

Mr Steve Griffin
Chief Executive Officer
Greyhound Welfare & Integrity Commission
Level 1
230 Howick Street
Bathurst NSW 2795

14 May 2021

By email: steve.griffin@gwic.nsw.gov.au

Dear Mr Griffin,

Independent review into Greyhound Racing NSW (GRNSW) box draw process

1. CurbyMcLintock Pty Limited (**CurbyMcLintock**) was engaged to undertake an independent review of the box draw process adopted by GRNSW to identify any vulnerabilities in the process and to make recommendations as to how controls could be bolstered to further enhance the integrity of the process (**the Engagement**).
2. This Letter of Advice sets out the work performed, the key findings and recommendations to enhance the integrity of the box draw process.
3. This report has been adapted for publication by GWIC to the general public and we have removed references to participants, greyhounds and a number of GWIC and GRNSW staff.

Background

4. GRNSW is committed to ensuring the integrity of business operations. A critical aspect of GRNSW's integrity is ensuring the industry can rely on processes adopted by GRNSW including the box draw process of sanctioned racing events. Similarly, the Greyhound Welfare and Integrity Commission (**GWIC**), in its role as an independent body to provide regulatory oversight and enforcement of integrity and welfare standards in the industry, seeks to ensure the integrity of business operations including the box draw process.
5. On 26 January 2021, GRNSW announced that it requested GWIC to carry out an independent review into the box draw process¹. GWIC engaged CurbyMcLintock to undertake a review of the box draw process adopted by GRNSW to test the integrity of the process.

Scope of Work

6. As part of the Engagement, CurbyMcLintock was asked to undertake the following:
 - Review GRNSW documents that articulate the grading process to understand its potential to influence the outcome of a box draw;
 - Conduct interviews and walk-through with at least two appropriate GRNSW staff involved in the grading and box draw process to understand the box draw process and obtain an understanding of how GRNSW ensures a fair and equitable process for the boxing of greyhounds for a race;

¹ Article published on 'The Dogs' website on 26 January 2021 – link [here](#)

- Conduct an observation of at least one box draw process in action to confirm that they are consistent with those described as set out in relevant GRNSW policy documents;
- Perform relevant tests in the OzChase 'QUAL' system to replicate the draw process (e.g. manual draw process);
- Conduct a data analytics review of the audit logs relating to the box draw process;
- Following completion of the data analytics process, select two case studies to review box draw allocations and the relevant process in drawing of these races; and
- Prepare a Letter of Advice setting out findings and recommendations for next steps.

Limitations

7. This engagement may be limited by the following:
 - The accuracy of information, including documentation, provided by GRNSW employees who participated in the review;
 - The accuracy and completeness of information and data provided by Racing and Wagering WA (**RWWA**) representatives; and
 - Access to relevant systems used as part of the grading and box draw processes.

Information considered and work performed

8. As part of the review, the GRNSW Grading Policy (**Grading Policy**) was considered to the extent that it may impact the box draw process (see **Appendix 1**² for a copy of the Grading Policy).
9. We interviewed four (4) key GRNSW employees (the **Grading Team**) to understand the grading and box draw process adopted by GRNSW.
10. Each GRNSW interviewee was asked to provide the following information:
 - General overview of their tenure with GRNSW;
 - Their roles and responsibilities;
 - An overview of the process adopted by each of them during the grading and box draw process; and
 - Any perceived vulnerabilities in the grading and box draw process.
11. CurbyMcLintock and GWIC representatives undertook a walkthrough of a live grading and box draw process on 1 February 2021. The grading process and box draw process described by members of the Grading Team was consistent with the process adopted during the walkthrough of the grading and box draw process.
12. A walkthrough of particular scenarios and potential vulnerability identified during the engagement was conducted in the OzChase 'QUAL'³ on 8 March 2021. The key scenarios tested during the exercise were:

² Available on the GRNSW website (www.grnsw.om.au).

³ QUAL is an offline version of the live OzChase system which allows testing to occur on live data without affecting the live OzChase data.

- The ability to enable the manual draw process for races other than a final; and
 - The ability to redraw races multiple times for a greyhound to obtain a more favourable box draw.
13. The results of the tests conducted in the QUAL system are included in the 'Observations and Recommendations' section below.
 14. The relevant date range of the data requested, extracted and analysed from the OzChase system was 1 January 2016 to 10 March 2021 (**Relevant Period**).
 15. CurbyMcLintock liaised with RWWA representatives during the period 1 February 2021 to 14 May 2021 to obtain relevant data from the OzChase system to undertake an analysis of the box draw and redraw data administered and managed by RWWA.
 16. There was a significant delay in obtaining the requested data from RWWA which culminated in CurbyMcLintock visiting the RWWA office in Perth during the period 21 April to 23 April 2021 to work in conjunction with the RWWA team to assist them to identify and extract the required data necessary to undertake the data analytics work.
 17. The extended period of time taken in obtaining the required OzChase data to conduct the relevant data analysis across the box draw and redraw data, delayed our work and as a consequence, the delivery of this Letter of Advice. The delay was associated with the extended periods of time from the date data was requested to when it was produced. Anomalies identified in the data extracted by RWWA required clarification and follow-up and required RWWA to refine scripts to reproduce the data.
 18. A summary of the work conducted in relation to the data analytics exercise is set out under the 'Observations and Recommendations' section below.

OBSERVATIONS AND RECOMMENDATIONS

19. Set out below are our observations and recommendations in relation to our field work and data analytics exercise.
20. Any recommendations need to be considered in terms of the operational, financial and reputational risks associated with the vulnerability identified and balanced against the commerciality of implementing any recommended changes.

Grading and Box Draw Process

21. CurbyMcLintock interviewed members of the Grading Team to understand the box draw process to understand how the application of the Grading Policy could impact the box draw process. Interviewees were each asked, independently, to describe the process adopted and to identify any perceived vulnerabilities in the box draw process.
22. A live box draw process and the relevant associated tasks performed by a Grading Team member was observed to understand the process undertaken from receiving nominations, applying the Grading Policy, allocating the greyhounds to particular race meetings/races, and the process applied to draw the race. This was subsequently followed up with a walkthrough of particular scenarios in the OzChase 'QUAL' system to understand the impact on the draw and redraw process.
23. Having undertaken this work, we make the following observations and recommendations.

Observations and Recommendations

Observation 1 – The OzChase system allows an unlimited amount of redraws to be undertaken

24. When a draw has been finalised in OzChase, relevant participants are notified of the draw results via email automatically generated by OzChase. If a participant has multiple greyhounds racing at the same meeting, the draw results email reflects the draw result for their relevant greyhounds across the respective races (see **Appendix 2**).

25. In the instance where a draw has been finalised in OzChase and a redraw is performed, an email notification, automatically generated by OzChase, is sent to 'Grading_Alerts_D@grnsw.com.au' (**Grading Alerts**) as well as to the affected participants confirming their new box allocation (see **Appendix 3**).
26. The OzChase system has the functionality to allow an authorised user to redraw a race an infinite number of times by repeatedly pressing the 'redraw' radio button. This functionality might be exploited where an operator is seeking a particular box allocation for a greyhound in a particular race.
27. All redraws undertaken using the 'redraw' radio button in OzChase trigger the OzChase system to automatically send an email notification to the email distribution group, Grading Alerts, each time the redraw radio button is selected even if the race has not been 'finalised' in OzChase (see **Appendix 4**). The system does not specifically reconcile the email notification with the race sequence ID (see Observation 12).
28. All redraws and amendments to a draw are captured in the OzChase audit tables which captures the user ID of the person who executed the redraw and the date and time of the redraw.
29. As it is unlikely that there would be a need to undertake a redraw for a race more than once, consideration to be given to potentially disabling the redraw radio button in OzChase after a redraw is completed to avoid multiple redraws being conducted, accidental or deliberate

Recommendation 1a

30. While the automated email to Grading Alerts and participants is an appropriate control, a periodic review of redraws executed should be undertaken by GWIC to ensure that the redraw functionality is not being utilised in a manner that may compromise the integrity of the box draw process. Any anomalies identified in that review process can be investigated contemporaneously.

