



Regulatory Approach

October 2025



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"Greyhound Racing Victoria (GRV) is committed to the health and wellbeing of our greyhounds and ensuring the integrity of greyhound racing in Victoria.

Building a strong culture of voluntary compliance across the greyhound racing industry is core to our approach."



Foreword

Greyhound Racing Victoria (GRV) is pleased to publish our Regulatory Approach. Thank you to all those who play a part within GRV and across the industry in delivering on this approach.

It continues to guide our decision making when identifying and directing effort to managing existing and emerging risks. I am pleased to note that it transparently demonstrates a continued commitment to registered participants and the wider community to regulate in a proportionate way. However, we all need to keep moving forward and embrace change because continual improvement is critical to success of the greyhound industry into the future.

Greyhound racing is a community activity where the majority of registered persons not only comply with the regulatory structure but also strive to achieve best practice in how they comply.

Voluntary compliance is what we all strive for. However, we all need to keep moving forward and continual improvement is critical to the success of the industry into the future.

I am confident that registered participants will continue to adopt the regulatory approach and work with GRV to achieve the best outcomes possible.

Tom Salom

Chair, Greyhound Racing Victoria



GRV is responsible for controlling and promoting greyhound racing with animal welfare and integrity at its core. A successful and thriving industry takes many forms including having in place a robust, agile and proportionate regulatory regime that gives registered persons and the wider community confidence that the industry is fair, transparent and accountable.

As a modern regulator, we take a risk-based approach that focuses on building a strong culture of voluntary compliance. From birth to retirement and rehoming, this is based on registered persons fully understanding their responsibilities regarding the greyhounds they breed, own, train and race.



At the same time, we aim to ensure that registered persons are not disadvantaged by the few who choose to do the wrong thing and aims to be consistent in taking prompt and strong enforcement action against who don't comply with their obligations. We have a strong team in place to assist with this, both on and off the track – a team that is able to monitor and respond to new and emerging threats.

GRV is committed to supporting the greyhound racing community in continually improving practice. We will continue to work closely with registered persons and our other partners to achieve the best possible outcomes for the welfare of the dogs and the integrity of the industry while sharing our pride and passion for greyhound racing.

Stuart Laing

Chief Executive Officer, Greyhound Racing Victoria



1 GRV Overarching Approach

Greyhound Racing Victoria (GRV) is committed to the health and wellbeing of our greyhounds and ensuring the integrity of greyhound racing.

GRV regulates greyhound racing under the *Racing Act 1958*.

Our role is to control and promote greyhound racing in a way that meets its statutory functions and ensure that registered persons meet, or exceed, the requirements of rules, policies and other standards applicable to our industry.

GRV has a dedicated team of people who deliver on functions across race day and non-race day settings. In the welfare and integrity space, this includes expert intelligence and investigative capability as well as those with animal welfare, policy, legal and regulatory skills. We must also ensure that the industry operates in a setting that meets community and government expectations with a regulatory approach that is designed to maintain public confidence in the racing of greyhounds in Victoria for which betting is lawful. Importantly, this includes an environment where personal conduct is of the highest standards and people are safe and secure to operate in the greyhound racing space.

At the core of GRV's activities are achieving high standards of integrity and animal welfare. These standards apply not only to those already engaged in the industry, but also those coming into or re-entering the industry through the application of a fit and proper person registration framework that determine their suitability to participate.

GRV builds a strong culture of voluntary compliance across the industry with registered persons. This is not only required to actively adhere to their responsibilities for the greyhounds they breed, own, train and race, but also to continue improving their practices and operate to the highest welfare standards.

