality assurance programs that have been implemented in other animal industries.

Attachment 1 – Compliance and Enforcement Outcomes



Attachment 2 – Implementation Plan

Animal Welfare Strategy							
Strategy Objective	Action	Owner	16/17	17/18	18/19	19/20	Funding Source
Minimise wastage of racing animals through promotion of more informed breeding and increased participant responsibility for welfare and end of career alternatives	Introduce competency-based licensing that requires licensees to demonstrate relevant knowledge and experience of managing key animal welfare issues (COI Rec.11) Link to Licensing Strategy	Director Stewarding, Licensing and Registration		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		Base Funding
	Publish and promote expert advice on greyhound breeding practices and socialisation that maximise breeding and rehoming success (COI Rec.11)	Director Animal Welfare and Veterinary Services		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Base Funding
	Develop a licensing and registration fee structure that reinforces the importance of animal welfare (COI Rec.10)	Director Stewarding, Licensing and Registration		<input checked="" type="checkbox"/>			Base Funding
	Enable whole-of-lifecycle tracking for racing greyhounds (COI Rec.4-7)	Director Stewarding, Licensing and Registration		<input checked="" type="checkbox"/>			Base Funding
	Lobby for whole-of-lifecycle tracking for Thoroughbred and Standardbred racing horses	Director Animal Welfare and Veterinary Services			<input checked="" type="checkbox"/>		Base Funding

	Stimulate demand for retired racehorses to maximise rehoming/retraining opportunities	Director Animal Welfare and Veterinary Services	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Base Funding
	Strengthen current Greyhound Adoption Program through service optimisation, additional capacity, better promotion and partnerships	Director Animal Welfare and Veterinary Services	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Base Funding
	Make primary breeding and industry-wide euthanasia data available on website and via Open Data portal	Director Animal Welfare and Veterinary Services	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Base Funding
Maximise career opportunities for all racing animals	Promote optimal breeding numbers to facilitate maximum career opportunities for a smaller number of suitable animals	Director Animal Welfare and Veterinary Services	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Base Funding
	Promote safe training techniques, injury prevention and detection and recovery to help maximise longevity of an animal's racing career and minimise accumulation of injuries through their career	Director Animal Welfare and Veterinary Services		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Base Funding
Enhance safety and welfare of racing animals through evidence-	Publish and promote expert advice on animal health and behavioural issues that contribute to	Director Animal Welfare and Veterinary Services		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Base Funding

based welfare standards and timely, proactive investigation of animal welfare complaints	overall animal welfare						
	Promote and develop evidence-based safety guidelines for racing facilities	Director Animal Welfare and Veterinary Services		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Base Funding
	Develop and implement a range of proactive, risk-based inspection strategies that maximise deterrence and detection	Manager, IRU		<input checked="" type="checkbox"/>			Base Funding
	Enhance veterinary care of and attention to animals while racing	Director Animal Welfare and Veterinary Services		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	CBRC Submission
	Proactive monitoring of animal welfare complaints to ensure appropriate and timely closure and referral	Director Animal Welfare and Veterinary Services	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Base Funding
	Implement a Customer Relationship Management (CRM) tool or similar capability to enhance customer identification, provide a centralised repository, and reduce duplication and inefficiencies.	Director Stewarding, Licensing and Registration			<input checked="" type="checkbox"/>		Base Funding
	Enhance capability in judicial process and prosecution of rule breaches	Director, Office of the Commissioner	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			Base Funding

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Appendix 3: RSPCA Policy G1 Humane Killing

RSPCA Policy G1 Humane killing

1.1	RSPCA Australia advocates for the humane treatment of all animals at every stage of their life, from birth through to death.
1.2	RSPCA Australia defines humane killing as when an animal is either killed instantly or rendered insensible until death ensues, without pain, suffering or distress.
1.3	Humane killing must employ methods that: <ul style="list-style-type: none">◦ ensure that any handling, transport and/or restraint of the animal is carried out in a manner that avoids pain, suffering or distress, including to other animals◦ are reliable◦ use equipment that is in good working order◦ are carried out by a competent operator◦ ensure death is confirmed.
1.4	RSPCA Australia is opposed to all inhumane methods of killing.

(adopted 28/03/2018)

See also

[Position Paper G3 Welfare of animals at abattoirs](#)

Also Read

 [Are there animal welfare advantages to on-farm mobile slaughtering units or micro-abattoirs?](#)

 [How can fish caught in commercial fishing be killed humanely?](#)

Appendix 4: Form R25A/Notification of Deregistration or Death of Standardbred



V7-102017

FORM R25A / NOTIFICATION OF DEREGISTRATION OR DEATH OF A STANDARDBRED

Horse Name	Suffix / COB.	Sex
<input type="text"/>	<input type="text"/>	<input type="text"/>
Sire	Freezebrand	Foal Date
<input type="text"/>	<input type="text"/>	<input type="text"/>
Dam	Microchip Number (if relevant)	
<input type="text"/>	<input type="text"/>	

DEREGISTRATION (Please select one option from each section).

Deregistered to: <input type="checkbox"/> a. Equestrian / pleasure / working / companion horse / kept by owner <input type="checkbox"/> b. Breeding purposes (deregistered from racing) <input type="checkbox"/> c. Industry retirement program <input type="checkbox"/> d. Sent to livestock sale	Reason for Deregistration <input type="checkbox"/> a. Injury while training <input type="checkbox"/> c. Racing Injury <input type="checkbox"/> e. Owner's request / decision <input type="checkbox"/> g. Decision to breed (for deregistered option "b" only) <input type="checkbox"/> h. Other <input type="text"/>	<input type="checkbox"/> b. Paddock Injury <input type="checkbox"/> d. Illness <input type="checkbox"/> f. Decision to cease breeding
Date Retired/Deregistered <input type="text"/>		
At the time of deregistration horse was: <input type="checkbox"/> Racing <input type="checkbox"/> Training <input type="checkbox"/> Spelling <input type="checkbox"/> Breeding		

OR

DEATH (Please select one option from each section).

