



**Racing
Victoria**

PARTICIPANT PROTECTION POLICY



ISSUED JUNE 2019

Statement from the Chief Executive Officer

The *Participant Protection Policy* aims to ensure Racing Victoria's (RV):

- core values of *honesty, excellence, engagement and safety and wellbeing*;
- reputation; and
- positive behaviours and attitudes are maintained.

It reiterates RV's commitment to "Racing for All," by doing our best to safeguard participants and implement a reporting framework for participants involved in the Victorian thoroughbred racing industry to speak up, so that they are treated with respect and dignity and are safe and protected from any forms of harassment and abuse.

Through this policy, RV aims to ensure that everyone involved in the industry is aware of their legal and ethical rights and responsibilities.

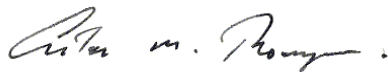
This policy is applicable to all participants in the industry. It is not intended to replace existing frameworks currently in place within the industry but will complement those frameworks and add another path for incident reporting.

This policy also outlines the procedures that support RV's commitment to eliminating discrimination, harassment, child abuse and other forms of inappropriate behaviour and/or conduct from racing.

RV is committed to providing an environment safe for children and young persons, which is free from harassment and abuse for everyone and promotes respectful and positive behaviours and values.

This policy (and any amendments from time to time), will be available on our [website](#).

This *Participant Protection Policy* is an essential part of RV's proactive and preventative approach to tackling inappropriate behaviour and making "Racing for All."



Giles Thompson
Chief Executive Officer
Racing Victoria Limited

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1. Purpose

The objectives of this Policy are to:

- a) seek to prevent harm to Participants in the Industry;
- b) promote and achieve the highest safeguarding standards;
- c) outline RV's commitment and expectations;
- d) ensure all Participants have a clear understanding of what constitutes appropriate behaviour within the Industry and in employment and professional contexts;
- e) take appropriate action against those who harm, or pose a risk of harm, to Participants within the Industry; and
- f) encourage a safe and inclusive environment for Participants, with the wellbeing (both mental and physical) of the participant, being paramount.

This Policy provides guidance to Participants within the Industry on:

- a) when and how a Safeguarding Concern should be reported to RV;
- b) how the report of a Safeguarding Concern will be handled by RV; and
- c) the support RV aims to provide for those individuals who have reported a Safeguarding Concern and/or who are affected by inappropriate conduct.

A breach of this Policy, with respect to a Safeguarding Concern, may be a potential breach of the Rules of Racing.

2. Protection Principles

The welfare of Participants within the Industry is paramount. RV and Club's are committed to safeguarding the safety and wellbeing of all Participants.

All Participants engaged in the Industry:

- a) have the right to be protected from all forms of unacceptable behaviour and/or conduct;
- b) are to respect the rights, dignity and worth of others;
- c) should be fair, considerate and honest in all dealings with others;
- d) are to be a positive role model and demonstrate a high degree of individual responsibility, especially when dealing with young persons, as your words and actions are an example;
- e) should refrain from any behaviour that may be prejudicial to the image, interests, or welfare of the Industry and/or RV;
- f) should provide a safe environment for the conduct of any activity in connection with racing; and
- g) should speak up if they become aware of a potential Safeguarding Concern, including reporting the concern to RV.



3. Definitions and interpretation

Unless otherwise defined in this Policy, terms are as defined in the Rules of Racing. Where there is any inconsistency between this Policy and the Rules of Racing, *the Rules of Racing prevail* to the extent of any inconsistency.

If anything in this Policy is inconsistent with any relevant Federal or State law, then the relevant Federal or State law prevails to the extent of the inconsistency.

Abuse is as defined in clause 8.1.2.

Adults at risk is as defined in clause 7.2.

Bullying is as defined in the Rules of Racing.

Child abuse is as defined in clause 8.3.

Club is as defined in the Rules of Racing.

Discrimination is as defined in clause 8.1.4.

Harassment is as defined in clause 8.1.

Industry means the Victorian thoroughbred racing industry.

Licensed Trainer means a person granted a licence by RV to train thoroughbred racehorses.

RV means Racing Victoria Limited.

Policy means this Participant Protection Policy.

Participants is as defined in clause 4.1.