The regulatory framework utilises a range of regulatory tools including:

- GRV Rules of Racing including GRV Local Rules and Greyhound Australasia Rules (National Rules), Coursing Rules and Betting and Bookmakers Rules and the Code of Practice for the Keeping of Racing Greyhounds;
- Operating Policies and Procedures; and
- other legislation (such as the Prevention of Cruelty to Animals Act 1986 and Domestic Animals Act, 1994)

The overarching regulatory principles are embedded into its regulatory framework. These principles are that GRV:

- **IDENTIFIES AND MANAGES RISKS** that can affect our ability to meet our statutory obligations and positively promote the industry;
- **REGULATES ONLY AS MUCH AS NECESSARY** to protect the welfare of greyhounds and the integrity of the industry through the setting of standards underpinned by



- rules, policies and procedures;
- **MONITORS COMPLIANCE** in response to managing risks at an industry and individual level;
 - **DELIVERS ENFORCEMENT RESPONSES** that are proportional to any non-compliance;
 - **PROVIDES INFORMATION and EDUCATION** to ensure registered persons understand their responsibilities and are in the best position to comply voluntarily with their obligations.

The regulatory framework is aimed at ensuring GRV has a best practice approach (Figure 1). It delivers flexible, appropriate and proportionate enforcement strategies to deal with all levels of non-compliant behaviour, providing a high level of confidence to registered persons, the community and other stakeholders that non-compliance will not be tolerated.

Fundamental to delivering on the framework however is an approach based on all those involved in the industry conducting themselves in a respectful and appropriate manner.

Shane O'Connell

Executive General Manager – Integrity and Welfare

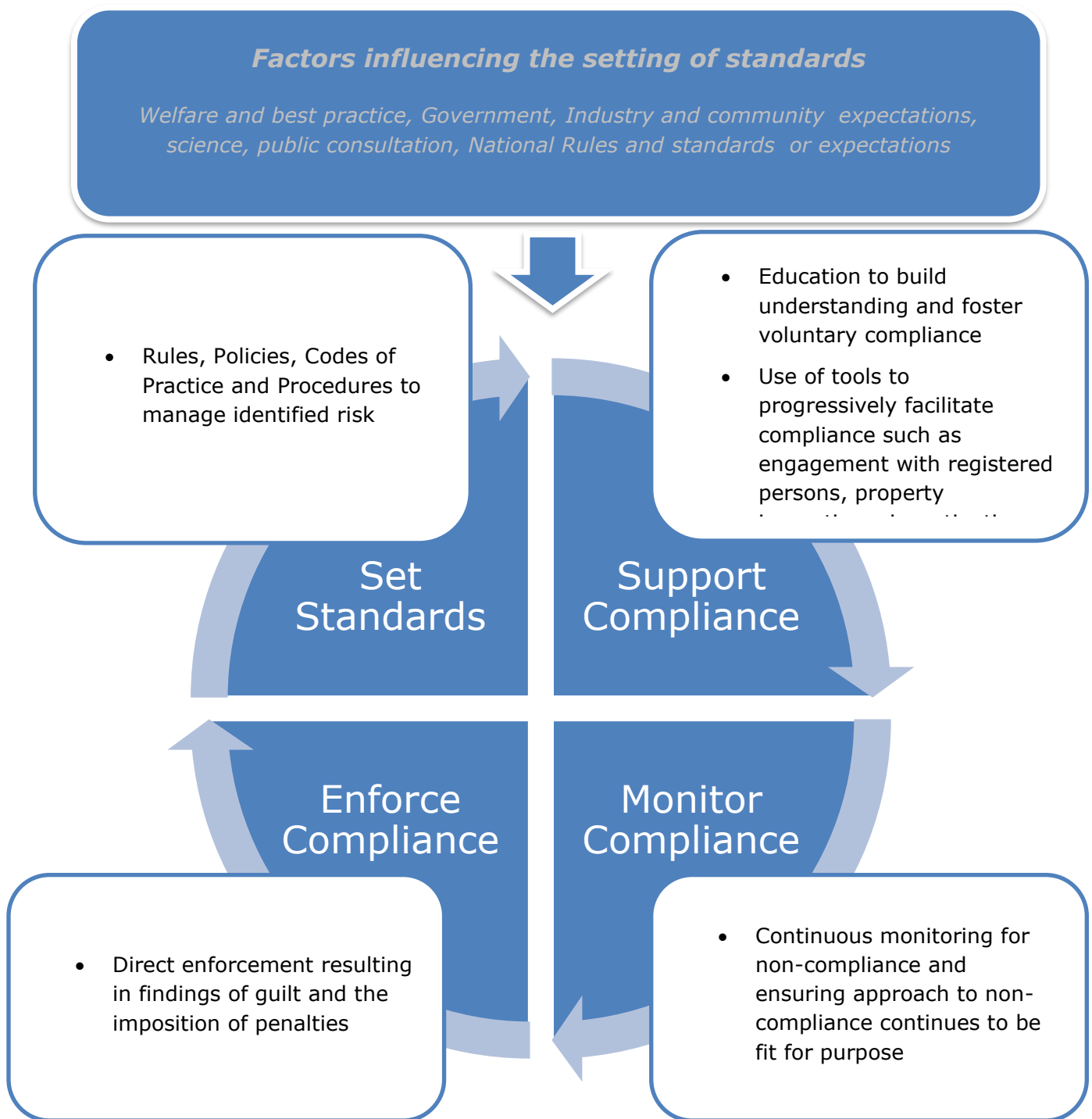
GRV's focus is on achieving and demonstrating positive regulatory and compliance outcomes through high levels of integrity and animal welfare, both on and off the track. This is at the heart of a sustainable and prosperous racing industry.