Deceased <input type="checkbox"/> a. Died (natural causes) <input type="checkbox"/> b. Euthanised <input type="checkbox"/> c. Sent to abattoir	Cause of Death <input type="checkbox"/> a. Injury while training <input type="checkbox"/> c. Racing Injury <input type="checkbox"/> e. Owner's request <input type="checkbox"/> f. Other <input type="text"/>	<input type="checkbox"/> b. Paddock Injury <input type="checkbox"/> d. Illness
Date of Death <input type="text"/>		
At the time of death horse was: <input type="checkbox"/> Racing <input type="checkbox"/> Training <input type="checkbox"/> Spelling <input type="checkbox"/> Breeding		

MANAGING OWNER / TRAINER DETAILS:

Title	First Name	Last Name
<input type="text"/>	<input type="text"/>	<input type="text"/>
Address <input type="text"/>		
Town/City	State	Postcode
<input type="text"/>	<input type="text"/>	<input type="text"/>
Country		
<input type="text"/>		
Phone Number	Email	
<input type="text"/>	<input type="text"/>	

AUTHORITY TO DEREGISTER / NOTIFY DEATH - THIS FORM WILL NOT BE PROCESSED UNLESS IT IS CORRECTLY COMPLETED & SIGNED.

I hereby confirm that I am the managing owner or trainer with authority of the above named horse and am authorised to make the above declarations under the provisions noted in rule 96A of the Australian Harness Racing Rules.

- I am the Managing Owner or
 I am the Trainer

Date of Notification

Signature

Print Name

Completion of this form does not in any way alter the horse's status in the stud book.

PLEASE LODGE THIS FORM WITH THE REGISTRATION DEPARTMENT AT YOUR STATE CONTROLLING BODY

Form R25A - Notification of Deregistration / Death - refer to Rules 96A and 96B of the Australian Harness Racing Rules at www.harness.org.au/rules



Appendix 5: Queensland Racing Integrity Commission Intelligence Capability Strategy



QUEENSLAND RACING
INTEGRITY COMMISSION



Queensland
Government

Intelligence Capability Strategy

Prepared by: Queensland Racing Integrity Commission (QRIC)

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August 2017

Foreword

The Queensland Greyhound Racing Industry Commission of Inquiry final report (the MacSporran Report) identified a number of significant risks and issues within the Queensland racing industry, specifically regarding animal welfare and industry integrity.

It outlined that poor intelligence practices within the Queensland racing industry created significant barriers to detecting and responding to the already identified and emerging threats and issues in the Queensland racing industry.

The MacSporran Report indicated the development of an operational intelligence capability as best practice would support the QRIC's requirement to gather and analyse information on activities that threaten the racing industry. The proposed intelligence capability will be central to the QRIC's Compliance and Enforcement Strategy and Framework. The QRIC Intelligence Strategy will be the framework that supports the development and implementation of our intelligence capability.

Our people, processes and products will be fundamental to the success of QRIC's Intelligence Strategy. Specifically, our people taking the opportunity to report and share information through appropriate processes to ensure we provide a true picture of racing in Queensland. As a result, the early identification of emerging issues and drivers will underpin our resource and allocation decisions at the strategic level.

This journey is important not just from an organisational perspective, but for the entire Queensland racing industry. Recent national media attention and the findings from the MacSporran Report have demonstrated that the Queensland community will not accept a racing industry that puts commercial interests above animal welfare and industry integrity. Industry sustainability is therefore intrinsically linked to these factors, and an intelligence-led approach will not only assist in building a more ethical and safe industry, it will create strategies and options for longer-term industry sustainability.

Ross Barnett APM

Racing Integrity Commissioner

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Purpose

Intelligence supports informed decision-making to improve organisational planning and prioritised deployment of resources. Improved planning and resource allocation will achieve maximum possible reduction in serious harm and risk to the integrity of the Queensland racing industry, which is essential to its long-term sustainability.

The Intelligence Capability Strategy supports the QRIC Compliance and Enforcement Strategy and Framework (see **Attachment 1**). It will support the compliance lifecycle (“*Engage, Deter, Detect, Respond*”), where intelligence-led enforcement and capability will maximise the impact of our detection and response activities.

