Tasracing	**POLICY**	
COMPLAINTS MANAGEMENT AND PROCEDURES POLICY		
CONTROLLER: GENERAL MANAGER – LEGAL & COMPLIANCE		**OWNER: CEO**
REVIEWED: OCTOBER 2026		**SCHEDULED REVIEW: OCTOBER 2027**

1. PURPOSE

Tasracing is committed to providing a fair, accessible, transparent and timely complaints management system.

This Policy:

- Sets out how complaints may be made to Tasracing;
- Explains how complaints are assessed, managed and resolved;
- Ensures compliance with the Tasmanian Racing Integrity Commissioner (**TasRIC**) Complaints Handling Standard and aligns with the TasRIC Investigations and Disciplinary Action Standard where investigations are required; and
- Reflects the *Australian and New Zealand Standard – Guidelines for complaint management in organisations* (AS/NZS 10002:2022).

This Policy does **not** apply to:

- Public Interest Disclosures / Protected Disclosures;
- Applications for assessed disclosure of information under the Right to Information Act 2009 (**Act**) (a separate review process exists under the Act);
- Employee grievances (see the Tasracing Grievance Handling Policy);
- Code of Conduct disciplinary matters; or
- Integrity complaints that fall within the jurisdiction of, and are investigated by, TasRIC.

2. SCOPE

This Policy applies to complaints made by:

- Industry participants;
- Members of the public;
- Suppliers and stakeholders;
- Registered clubs; and

- Any person affected by Tasracing's services, decisions or conduct.

It applies to complaints regarding:

- Tasracing services;
- Administrative decisions;
- Conduct of Tasracing employees;
- Policy implementation; and
- Tasracing's complaint handling itself.

3. COMPLAINTS HANDLING PRINCIPLES

In receiving and handling complaints, Tasracing adopts:

- The Tasmanian Ombudsman's 10 Complaint Handling Principles;
- The TasRIC Complaints Handling Standard;
- Procedural fairness and natural justice principles; and
- Risk-based triage and proportionality.

4. WHAT IS A COMPLAINT?

A complaint is an expression of dissatisfaction made to or about Tasracing, relating to its products, services, conduct, decisions or complaint handling, where a response or resolution is explicitly or implicitly expected or legally required.

Feedback, suggestions and compliments are recorded separately but may inform system improvement.

5. HOW TO MAKE A COMPLAINT

Complaints may be made:

To Tasracing:	**To TasRIC:**
• By filling out the Complaint/Feedback Form online or sending it to Tasracing via email or post: **Email:** enquiries@tasracing.com.au	• **Complete an online reporting form:** The Tasmanian Racing Integrity Commissioner's Office (TasRIC) Disclosure Form; • **Email:** MakeaReport@racingintegrity.tas.gov.au (please include 'TASRIC' in the email subject line);

Postal Address: Complaints Manager PO Box 730 Glenorchy TAS 7010 • If required, Tasracing can be contacted by telephone ((03) 6212 9333) or in person, if a person requires assistance with making a complaint.	• **Phone:** 1800 296 967 (between 8.00am to 8pm, Monday to Friday); or • **Post to:** Tasmanian Racing Integrity Commissioner, GPO Box 584, Hobart TAS 7001 (please mark as 'confidential').

Anonymous complaints are accepted; however, insufficient contact information may limit Tasracing's ability to acknowledge, update or notify an anonymous complainant. A complaint must, at a minimum, be accompanied by, at least, a valid email address or phone number in order for Tasracing to be able to respond. Tasracing will not release a complainant's identity to others, unless it has first received their consent or are required to do so by law, otherwise Tasracing is unable to implement any additional protective mechanisms.

Protected Disclosures must be made under the Protected Disclosure Procedures and not through this Policy.

Informal Complaints

Complaints not supported by a Tasracing Complaint/Feedback Form are considered to be informal complaints. Employees are empowered to resolve such complaints as relevant to their roles and responsibilities, and with as little formality as possible to encourage early resolution, to meet the aim of resolving the complaint at first contact where possible.

Employees should assess whether the matter requires escalation to the Complaints Manager due to its severity, health and safety implications or unreasonable complainant conduct.

If the matter cannot be resolved at the first point of contact, the complainant should be directed to Tasracing's complaint handling process set out in clauses 5 and 8 and the matter referred to the Complaints Manager as soon as possible.

Accessibility and Support

Tasracing is committed to ensuring that its complaints process is accessible to all persons.

Tasracing will:

- Provide reasonable assistance to any person who requires help to make a complaint;
- Make reasonable adjustments for persons with disability;
- Provide access to interpreter services where required;
- Accept complaints in alternative formats where necessary; and
- Ensure that information about the complaints process is publicly available in clear and accessible language.

