



# Greyhound Racing Victoria

**Box Draw Integrity**

**Final Draft**

**February 2023**

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## 1. Introduction

Greyhound Racing Victoria (GRV) uses FastTrack to co-ordinate racing activity across all greyhound racing venues in Victoria. These activities are required to be in compliance with the guidelines outlined in *Greyhound Australasia Rules (May 2022)* and *GRV Local Rules Local Rule 36 – Box Draw*.

FastTrack is used to facilitate box draws and includes a program which randomly selects the starting positions (box draws) of participating greyhounds. The box draws on FastTrack is conducted via livestream and can therefore be viewed by the public.

Alternatively, once the grading process is completed on FastTrack, the manual box draw process for a race is conducted as per GRIU's *Steward's Standard Operating Procedures* using a Banjo which a GRV Steward uses to randomly allocate participating greyhounds to numbers and then to box draws to determine their order of racing.

To support the random generation of box draws, and to maintain the integrity of the box draw process, all information that can be used to identify greyhounds, including their names, IDs, owners and trainers are automatically removed (deidentified) in FastTrack prior to each box draw. This de-identification process, in conjunction with random selection of starting positions in FastTrack, together supports box draw integrity.

The box draw process was last audited in 2020, at which time no evidence was identified to indicate that automated box draw results could be manipulated. Given the importance of racing integrity to GRV and the industry more broadly, management has requested that a further independent review of the box draw process be conducted by Protiviti.

## 2. Objective and Scope

The objective of this review was to assess the design and effectiveness of processes and controls established to maintain the integrity of box draws. Specifically, the review was to confirm whether box draws (manual and in FastTrack) were configured so that:

- Draws and numbers are randomly generated; and
- Draw results cannot be manipulated by any FastTrack user or users of manual box draws.

This review examined the key stages of a race meeting leading to a box draw, including controls and inputs which support box draw integrity. This includes controls and inputs relating to race nominations and grading, greyhound de-identification and box draw allocation, stages of a manual box draw process as well as system controls surrounding the FastTrack box draw model.

## 3. Key Activities Relating to Box Draw

The key activities and controls which support the box draw process are described in the following sections, and summarised in the process map in **Appendix A**.

### 3.1. Race Nominations and Grading

#### **Process overview**

Up to two (2) weeks prior to each race meeting, the nomination window opens for Participants to nominate their greyhounds for races, specifying their preference for each race. Once the nominations close, FastTrack processes these nominations by considering information relating to each greyhound such as its ability to participate, its preferences for each race and its ranking which is based on past performances and racing experience.

Once nominations are complete, the Racing Operations team performs the grading process in FastTrack in accordance with Local Rule 28 – Grading of *GRV Local Rules* and *GRV Grading Guidelines*.

Key grading activities at this stage include:

- Allocating greyhounds into appropriate races based on their grade, ranking, form and distance preferences;

- Guarding or minimising the number of greyhounds owned or trained by the same Participant contesting in the same race; and
- Determining the order, timing and names of races within a race meeting for up to 12 races.

The *GRV Grading Guidelines* outline the process in place for grading in order to ensure that greyhounds allocated to races with other greyhounds of similar ranking, racing experience and form.

#### ***Review procedures performed***

As part of this review, we observed grading activities being performed by Racing Operations team for the Healesville race meeting and Shepparton Provincial race meeting, on 3 February 2023. Internal audit confirmed that:

- User access to perform grading in FastTrack is restricted to the Graders within the Racing Operations team; and
- Each grading event is performed by one Grader, and then reviewed by a second independent Grader in the Racing Operations team. This segregation of duties means that Grader activity, including compliance with the Race Rules, is independently verified.

### **3.2 FastTrack Box Draw Allocation**

#### ***Process overview***

FastTrack performs the de-identification and box draw processes automatically at the nearest 15-minute mark once the race allocations have been finalised. Through de-identification, information that can be used to identify the greyhound, such as owner and trainer details, ranking, performance and race history are removed, which enforces the random nature of each box draw. Participants are notified of the box draw allocation prior to commencement and the process is displayed live on the FastTrack website as the box draw process is undertaken, and no further manual input from any system user or Participant is possible at this stage.

#### ***Review procedures performed***

As part of this review, internal audit conducted live examination of box draws for two racing events, namely:

- Tier 3 Race meeting in Healesville, on 3 February 2023 (12 races); and
- Provincial race meeting in Shepparton on 3 February 2023 (11 races).

Examination of these box draws confirmed that:

- Once a race meeting's schedule has been finalised, the box draw is set to the nearest 15-minute mark and is automatically processed in FastTrack (including allocation of numbers to individual greyhounds);
- For each race meeting, once the box draw is set, a countdown is displayed on FastTrack notifying Participants and general public of the draw time;
- The draw results are displayed via livestream on the FastTrack website. As such, there is no 'cooldown period' between the box draw being completed and its results being displayed to the public;
- There was no evidence any of the 23 draws was influenced or manipulated during the countdown or the allocation process; and
- A re-run of the draw cannot be performed on FastTrack.