Recommendation 1b

31. We recommend that appropriate GWIC representative(s) should be added to the Grading Alerts distribution list (see Observation 6 below).

Recommendation 1c

32. Consideration be given to disabling the redraw radio button after a redraw. If a second redraw is contemplated or required and the redraw radio button needs to be reactivated, a service request from, or authorised by, the Chief Grader cc'ing a nominated GWIC representative (e.g. Chief Steward) detailing the reason why an additional redraw is required, to be sent to RWWA. In the instance where the Chief Grader has undertaken the redraw, the next most senior grader is to send the email requesting the reactivation of the redraw button. This provides a segregation between executing the redraw and requesting that the redraw functionality be re-enabled if a redraw for that race has already occurred.
33. Consultation between GRNSW, GWIC and RWWA will need to be undertaken to firstly, assess the adequacy of this recommendation and secondly, assess the viability of the proposed change to ensure that there is no impact to operations (e.g. timely performance of draws/redraws).

Observation 2 – OzChase provides the opportunity to set up a race as a 'final' enabling the manual draw function

34. OzChase has the capability for a race to be set up as 'final' when it is not in fact a final. The reason this method is utilised by the Grading Team is that the OzChase doesn't allow a user to create a restricted race (e.g. 1-3 win races) when there are other races at the same distance and grade or when the prize money is different for races where the distance and grade is the same.

35. When a race is set up as a final in OzChase, an authorised user has the ability to choose from an 'automatic draw' or a 'manual draw.' The purpose of having a manual draw function for a final in OzChase is to enable the Grading Team to manually allocate a greyhound to a box to reflect the results of a live box draw completed as part of a final or feature event. The Grading Team manually input the box draw results for a final or feature race based on a document provided by the Steward that presided over the live box draw. We note that the manual draw function is not available in OzChase for a normal race.
36. A scenario was run in QUAL for a Grade 5 race over 350m for greyhounds with 1-2 wins. If there was another Grade 5 race over 350m, the 1-2 win race would be set up as a 'final' to enable participants to nominate their greyhound for that race and to allow the Grading Team to allocate the eligible greyhounds to that race. In setting the race up as a final, it enables the manual box draw radio button and box allocations can be manually input.
37. We were informed that any race set up as a final where a draw was not drawn on track (i.e. feature race or final), is drawn as an automatic draw even though the manual draw radio box is enabled. This may be the case, but the functionality for a manual redraw is available and creates a vulnerability within the system giving those with the relevant access, the ability to manually allocated a greyhound to a particular box.
38. It is important to note that OzChase live and audit captures if the race is a "final" and whether a box draw was "manual" or "automatic." The OzChase system also records the user ID, the date and time of the box draw which allows activities to be monitored and audited.

Recommendation 2

39. It is recommended that the OzChase workflow associated with setting up multiple races over the same distance and grade or where the prize money differs for a race over the same distance and grade be reviewed to preclude the need to set races up as a final when they are not finals so that the manual draw functionality is not available. The purpose being to reduce the risk (perceived and actual) of the process being manipulated.

Observation 3 – No formal approval process for a redraw to be undertaken

40. The current redraw process requires no formal documented approval for a redraw to be conducted by a member of the Grading Team. It was explained to CurbyMcLintock that as all members of the Grading Team are located in the same room, any potential redraw is communicated verbally in real time and one member of the Grading Team has the final say as to whether a redraw is conducted.
41. The additional control relied on is that each time a redraw is undertaken, regardless of whether the race has been finalised in the OzChase system, details of the redraw, including the reason for the redraw, are captured in the OzChase audit logs and an email notification is automatically sent to the Grading Alerts email address notifying the group that a redraw has been conducted. Participants are notified of the results of a draw once it is finalised but will not be notified if a redraw is undertaken before the results are finalised in OzChase. As noted above, participants are however notified of any redraws that are performed once the race has been finalised in the OzChase system and the results of the draw are published.
42. Our review of OzChase audit records regarding redraws identified that many of the redraw records are deficient with regard to why a redraw was undertaken and it is therefore not easily apparent to identify why the redraw was conducted (see Observation 13).

Recommendation 3

43. To bolster the transparency around redraw approvals, it is recommended that an additional step be introduced before a redraw can be undertaken to capture that the redraw has been authorised. This is to improve the auditability around a redraw and to avoid a situation where it may be implied that a member of the grading team is conducting redraws in isolation.
44. This additional measure could be as simple as a member of the Grading Team emailing the Chief Grader setting out the request to redraw a race, including the reason for the redraw, and the Chief Grader approving the redraw with the authority being recorded and filed for auditability purposes. A more integrated solution could be that an escalation process be included in OzChase whereby a duly authorised person is required to approve the redraw in OzChase before the redraw capability is enlivened.
45. The commerciality of any controls to add an additional gateway to conducting a redraw will need to be assessed based on the perceived risk and the residual risk that exists given the other controls in place. This needs to be balanced with the delays this additional authorisation may cause when finalising a field for publication.
46. If an email authorisation process is to be adopted, it is recommended that a member of GRNSW independent of the Grading Team (e.g. Chief Operating Officer) and GWIC (e.g. Chief Steward), be copied to the email correspondence requesting authorisation to undertake a redraw. An appropriate authority matrix would need to be developed in parallel to address a situation where no member of the grading team is requesting and approving a redraw.

Observation 4 – Lack of governance regarding change requests sent to RWWA

47. CurbyMcLintock was informed that any member of the Grading Team can raise a service request seeking RWWA make changes to a field in OzChase including the box draw allocation of a greyhound. An example of the use case for RWWA's involvement in this manner is where an automatic redraw has been executed in error. A member of the Grading Team can request that the greyhounds box allocation be reverted to the original draw results.
48. Any requests to change box allocation is made by the Grading Team via email to a nominated RWWA email address which automatically generates a service request with a unique service request number. Having received a service request, appropriately authorised RWWA staff create a patch and manually update the data to reflect the changes requested by the Grading Team. The patches and related changes to the system are captured in the OzChase audit tables and the user, 'data_fix', is denoted in the user ID field. Details of the individual RWWA user who processed the patch is not reflected in the OzChase audit data. The service request number is also contained in the patch and reflected in the OzChase system so that the patch can be linked back to the service request. Service requests are filed in hard copy by RWWA.
49. If changes are made by RWWA to a box draw allocation, the automatic email function is not triggered, which is in effect a circumvention of the controls. As such, no notification is sent to the Grading Alerts distribution group as it does when the redraw button is selected. It is therefore currently possible for a member of the Grading Team to request a change to a draw prior to the draw results being finalised which would be processed 'straight through' by RWWA without any further notification to, or oversight from GRNSW or GWIC.

Recommendation 4a

50. All service requests to RWWA requesting manual changes, to be copied to at least the Chief Grader (GRNSW), Chief Steward (GWIC) and a nominated role at GRNSW to ensure greater transparency and oversight of the process and to reduce the risk that the process could be manipulated to manually override the results of box draws before they are finalised.

Recommendation 4b

51. As an additional measure, subject to business practicalities, consider the possibility that any manual adjustments to box draw allocation undertaken by RWWA be observed (virtually via Zoom/Microsoft Teams etc) by GWIC's Steward or Senior Steward. The practicalities of observing any manual adjustments undertaken by RWWA (virtually or by other means) to be contemplated by GWIC and GRNSW in the context of any impacts on operations (i.e. where time is of the essence with regard to making the manual changes).

Recommendation 4c

52. That the user ID of the RWWA representative be captured in the audit log where a patch is undertaken to easily identify who executed the patch.