GRV seeks to provide a 'fit for purpose', agile and risk based regulatory system. The system is focused on ensuring only suitable people are registered and engaged in greyhound racing in Victoria and that voluntary compliance in meeting their obligations is achieved. At the same time, GRV ensures that this approach is underpinned by strong penalty-based enforcement where required.

We constantly seek to learn from other regulators and industry partners to inform best practice and improve information and intelligence sharing. This helps GRV to take a lead in our approaches to compliance and reporting, achieving transparency and consistency in enforcement and quality education and guidance for our racing community.



Figure 1: Factors influencing the setting of standards



GRV’s best practice approach is based on a commitment to a world class integrity and animal welfare capability to ensure the sustainability and growth of greyhound racing in Victoria. GRV’s regulatory approach will assist in responding to the Minister for Racing’s annual [Statement of Expectations](#) and is fundamental to delivering on [GRV’s Strategic Plan 2023-2027](#).



Our strategic priorities under the Strategic Plan 2023-2027 are designed to lead, develop and regulate a responsible and sustainable greyhound racing industry underpinned by evidence-based world leading approaches to animal welfare and integrity across all facets of the racing industry.

Consistent with best practice regulation, the approach undertaken by GRV in delivering on its Strategic Plan 2023-2027, is to:

- deliver a clear and responsive regulatory approach;
- translate strategy and priorities into workable, operational practice within GRV and across the industry; and
- provide support through leadership and transparency and collaboration to continually improve practice within GRV and across the industry.

2 Risk Management

GRV maintains and builds a strong information and intelligence base and with the assistance of a range of stakeholders, identifies and manages strategic and operational integrity risks and associated controls and tools.

Stakeholders contributing to this work include:

- other racing codes and greyhound controlling bodies within Australia, New Zealand and internationally;
- welfare bodies such as the RSPCA and the veterinary sector;
- rehoming groups;
- local government; and
- government agencies, regulators and other enforcement agencies such as Victoria Police.

Stakeholder engagement assists GRV to identify risks – both current and emerging – assess that risk and then decide how to manage and direct effort to the areas of greatest risk, applying relevant operational tools and controls. At the same time, regular monitoring of strategic and integrity risks allows GRV to adjust its strategies and activities to reflect the changing priorities that result from identifying new and evolving threats.

2.1 Fit and Proper Person Assessment

The Board applies a 'fit and proper' person test, which is a point in time determination of suitability to be or remain registered. This assessment includes all matters relevant to the category of registration, including consideration of character, reputation, honesty, integrity, criminal history and history related to animal welfare.



The fit and proper assessment is not a 'one size fits all' assessment of suitability. The Board will look at the personal circumstances of the person as an individual and the weighting and risk appetite of the Board when considering the propriety of a registered person which is determined by the category of registration being sought.