Participant Protection Contact means a person nominated by a Club and appointed by RV to act as a point of contact for RV and the Participant to assist with any enquiries, concerns or complaints in relation to matters considered in this Policy.

Rules of Racing means the Rules of Racing of RV which includes the Australian Rules of Racing made by the Australian Racing Board and the Local Rules and Rules of Race Betting of RV.

Safeguarding Concern means a type of concern as outlined in clause 8.

Sexual harassment is as defined in the Rules of Racing.

Social Networking is as defined in clause 8.4.

Trainers in tenant means a Victorian Licensed Trainer leasing stables and/or running a thoroughbred training service business from a Clubs premises.

Workplace Harassment is as defined in the Rules of Racing.

Young Person is as defined in clause 7.1.

4. Who is covered by this Policy?

This Policy applies to a Safeguarding Concern between Participants engaged in the Industry.



For clarity, this Policy does not apply to human resource matters that are subject to any RV Policy applicable to RV employees, officials, contractors (including service providers) and volunteers. Such matters are to be referred to RV's General Manager – People and Culture.

4.1. Participants

For the purpose of this Policy, Participants include (but is not limited to):

- a) Licensed Trainers;
- b) Stable Staff;
- c) Riders;
- d) an employee, officer, official and/or volunteer of a Club;
- e) Owners;
- f) Riders Agents;
- g) RV employees, officials, volunteers and service providers engaged on race day, official trials and/or jump outs such as photo-finish operators, barrier attendants, veterinarians and judges; and
- h) a relevant person, as defined in the *Racing Act 1958* (Vic).

5. RV Obligations

When RV receives a report in relation to a Safeguarding Concern it will:

- a) take all allegations seriously and handle the report as stated in this Policy;
- b) within its jurisdictional powers, challenge any conduct within the Industry that is (or perceived to be) harmful to Participants;
- c) aim to work in conjunction with Club's, external service providers, law enforcement and government authorities, and Participants, during an investigation into a Safeguarding Concern;
- d) support individuals involved, with respect to a report of a Safeguarding Concern. Support will be offered to:
 - i. affected Participants;
 - ii. their families; and
 - iii. those who have reported concerns to RV.

The level of support will be appropriate to the circumstances of each individual case and the circumstances of each affected individual;

- e) provide education and appropriate support to Club's (including the Participant Protection Contact) in relation to their safeguarding policies and practices, with a view of consistent safeguarding standards across the Industry; and
- f) provide education and appropriate support to all Participants so that they are aware of what their rights and obligations are as Participants in the Industry.



6. Expectation of Clubs

RV encourages all Club's to develop, review and/or implement an approach to safeguarding and safeguarding procedures, which should reflect and complement this Policy.

RV anticipates that the Club's will collaborate with RV in the development and effective delivery of those approaches and procedures including education.

All Club's should take steps to:

- a) adopt and comply with this Policy;
- b) recognise and enforce any penalty imposed under this Policy; and
- c) publish, distribute and promote this Policy (and any amendments made to it from time to time) to their members, affiliates and Trainers in tenant and/or Licensed Trainers using their facilities, in the manner required by RV.

A Club may be requested by RV to nominate an employee for consideration by RV to be the Participant Protection Contact for the Club and for the purposes of this Policy. When a Participant Protection Contact is appointed, a Club must publish and make available their contact details to all Participants. RV will also make available the Participant Protection Contact details, on our website.

This Policy is not intended to supersede any procedures and/or policies that a Club may have in place to deal with human resource matters including concerns between a Club and Licensed Trainers with respect to their respective agreements including commercial agreements to utilise a Club's facilities. Matters relating to conduct between employees of a Club may be employment matters, meanwhile matters relating to a Club and Licensed Trainers may be contractual issues rather than being dealt with pursuant to this Policy. RV will work with the relevant Club regarding the appropriate mechanism for dealing with the matter.

7. At Risk Persons

Although this Policy is applicable to all Participants within the Industry, Young Persons and Adults at risk are considered to be particularly vulnerable groups.

7.1. Children and Young Persons

For the purposes of this Policy a Young Person is anyone under the age of 18 years.

The youngest age at which individuals participate in the Industry overseen by RV is 14 years (refer to [RV Stable Employee Policy](#)).