Observation 5 – There is no policy setting out guidelines as to how a live manual box draw is to be undertaken for finals and feature races

53. A live manual draw is undertaken for finals and feature events at the track. These live manual draws are overseen by a Steward and the results of the live draw are provided by the Steward to the grading team to manually allocate the relevant greyhounds to the necessary box in OzChase to reflect the outcome of the live draw and publish the results.
54. CurbyMcLintock requested from GWIC and GRNSW a copy of any policy or guideline that set out the process to be adopted for a live manual draw performed by clubs. No policy or guideline was forthcoming and it is therefore assumed that such policy/guideline does not exist.
55. We have not undertaken an exercise to determine an exhaustive list of live draw methods undertaken by various clubs, but suffice to say that in the absence of any policy or guideline, it is at the club's discretion as to the method adopted and as such, there could be disparity with regard to the rigor applied to the live draw process.
56. We note that Greyhound Racing Victoria allows for 'live' draws to be viewed on FastTrack⁴. While the live draw is not broadcast live perse, the ability to view the 'live' draw provides additional transparency and comfort of the live draw process in the form of providing accessibility to participants to witness/review the process.

Recommendation 5

57. That a policy with regard to conducting a live draw be developed and adopted by GRNSW, GWIC and relevant clubs to ensure consistency and transparency in the process.

Observation 6 – Recipients of automatic notification email is not fit for purpose

58. As previously mentioned, OzChase automatically generates an email that is sent the Grading Alerts email distribution list when the 'redraw' function in OzChase is executed. The distribution list is administered by Intellitek and any change request made in relation to the distribution list are undertaken by them.
59. Requests for changes to Grading Alerts can be made by the Grading Team but they do not have the authority or ability to change members of the distribution list themselves.
60. CurbyMcLintock requested a list of members of the Grading Alerts distribution list. An examination of this list identified that the distribution list as at 24 March 2021 was made up of five recipients. Three GRNSW staff and two Intellitek representatives. CurbyMcLintock was informed that one of the Intellitek recipients was a dummy account set up by Intellitek to test that the automated emails system was functional. No GWIC representatives are currently on the Grading Alerts email distribution list and as such, GWIC has no warning and potential oversight of the consequence of when a redraw is performed.

⁴ www.fasttrack.grv.org.au

61. CurbyMcLintock was informed during the field work that the whole grading team received notification when a redraw occurred but as noted above, this was not the case. The remaining members of the grading team have been subsequently added to the Grading Alerts distribution list.

Recommendation 6

62. That relevant GWIC personnel including the Chief Steward be added to the Grading Alerts distribution list to enable GWIC to have optics of the redraw process to exercise their function as the independent body with independent regulatory oversight.

Observation 7 – No audit history maintained with regard to changes to the email distribution list receiving notification of redraws

63. We were informed by Intellitek that they do not maintain an audit log/history of requests/changes to the Grading Alerts distribution list. As mentioned, members of the Grading Alerts distribution list receive notification when a redraw is conducted in OzChase. It would seem appropriate that there be a requirement to be able to identify the members of the distribution list at any given time for auditability purposes.

Recommendation 7

64. That Intellitek maintain an audit log/history of requests/changes made to the Grading Alerts distribution list.

Observation 8 – Seeded Reserves Grading Policy presents an opportunity for manipulation

65. GRNSW adopts a Seeded Reserves Grading Policy⁵ (**Reserves Grading Policy**) which means that if there is a single scratching in a race, the first reserve is guaranteed to be allocated the box of the scratched greyhound. We understand that other states adopt a random ballot approach where either the first or second reserve has equal chance of being allocated as the replacement. The random draw of the reserve, where there is a single scratching, reduces the risk of manipulation where a participant might deliberately scratch their greyhound in collusion with other participants to guarantee the first reserve box allocation. We note the penalties that apply under the Racing Rules if a greyhound is scratched/withdrawn from a race, which may act as a deterrent for any scratching for illegitimate reasons.
66. We note however that where more than one greyhound is scratched from the same race, a random draw is undertaken in the OzChase system on the reserves to determine which of the vacant boxes they will be allocated. Although a participant may seek to manipulate a field by scratching their greyhound as contemplated above, there is the possibility that another greyhound would separately be scratched from the race which would initiate the random ballot method and would therefore not guarantee a greyhound a particular box allocation.

Recommendation 8

67. Consideration be given to whether the risk associated with potential manipulation of the Reserves Grading policy warrants adopting the random allocation of reserves policy used in other jurisdictions. As noted above, a random ballot approach would seek to reduce any risks associated with potentially manipulating a field where a participant may scratch their greyhound in favour of the first reserve. This needs to be balanced with the obvious objection to this approach which is that the Reserves Grading Policy ensures that the greyhound with the best form gets a run.

Observation 9 – The Grading Process is Susceptible to Human Error

68. The grading process applied by the grading team is susceptible to human error with specific reference to how they interpret and apply the grading criteria contained in the Grading Policy.

⁵ LR22 and LR22A of the Racing Rules

69. It is the responsibility of the Grading Team to apply the rules set out in the Grading Policy but by their own admission, errors occur during grading as it is a manual process. The Grading Team are reliant upon self-review or industry participants reporting errors in the grading process once a draw is finalised and published. Complaints in relation to the grading process are received by the Grading Team which creates a possible conflict situation i.e. receiving and managing complaints about a process which they have performed.
70. Errors and omissions can lead to a box redraw being required, either specific races or a whole event, which can cause scepticism on the part of industry participants where they might receive a less favourable box allocation as a result of the redraw.

Recommendation 9

71. Improve straight through processing by identifying human intervention in the grading process that may be redundant and can be eliminated.

Observation 10 – The term Redraw is not defined in the greyhound racing rules

72. We note that 'redraw' is not defined in the Racing Rules. Defining a redraw is important for transparency for participants and to ensure that any redraws executed are undertaken in a consistent and uniformed way, in accordance with an expected process. Defining the redraw process will add clarity and transparency around the process.
73. We foresee that it is a potential blind spot in the Racing Rules whereby a challenge could be brought to GRNSW and GWIC with regard to the proper (or improper) application of the redraw process.

Recommendation 10

74. That an appropriate definition for a redraw be drafted and included in the Racing Rules. Defining what constitutes a redraw also has implications for Observation 11 and Recommendation 11b.

Data Analytics Review

75. CurbyMcLintock worked with RWWA to extract relevant box draw and redraw data for the Relevant Period. The data provided included extracts from various data tables maintained in the OzChase system. RWWA produced extracts from the following OzChase data tables for the Relevant Period:
 - Live (Venue, Meetings, Race, Box Draw, Draw Results, Contestant)
 - Audit (Race, Box Draw, Draw Results, Contestant)
 - Redraw email notification
 - Owner
 - Trainer
 - Group
76. The live data tables reflected the most recent events and the audit data table contained records reflecting any changes in the OzChase system.
77. RWWA representatives explained that the OzChase system was designed so that individual instances and events could be interrogated as opposed to a mass analysis of the magnitude we endeavoured to undertake. RWWA noted the difficulties experienced in extracting the data in a format that could be used for the analysis given there was no redraw 'flag' in the OzChase system that would easily identify relevant audit records. This was further exacerbated as it was the first time the redraw data had been extracted in such a manner.