No person will be disadvantaged in making a complaint due to language, disability or other personal circumstances.

Protection from Victimisation

Tasracing will not tolerate victimisation of any person who makes a complaint in good faith under this Policy.

Any attempt to disadvantage, intimidate or retaliate against a complainant may result in disciplinary action or constitute prohibited conduct under the Tasracing Member Protection Policy.

This protection does not extend to allegations covered in section 6.

6. VEXATIOUS COMPLAINTS

A complaint must be made in "good faith", must be honest, genuine and motivated by wanting to disclose serious misconduct. Allegations which are considered: vexatious, malicious, motivated by revenge, motivated by personal (or business) gain, or motivated by a desire to harm the reputation of another, will not result in any disclosure protections.

Tasracing reserves the right to decline or discontinue dealing with a complaint if the complainant's arguments are unreasonable. A complaint that is false or misleading in relation to a matter in connection with the administration or control of racing may be considered a breach of the Rules of Racing.

7. COMPLAINT RECORD KEEPING

The Complaints Manager, and anyone delegated to fulfill that role or part thereof, should abide by the record keeping standards outlined in the Tasracing Records Management, Retention and Disposal Policy and specifically abide by the Tasracing Privacy Policy (https://tasracing.com.au/governance/privacy-policy).

Further, Tasracing will:

- Maintain a central Complaints Register for the purpose of recording:

- The nature of each complaint received;
- Actions taken in relation to a complaint;
- Relevant information related to a complaint;
- Timeframes for managing a complaint; and
- Outcomes related to a complaint;

- Retain documentation in accordance with legislative requirements and the Tasracing Records Management, Retention and Disposal Policy;
- Ensure communication with a complainant throughout the process, including any outcomes, in line with the timeframes set out in this Policy; and
- Provide to TasRIC a summary of all complaints (except informal complaints) on a monthly basis. This summary must include:
  - The nature of each complaint received;
  - How the complaint was received;
  - Actions taken or proposed to be taken in relation to a complaint;
  - Whether the matter has been finalised within required timeframes; and
  - Any systemic issues identified.

8. COMPLAINTS PROCESS

All complaints received by Tasracing will be dealt with in an equitable, objective and unbiased manner in accordance with this Policy. The Tasracing complaints process consists of four stages:

8.1 Stage 1 – Receipt and Acknowledgement

When a complaint is submitted in accordance with this Policy, Tasracing will record the complaint in the Complaints Register and acknowledge receipt of the complaint within **five (5) business days**. This acknowledgment will also provide information to the complainant about the process and timeframes to be followed.

Tasracing aims to resolve each complaint at first contact where possible.

8.2 Stage 2 – Assessment and Triage

All complaints will undergo preliminary assessment to determine:

- Whether Tasracing has jurisdiction over the matter which is the subject of the complaint;

- Whether the complaint is an integrity-related complaint;
- Whether investigation is required; and
- Whether referral is required.

Assessment considerations must align with section 59 of the Racing Regulation and Integrity Act 2024 (General functions and powers of Tasracing) and be consistent with the requirements of the TasRIC Complaints Handling Standard.

Possible outcomes at this assessment stage could include the following:

- Early resolution;
- Informal enquiries;
- Formal investigation;
- Referral to TasRIC;
- Referral to Tasmanian Police or other regulator;
- No further action (with reasons recorded); and
- Recorded for intelligence purposes only (and retained in accordance with Tasracing's information management framework and applicable laws).

Reasons for decisions must be documented in the Complaints Register. If no further action is taken, the reasons must be recorded in the Complaints Register and the complainant notified.

Some complaints may not require immediate investigation but may contain information relevant to identifying emerging integrity risks, trends or patterns of behaviour.

In these circumstances, Tasracing may retain the information for intelligence purposes and use it to support future risk assessments, investigations or integrity monitoring activities.

Recording information for intelligence purposes does not of itself constitute a finding of misconduct or wrongdoing.

Informal Resolution

If it is found by the Tasracing Complaints Manager that a reasonable suspicion of misconduct is made out but that that conduct is minor and limited in nature of a kind that might be resolved informally (e.g., an inter-personal grievance), the Complaints Manager is empowered to resolve such complaints by, for example, simply acknowledging the complaint or by way of conciliation or mediation.

Internal Complaints Concerning Tasracing Personnel

Where a complaint involves allegations concerning Tasracing employees, contractors, directors or registered clubs, the Complaints Manager must:

- Immediately notify TasRIC in accordance with the TasRIC Investigations and Disciplinary Action Standard;
- Assess whether the matter requires referral to TasRIC for inquiry or oversight;
- Ensure that any internal investigation is conducted independently, transparently and free from actual or perceived conflict of interest; and
- Consider the appointment of an external investigator where independence cannot be assured.