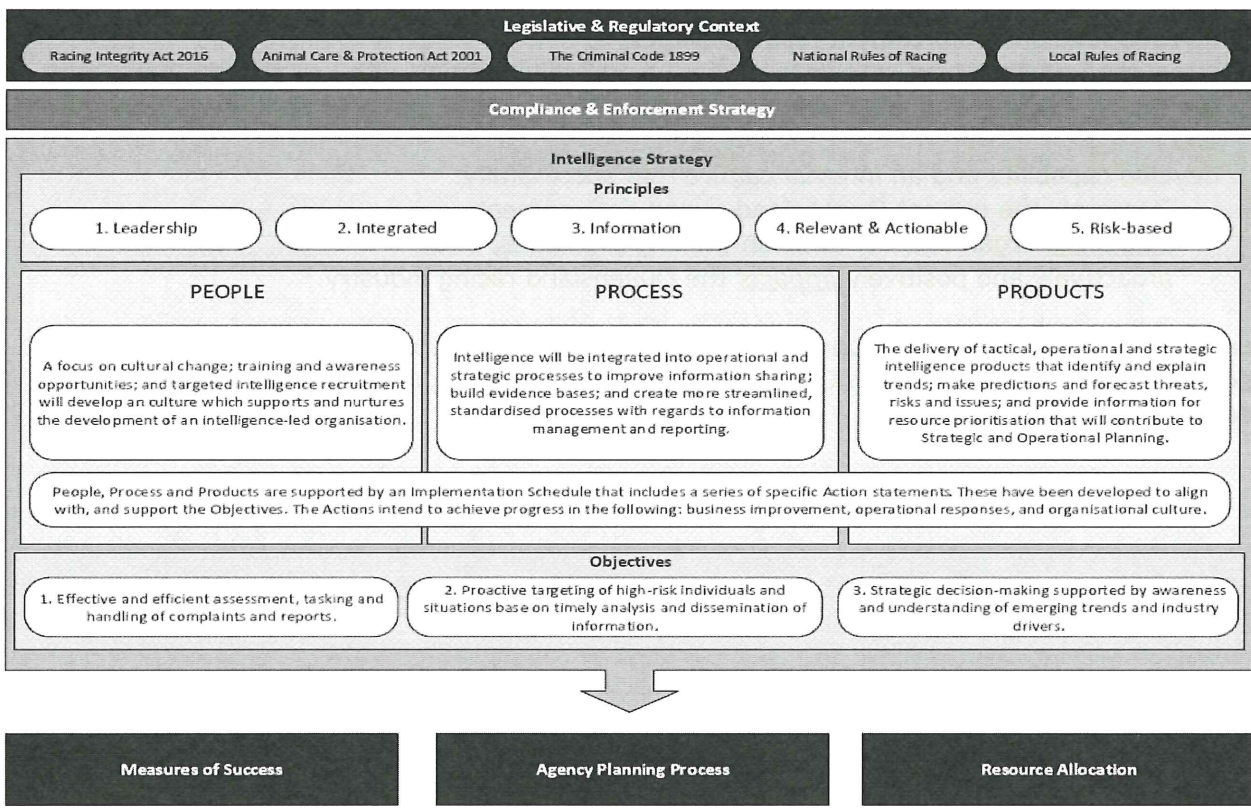
The development and implementation of an Intelligence Strategy will:

- assist the Queensland Racing Integrity Commission (QRIC) in meeting its legislated investigative and enforcement responsibilities;
- strengthen partnerships, intelligence sharing and collaboration with key stakeholders from the racing industry and law enforcement agencies at a state, national and international level; and
- develop capability and an internal culture that successfully:
 - *interprets* the current Queensland racing environment;
 - *influences* organisational decision-making processes; and
 - proactively and positively *impacts* the Queensland racing industry.¹

Implementing an intelligence-led approach will also inform and support QRIC engagement in strategic policy agendas within both Queensland and national racing industries, as well as at a broader law enforcement capacity.

¹ NB: The 3i model (interpret, influence and impact) was originally developed by Jerry Ratcliffe, as noted in: Ratcliffe, J. (2008). *Intelligence-Led Policing*. Cullompton, Devon, Willan Publishing.

The QRIC Intelligence Framework



Principles

Principle	Rationale	Implementation
<p>Leadership QRIC leaders understand and support a culture that champions and effectively implements intelligence-led tactical, operational and strategic processes and decision-making.</p>	<p>QRIC is transitioning into an intelligence-led agency and leaders will need to support and lead this cultural change through formal (governance, process) and informal (networking, ad hoc conversations) interventions. Best practice often recommends senior executives lead cultural change.</p>	<ul style="list-style-type: none"> - Intelligence products incorporated into management meetings at all levels. - Awareness/cultural change programs undertaken by all employees. - Strategic Intelligence Products accessible to all employees.
<p>Integrated Intelligence is at the hub of QRIC operational and strategic activities, provides direct support to decision-makers at all levels of the organisation and is reliable and valid.</p>	<p>Integrating intelligence into existing processes will ensure:</p> <ul style="list-style-type: none"> - Ability for intelligence officers to have exposure to valuable racing subject matter expertise; - Improve information management and sharing opportunities; - An appropriate evidence-base is built around identified trends and issues; and - Creation of more streamlined, standardised processes concerning information management and reporting. 	<ul style="list-style-type: none"> - An organisational structure that places intelligence capability within operational and strategic units. - Policies, procedures and agreements to ensure that information is shared/reported appropriately. - Intelligence training and/or awareness sessions. - Intelligence Analysts contribute to investigation plans and the QRIC Strategic and Operational Plans. - A case management system with intelligence capability.
<p>Information Information sharing and management is critical to the QRIC developing intelligence products that effectively identify high-risk individuals and situations within Queensland racing.</p>	<p>The QRIC intelligence capability will rely significantly on information shared via out people (i.e. operational units); partnerships (i.e. stakeholders); processes (i.e. complaints, information submissions); and systems (i.e. ICT).</p>	<ul style="list-style-type: none"> - Development of an Intelligence and Case Management System (ICMS) to store and manage information. - Develop an internal culture which shares information that can be used for intelligence purposes. - Development of information sharing agreements with other jurisdictions and agencies which support our investigative and intelligence objectives. - A QRIC Information Management Policy Framework which outlines agency requirements regarding the recording, storage and release information.
<p>Relevant and Actionable Intelligence is timely; supporting QRIC’s organisational objectives, and providing realistic and achievable strategies and recommendations in response to identified</p>	<p>Intelligence should:</p> <ul style="list-style-type: none"> - Be inherently actionable by enabling decisions; - Identify and explain trends and patterns; - Make predictions and forecast potential threats, risks and issues; and 	<ul style="list-style-type: none"> - An Intelligence Style Guide, including a proof of concept for tactical, operational and strategic products. - A Dissemination plan, so products reach the appropriate audience and seek feedback.