78. RWWA provided the data in distinct files which represented extracts from the various data tables and was compiled, analysed and processed in FastStats software⁶ to assist with the analytics component of the engagement. CurbyMcLintock has prepared an interactive dashboard which has been provided to relevant GWIC/GRNSW stakeholders to undertake any specific 'deep dive' into the analysis.
79. For the purposes of undertaking the analysis of the data and to identify false positive and anomalies, a working definition of a draw and redraw had to be defined. The working definitions provided the framework for extracting and analysing the data provided by RWWA.
80. We note that the Greyhound Racing Rules, dated 12 November 2018, defines 'box draw' as follows:
- “Box draw” means a random allocation process used to determine the respective boxes in which greyhounds are to be placed”*
81. We needed to further define the meaning of redraw in order to take into account how the data is recorded and stored in OzChase. For the purposes of the data analytics exercise, we defined a box draw as, the initial draw undertaken by the GRNSW grading team in OzChase, including automatic draws undertaken and the manual inputting of results from live box draws.
82. We defined a redraw as a redraw of an entire field where a race was run (results finalised) and the records representing the draw results for all runner box draws were replaced following an adjustment in the OzChase data. This definition of a redraw is reflected in the OzChase data where there are the same number of runners in the live data and the audit data tables, or a multiple thereof (i.e. multiple redraws for one race) and the field “Draw_Type” in the audit table is “RBD”, which represents a “Runner Box Draw.”
83. The analysis identified that there were 61,237 races relating to 5,969 meetings that were run during the Relevant Period. Applying the logic stated in paragraph 81 above, we have identified 283 races that were redrawn during the Relevant Period. Of the 283 races where a redraw was undertaken, 12 races involved two redraws⁷.
84. Of the 283 races we have classified as a redraw, this can be broken down into the following three instances based on the OzChase data:
- All greyhounds that were present in the original draw, captured in the audit data tables, were reflected in the live draw data tables have been classified as a **'full field redraw'** (66 instances);
 - Where some of the greyhounds present in the original draw, captured in the audit data tables, were reflected in the live draw data tables have been classified as a **'partial field redraw'** (208 instances); and
 - Where none of the greyhounds present in the original draw, captured in the audit data tables, were reflected in the live draw data tables have classified as a **'new field redraw'** (9 instances).
85. In relation to a 'partial field redraw' and 'full redraw', we have further split them into the following subcategories:

Partial Field Redraw

This is captured here in instances where at least:

- One of, but not all runners in the original box draw for a race, as reflected in the audit data tables, appear in the live draw data tables and they have retained their original box allocation (2 instances);

⁶ FastStats software by Apteco of which CurbyMcLintock is a reseller

⁷ There were no instances where a redraw of a race occurred more than twice.

- Two of, but not all runners in the original box draw for a race, as reflected in the audit data tables, appear in the live draw data tables and at least one retained their original box allocation (95 instances); and
- One of, but not all runners in the original box draw for a race, as reflected in the audit data tables appear in the live draw data tables and the allocation of the box has changed (111 instances).

Full Redraw:

This is in instances where the audit and live data tables reflect the same runners for a race and:

- Each of the runners have retained their original box allocation (13 instances);
 - Some of the runners have retained their original box allocation (31 instances); and
 - None of the runners have retained their original box allocation (22 instances).
86. For the purpose of the analysis, the following instances were excluded from the count of redraws:
- Reserve swaps undertaken as part of the process to adhere to the Seeded Grading Policy. It has been assumed that only the reserve to replace the scratched greyhound appears in the audit data (i.e. whole field not again reflected in the audit table);
 - Races where only some of the runner box draw and draw results for a race were replaced (i.e. not all runners box allocation was changed. An example could be a reserve replacing a scratched dog. See point above); and
 - Races for which the results were not approved (i.e. the race did not proceed. An example is where a race was abandoned or postponed).
87. Having undertaken our analysis of the OzChase data having applied the above parameters, we set out the following summary of key findings:
- There were 63,164 races relating to 6,119 meetings across 34 venues drawn in OzChase;
 - There were 61,237 races relating to 5,969 meetings across 34 venues where the race was run and results were approved (i.e. the race went ahead);
 - Of the 61,237 races that went ahead, there were 60,895 automatic draws and 342 manual draws⁸ which represents 99.4% and 0.6% respectively of races drawn in OzChase;
 - The number of races redrawn each calendar year is set out below. The number of annual redraws (calendar year) conducted over time has decreased from 74 in 2016 to 48 in 2020 representing 0.59% and 0.43% respectively of draws undertaken in those calendar years:

Calendar Year	Races Drawn⁹	Number of Redraws	Redraw %'age¹⁰
2016	12,439	74	0.59%
2017	12,351	66	0.52%
2018	11,917	59	0.50%

⁸ Reflected in the live results table in OzChase.

⁹ Races that were approved (i.e. they went ahead)

¹⁰ Redraws as a percentage of total races drawn

2019	11,091	29	0.26%
2020	11,261	48	0.43%
2021 ¹¹	2,178	7	0.32%

- There were 302 races where an automatic box draw was undertaken and a manual redraw was subsequently undertaken representing 0.49% of total races drawn. The explanation provided as to why this may occur relates to a situation where a consolation final is set up in OzChase but is 'hidden' by RWWA at the request of the Grading Team and reinstated by RWWA at the appropriate juncture (e.g. Coonamble Carnival October 2018);
- There were 36,079 races where a manual draw was undertaken and was subsequently adjusted. The explanation provided as to why this may occur relates to an instance where a grader is inputting the live draw results into OzChase for a final or feature race and presses the save button several times during the process which 'prints' multiple records to the audit tables;
- Work was done to identify greyhounds with the most number of redrawn races during the Relevant Period. We identified four greyhounds who had redraws on seven (7) occasions and three greyhounds had a redraw on six (6) occasions. We noted a further seventeen (17) greyhounds that were associated with a race where a redraw was undertaken on five (5) occasions.
- Further work was done to identify trainers with the most number of redraws for the Relevant Period. For the purpose of this report, we have referred to the trainers as Trainer 1 through Trainer 11 inclusive. In undertaking this analysis, it was assumed that the trainer did not change during the intervening period between when a greyhound was drawn and subsequently redrawn:

Trainer Name	Total Races Participated In	% Races	Redraws	% Redraws
Trainer 1	3,402	6%	30	11%
Trainer 2	1,569	3%	16	6%
Trainer 3	3,984	7%	16	6%
Trainer 4	1,255	2%	15	5%
Trainer 5	1,097	2%	14	5%
Trainer 6	872	1%	13	5%
Trainer 7	1,671	3%	13	5%
Trainer 8	1,067	2%	12	4%
Trainer 9	1,246	2%	12	4%
Trainer 10	1,573	3%	12	4%
Trainer 11	3,122	5%	12	4%

¹¹ To 10 March 2021.

- We note that Trainer 1 and Trainer 3 have had greyhounds in a comparable number of races, yet Trainer 1 has twice as many instances of being involved in a race where there was a redraw.
- Trainer 2 has been involved in half as many races as either Trainer 1 and Trainer 3 but has been involved in a comparable number of races where a redraw was undertaken, to Trainer 3.
- Of the 283 races where there was a redraw undertaken, there were 185 (65%) instances where little or no detail was provided for why the redraw was undertaken. Captured below is a word cloud that demonstrates the most commonly used words in the redraw reason field in OzChase.



88. Further to the last point above, there was no email audit data in Ozchase for the period December 2015 to June 2018 capturing the reason for the redraw and details that would easily identify the race and greyhounds impacted by the redraw (see Observation 12 and 13 below). The reason provided by RWWA for the gap in the audit data was as follows¹²:

“The reason behind the gap in content is probably a combination of:

Application error and Transition to new storage format. A software change in late 2015 appears to have changed the Table where the data was to be saved and its format from plain text to encoded format. The assumption amongst members of the team that were present (no developers unfortunately) is that the missing data was not identified until later (mid 2018).”

89. In addition, there was no unique identifier (e.g. race sequence number) captured in the email data enabling an easy match of the redraw email data to the redraw undertaken.
90. Having completed the data analytics exercise, we make the following observations and recommendations.

Observations and Recommendations

Observation 11 – No ‘flag’ in the OzChase system to easily identify redraws

91. The data analytics exercise identified that there was no simple ‘flag’ in the OzChase system to easily identify and extract records associated with a redraw. As mentioned above, it was explained to CurbyMcLintock that the OzChase system was designed to look at unique instances as opposed to large historical audit records. This limitation with

¹² Contained in email to CurbyMcLintock

regard to not being able to identify data specific to redraws over time was central to the delays in RWWA producing the requested data.