The Board could consider a range of factors, including, for example:

- **animal welfare history** including how a person regards GRV's commitment to animal welfare;
- the seriousness of **previous adverse findings or convictions** and what has been done since then to mitigate the risk of re-offending;
- **compliance history with GRV**, including the types of offending, an applicant's attitude, understanding of and acceptance of fault;
- **compliance history with other racing industry codes or jurisdictions** including any previously refused, suspended or revoked licenses or registrations or failures to comply with regulatory directions;
- **candidness** including whether the applicant was open and truthful in their dealings with GRV in the past and as part of the application process;
- **reputation and integrity** including what kind of reputation does the person have within the industry or the general community; and
- **understanding** including a person's understanding of the Rules, their role they are seeking registration for acceptable training practices and the likelihood they will engage in voluntary compliance.

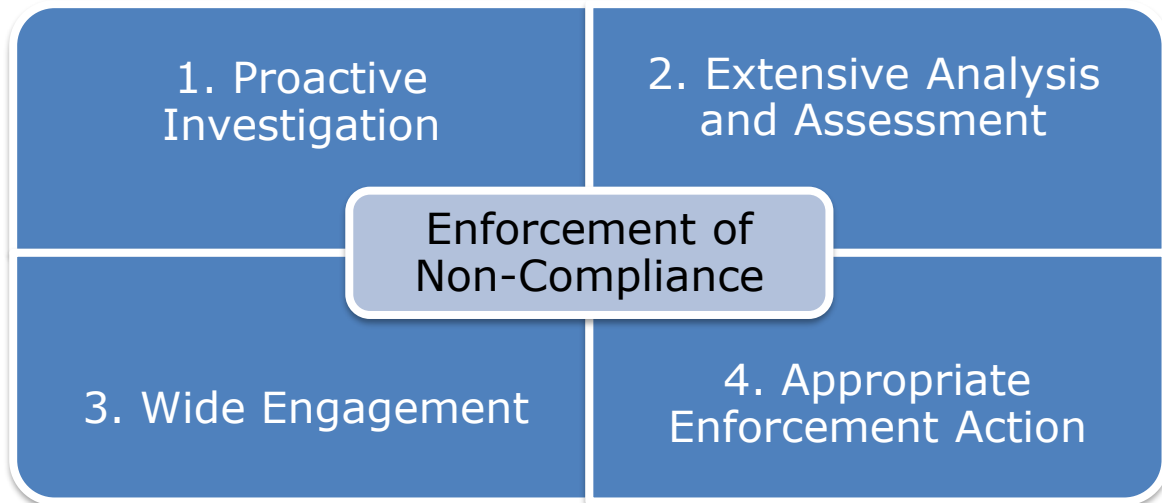
3 Compliance and Enforcement

Most registered persons in the greyhound industry meet their obligations. However, GRV is committed to acting against those who have difficulty in complying, who intentionally fail to comply, who fail to take action to avoid noncompliance or who put the welfare of greyhounds, other people, or the reputation of the industry at risk.

Having identified an overarching risk and put in place appropriate tools to manage that risk, GRV applies a risk-based approach to compliance and enforcement. This risk-based approach is underpinned by four elements (Figure 2):