IN CONFIDENCE

<p>current and potential threats, risks and issues.</p>	<p>- Recommend priorities for focus.</p>	
<p>Risk-based Intelligence will empower QRIC management to make targeted resource and allocation decisions, based on known threats and risks to the organisation.</p>	<p>Part of an intelligence process is an appropriate methodology for prioritising issues. Intelligence capability will therefore enhance risk-based decision-making through analysis and products provided.</p>	<ul style="list-style-type: none">- Development of threat/risk identification (issue prioritisation) model as part of strategic intelligence product proof of concept.- Strategic intelligence products delivered to support Queensland Government agency planning requirements.- A case management system with intelligence capability.- Appropriate information management guidelines, policies and procedures in place.- Intelligence products incorporated into all management meetings.

Intelligence Threats and Opportunities

The formation of the QRIC alone will not immediately fix the racing industry. For example, the MacSporran Report indicated that many individuals had witnessed inhumane and unethical behaviour in Greyhounds, but due to a lack of evidence, these claims could not be responded to.² Further, failure to prosecute historical cases involving the use of illicit substances in Thoroughbreds³ and issues with race-fixing in Harness races⁴ identified that prior to the inception of the QRIC and the formation of the *Racing Integrity Act 2016*, sufficient processes were not in place to build acceptable evidence bases and investigate poor behaviour across all codes of racing.

The MacSporran Report summarised the issue when it identified that the inability to detect and respond to emerging risks and issues stemmed from poor intelligence gathering and analysis, commercial disincentive, inadequate environmental scanning, and poor execution of compliance strategies under the previous structure.⁵

Therefore, the opportunity for the QRIC is in how it manages its strategic and operational responses. Critical to this is the implementation of an intelligence program that allows the QRIC to collect information, turn it into intelligence, and create evidence bases to ensure that the QRIC is able to detect and respond to identified serious issues within each code. An effective intelligence program would prioritise resources and work towards developing a robust evidence base against high-risk individuals and situations.

Becoming intelligence-led will take time; however, as intelligence embeds itself within the QRIC, there will be benefits such as increased detection capabilities and subsequent increased deterrent effects. This, in turn, will have a trickle-down effect on increasing public confidence in the integrity of the racing industry, as well as empowering participants within the industry to share information with the QRIC where necessary.

Attachment 2 outlines the strategic intelligence opportunities and threats that underpin the focus of the QRIC Intelligence Strategy.

² MacSporran, A. (2015). *Queensland Greyhound Racing Industry Commission of Inquiry*. Queensland Government: Brisbane.

³ Queensland Racing Integrity Commission. (2017). Positive Swab Cases Withdrawn. *Media Release 18 August 2017*. Queensland Government: Brisbane.

⁴ Queensland Racing Integrity Commission. (2017). License of race fixing accused suspended. *Media Release 11 April 2017*; and Execution of search warrants and arrest – Race fixing investigation. *Media Release 7 April 2017*. Queensland Government: Brisbane.

⁵ MacSporran, A. (2015). *Queensland Greyhound Racing Industry Commission of Inquiry*. Queensland Government: Brisbane.

Intelligence Objectives

Objective 1

Effective and efficient assessment, tasking and handling of complaints and reports.

Priority Activities:

- Establish a formal information triage capability that records, assesses and assigns complaints/request based on pre-defined criteria.
- Introduce a formal case management approach.

Objective 2

Proactive targeting of high-risk individuals and situations based on timely analysis and dissemination of information.

Priority Activities:

- Develop a tactical intelligence management capability.
- Nurture awareness and understanding across QRIC of the role of intelligence in investigation and resource management.

Objective 3

Strategic decision-making supported by awareness and understanding of emerging trends and industry drivers.

Priority Activities:

- Establish a strategic intelligence/environmental scanning capability.

Measures of Success

Progress towards the strategic objectives of the Intelligence Strategy, and overall outcomes of the Compliance and Enforcement Strategy and Framework, will be measured by:

- Implementation of an intelligence and case management system;
- Number of intelligence submissions made;
- Number of investigations triggered by intelligence submissions; and
- Number of intelligence disseminations to external agencies.

People

A focus on cultural change, training opportunities and targeted recruitment will develop an internal culture that supports and nurtures the development of an intelligence-led organisation.

Cultural Change

Organisational culture is defined as the shared assumptions, beliefs and values which governs how people behave in organisations.

Cultural change is less observable and less measurable than most organisational developments (i.e. legislative reform).⁶ However, it is considered the single most important factor for success or failure in an organisation.⁷

⁶ Cardillo, R. (2010). A Cultural Evolution. *Studies in Intelligence*, vol. 54 (3), September 2010. Sourced online from: Central Intelligence Agency Library.

⁷ Deal, T and Kennedy, A. (2000). *Corporate Cultures: The Rites and Rituals of Corporate Life*.

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According to best practice, for the successful embedding of intelligence into an organisation, cultural change must come from the 'top down'. That is, executive leaders must encourage change for it to be effective.

Therefore, central to the success of the Intelligence Strategy are a number of cultural change activities that have been developed as part of the Communications Plan. The Plan seeks to promote and develop an internal culture that supports and nurtures the development of an intelligence-led organisation.

As part of the Plan, specific communication activities and strategies have been developed for QRIC leaders to influence and impact change; performance management, training, and targeted intelligence recruitment.

Training

Regular employee training ensures the agency sets and maintains analytic standards that ensures the QRIC's intelligence capability achieves similar objectives and competencies to support tactical and strategic operations effectively.⁸

Training also fosters feelings of security and reduces feelings of resistance, anxiety and instability.⁹ Therefore, as part of the Communications Plan, a training program will be offered, which considers following:

- Recognised intelligence training to individuals identified as working in defined intelligence roles, as well as those in investigative roles and some stewards as part of agency succession planning; and
- Information awareness sessions that share the value proposition of intelligence to operational employees.