RV is committed to the safety and wellbeing of all Young Persons who participate in the Industry. RV supports the rights of Young Persons and will act at all times to promote and/or provide a child safe-environment, as appropriate. When assessing Participants for a licence and/or registration, RV will consider applications so that licensees and registered persons fit the criteria of the [RV Suitability Policy](#).

RV acknowledges the valuable contribution by its staff, members and volunteers and encourages their active participation in providing a safe, fair and inclusive environment for all Young Persons.

It is important that Participants (especially in the function as a Licensed Trainer) engaging Young Persons in the workforce undertake an assessment as to whether their current and/or future



employees or contractors are suitable. It is important that those Participants within the Industry employing Young Persons have identified whether a Working with Children Check is required.

When a Safeguarding Concern is reported and it is identified as part of the investigation by RV, that those involved who should, but do not, hold a Working with Children Check, this fact will be sufficient to form a basis of an investigation and RV will, if required, report it to the relevant authorities.

RV will undertake an assessment of its current and future employees, to ensure that any person it employs, to deal with Young Persons, is to undertake a Working with Children Check, if required under relevant legislation.

For more detailed information, including the forms required to complete a Working with Children Check, please contact the Department of Justice or visit www.workingwithchildren.vic.gov.au.

7.2. Adults at risk

RV believes the safeguarding of Adults at risk is a priority. For the purposes of this policy, an Adult at risk means an adult who:

- a) is unable to take care and support themselves; and
- b) is being abused or neglected or is at risk of abuse or neglect; and
- c) cannot protect themselves from the abuse.

8. Potential Safeguarding Concerns

This section is intended to set out and provide guidance on the types of Safeguarding Concerns that may be a breach of this Policy and/or the Rules of Racing and/or applicable laws.

8.1. Harassment

Harassment is any unwelcome behaviour which is offensive, abusive, belittling or threatening to a person. It can be expressed or implied, physical, written or oral.

Harassment is to be considered behaviour that a reasonable person with the characteristics of the person affected would find unwelcome. For the purposes of establishing whether Harassment has occurred, it is irrelevant if the behaviour and/or conduct, is intended to offend or not.

Forms of Harassment, including Bullying and Workplace Harassment, are offences under the Rules of Racing (AR 233(b)).

Harassment may include:

- a) Sexual harassment;
- b) Abuse; and
- c) Discrimination, including vilification.

8.2. Sexual Harassment

Sexual Harassment is as defined in the Rules of Racing. For clarity, under the Rules of Racing, Sexual Harassment means:

- a) subjecting a person to an unsolicited act of physical intimacy; or
- b) making an unsolicited demand or request (whether directly or by implication) for sexual favours from a person; or

- c) making a remark with sexual connotations relating to a person; or
- d) engaging in any other unwelcome conduct of a sexual nature in relation to a person,

where the person engaging in the conduct described in paragraphs (a), (b), (c) or (d) does so:

- i. with the intention of offending, humiliating or intimidating the other person; or
- ii. in circumstances where a reasonable person would have anticipated the possibility that the other person would be offended, humiliated or intimidated by the conduct.

The conduct described in paragraphs (b), (c) and (d) includes, without limitation, conduct involving the internet, social media, a mobile phone, or any other mode of electronic communication.

Examples of Sexual Harassment may include:

- a) Sexual jokes, offensive telephone calls, displays of obscene or pornographic images, drawings, posters, reading matter or objects;
- b) Sexual propositions or persistent and unwanted requests for dates;
- c) Unwelcome comments about a person's sex life or physical appearance;
- d) Suggestive behaviour such as leering, wolf whistles, cat calls, obscene gestures or staring;
- e) Unnecessary familiarity such as deliberately brushing up against a person;
- f) Unwelcome questions and remarks about a person's sex or private life.
- g) Insults or taunts based on a person's sex;
- h) Indecent assault or rape (these are criminal offences and the victim will be advised to report the offence to the police).

Sexual Harassment is considered an offence under the Rules of Racing (AR 233(c)). It may also be a criminal offence. If a person suspects that a criminal offence may have been committed, they should notify the police and/or seek legal advice.