Figure 2: Risk-based approach

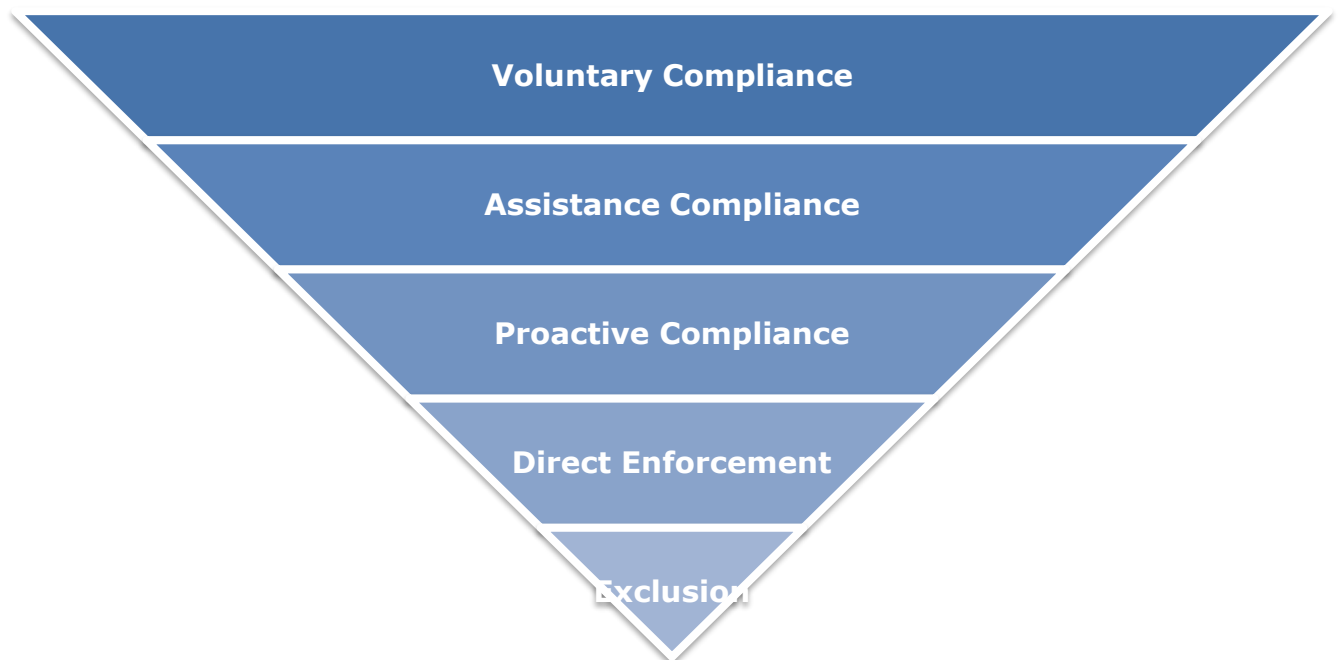


- Proactively monitoring compliance and investigating potential non-compliance using industry and community intelligence.
- Analysing and assessing this intelligence alongside other information and data analysis, monitoring programs, property and kennel inspections, investigations and targeted operations to establish the nature and extent of non-compliance.
- Engaging with other industry bodies and maintaining regulatory partnerships with bodies such as Victoria Police, the Victorian Racing Integrity Board and the Office of the Racing Integrity Commissioner, the RSPCA, local councils, government agencies and other bodies to identify trends and assess the consequences of non-compliance.
- Assessing and analysing non-compliance with our legislative requirements is undertaken to determine an appropriate response to mitigate the impacts of the non-compliance (both individual and industry impacts).

The compliance response (Figure 3) – whether in a race day or non-race environment – is based upon a consideration of the likelihood and wilfulness of non-compliance combined with the scale of the actual or potential harm caused to the welfare of a greyhound and integrity of the industry.



Figure 3: Compliance response



3.1 Voluntary Compliance

While GRV is an active regulator, GRV also seeks to create an industry culture where registered persons actively work to voluntarily meet GRV's requirements established via Rules, policies and standards. There is a strong acceptance of voluntary compliance within the industry.

GRV is committed to assisting to build this culture of compliance by ensuring that all registered persons have access to clear information that builds understanding of:

- their obligations;
- why these obligations are important;
- how to meet their obligations; and
- the consequences of not meeting their obligations.

REPORT SUSPICIOUS ACTIVITY
Call Investigations Hotline 24
hours a day - 7 days a week
1300 856 109

GRV provides educational support for registered persons in relation to adopting best greyhound welfare practice in topics such as husbandry, feeding and nutrition, breeding, injury management and rehoming. While most people involved in the greyhound racing industry are responsible and endeavour to achieve or go beyond their obligations there will be occasions where some people fail to meet these obligations.



3.2 Assistance and Proactive Compliance

GRV has significant proactive intelligence and investigative capability within the Greyhound Racing Integrity & Welfare unit (GRIW) (see Figure 4). This expert team draws on a range of sources of information derived from both:

- 1 internal system data which informs the assessment of operational risk; and
- 2 external information through referrals and sources such as the Investigations Hotline, wagering data and other open sources such as the internet.