Recruitment

Targeted Recruitment

Any expansion in intelligence capability will be targeted. Specifically, it will be expected that those in intelligence officer positions should have formal intelligence training, including either intelligence-specific tertiary qualifications, or a prior suitable qualification that places emphasis on research, writing and critical thinking.

As part of the focus on agency cultural change, during recruitment specific skillsets for intelligence officers will be sought: professionalism/liaison, judgement, flexibility/adaptability, capacity to learn, initiative/motivation, organising, planning and prioritising, knowledge of current events and coaching skills.¹⁰

Pre-employment screening

Due to the nature of the position, pre-employment screening for intelligence officers will include a criminal history check. The *Public Service Act 2008* refers to agency requirements for criminal history checks.

Further probity checks may need to be conducted, in relation to requirements of the QRIC (i.e. FTEs not placing bets during the entirety of their employment, etc.).

Process

Intelligence will be integrated into QRIC operational and strategic processes to improve information sharing, build evidence bases, and create more streamlined, standardised processes for information management and reporting.

⁸ International Association of Law Enforcement Intelligence Analysts. (2012). Law Enforcement Analytic Standards. *Global Justice Information Sharing Initiative*. United States Department of Justice: Washington.

⁹ Hamrah, S. (2013). The Role of Culture in Intelligence Reform. *Journal of Strategic Security*, vol. 6 (5), Fall 2013.

¹⁰ Federal Bureau of Investigations. (2000). Career Path Standards. United States Government.

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Governance

Effective governance frameworks and processes around QRIC intelligence capability will achieve intelligence objectives, maintain oversight of capability and capacity and support QRIC's vision to become intelligence-led.

Intelligence governance will be function as a two-tiered process:

- Operational Governance: Process and prioritisation for the management of tactical and operational intelligence; and
- Strategic Governance: Provision of high-level direction based on strategic products to influence and inform the agency planning process.

Attachment 3 provides a visual overview of the QRIC Intelligence reporting arrangements.

Operational Governance

Operational governance will enable the QRIC to deliver effective and targeted tactical and operational intelligence, including:

- Aligning operational work areas (i.e. intelligence, investigations, stewards, etc.) to improve overall situational awareness and decision-making;
- Advising QRIC senior management of trends, risks, and issues;
- Ensuring quality tactical and operational intelligence products are delivered to support agency planning and resource and allocation requirements; and
- Maintaining standards and processes for tactical and operational intelligence.

Tactical intelligence supports frontline, operational activities. Objectives of tactical intelligence may include successful enforcement activity such as surveillance operations, targeting, evidence-gathering, problem solving and disruption of the immediate environment (criminal and/or other).¹¹

Operational intelligence "... supports planning crime reduction activity and deploying local resources to achieve operational objectives. It is used against offending hotspots, joint operations, prevention campaigns, forming of specialised squads, resource allocation and local prioritisation."¹²

Internal Animal Welfare Committee

An internal meeting, involving a number of QRIC units, is held monthly to discuss internal animal welfare concerns. The meeting ensures that each unit maintains visibility of issues, has an opportunity to share ideas and seek advice and has access to a medium to escalate more serious issues to the Racing Animal Welfare Committee.

The Internal Animal Welfare Committee is currently comprised of the following members:

- Director Stewarding, Licensing and Registration;
- Director Veterinary Services and Animal Welfare;
- Manager Integrity Regulation Unit;
- Manager Veterinary Services Unit;
- Stipendiary Steward, Integrity Regulation;
- Principal Policy Officer, Office of the Commissioner;
- Officer in Charge, Racing Crime Squad;
- Senior Business Analyst, Office of the Commissioner;
- GAP Officer, Veterinary Services and Animal Welfare; and
- Veterinary Officer, Veterinary Services and Animal Welfare.

It is recommended that both tactical and strategic intelligence capability are invited to attend meetings to gain further exposure to information and issues.

The Internal Animal Welfare Committee is a suitable forum to assist the tasking and coordination of the tactical and strategic intelligence effort, including identification of problem places and cases.

¹¹ Organised and Financial Crime Agency New Zealand. (2008). *Improving the safety and security of New Zealand through inter-agency partnerships*. Tasking Framework (Organised Crime). New Zealand Government.

¹² Ibid.

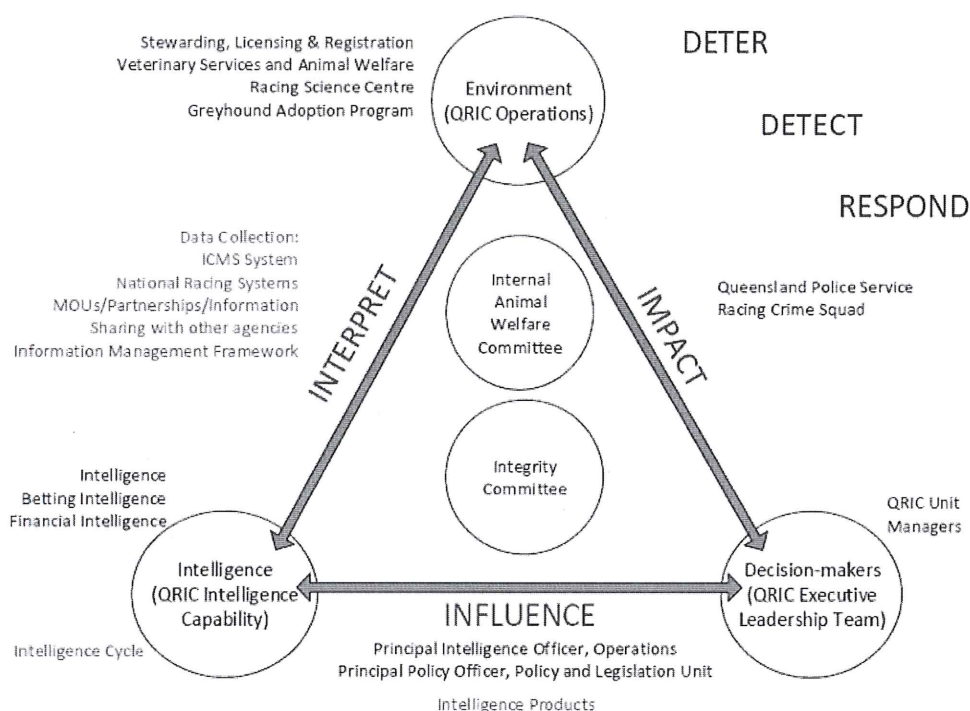
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Figure 1, below, provides an outline of the proposed way in which intelligence will embed itself into the QRIC. Within this model, relevant units compile their trends and issues and proceed to submit them to the Internal Animal Welfare Committee and the Integrity Committee. Intelligence Officers will also be expected to proactively approach, and work with, specialist units. Issues raised through these methods will be prioritised based on their threat and risk to the QRIC, and intelligence resources will be coordinated to respond accordingly.