Recommendation 11a

92. It is recommended that a 'flags' and reason codes are appended to the data so that a race that is redrawn can be easily identified and that the related redraw results can be associated with a redraw reason so that a system user can identify when a redraw has taken place, why, and how many times the redraw occurred.
93. The appropriate attribute to add this flag to appears to be 'Draw_Type_Code', contained in the audit tables.

Recommendation 11b

94. Key to Recommendation 11a is to define what a redraw is for the purpose of attributing a flag against relevant audit and live data in the OzChase system. It is further recommended that the Grading Team work with RWWA to define these scenarios (see Recommendation 10 above).

Observation 12 – No race sequence number contained in email redraw audit data

95. As referred to above, there is no race sequence number¹³ or other unique identifier reflected in all email notifications sent to the Grading Alerts distribution group when a redraw is performed. This makes any reconciliation of the email redraw data to the redraw audit data extremely difficult and sometimes impossible. The date/time stamp together with the venue name on each of the redraw email data and the redraw audit data and on occasion, the race number, were the only fields that enabled a partial reconciliation but this was not an absolute match.

Recommendation 12

96. The race sequence number or other unique identifier to be included in the email notification sent to the Grading Alerts distribution group to enable a simple reconciliation process for any future reviews.

Observation 13 – The majority of redraws contain little or no detail regarding the reason for the redraw

97. When a redraw is undertaken, a free-form text box is activated in the OzChase system to enable members of the Grading Team to input the reason(s) for a redraw. It is up to the grader performing the redraw to adequately capture the reason for the redraw and the runners affected by the redraw.
98. Our analysis of data relating to the redraws identified that there were a large number of redraws conducted over the Relevant Period, where there was no detail contained in the field to capture the reasons for the redraw. In 98 cases, representing 35% of redraws over the Relevant Period where we have been able to successfully match a redraw notification email with a redraw, there is insufficient information to form a view as to why a redraw was undertaken including the name of the greyhound where, for example, a greyhound may have been accidentally omitted during the nominations/allocation phase of the draw process.

Recommendation 13

99. That the free form text field in OzChase be made a mandatory field and is supplemented by a mandatory field requiring users to select a reason for a redraw from a drop down box (e.g. greyhound omitted from race, greyhound omitted from reserve allocation, did not schedule event etc.) In addition, a detailed description of why a redraw was required, including the greyhound name and race details, to be included so that someone undertaking an independent review of redraws can easily identify and understand the reasons for the redraw.

¹³ Unique numerical reference assigned to every race run.

Observation 14 – Missing email audit data in OzChase

100. As noted above, there was no email audit data in OzChase for the period December 2015 to June 2018 capturing the reason for the redraw and details that would easily identify the race and greyhounds impacted by the redraw.

Recommendation 14

101. That any service level agreement between GRNSW and RWWA be reviewed to determine whether there is sufficient coverage to ensure the audit data, including the email draw data, is retained for a period commensurate with the data retention requirements contained within the agreement or associated policy.

Observation 15 – Box draw ‘type’ captured in OzChase is misleading with regard to amendments made by RWWA representatives

102. The analysis of the data identified a number of instances where a data patch had been undertaken by RWWA reflected by the user, ‘data_fix’. Although the patch undertaken by RWWA is a manual override of the box allocation, the data is reflective of an ‘automatic’ draw being conducted. The reason put forward by RWWA is that when a patch is undertaken to remedy an issue in OzChase (e.g. reverting field back to original box draw), the original records are duplicated and then the box allocation is manually amended. The box draw type will therefore remain the same and where an automatic draw was undertaken, will reflect that another ‘automatic’ draw was undertaken.

103. This is misleading and does not reflect the true nature of what has taken place.

Recommendation 15

104. That the ‘draw_type’ attribute in the OzChase system reflect that there has been a manual override of the data. The suggested descriptor to be included against that attribute to be ‘manual_override’ or similar to clearly identify the items that have been manually altered.

Observation 16 – No capability currently in OzChase for a consolation final to allow a manual draw in the system

105. It was described to us by a RWWA representative that OzChase currently does not have the capability to allow for a manual draw for consolation finals. This therefore means that the Grading Team can’t directly execute their function in these instances and requires them to send a service request to RWWA requesting that the allocation of greyhounds be done manually by them via a patch. Instances where this has occurred will reflect ‘data_fix’ as the user identification.

106. Unforeseen delays could be experienced if the Grading Team’s request is not processed in a timely manner.

Recommendation 16

107. GRNSW, GWIC and RWWA to collaborate to find a solution to enable the Grading Team to undertake a manual draw for a consolation final without needing to request RWWA run a patch.

Summary

108. Taking into account the work undertaken as articulated above, we have prepared a summary table with the key observations made in relation to this review. These are as follows:

No.	Observation	No.	Recommendation
1	The OzChase system allows an unlimited amount of redraws to be undertaken.	1a	Periodic review of redraws executed should be undertaken by GWIC to ensure that the redraw functionality is not being utilised in a manner that may compromise the integrity of the box draw process. Any anomalies identified in that review process can be investigated contemporaneously.
		1b	GWIC representative(s) should be added to the Grading Alerts distribution list.
		1c	Disable the redraw radio button after a redraw (subject to consultation between GRNSW and GWIC).
2	OzChase provides the opportunity to set up a race as a 'final' enabling the manual draw function.	2	OzChase workflow associated with setting up multiple races over the same distance and grade or where the prize money differs for a race over the same distance and grade, be reviewed to preclude the need to set races up as a final when they are not finals, so that the manual draw functionality is not available.
3	No formal approval process for a redraw to be undertaken.	3	An additional step be introduced before a redraw can be undertaken to capture that the redraw has been authorised.
4	Lack of governance regarding change requests sent to RWWA.	4a	All service requests to RWWA requesting manual changes, to be copied to at least the Chief Grader (GRNSW), Chief Steward (GWIC) and a nominated role at GRNSW.
		4b	Subject to business practicalities, consider the possibility that any manual adjustments to box draw allocation undertaken by RWWA be observed (virtually via Zoom/Microsoft Teams etc) by GWIC's Steward or Senior Steward.
		4c	That the user ID of the RWWA representative be captured in the audit log where a patch is undertaken to easily identify who executed the patch.
5	There is no policy setting out guidelines as to how a live manual box draw is to be undertaken for finals and feature races.	5	That a policy with regard to conducting a live draw be developed and adopted by GRNSW, GWIC and relevant clubs to ensure consistency and transparency in the process.