TasRIC Referral

Where a complaint relates to integrity matters (including matters concerning racing integrity, compliance with Rules of Racing or conduct of licensed persons), Tasracing must advise the complainant that such complaints are to be lodged with TasRIC first.

The complainant may do so via one of the methods outlined in section 5

Complaints Referred by TasRIC

Where a complaint is referred to Tasracing by TasRIC, Tasracing will:

- Acknowledge receipt of the referral;
- Record the complaint in the Complaints Register;
- Assess the complaint in accordance with this Policy;
- Undertake any investigation or other action considered appropriate; and
- Report to TasRIC the final outcome of the complaint within the required timeframe or as otherwise directed by TasRIC.

Tasracing will cooperate fully with TasRIC in relation to any complaint referred.

External Referral

Other than complaints referred to TasRIC, it may also be found by the Complaints Manager that the matter is one better dealt with on referral by Tasracing under another policy and procedure and/or by an external agency, such as:

- Member protection issues, referable to Tasracing's Participant Protection and Safeguarding Policy
    - The PPSP is available here: TBA – check Tasracing's website
    - Key contact details: P&C@tasracing.com.au; (03) 6212 9333

- Safeguarding concerns, referable to Tasracing's Participant Wellbeing and Support Policy
    - The PWSP is available here: https://tasracing.com.au/about-us/industry/participant-wellbeing-support
    - Key contact details: admin@tasracing.com.au; (03) 6212 9333
- Animal welfare concerns, referable to Tasracing's Equine Code of Practice or Greyhound Code of Practice and/or Tasracing's Integrity Unit
    - The Equine Code of Practice is available here: https://tasracing.com.au/industry/thoroughbred-rules-policies
    - The Greyhound Code of Practice is available here: https://tasracing.com.au/industry/greyhound-rules-and-policies
    - Key contact details: (03) 6777 1900, operations@tasracingintegrity.com.au
- Breaches of the Rules of Racing, referable to Tasracing's Integrity Unit
    - The Rules of Racing which are updated from time to time are available on the websites of the following organisations:
        - Greyhound Code: Greyhounds Australasia (and Tasracing website for Local Rules)
        - Harness Code: Australian Harness Racing Rules - Index (and Tasracing website for Local Rules)
        - Thoroughbred Code: Racing Australia (and Tasracing website for Local Rules)
    - Key contact details: (03) 6777 1900, operations@tasracingintegrity.com.au
- Whistleblowing or protected disclosures, referable to Tasracing's Whistle Blower Policy with Public Interest Disclosure Procedures and the Tasmanian Ombudsman
    - The Whistleblower Policy containing Public Interest Disclosure Procedures is available on Tasracing's website
    - Key contact details for the Ombudsman are:
        - Post: GPO Box 960, HOBART TAS 7001
        - Telephone: 1800 001 170
        - Email: ombudsman@ombudsman.tas.gov.au
        - In person: NAB House, Level 6, 86 Collins Street, HOBART TAS

- Depending on the nature of the matter that has been reported, Tasracing reserves the right to refer it to a relevant external agencies and including (but not limited to): the Integrity Commission of Tasmania; Tasmanian Police, if the matter involves conduct contrary to the Criminal Code Act 1924 (Tas) or federal criminal laws, especially if the conduct is potentially ongoing is available for advice; and WorkSafe Tasmania.

8.3 Stage 3 – Investigation (Where Required)

Where the Complaints Manager determines that an investigation is needed, then the Complaints Manager should commence an investigation as guided by Tasracing's investigation procedure and the principles outlined in:

- The TasRIC Investigations and Disciplinary Action Standard; and
- Stage 2 (Investigation) of the Integrity Commission of Tasmania Guide to Managing Misconduct in the Tasmanian Public Sector (September 2023).

Where any inconsistency arises between the Guide and the Investigations and Disciplinary Action Standard, the Rules of Racing or the Racing Regulation and Integrity Act 2024 (Tas), the latter will prevail.

The Complaints Manager may, depending on the nature and complexity of the matter or if it is one that might engender a conflict of interest within Tasracing, appoint another person (e.g., an external investigator, another employee (such as from People & Culture), a senior executive at Tasracing or a Steward) to investigate the substance of the complaint to determine whether there is evidence in support of the complaint raised.

8.4 Stage 4 – Outcome and Resolution

Once the investigation report is completed, the Complaints Manager should, acting as a decision-maker, decide on the outcome and contact the complainant, supplying them with reasons for the decision and, if relevant, avenues for appeal or alternative means of resolution, e.g., the Tasmanian Ombudsman.