### **3.3 FastTrack System Controls**

As part of this review internal audit performed a high-level assessment of the processes and controls configured in the FastTrack box draw module.

The assessment confirmed that:

- Random number generators have been built into the coding to enforce the random generation of box draw numbers;

- Access to coding is restricted to the system developers and database management team members only;
- The system maintains audit logs of all races graded for each meeting which is available to the general public for viewing; and
- FastTrack utilises a role-based access management system to determine the level of access each user is provided, however this currently requires manual updating, requiring the business to notify Technology of any role changes; due to the manual nature of this process it does not ensure that roles are accurate in real time. A system-based solution addressing system access generally is currently being scoped and socialised.

### 3.4 Manual Box Draw Allocation

#### **Process overview**

Manual box draw allocations are predominantly conducted for feature races such as the Traralgon Country Cup or Melbourne Cup. Once the grading process has been conducted and the races for each race meeting has been finalised, the stewards on-site perform the manual box draw process using the Banjo, or other method approved by the Board. The guideline for this process is outlined in section 3.32 of GRIU's *Steward's Standard Operating Procedures and in accordance with GRV Local Rule 54.4*. Requirements for the manual box draw process include:

- Completion of Manual Box Draw Form by two (2) persons, at least one of them being a Steward, Authorised Officer of the GRV Board;
- The manual box draw is conducted by two (2) GRV Stewards or one (1) GRV Steward and one (1) Club Representative; and
- The manual box draw process must be observed by at least one (1) member of the general public.

#### **Review procedures performed**

As part of this review, internal audit examined manual box draws for the two following racing events:

- Bridges On Argyle Traralgon Cup, on 20 January 2023; and
- Warragul Cup on 6 January 2023.

Examination of these box draws confirmed that:

- The manual box draw process is conducted in view of general public, Participants and in the attendance of at least one (1) GRV Steward;
- As manual box draw allocations are conducted in person, there is no time lag between the allocation and the display or announcement of the box draw results; and
- There was no evidence that any of the two (2) draws were influenced or manipulated during the box draw or allocation process.