8.3. Abuse

Abuse (which may be a form of Harassment), includes:

- a) Physical abuse, which occurs when any person subjects another person to non-accidental physically aggressive acts. The abuser may:
 - i. Intentionally inflict an injury; or
 - ii. Inadvertently inflict an injury as a result of physical punishment or aggressive treatment.Physically abusive behaviour includes (but is not limited to) shoving, hitting, slapping, shaking, throwing, punching, biting, burning, kicking or acts which may exceed the person's development or maturity. It may also include forms of domestic violence.
- b) Sexual abuse occurs when a person involves another person in any sexual activity without their consent. It includes both contact and non-contact behaviour, and when a person is encouraged or forced to watch or engage in a sexual activity, or any other inappropriate conduct of a sexual nature. Examples include:
 - i. sexual intercourse;
 - ii. masturbation;
 - iii. kissing or fondling;
 - iv. oral sex;
 - v. making sexual comments;
 - vi. engaging a person in sexual conversations in-person or via social media;
 - vii. voyeurism (i.e. observing a person in an action that is considered to be of a private nature, such as undressing in a change room);
 - viii. nudity (i.e. an abuser exposing themselves or another person);

- ix. encouraging a person to view pornography including child pornography or other inappropriate touching or conversations; and
 - x. exploiting a person through prostitution.
- c) Emotional or psychological abuse, which occurs when any person repeatedly rejects or threatens a person. Often there is a pattern of emotional or psychological abuse, rather than a single incident. Such abuse may involve humiliating, terrorising, name-calling, belittlement, inappropriate symbolic acts, taunting, sarcasm, yelling, negative criticism, placing unrealistic expectations on a person or continual coldness from any person to an extent that results in significant damage to the person's physical, intellectual or emotional wellbeing and development.
- d) Neglect of a person is the persistent failure to provide, or the deliberate denial of the basic necessities of life. Examples include failing:
- i. to give adequate:
 - i. food, clean water;
 - ii. supervision;
 - iii. medical attention, shelter, clothing; or
 - ii. to protect a Young Person and/or Adults at risk from danger or foreseeable risk of harm or injury.

8.4. Abuse of Power

Abuse of power which the harasser holds over the harassed. Relationships that involve a power disparity have the potential for abuse of that power. People in such positions of power need to be particularly wary not to exploit that power. An example may be an intimate relationship between a trainer and an employee or contractor.

8.5. Discrimination

Discrimination is treating or proposing to treat a person unreasonably than someone else on the basis of an attribute or personal characteristic. Requesting, assisting, instructing, inducing or encouraging another person to engage in Discrimination may also be considered Discrimination.

The personal attributes or characteristics against which a person may be discriminated are:

- i. Age;
- ii. Disability – this includes loss of bodily function (e.g. deaf or blind), presence of disease, loss of part of the body, disfigurement, malfunction of part of the body, psychological disease, intellectual disability;
- iii. Marital status – this covers whether the person is single, married, de facto, married but living separately from their spouse, divorced, or widowed;
- iv. Family/Carer status – this includes whether the person is a stepparent, adoptive parent, foster parent or guardian and also includes whether the person is childless or is a carer (e.g. of children, or other dependents);
- v. Sex or gender;
- vi. Gender identity and transgender or intersex status;
- vii. Sexual orientation;
- viii. Irrelevant medical record;
- ix. Irrelevant criminal record;
- x. Physical features – this includes a person's weight, size, height and other physical features;
- xi. Political belief or activity;
- xii. Pregnancy and breastfeeding, including whether the person has or supposedly has the signs or symptoms of pregnancy (e.g. morning sickness);
- xiii. Race; or
- xiv. Religious beliefs or activity.

Discrimination also includes victimisation. Victimisation occurs when one person subjects or threatens to subject, another person to some form of detriment or harm, because that person has asserted a right (for example, that person has exercised their right to lodge a harassment complaint or supported someone else's complaint of a similar nature).

RV will take all necessary steps to safeguard the people involved in the reporting of a Safeguarding Concern, so that they are not victimised by anyone for coming forward with a complaint or for providing assistance in relation to a complaint. Conduct which amounts to victimisation is a breach of this Policy and will not be tolerated. There are Federal laws for example the *Fair Work Act 2009*, which may protect a person from being victimised for making a complaint.