Under this model, the Principal Intelligence Officer leads decision-making for the following:

- Trends, issues and intelligence submissions that should be explored/prioritised/escalated through the Internal Animal Welfare Committee;
- Oversight of operational and tactical priorities for the Intelligence Officers; and
- Advise on operational and tactical intelligence priorities at the strategic governance level.

Figure 1: Proposed model for QRIC Operational and Strategic Intelligence process



Strategic Governance

Strategic governance will be a key enabler for the QRIC to ensure that risks and issues discovered at the tactical and operational level are escalated appropriately to the executive level, to inform organisational policy, planning and resource and allocation priorities.

*It "... aims to provide insight or understanding, and makes a contribution to broad strategies, policies, and resources. It is directed to the achievement of long-term organisational objectives ... used to influence operations and planning at every level, long-term resource decisions, legislative demands and national and international cooperation."*¹³

Therefore, strategic intelligence processes should aim to achieve the following:

- Identify drivers which present a significant risk to organisational services and strategic priorities;
- Provide the Executive Leadership Team with situational awareness of the racing industry at a state, national and international level; and

¹³ Organised and Financial Crime Agency New Zealand. (2008). *Improving the safety and security of New Zealand through inter-agency partnerships*. Tasking Framework (Organised Crime). New Zealand Government.

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- The prediction of future trends and the potential impact on agency services and strategic priorities.

The Integrity Committee

Strategic intelligence decisions and products will be formally escalated through the QRIC Integrity Committee (IC).

The IC is the strategic governing body for intelligence in the Queensland racing industry, as part of its responsibilities for upholding the integrity of racing by overseeing strategic racing integrity issues.

One of the IC's key roles is to review intelligence collection and investigation strategies and practices. Due to its exposure to a range of trends, issues and risks through its required functions, the submission of intelligence analysis and products will allow the IC to make relevant, risk-based recommendations to the Racing Integrity Commissioner.

To support the QRIC Intelligence Strategy, the IC will have responsibility for:

- Review and approve operational intelligence strategies and operational plans outlining collection and reporting priorities (as outlined in Operational Governance);
- When deemed necessary, escalation of intelligence analysis and products to the Executive Leadership Team submitted via the Intelligence and Investigations Unit; and
- Provide feedback and/or consult on strategic intelligence products, as part of the agency planning process.

The Principal Intelligence Officer, via the Internal Animal Welfare Committee (outlined in Operational Governance) will be responsible for escalating trends, issues and operational intelligence products (i.e. assessments) to the IC for strategic consideration via the Deputy Commissioner.

A Principal Policy Officer, Policy and Legislation Unit, Officer of the Commissioner, will have responsibility for drafting and producing strategic intelligence products. Key reporting responsibilities include:

- Input to strategic and operational planning activities, that ensures the QRIC is future-focused and responsive to wider industry, government and law enforcement trends;
- An evidence base for operational policy making;
- An ability to contribute to inter-agency discussions and forums on sporting integrity, government regulation and law-enforcement and compliance; and
- Stronger relationships with external stakeholders (i.e. racing bodies, other racing integrity bodies and law enforcement and prosecuting agencies).

A Risk-Based Approach

Underpinning operational and strategic intelligence governance processes and a key principle of the Intelligence Strategy is the requirement for officers to make risk-based decisions as they prioritise, escalate, report or allocate resources to respond to identified tactical, operational and strategic threats to the QRIC.

Risk-based decision-making allows an agency to have increased confidence in their ability to manage threats to an acceptable degree, deliver required services and make informed decisions about opportunities and challenges faced.¹⁴

This approach will also assist the QRIC in establishing and maintaining appropriate risk management systems. This is a requirement under the *Financial Accountability Act 2009*. Specifically, incorporating risk-based decision-making as part of the intelligence process will support strategic planning, strategic management and the everyday activities of the QRIC.

¹⁴ Queensland Treasury. (2011). *A Guide to Risk Management*. Queensland Government, Brisbane.

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Risk Management

Through the Operational and Strategic Governance processes, respective officers should undertake a risk management process to determine severity, impact, priority and treatment options of identified threats and issues.

Risk-based decision-making for intelligence should be utilised in appropriate committees and working groups, as well as in products produced for the QRIC.

The recommended process for the Queensland Government outlined in *A Guide to Risk Management* by Queensland Treasury has been utilised as an appropriate framework in this process.