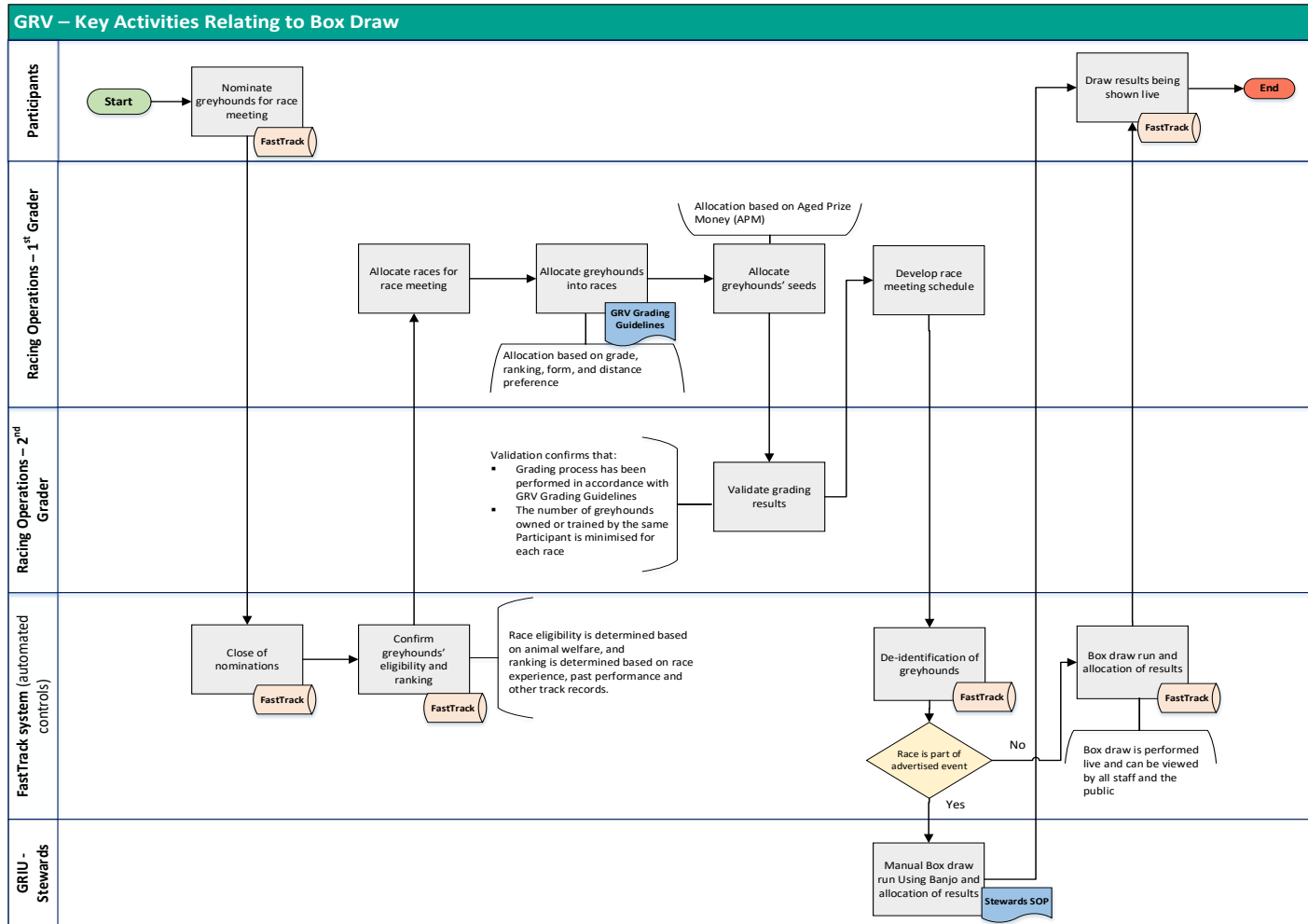
## 4. Conclusion

In conclusion, our review identified no evidence that outcomes of the box draw process could be influenced or manipulated. The result of our review is tabled against each key objective, below.

Review Objective	Result
<ul style="list-style-type: none"> <li>▪ Draws and numbers are randomly generated for FastTrack and Manual Box Draws</li> </ul>	Confirmed
<ul style="list-style-type: none"> <li>▪ The draw results cannot be manipulated by any FastTrack user or users of manual box draws</li> </ul>	Confirmed

# Appendix A: Box Draw Process Map

The following process flow represents the key activities and processes related to the box draw process which is performed automatically by the FastTrack system as well as the manual box draw process for advertised race events:



# Appendix B: Terms of Reference

## Objective and Scope

This review was designed to assess the design and effectiveness of processes and controls established to maintain the integrity of box draws. Specifically, the review will confirm whether box draws (manual and in FastTrack) are configured so that:

- Draws and numbers are randomly generated; and
- The draw results cannot be manipulated by any FastTrack user or users of manual box draws.

## Scope Limitations

This review will target GRV's manual box draws and the box draw number generation process in FastTrack. Other aspects relating to race meetings, such as swabbing and greyhound welfare will not be included in scope.

The results of this review will provide GRV with information on the integrity of the box draw and number generation process in FastTrack and manual box draws at a point in time. Future changes to the organisation, changes in external factors or actions by individuals may significantly impact GRV's control environment in ways that our report could not anticipate.

GRV is, and will continue to be, solely responsible for:

- Making all management decisions and performing all management functions
- Establishing and maintaining an effective system of risk management and internal control over its operations and reporting, including, without limitation, systems designed to assure achievement of its risk and control objectives and its compliance with applicable laws and regulations, and
- Making all decisions in connection with the implementation of any change or recommendation identified as part of the internal audit planning process.

## Approach

To achieve the objectives of this review, we performed the following activities:

- Inform key stakeholders and potential project participants of Protiviti's review process;
- Conduct a planning meeting to introduce the Protiviti team, to discuss the project scope, and to agree information requirements, timelines and deliverables;
- Perform interviews with key GRV stakeholders, and examine relevant policies, procedures and elements of manual box draws and the box draw process in FastTrack to confirm how the box draw process is operating;
- Review FastTrack user access to the box draw program/modules within FastTrack to verify whether box draws can be accessed and/or manipulated by any user;
- Review manual box draws access to verify whether manual box draws can be accessed and/or manipulated by any user;
- Confirm user access privileges are restricted to key personnel only, and that system change controls are operating effectively;
- Observe the box draw process in operation for two (2) race meetings to support our independent assessment of the box draw process;
- Review a sample of 10 box draws, and confirm:
  - Information to identify the greyhounds, and their owners or trainers is removed prior to box draws; and
  - The draw results are randomly generated and have not been altered.

- Evaluate the results of the review to determine potential improvements and recommendations, as well as positive aspects of control;
- Conduct a closing meeting to agree observations, improvements and recommendations (in addition to regular meetings throughout the course of our engagement); and
- Prepare and finalise draft and final reports, including management comments.



## Appendix C: Personnel Consulted

We would like to extend our appreciation to the following individuals who assisted us and provided information during this review.

Position
Acting General Manager Racing (prior to General Manager, Racing, Racing Safety and Clubs commencement 13 February 23) – see below
General Manager, Racing, Racing Safety and Clubs
Risk Manager
Manager Board Secretariat
General Manger, Technology and Innovation
Grader & Racing Coordinator
Acting Chief Steward
Senior Manager, Technology and Innovation

*Face the Future with Confidence*

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