Analysing this information to target alleged non-compliant activities and behaviours, the GRIU implements a range of strategies, both targeted and random in nature, including property inspections and swabbing. The GRIU in collaboration with other areas within GRV, engages proactively with registered participants to promote and assist with compliance in a positive and educative manner, providing information and building knowledge, however, will utilise Lawful Orders, where required, to ensure compliance is achieved.

Figure 4: GRIW intelligence and investigative capability





When required, GRIW will initiate detailed investigations in response to allegations of serious non-compliance. This may necessitate the conduct of a formal inquiry and where necessary, the laying of charges and a hearing, either by Stewards or the Victorian Racing Tribunal, which may result in penalties being imposed, such as, Warnings, Fines, Suspensions, Disqualification and Warning Off.

Inquiries are conducted by authorised officers and may involve the collection of information and records, interviews, scientific investigations and property searches. In some cases, matters may be referred to other agencies such as Victoria Police or the RSPCA.

GRV authorised officers may also be required to prepare evidence for matters referred to the Victorian Racing Tribunal (VRT) which has jurisdiction across all three Victorian racing codes for breaches of the rules defined as 'serious offences' under the Rules of Racing.

Depending on the matter, they may progress to the Victorian Civil and Administrative Tribunal (VCAT) and in some cases, the Magistrates Court of Victoria, or Supreme Court of Victoria.

3.3 Direct Enforcement

The level of enforcement action taken by GRV reflects the severity and the potential impact of the non-compliance on the welfare of the greyhound or the integrity of the industry.

Penalties, play an important role in supporting all registered persons to ensure they are not disadvantaged by the actions of others. GRV's approach seeks, as far as possible, to



differentiate between deliberate, reckless or persistent non-compliers from those who might make a genuine error and for whom alternative interventions may be more appropriate.

After investigating, GRV will determine whether prosecution is the most appropriate enforcement action to take. However, it is the VRT who will hear a "serious offence" matter and determine any penalty where guilt is established. GRV will make a submission in regard to an appropriate penalty.

Prosecution is just one of the enforcement tools available to GRV to deal with non-compliance, and it is important to ensure a decision to prosecute is appropriate in the circumstances. Where penalties and sanctions are applied, GRV aims to be transparent as to the reasons for the penalty or sanction and its effect.

GRV will exercise the discretion to prosecute in a fair, honest and transparent manner that considers the facts of an individual case. Decisions about enforcement action will be impartial, based on available evidence, and on the functions and objectives of GRV.

In deciding whether to commence a prosecution, GRV will consider (where relevant) a range of factors including:

- the nature of the offence;
- culpability of the alleged offender;
- prevalence of the offence;
- negligent or wilful conduct of the alleged offender;
- whether there is sufficient credible evidence to make the case;
- the actual or potential harm or impact and the steps taken to rectify or mitigate the impacts;
- prosecution as a proportionate response to the nature of the breach;
- whether the offence is strict liability;
- the availability and efficacy of any alternatives to prosecution;
- the extent of the risk to the integrity of greyhound racing or the wider industry;
- whether there is a reasonable prospect of the registered person being found guilty;
- whether proceedings are to be instituted against others arising out of the same incident;
- whether GRV's informal enforcement measures such as directions were used and not complied with;
- whether the breach is a continuing or a repeat offence;
- the prevalence of the alleged offence and the need for deterrence, both specific and general.

The applicability of, and weight to be given to, the above factors will depend on the circumstances and facts of each case.



3.3.1 Aims of a Prosecution

The key aims of a GRV prosecutions are to:

- maintain the integrity of the industry;
- protect other participants in the industry;
- achieve an outcome consistent with the objectives of the regulatory framework;
- prevent greyhound death, injury, mistreatment and disease;
- ensure behaviour and conduct expectations are understood and complied with;
- provide a message of deterrence to the industry to improve compliance;
- discourage repeat offences and/or recalcitrance by registered persons, and thereby improve compliance;
- stop a continuing breach, or remedy the impacts of a breach;
- ensure persons identified as being in breach of the Rules of Racing or other non-compliance are held accountable; and
- promote a culture of voluntary compliance.