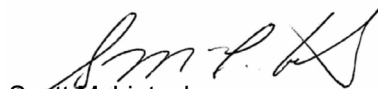
No.	Observation	No.	Recommendation
6	Recipients of automatic notification email is not fit for purpose.	6	That relevant GWIC personnel, including the Chief Steward, be added to the Grading Alerts distribution list to enable GWIC to have optics of the redraw process to exercise their function as the independent body with independent regulatory oversight.
7	No audit history maintained with regard to changes to the email distribution list receiving notification of redraws.	7	That Intellitek maintain an audit log/history of requests/changes made to the Grading Alerts distribution list.
8	Seeded Reserves Grading Policy presents an opportunity for manipulation.	8	Consideration be given to whether the risk associated with potential manipulation of the Reserves Grading policy warrants adopting the random allocation of reserves policy adopted in other jurisdictions.
9	The Grading Process is Susceptible to Human Error.	9	Improve straight through processing by identifying human intervention in the grading process that may be redundant and can be eliminated.
10	The term Redraw is not defined in the greyhound racing rules.	10	That an appropriate definition for a redraw be drafted and included in the Racing Rules. Defining what constitutes a redraw also has implications for Observation 11 and associated recommendations.
11	No 'flag' in the OzChase system to easily identify redraws.	11a	A flag and reason code be appended to the data so that a race that is redrawn can be easily identified along with the reason for the redraw.
		11b	That a definition for a redraw be prepared for the purpose of attributing a flag against relevant audit and live data in the OzChase system (see Recommendation 10 above).
12	No race sequence number contained in email redraw audit data.	12	The race sequence number or other unique identifier to be included in the email notification sent to the Grading Alerts distribution group to enable a simple reconciliation process for any future reviews.
13	The majority of redraws contain little or no detail regarding the reason for the redraw.	13a	That the free form text field capturing the reason for a redraw in OzChase be made a mandatory field and to be supplemented by a mandatory field requiring users to select a reason for a redraw from a drop down box (e.g. greyhound omitted from race, greyhound omitted from reserve allocation, did not schedule event etc.)
		13b	A detailed description of why a redraw was required, including the greyhound name and race details, to be included so that someone undertaking an

No.	Observation	No.	Recommendation
			independent review of redraws can easily identify and understand the reasons for the redraw.
14	Missing email audit data in OzChase.	14	That any service level agreement between GRNSW and RWWA be reviewed to determine whether there is sufficient coverage to ensure the audit data, including the email draw data, is retained for a period commensurate with the data retention contained within the agreement or associated policy.
15	Box draw 'type' captured in OzChase is misleading with regard to amendments made by RWWA representatives.	15	That the 'draw_type' attribute in the OzChase system reflect that there has been a manual override of the data. The suggested descriptor to be included against that attribute to be 'manual_override' or similar to clearly identify the items that have been manually altered.
16	No capability currently in OzChase for a consolation final to allow a manual draw in the system.	16	GRNSW, GWIC and RWWA to collaborate to find a solution to enable the Grading Team to undertake a manual draw for a consolation final without needing to request RWWA run a patch.

Reliance on this letter

109. The issues considered during this review/engagement have been specifically limited to those set out in the Scope Statement
110. We have no responsibility to update this letter for events or circumstances occurring after the date of this letter, apart from any subsequent arrangement.
111. Risk management work relies on information we obtain from staff with expertise. Our work is done on a best efforts basis and we do not warrant the accuracy of information provided by those who participated in the review or the accuracy or completeness of documentation provided by GRNSW or RWWA as part of the review.
112. This letter has been prepared, and may be relied on, solely for the purpose/s specified in the Engagement Letter. This letter may only be published or distributed in accordance with the Engagement Letter and/or in accordance with any law or by order of a court of competent jurisdiction.
113. The express written consent of CurbyMcLintock must be obtained prior to relying upon, publishing or distributing this letter, or part of it, for some other purpose. CurbyMcLintock does not accept responsibility to anyone if they use this letter for some other purpose.
114. Should you wish to discuss any aspect of this Letter of Advice, please contact Scott McLintock or Paul Curby.

Yours sincerely,



Scott McLintock
Partner



Paul Curby
Partner

For and on behalf of CurbyMcLintock Pty Limited
Enc.

APPENDIX 1



NSW Grading Policy

Commencement:

24 January 2021

Updated:

24 February 2021

Greyhound Racing NSW

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2000

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1. Purpose

- 1.1 The Greyhound Racing New South Wales Grading Policy:
- (a) Creates a fair, equitable and transparent system where greyhounds with the most appropriate form secure starts and are grouped with greyhounds of similar ability; and
 - (b) Ensures the viability of the industry by promoting the highest standard of racing possible that maximises the racing career of greyhounds in New South Wales (**NSW**).

2. Scope

- 2.1 This Policy is applicable to the grading of all TAB and Non-TAB race meetings conducted at NSW racetracks.
- 2.2 This Policy must be read in conjunction with the Rules.

3. Definitions

- **Class of Meeting** – There are three classes of race meetings in NSW. The Class of Meeting will determine the grading and penalty applied to results.
- **Distance Category** – There are three distance categories in NSW. Each distance category will attract a separate grade.
- **Event** – The competitive pursuit by one or more greyhounds of a mechanical lure.
- **Free For All** – An Event open to eligible first to fourth grade greyhounds.
- **Greyhound** – A greyhound that is owned or kept in connection with greyhound racing.
- **Greyhound Racing New South Wales (GRNSW)** – the body corporate charged with providing strategic direction and leadership in the development and welfare of greyhound racing in NSW.
- **Guarding** – Guarding is the allocation of greyhounds owned and or trained by the same person into separate Events.
- **Last Start** – Most recent start at close of nominations.
- **Maiden Event** – An Event open to greyhounds who have not won an Event.

- **Masters Event** – An Event open to greyhounds having attained the age of Four years.
- **Meeting** – Means any occasion at which greyhound racing Events are scheduled to be conducted pursuant to the Rules.
- **Non-Grade** – An Event open to all graded greyhounds.
- **Order of Entry** – The order in which greyhounds will be drawn in an Event.
- **Rules** – The Greyhound Racing Rules which, together with the Local Rules are the Rules.
- **Special Event** – A Special Event will be any Event where the conditions of the Event differ from this Policy.
- **Weighted Points Score Table** – The points allocated for each resulted Event. The last five allotted points will form the greyhounds weighted points score.

4. Class of Meeting

Greyhound race meetings in NSW will be classified into the following classes prior to the opening of nominations:

- **City – C**
- **Provincial – P**
- **Country - Y**

5. Distance Category

There are three distance categories found in NSW:

- **Short** = 0m to 420m
- **Sprint** = 421m to 564m
- **Distance** = 565m and over

6. General Grading Provisions

- 6.1** The Chief Grader may exercise discretion with regard to the inclusion of a greyhound in an Event subject to the provisions of this Policy.
- 6.2** A greyhound will be deemed to have won an Event if it is adjudged that one or more greyhounds dead-heated for first.
- 6.3** A greyhound is penalised for each win unless the conditions of the Event stipulate otherwise.
- 6.4** A greyhound that is disqualified after an Event will have any grading penalty and points associated with the Event removed.
- 6.5** The grader will:
 - (a) Determine the grade and distances of Events to be drawn at any race meeting subject to nominations received; and
 - (b) Give preference to drawing full fields for all races.

7. Eligibility for Events

7.1 Maiden

- (a) A greyhound is eligible to compete in a Maiden Event if the greyhound at the time of starting has not won an Event.
- (b) A greyhound that competes in a Maiden Series which wins more than one Event in the Series will, at the conclusion of the Series, be deemed to have won one Event for the purposes of determining the greyhound's grade under this Policy.

7.2 After winning a Maiden Event:

- (a) A greyhound will be graded as a fifth grade greyhound at all class of race meetings in all distance categories.
- (b) A greyhound will be elevated one grade for each win after reaching fourth grade at all tracks in a particular distance category.

CITY

7.3 A greyhound's grade will be calculated at a City meeting as follows:

- (a) A greyhound will be graded as a fourth grade greyhound at a City meeting in a particular distance category in accordance with the following:
 - (i) On winning two fifth grade Events at City meetings in a particular distance category excluding its maiden.

Thereafter, it will progress up and down the grades in accordance with 7.2(b) and 8.

PROVINCIAL

7.4 A greyhound's grade will be calculated at a Provincial meeting as follows:

- (a) A greyhound will be graded as a fourth grade greyhound at a Provincial meeting in a particular distance category in accordance with one of the following:
 - (i) On winning two Events at City meetings in a particular distance category excluding its maiden; or
 - (ii) On winning four Events at Provincial meetings in a particular distance category excluding its maiden; or
 - (iii) On winning four Events at City or Provincial meetings combined in a particular distance category excluding its maiden; or
 - (iv) On winning eight Events at City or Provincial meetings combined in all distance categories, excluding its maiden.

Thereafter, it will progress up and down the grades in accordance with 7.2(b) and 8.