Information Management

One of the most significant aspects of intelligence is knowledge management. As such, the development and implementation of automated processes, enterprise architecture and organisational culture enables the management of information, data and knowledge that complements human analysis and decision-making.¹⁵

Intelligence information management will be supported by the development of an Information Management Policy Framework. Recommended best practice is that the framework will be structured around on the following domains:

- Information Governance;
- Information Asset Management;
- Information Asset Use and Access Management;
- Recordkeeping;
- Knowledge Management;
- Data Management; and
- Information Security.¹⁶

Information Security

Under the Queensland Government's existing Information Security Standard (IS18), the three elements of information security are:

- Confidentiality: ensuring that information is accessible only to authorised persons;
- Integrity: protecting the accuracy and completeness of information and process methods; and
- Availability: ensuring that authorised persons have access to information and relevant assets when required.

The above three elements naturally align with the intelligence process: "getting the right knowledge to the right people at the right time".¹⁷

Significant emphasis will be placed on 'Information Security Culture'. Positive information security culture builds emphasis on increasing internal and external trust, consistent compliant and positive behaviour towards the protection of QRIC information, and productive engagement with risk (i.e. "risk is not a bad thing; risk we don't know about is a bad thing").

Intelligence and Case Management System

The Intelligence and Case Management System (ICMS) will be the QRIC's single source of truth for all racing integrity and animal welfare related matters within the Queensland racing industry.

Specifically, the ICMS will:

- Store all complaints that come to the QRIC's attention, including outcomes;
- Store data pertaining to entity management (i.e. registration details of people and animals); inspections; samples and other business-related information; and

¹⁵ Waltz, E. (2003). *Knowledge Management in the Intelligence Enterprise*. Norwood, MA: Artech House, INC.

¹⁶ Queensland Government Chief Information Office. (2009). *Queensland Government Information Management Policy Framework*. Queensland Government, Brisbane.

¹⁷ Waltz, E. (2003). *Knowledge Management in the Intelligence Enterprise*. Norwood, MA: Artech House, INC.

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- Track all aspects of cases, which will create a Brief of Evidence to present to court or tribunal.

Within the QRIC, intelligence will come from a number of sources, including (but not limited to) human intelligence, race day reporting, and surveillance activities. An appropriate process framework will be developed providing an outline for the retrieval, processing, storage and reporting of intelligence information.

Data stored in the ICMS is classed as raw data. This means that the data has not yet been subjected to the intelligence process and is not intelligence on its own. It is the expectation that Intelligence Officers will evaluate this data, and assess its reliability and accuracy to generate potential hypotheses to be proven or disproven by further investigation and/or analysis.

Products

Key to the Intelligence Strategy is the creation and delivery of intelligence products that identify and explain trends; assist in operational planning processes; make predictions and forecast threats, risks and issues; and make recommendations for prioritisation of resources will be central to QRIC Strategic and Operational Planning processes.

Intelligence Methodologies

To ensure that intelligence products are delivered to be of high quality and consistency, the QRIC has adapted known, accepted methodologies in the creation of products. This includes:

- The Intelligence Cycle: Internationally accepted cyclical process to ensure intelligence products meet substantive criteria to ensure evidence-based outcomes; and
- The National Intelligence Model (NIM): originally developed by the National Criminal Intelligence Service, Her Majesty's Government, the NIM is an internationally recognised approach for gathering, co-ordinating and disseminating intelligence. It is also well known for being a good business and decision-making model.

A QRIC Intelligence Style Guide will outline how employees are to approach each stage of the intelligence product development process.

Tactical, Operational & Strategic Products

There are three different types of intelligence products to be produced by QRIC intelligence officers:

- Tactical: these products support frontline areas, investigations and other operational areas in taking case-specific action to achieve QRIC's integrity and enforcement objectives. For example: surveillance, targeting, evidence-gathering and immediate disruption of a specific 'undesired' (e.g. illegal) environment.¹⁸
- Operational: These products will support corruption reduction activities linked to animal welfare standards and integrity in the racing industry, and deploying frontline resources to achieve operational objectives. Operational products are to be used in joint operations; prevention campaigns; and resource allocation and prioritisation.¹⁹
- Strategic: Products that provide insight/understanding and contribute to broader strategies, policies, and resources. Strategic products influence operations and planning at every level, help make long-term resource decisions, and other stakeholder liaison.²⁰

¹⁸ Organised and Financial Crime Agency New Zealand. (2008). *Improving the safety and security of New Zealand through inter-agency partnerships*. Tasking Framework (Organised Crime). New Zealand Government.