3.3.2 Determining Charges

Any charges laid against a person in relation to a breach of the Rules will reflect the nature and extent of the conduct disclosed by the evidence.

There will be occasions where the same conduct is prohibited under several Rules and involves an offence under each. The registered persons may be charged under a single Rule or under multiple Rules.

However, in circumstances where it would be inappropriate to lay both charges, GRV will exercise its discretion to lay charges for a breach of one of the Rules considering the seriousness of the alleged conduct and the penalties available for each offence provision. GRV may also refer conduct to another enforcement agency for investigation and prosecution.

3.3.3 GRV Lawyers

GRV employs and engages lawyers to represent GRV. As registered legal practitioners, these lawyers have professional obligations and duties to comply with the *Legal Profession Uniform Law Application Act 2014*, the *Legal Profession Uniform General Rules 2015*, and other rules relevant to conduct and continuing professional development.

In undertaking a case for GRV against a registered person, a lawyer will:

- act as a Model Litigant, in accordance with Victorian Model Litigant Guidelines
- comply with their professional obligations and duties;



- act fairly towards the registered person;
- present GRV's case with appropriate vigour;
- act objectively;
- subject to any claim of public interest immunity or legal professional privilege, or any statutory provisions to the contrary, disclose to the registered person any material which is relevant or possibly relevant to an issue in the case, including information which is or is possibly exculpatory;
- assist the tribunal or court as much as practicable, to avoid appealable error;
- not make any submissions of fact or law which are not soundly based or supported by evidence;
- endeavour to ensure that proceedings are completed fairly and expeditiously; and
- avoid any real or potential conflict of interest.

3.3.4 Penalties

Upon a finding of guilt, GRV Lawyers are able to make submissions to the tribunal or court in respect to an appropriate penalty, as is the accused person (or their legal representative). When making a penalty submission to the VRT, GRV lawyers seek to balance the aims of general and specific deterrence with the circumstances of each individual case.

When GRV Lawyers make a submission relating to penalty, the individual circumstances considered include (where relevant):

- seriousness of the alleged offence;
- the actual or potential harm or impact;
- steps taken to rectify or mitigate the impacts;
- any mitigating or aggravating circumstances;
- intention to engage in the conduct any intention to deceive GRV;
- level of co-operation provided;
- plea entered by the registered person at the VRT hearing;
- previous compliance history and other previous conduct;
- penalties imposed in recent and similar cases;
- whether the breach is a continuing or repeat offence; and
- the prevalence of the alleged offence and the need for deterrence (specific and general).



GRV's application of penalties is guided by:

Impartiality	Transparency	Effectiveness
<p>GRV treats all registered persons fairly with everyone having the opportunity to explain the circumstances of their offence and any penalty reflects the impact of the non-compliance.</p>	<p>GRV ensures that a registered person understands what is expected of them and the consequence of any non-compliance.</p> <p>Any penalties imposed are applied consistently and discretion is used in similar circumstances with the basis for discretion and decisions including the reasons for that decision explained in a way that is easy to understand.</p>	<p>GRV focuses on ensuring that penalties are easy to enforce and administer and encourage voluntary compliance going forward – not only for an individual but for the wider industry.</p> <p>GRV works hard to ensure penalties are designed in such a way that they are substantial enough to encourage compliance but not so severe as to be difficult to enforce or perceived as disproportionate.</p>

3.4 Exclusion from the industry

The GRV Board's power to exclude people from participation in or association with greyhound racing is an integral part of the Victorian greyhound racing regulatory approach. Exclusion protects the integrity and reputation of the industry and protects other registered persons engaging in the industry. Disqualification is the most serious of the penalties available to GRV, with the greatest level of deterrent effect.

The consequences of disqualification are well known and understood by participants. As a penalty, disqualification is intended to completely exclude people from access to racing greyhounds, racing or training income, association with or benefits from greyhound racing, and association with those participating in the industry (in so far as that association relates to greyhound racing).





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