Following consideration of the complaint and any investigation into the issues raised, the Complaints Manager will contact the person who has made the complaint and advise them of:

- The outcome of the complaint and any action taken;
- The reason/s for the decision;
- The remedy or resolution/s that Tasracing has proposed or put in place, and
- Options for review that may be available to the complainant, such as an external review by the Tasmanian Ombudsman if Tasracing was unable to resolve the complaint to the complainant's satisfaction.

9. COMPLAINT PROCEDURES

All complaints must be addressed with integrity and in an equitable, objective and unbiased manner.

The person handling a complaint must be different from any employee member whose conduct or service is being complained about.

Conflicts of interests, whether actual or perceived, must be managed responsibly. In particular, internal reviews of how a complaint was managed will be conducted by a person other than the original decision maker who is not in a position of conflict.

The identity of the person making the complaints must be protected in accordance to Tasracing's Privacy Policy and should only be used for the purposes of addressing the complaint and any follow up actions.

Whilst Tasracing will endeavour to preserve the confidentiality of the complainant and the respondent, it may be necessary to speak with other people involved to determine what happened and to maintain the integrity of the investigation process. Where potentially unlawful conduct has occurred, Tasracing will need to alert the appropriate authorities. Those people who are involved in the complaint (including the complainant, witnesses etc.) are also under a duty to maintain confidentiality and display a commitment to uphold the integrity of the complaint management process.

Tasracing should use reasonable endeavours to ensure that complaints are dealt with in line with the following timeframes:

- **Within 5 days:** Acknowledge receipt of a complaint submitted in accordance with this Policy and provide information to the complainant about the process to be followed.
- **Within 45 days:** Finalise most straight-forward complaints.
- **Within 90 days:** Finalise complaints that require informal enquiries or straight-forward investigation.
- **Within 6-12 months:** Finalise complaints that require a complex investigation.
- **Every 6 weeks:** Provide an update about the progress of a complaint from assessment to outcome to the complainant who made it, the relevant controlling body and any affected persons, as appropriate and practical.

If the matter is unable to be resolved within the timeframes listed above, the Complaints Manager will explain the reason for the delay and advise the complainant of a new timeframe and keep them informed of the progress.

The Complaints Manager is responsible for day-to-day complaints management.

Complaints must be escalated as follows:

- High-risk or serious matters (including allegations involving senior management, systemic risk, significant reputational risk or potential criminal conduct) must be escalated to the Chief Executive Officer.

- Matters involving significant governance, financial or reputational risk must be reported to the Audit & Risk Committee.

- Matters involving allegations concerning the Chief Executive Officer must be escalated to the Chair of the Audit & Risk Committee.

- Matters involving Directors must be escalated to the Board Chair.

The Complaints Manager must ensure that escalation decisions are recorded in the Complaints Register.

This escalation framework operates in conjunction with Tasracing's broader governance and risk management framework.

10. EDUCATION AND TRAINING

Tasracing will ensure that employees involved in receiving, assessing or managing complaints receive appropriate education and training to perform those functions consistently and in accordance with this Policy.

Complaint handling training requirements will form part of Tasracing's Education Framework and be included in refresher training programs.

11. EXTERNAL REVIEW

Where a complainant does not accept a resolution offered by Tasracing and wishes to pursue the matter, that person will be advised that they will have a right to lodge a complaint with the Tasmanian Ombudsman. Information regarding making a complaint to the Tasmanian Ombudsman can be found at the following link: https://www.ombudsman.tas.gov.au/making_a_complaint.

However, the Tasmanian Ombudsman cannot investigate a complaint until the complainant has attempted to resolve the issue with Tasracing in the first instance.

12. REVIEW AND APPROVAL

This Policy is provided to the Racing Integrity Committee for advice in accordance with section 58 of the RRI Act, endorsed by the Tasracing Audit & Risk Committee, and then provided to the Board for approval. This will be published on the Tasracing website as soon as practicable following approval.

This Policy will be reviewed at least annually, or earlier where required due to changes to legislation, the TasRIC Standards, the Rules of Racing or Tasracing's operating environment.

13. DOCUMENT CONTROL

Date	Version	Author	Approved by
August 2018	1.0	Compliance Administrator and General Counsel	Acting CEO
29 August 2018	1.0	Compliance Administrator & General Counsel	ARC
10 March 2020	2.0	General Counsel & Company Secretary (GC&CS)	CEO
October 2024	2.1	General Manager – Legal & Compliance	ARC (meeting no. 84 – 30 October 2024)
October 2026	3.0	General Manager – Legal & Compliance	Board (meeting no. 235 – October 2026)