- (b) Interstate City class wins in a particular distance category will be calculated as City, Provincial and Country wins in NSW.

COUNTRY

- 7.5** A greyhound's grade will be calculated at a Country meeting as follows:
- (a) A greyhound will be graded as a fourth grade greyhound at a Country meeting in a particular distance category in accordance with one of the following:
 - (i) On winning one Event at any City meeting excluding its maiden; or
 - (ii) On winning two Events at any Provincial meetings combined excluding its maiden; or
 - (iii) On winning four Events at Country meetings in a particular distance category excluding its maiden; or
 - (iv) On winning eight Events at any Provincial or Country meetings combined in any distance category, excluding its maiden.Thereafter, it will progress up and down the grades in accordance with 7.2(b) and 8.

 - (b) A greyhound will be graded as a third grade greyhound at a Country meeting in a particular distance category in accordance with one of the following:
 - (i) On winning two Events at any City meetings excluding its maiden; or
 - (ii) On winning four Events at any City or Provincial meetings combined excluding its maiden; or
 - (iii) On winning ten Events at any City, Provincial or Country meetings combined excluding its maiden.Thereafter, it will progress up and down the grades in accordance with 7.2(b) and part 8.

 - (c) Interstate Provincial class wins in a particular distance category will be calculated as Provincial and Country wins in NSW.

8. Drop-Back Rule

- 8.1** A greyhound will drop back one grade at its next start in a particular class, and particular distance category if:
- (a) It is unplaced at a NSW track at the same class of meeting in a particular distance category in two Events after its last win at that particular class of meeting and in a particular distance category.
- 8.2** After being lowered one grade in accordance with clause 8.1(a) a greyhound will upon winning an Event in that particular class of meeting and in that particular distance category, be elevated one grade at that particular class of meeting in that particular distance category.
- 8.3** A greyhound's Masters grade will drop back one Masters grade at its next Masters start following two unplaced starts in NSW Masters Events.
- 8.4** After being lowered one Masters grade in accordance with clause 8.3 a greyhound will upon winning a Masters Event be elevated one Masters grade.
- 8.5** A greyhound will be ineligible to compete in a fifth grade Event at Provincial or Country race meetings after winning fifteen combined City and Provincial Events excluding its maiden.

9. Order of Entry

- 9.1** The following is the order of entry that the Grader must use for the inclusion of greyhounds in fields for all **Maiden** Events, including heats:
- (i) Last start placegetters at the class of meeting and particular distance category;
 - (ii) Greyhounds placed in two of their last three race starts;
 - (iii) Greyhounds placed in one of their last three race starts;
 - (iv) Greyhounds having their first start;
 - (v) Greyhounds that were reserves at the previous meeting in the class of meeting and distance at the same track of nomination that had not gained a start at that meeting;
 - (vi) Greyhounds unplaced after having one race start;
 - (vii) Greyhounds unplaced as determined by the Weighted Point Score Table.
- 9.2** The following is the order of entry that the Grader must use for the inclusion of greyhounds in fields for **Graded** Events, excluding heats:
- (i) Last start winners at the category of meeting and particular distance category;
 - (ii) Last start placegetters at the category of meeting and particular distance category;
 - (iii) Last start winners at a City race meeting when nominating at a different distance category at a City race meeting or at any distance category at a Provincial or Country class meeting;
 - (iv) Last start winners at a Provincial race meeting when nominating at a different distance category at a Provincial race meeting or at any distance category at a Country class meeting;
 - (v) Last start winners at a Country race meeting when nominating at a different distance category at a Country race meeting or at any distance category at a Provincial class meeting;
 - (vi) Greyhounds that were reserves at the previous meeting in the class of meeting and distance at the same track of nomination that had not gained a start at that meeting;
 - (vii) Greyhounds dropping in grade at the class of meeting and particular distance category;
 - (viii) Greyhounds with the best race form amongst the remainder as determined by the Weighted Points Score Table. (See Appendix A)

- 9.3** For the purposes of City, Provincial and Country race meetings, once the Order of Entry has determined the pool of greyhounds to be drawn, the ‘top-down’ grading principle will be applied in the following order:
- (a) Greyhounds graded first grade will be drawn to race ahead of second grade, second grade ahead of third grade, third grade ahead of fourth grade, fourth grade ahead of fifth grade, and fifth grade ahead of maiden greyhounds;
 - (b) Greyhounds of the same grade will be drawn in the following order:
 - (i) Greyhounds with a preference in accordance with 9.1 and 9.2;
 - (ii) Greyhounds with the highest number of points under the Weighted Points Score Table (See Appendix A);
 - (iii) Greyhounds with the highest number of class wins in the particular distance category;
 - (iv) Greyhounds with the highest number of total wins.
- 9.4** The following is the order of entry that the Grader must use for the inclusion of greyhounds in fields for all **Masters** Events:
- (a) Last start winner in a Masters Event;
 - (b) Last start placegetters in a Masters Event;
 - (c) Greyhound with the best form as determined by the Weighted Point Score Table.
- 9.5** For the purposes of Masters Events, once the Order of Entry has determined the pool of greyhounds to be drawn, the ‘top-down’ grading principle will be applied in the following order:
- (a) Greyhounds with a Masters preference in accordance with 9.4.
 - (b) M1’s will be drawn to race ahead of M2’s and M2’s will be drawn ahead of M3’s.
 - (c) Greyhounds of the same Masters Grade will be drawn based on their weighted Point Score.
- 9.6** **Guarding**
- (a) Guarding will be applied to the following:
 - (i) All maiden Events;
 - (ii) All Events consisting of heats and/or semi-finals;
 - (iii) All Grade 5 Events where no greyhound has five or more wins
 - (b) The grader will guard all Events listed in clause 9.6(a) except in circumstances where doing so will not be fair or equitable to a majority of participants in an Event.

10. Special Event

- 10.1** A Special Event will be any Event where the conditions differ from this Policy. GRNSW may grant permission to a Club to conduct an Event, the conditions of which differ from this Policy.
- 10.2** All Events provided on the Australian Greyhound Racing Group Race Calendar will be defined as Special Events.
- 10.3** Nominators must nominate directly into heats where the final is to be run at a different track.
- 10.4** Nominators must nominate directly into all Group 1, Group 2, Group 3 and Listed Events.
- 10.5** An eligible greyhound will be drawn in a Special Event that is not a group or listed Event unless the nominator states '**NO**' to a Special Event at the time of nomination.
- 10.6** Nominators cannot opt out of an advertised Non-Grade Event if eligible to compete.

11. Mixing of Grades

- 11.1** Special Events may consist of greyhounds of any grade subject to the eligibility requirements of the particular Special Event.
- 11.2** A greyhound is eligible for a Free For All Event if:
- (a) the greyhound is graded, first, second or third grade at the class of meeting and in that particular distance category; or
 - (b) a fourth grade greyhound has won:
 - (i) a minimum of eight Events; and
 - (ii) Includes a minimum of three Events in the distance category and in the class of race meeting or higher at which the Free For All Event is to be conducted.
- 11.3** A 4/5th grade Event may be conducted where the field consists of:
- (a) One 4th grade greyhound; and
 - (b) At least two 5th grade greyhounds.
- 11.4** Where a mixed grade Event is to be drawn the higher grade greyhounds will be drawn before the lower grade greyhounds.
- 11.5** A fourth grade greyhound is eligible to compete in a third and fourth grade Event if:
- (a) It has won five or more Events; and
 - (b) Includes a minimum of two Events in the distance category and in the class of race meeting or higher at which the third and fourth grade Event is to be conducted.
- 11.6** A fifth grade greyhound is eligible to compete in a fourth and fifth grade Event if it has won three or more Events, unless those wins are all Country class.
- 11.7** Where a greyhound wins an Event consisting of multiple grades, that win is classified as a win in the lowest grade for which the greyhound was eligible to compete at that class and particular distance category.
- 11.8** Masters Events may consist of any Masters Grade.
- 11.9** Where a Masters Event consists of mixed Masters Grades the points awarded will be awarded at the highest Masters Grade in the race.