Vilification is a form of Discrimination. It involves a person inciting hatred towards, serious contempt for, or severe ridicule of, a person or group of persons by a public act. It may include any form of communication to the public and any conduct observable by the public. Vilification is considered an offence under the Rules of Racing (AR 228(e)).

8.6. Grooming

Grooming is a term used to describe what happens when a perpetrator builds a relationship with a vulnerable person with a view to abuse of them at some stage. Grooming does not necessarily involve any sexual activity or even discussion of sexual activity. For example, it may only involve establishing a relationship with the child, parent or carer (e.g. giving special attention, providing favours, and giving gifts) for the purpose of facilitating sexual activity at a later time.

8.7. Child abuse

Means any Abuse where the offending conduct is against a Young Person and includes but is not limited to:

- a) Physical abuse by hurting a Young Person or a Young Person's development. For example:
 - i. Hitting, shaking or other physical harm;
 - ii. Giving a Young Person alcohol or drugs; or
 - iii. Training that exceeds the Young Person's development or maturity;
- b) Sexual Abuse;
- c) Emotional abuse by ill-treating a Young Person. For example, humiliation, taunting, sarcasm, yelling, negative criticism, name calling, ignoring or placing unrealistic expectations on a Young Person; and
- d) Neglect, which is discussed in detail above.

If a person suspects or has been provided with information that indicates Child Abuse has or may have occurred, the police and any relevant government agency must be notified.

8.8. Social Networking

Social Networking refers to any interactive website or technology that enables persons to communicate and/or share content via the internet. Persons bound by this Policy must conduct themselves appropriately, and in accordance with this Policy when using social networking sites or apps and/or when posting content.

All Participants are to acquaint themselves with RV's [Social Media Policy](#). A breach of the Social Media Policy may be an offence under the Rules of Racing, e.g. AR 228(d).

9. Reporting Safeguarding Concerns

9.1. When to report to RV?

When:

- a) a Participant has experienced a form of unacceptable behaviour or conduct; or
- b) when there are serious concerns for the safety and/or wellbeing of a Participant (particularly a Young Person or Adult at risk),

it is important that those concerns are reported to the appropriate authorities at the first available opportunity to take appropriate action.

Where there are reasonable grounds to consider that an individual may pose, or poses a risk of harm to Participants, RV expects to be made aware of these concerns by its Clubs, Participants or external authorities.

As the Principal Racing Authority, RV invites Participants and Clubs to report their concerns even if it has already been reported to another authority. The RV Participant Protection Manager will treat all matters in confidence to protect the safety and welfare of the victim.

9.2. Making a report to RV

9.2.1. Becoming aware of a concern

Concerns might be raised because of:

- a) something a Participant has said;
- b) secrecy and a reluctance of a Participant to share information;
- c) having experienced some form of unacceptable behaviour or conduct;
- d) signs or suspicions of abuse or harm;
- e) allegations made against an individual; and
- f) observation or perception of unacceptable behaviour or conduct.

9.2.2. How to make a report

RV wants to be presented with any information, from any source, where there is reason to believe that a Participant in the Industry has presented or presents a risk of harm to one or more Young Person or adult.

It is not the responsibility of those reporting concerns to RV, to determine if a Participant has been subjected to unacceptable behaviours or conduct or is otherwise at risk of harm.

In the first instance, all concerns can be reported directly to RV and any other appropriate bodies (such as a Club, Licensed Trainer or the police in an emergency or if criminal activity is suspected).

RV will support those who wish to make a report and will provide any guidance and support that may be necessary in relation to the making of a report.

Reports can be made to RV via any of the following means:

- email participantprotection@racingvictoria.net.au;
- online at our [website](#) under the Sport section; or
- telephone to the RV Participant Protection Manager on 0428 413 935.



To assist those making a report and assist RV in handling a concern, a Safeguarding Concern Form is available on RV's website link: <http://www.racingvictoria.com.au/the-sport/participant-protection-and-wellbeing/safeguarding-concern-form>.

Reports of a Safeguarding Concern may be subject to RV's Speak Up Policy, which includes protections regarding confidentiality and anonymous reports.

9.3. When making a report

When reporting a Safeguarding Concern to RV, the person making the report should always:

- a) focus on the facts rather than opinion. For example, what exactly has been observed, seen, heard, or disclosed; and
- b) distinguish clearly between what the person making the report knows first and what he or she has been told by others.