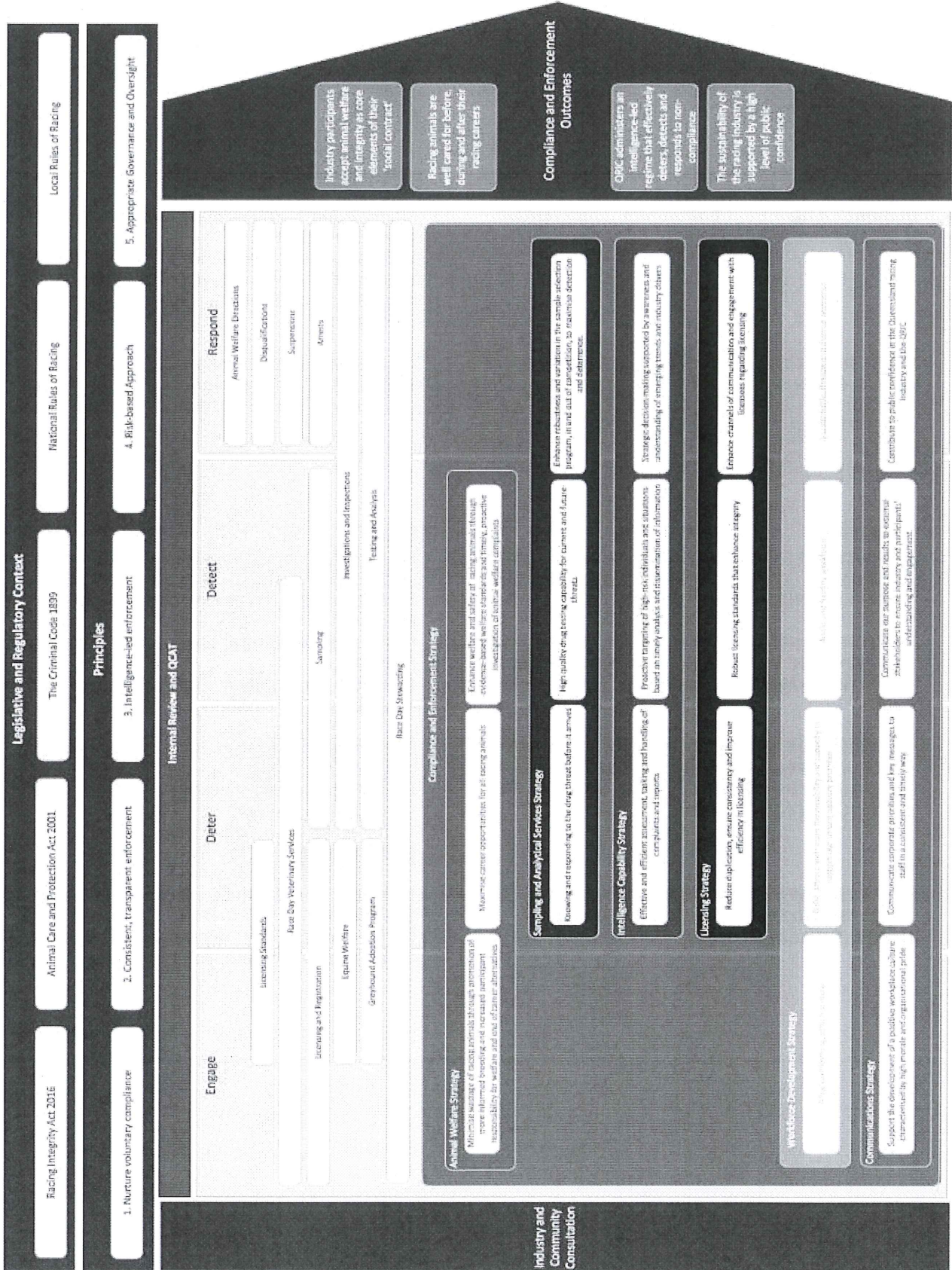
¹⁹ Ibid.

²⁰ Ibid.

Attachments

Attachment 1 – QRIC Compliance and Enforcement Framework

QRIC Compliance and Enforcement Framework v1.03



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Attachment 2 – Intelligence Strategy Opportunities and Threats

OPPORTUNITY	IMPACT
<p>THE QUEENSLAND GOVERNMENT SUPPORTS THE RECOMMENDATIONS OF THE MACSPORRAN REVIEW, WHICH PROPOSED A STRATEGIC, INTELLIGENCE-DRIVEN APPROACH TO UNDERPIN FRAMEWORKS, FUNCTIONS AND ACTIVITIES IN THE QRIC.</p>	<ul style="list-style-type: none">• Support the overall compliance-based approach proposed for QRIC.• Greater awareness of current and future trends, risks and issues for the racing industry.• Increased public confidence in the racing industry.
<p>INCREASE IN INTELLIGENCE CAPABILITY AND CAPACITY WILL BUILD ON THE EXISTING GOOD WORK BY THE CURRENT QUEENSLAND POLICE SERVICE TASKFORCE.</p>	<ul style="list-style-type: none">• Increased deterrent effect due to successful enforcement and investigation outcomes.• Increased detection capability for illegal, integrity and animal welfare-related issues in the racing industry.• Increased public confidence in racing industry.• Increase empowerment within the racing industry to act as whistle-blowers where necessary.
<p>THE CREATION, AND STRENGTHENING, OF RELATIONSHIPS WITH OTHER RACING INTEGRITY BODIES AS WELL AS LAW ENFORCEMENT AGENCIES' INTELLIGENCE UNITS.</p>	<ul style="list-style-type: none">• Improved information sharing.• Greater situational awareness of national and international trends in the racing industry.
THREAT	IMPACT
<p>IMPORTANT CAPABILITY GAPS THAT PREVENT QRIC FROM TAKING AN INTELLIGENCE-LED APPROACH</p>	<ul style="list-style-type: none">• Failure to recognise valuable intelligence and use it to prevent harm• Inability to quality assure our own policies and processes• Resistance to cultural change and engagement activities.• Inability to embed intelligence into the organisation successfully.
<p>TRANSITIONING TO AN INTELLIGENCE-LED AGENCY, ON TOP OF EXISTING MACHINERY-OF-GOVERNMENT CHANGES, WILL TAKE TIME.</p>	<ul style="list-style-type: none">• Unauthorised access of confidential racing industry intelligence.• Inability to protect investigations from potential leaks to the industry.• Inability to store data appropriately to build evidence briefs.
<p>INEFFECTIVE ICT SYSTEMS AND PROCESSES FOR DATA SECURITY, INCLUDING A LACK OF INFORMATION SECURITY CULTURE IN THE ORGANISATION.</p>	<ul style="list-style-type: none">• Inability to conduct appropriate resource prioritisation.• Failure to identify operational and strategic organisational threats, risks and issues.
<p>GAPS IN CAPABILITY AND CAPACTY TO ANALYSE DATA AND DRAW RESOURCE-BASED CONCLUSIONS.</p>	

Attachment 3 – QRIC Intelligence Governance Structure