12. Masters Racing

- 12.1** Masters Racing consists of three Masters grades:
- (a) M1;
 - (b) M2; and
 - (c) M3.
- 12.2** All Masters Wins will be classified as Penalty Free when greyhounds return from Masters to Non Masters Events.
- 12.3** A greyhound is eligible to compete in Masters Events at the age of four years on the date of the Event.
- 12.4** A greyhound's Masters grade will be calculated as follows:
- (a) No greyhound will commence Masters Racing as a M1;
 - (b) A greyhound will commence Masters Racing as a M2 if the greyhound has won:
 - (i) Two or more City Events, excluding its maiden; or
 - (ii) Six or more City and or Provincial Events combined, excluding its maiden; or
 - (iii) Twelve total wins, excluding its maiden.
 - (c) All other greyhounds will commence Masters Racing as a M3.
- 12.5** A greyhound's Masters grade will move up one grade on winning two Masters Events. Thereafter, it will progress up and down the Masters grades in accordance with 8.3 and 8.4.
- 12.6** Multiple Masters Events will not be guarded.
- 12.7** Maiden greyhounds are ineligible to nominate and compete in a Masters Event.

13. Pathways Racing

- 13.1** A greyhound will be ineligible to compete in a Pathways Event if:
- (a) The greyhound won its last Event at a City or Provincial race meeting including its maiden; or
 - (b) The greyhound is graded fourth grade or higher in the class of meeting and in the particular distance category.

14. Categories of Race Meetings

For the purposes of this Grading Policy, race meetings conducted at greyhound racing tracks are categorised as follows:

14.1 CITY RACE MEETINGS

NEW SOUTH WALES

City Class Meetings

VICTORIA

Meadows

Metropolitan Class Race Meetings

Sandown

Metropolitan Class Race Meetings

WESTERN AUSTRALIA

City Class Race Events

QUEENSLAND

QLD Category 1 race meetings

All Group race finals as set out in the Australian Greyhound Racing Group Race Calendar conducted interstate will be classified as City Events regardless of the classification of the track at which the Group race is held.

14.2 PROVINCIAL RACE MEETINGS

NEW SOUTH WALES / ACT

Provincial Class Meetings

VICTORIA

All TAB meetings, except Meadows and Sandown Metropolitan Class Race Meetings

QUEENSLAND

QLD Class 2, 3, 4, 5 and 6 race meetings

SOUTH AUSTRALIA

All TAB meetings

WESTERN AUSTRALIA

All TAB meetings, except City Class Events

TASMANIA

All TAB meetings

NORTHERN TERRITORY

All TAB meetings

NEW ZEALAND & INTERNATIONAL

All Tracks

14.3 COUNTRY RACE MEETINGS

NEW SOUTH WALES

Country Class Meetings

ALL OTHER STATES

Non TAB Meetings

Appendix A: Weighted Points Score & Pro Rata

Weighted Point Score for the purpose of determining order of entry in accordance with clause 7.								
City	1 st	2 nd	3 rd	4 th	5 th	6 th	7 th	8 th
Grade 1	112	96	88	44	40	36	32	28
Grade 2	104	88	80	40	36	32	28	24
Grade 3	96	80	72	36	32	28	24	20
Grade 4	88	72	64	32	28	24	20	16
Grade 5	80	64	56	28	24	20	16	12
Maiden	36	32	28	14	12	10	8	6
Provincial	1 st	2 nd	3 rd	4 th	5 th	6 th	7 th	8 th
Grade 1	84	72	66	33	30	27	24	21
Grade 2	78	66	60	30	27	24	21	18
Grade 3	72	60	54	27	24	21	18	15
Grade 4	66	54	48	24	21	18	15	12
Grade 5	60	48	42	21	18	15	12	9
Maiden	36	32	28	14	12	10	8	6
Country	1 st	2 nd	3 rd	4 th	5 th	6 th	7 th	8 th
Grade 1	56	48	44	22	20	18	16	14
Grade 2	52	44	40	20	18	16	14	12
Grade 3	48	40	36	18	16	14	12	10
Grade 4	44	36	32	16	14	12	10	8
Grade 5	40	32	28	14	12	10	8	6
Maiden	36	32	28	14	12	10	8	6
Masters	1 st	2 nd	3 rd	4 th	5 th	6 th	7 th	8 th
M1	70	60	55	28	25	22	19	16
M2	60	50	45	22	19	16	14	12
M3	50	40	35	17	14	12	10	8

Note: A greyhound's weighted point score will continue to be calculated on its last five starts, whether those starts in Masters or Non Masters Events.

Pro Rata

Greyhounds that have not yet competed in five starts are allocated points on a pro-rata or an average over five starts with a weighting of 80% applied to the "pro-rata" points. To calculate the points of a greyhound that has not competed in five starts you divide the greyhound's total points by the amount of starts it has competed in, then you multiply the new average by the difference between five and the number of actual starts and after applying the 80% discount weighting add the result to the actual points earned from the greyhound's starts.

Examples for working out the points of greyhounds using this method:

One Start = 36 points $36 / 1 = 36$ $36 \times 4 = 144$ $144 \times 0.8 = 115$ $115 + 36 = 151$ points

Two Starts = 46 points $46 / 2 = 23$ $23 \times 3 = 69$ $69 \times 0.8 = 55$ $55 + 46 = 101$ points

Four Starts = 84 points $84 / 4 = 21$ $21 \times 1 = 21$ $21 \times 0.8 = 16$ $16 + 84 = 100$ points

APPENDIX 2

From: [REDACTED]@rwwa.com.au >
Sent: Wednesday, 21 April 2021 1:10 PM
To: [REDACTED]
Subject: [TEST] - Greyhound Drawn Notification - ID:226711, Meeting: Casino - Thursday, 22 April 2021

Dear [REDACTED]

We are pleased to inform you that your greyhounds have been drawn as follows:

[REDACTED] at:
Casino, Thursday, 22 April 2021, [REDACTED]

Box	Greyhound Name	Trainer Name
1	[REDACTED]	[REDACTED]
5	[REDACTED]	[REDACTED]
6	[REDACTED]	[REDACTED]

[REDACTED] at:
Casino, Thursday, 22 April 2021, [REDACTED]

Box	Greyhound Name	Trainer Name
1	[REDACTED]	[REDACTED]
10	[REDACTED]	[REDACTED]

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Note: This email is automatically generated by OzChase.

APPENDIX 3

From: [REDACTED]@rwwa.com.au>
Sent: Wednesday, 21 April 2021 1:48 PM
To: [REDACTED]
Subject: [TEST] - REDRAW - Greyhound Drawn Notification - [REDACTED] - Thursday, 22 April 2021

Dear [REDACTED]

We are pleased to inform you that your greyhound has been drawn as follows:

[REDACTED] at:
Casino, Thursday, 22 April 2021, [REDACTED]

Box	Greyhound Name	Trainer Name
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1	[REDACTED]	[REDACTED]
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APPENDIX 4

-----Original Message-----

From: grading_alerts_d@grnsw.com.au <grading_alerts_d@grnsw.com.au>

Sent: Wednesday, 30 December 2020 2:54 PM

To: Grading_Alerts_D <Grading_Alerts_D@grnsw.com.au>

Subject: Redraw Notification -

Night - Race - NSW

Meeting Venue: [REDACTED]

Meeting Date: [REDACTED]

Timeslot: Night

Meeting Type: Race

Race Grade (Type/Class/Distance/Division): Grade 5/Provincial/365 (4)/4

Authorisation Details

User: [REDACTED]

Authorisation Name: [REDACTED]

Reason: nomination missed

Note: This email is automatically generated by OzChase.