All reports subject to this Policy will be treated in confidence and can (subject to applicable laws) be subject to anonymity. They will only be shared with individuals within RV or third parties (such as advisors) on a need-to-know basis.

RV will do everything it reasonably can to ensure that individuals can raise a matter of concern to RV without fear of victimisation, subsequent discrimination, or disadvantage.

10. RV's response to reports of Safeguarding Concerns

Depending on the circumstances of each case, the RV Participant Protection Manager will lead RV's response to Safeguarding Concerns. The Participant Protection Manager is responsible for promoting the welfare of all Participants in racing.

10.1. How will a report be handled?

As outlined in **Attachment A**, concerns received by RV will in the first instance be considered by the RV Participant Protection Manager or another RV staff member (under the direction of the RV Participant Protection Manager) on a need to know basis.

RV may liaise with Clubs, external authorities and Participants to determine the most appropriate response. RV may without prejudice to its own ability to investigate the matter or issue disciplinary proceedings refer the matter to one of the abovementioned groups, if it is satisfied that it is appropriate in all the circumstances of the case, including:

- a) that RV has confidence that the matter will be appropriately investigated/addressed; and
- b) the relevant group can keep RV informed of the matter's progress.

All cases progressed by RV will be investigated by RV and/or by an expert investigator/agency appointed by RV.

The amount of contact required between the relevant Participants and RV is dependent on the individual circumstances of the investigation, the specific facts and whether further information is required.

If it is determined by RV that the person (against which a Safeguarding Concern was raised), does not pose a foreseeable risk of harm to one or more Participants, but an understandable concern was

raised, RV or others may give guidance to any relevant individual in relation to his or her future conduct.

Whilst the welfare of Participants is a priority, RV recognises it may have a responsibility to those accused of wrongdoing. Consideration will therefore be given as to what level of support should be provided to the accused in each case. Such support may include access to support services and/or referral to legal services.

There are various avenues for complaint resolution. Such avenues may include counselling or mediation, as appropriate.

It is unlikely that it will be possible in any case to determine exact timeframes for when cases will be resolved. However, RV will always try to ensure that all parties know what procedure will be followed and what the expected timeframes are, as well as any changes to those timeframes and why.

10.2. Managing Conflicts of Interest

10.2.1. RV

When a concern relates to a potential breach of this Policy by a RV employee or officer, the Participant Protection Manager will immediately notify the Executive General Manager (**EGM**) - Integrity Services. The EGM – Integrity Services will take appropriate action to investigate and address the allegation including allocating the most appropriate resources (internal or external) to investigate the Safeguarding Concern.

Where the matter relates to an allegation against the EGM – Integrity Services and/or the Participant Protection Manager, the matter will be referred to the RV Chief Executive Officer.

10.2.2. Clubs

There may be circumstances where it is inappropriate for a Participant affiliated or employed by Clubs to be involved in the investigation and/or resolution of the matter. The RV Participant Protection Manager will work with the Club and, where relevant, the relevant Participant Protection Contact, to address any real or perceived conflicts.

10.3. When will a report be referred to an external authority?

RV's initial response to a report will depend on the nature of the concern and its specific facts.

When the RV Participant Protection Manager assesses the initial concern, if required and warranted, there may be a referral to external authorities (such as the police) to investigate whether there have been any potential breaches of relevant legislation.

10.4. Referral to RV Stewards

There are certain rules within the Rules of Racing which deal with Safeguarding Concerns discussed in this Policy such as (but not limited to) sexual harassment and bullying. If, during the investigation, it is identified that a person in their conduct may have breached the Rules of Racing, the matter will be referred to the RV Stewards.

Depending on the findings and the seriousness of the potential breach, the matter may either be determined by a Stewards inquiry or the Stewards may consider that the charges are to be heard before the Racing Appeals Disciplinary Board or Victorian Racing Tribunal in accordance with the Rules of Racing.



11. Policy Review

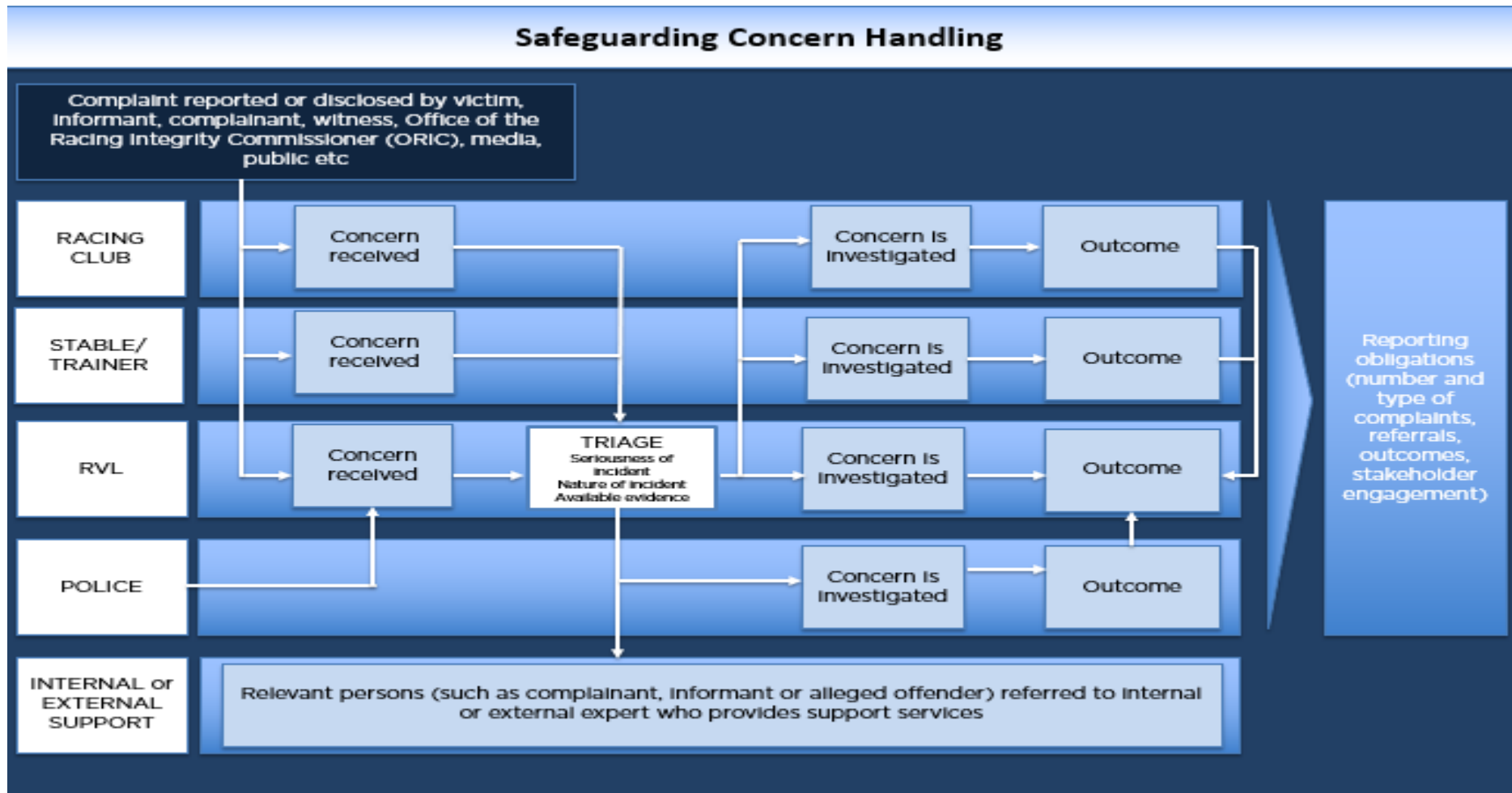
This Policy will be reviewed on a regular basis. In addition to this regular review, recommendations for changes to this Policy may be submitted to RV's Integrity Services department for consideration. In the event that changes are implemented, the Policy will be updated via RV's website.

This Policy will be made available to the general public on RV's website and will be communicated to all Board and staff members of RV and all Clubs and Participants.

Version	Date reviewed	Date endorsed	Content reviewed/purpose
<i>One</i>	-	<i>20 June 2019</i>	



12. Attachment A– Safeguarding Concern Handling





Racing Victoria Limited
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Flemington, VIC, 3031