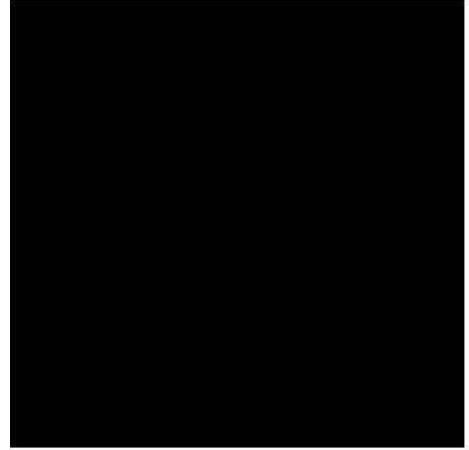


Sub # 4



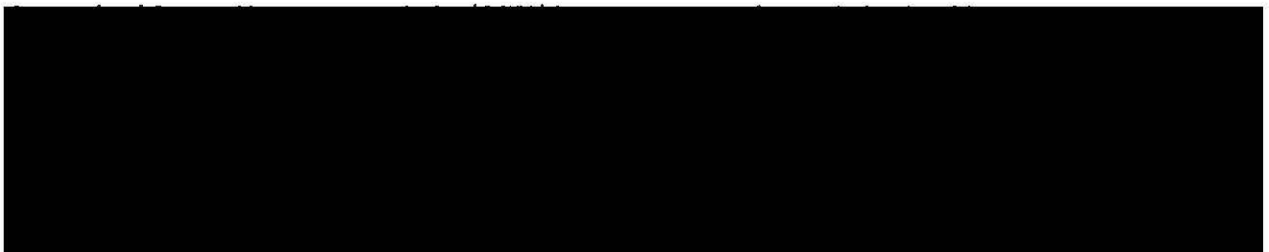
9 November 2012

Peter Dowling
Chair
Health and Community Services Committee
Parliament House
George Street
Brisbane Qld 4000

Dear Peter

YOUR REF: 11.1.8 6/11/12
RACING AND OTHER LEGISLATION AMENDMENT BILL 2012

Thanks for the invitation to submit and comment on the Bill.



The objectives of the Bill, as published:

- remove Racing Queenslandcodes of racing
- establish the Queensland.....codes of racing
- establish a separate.....codes of racing
- transfer integrity functions.....by the industry
- permit bookmakers to.....to conduct bookmaking
- ensure that the.....codes of racing
- ensure the code-specific.....codes of racing
- ensure that the.....control body, and
- make other related and consequential amendments

are fully supported in principal, as there is no doubt Harness Racing and possible all codes have been failed by the current structure and governance.

Explanatory Notes

P2 2nd paragraph states the all-codes board powers including licensing of clubs and participants, allocation of race dates, prizemoney etc.

Minister had previously provided a document that showed allocation of race dates and prizemoney as each control board's function, but not according to the legislative proposals.

Each 'industry' control board should have powers for these management issues, or at least input to the code control board on the matters.

These powers aren't further listed under the All-codes Board's functions and powers.

P3 Racing Disciplinary Board and Integrity Commissioner

Minister needs to give guidance as to the costing of the board and the commissioner, as it is indicated that the costs will be borne by the control body and therefore the industry. Current costing and expected costing need to be made available so as this part of the amendments can be fully considered.

I am sure the Minister isn't intending to introduce new/extra costs to the industry, so costings should be presented.

P19 Division 3 Membership of all codes board

Is it intended that the 2 appointments to the all-codes board not be limited to 2 terms, as is the case for control board members.

The appointment of a person to fill a casual vacancy should have to go through the selection criteria as per the initial appointments, otherwise a casual appointee could be on the board indefinitely without ever having to go through a selection/eligibility criteria, and hold this position indefinitely as there are no details as to the process to be undertaken at the expiry of any given term of appointment.

Appointment and eligibility criteria should be a part of every term and appointment/reappointment for members and prospective members.

P21 Division 5 Chief Executive Officer

An indication needs to be given as to whether this position is to be filled by an employee who will be transitioned from Racing Queensland under the proposed provisions for transfer of employees, or the position advertised.

As a key position I would feel sure all codes would want full transparency regarding this transition or appointment as the case may be.

P24 Division 9 Ministerial direction to all-codes board

It specifies that a direction may not be given in relation to certain matters including race days, funding to clubs, prizemoney etc.

This specification on certain matters is unnecessary and potentially leaves stakeholders with nowhere to turn should decisions be made they disagree with.

Eg. Allocation of race days may be changed by reducing a particular clubs number of race days by allocating them to another. The aggrieved club has nowhere to go to support their case as the Minister has precluded his powers in this area.

Eg. The control board may decide not to run or even program trot races(as is now the case for juvenile events) and participants and associations like QSTA can't raise the matter with the Minister as again he has precluded his powers in this area.

Any potential lack of direction from the Minister could easily see that particular groups that might be considered 'minor' or irrelevant could be forced from racing due to administrators' lack of vision or even prejudices.

[REDACTED]

As it would be quite possible that all 5 Board positions could be turned over at the same time, this section needs to be considered so as to ensure there is at least some continuity to the Board.

Proposed costings of the new Board structure should be made available so as to allow comparisons to current.

The Minister's submission on remuneration of the control boards should be made available.

Mr Kelly advised there is a guideline that is produced by government that identifies the work level, amount of engagement, time spent fulfilling duties etc. and the salary applicable.

These points must have already been considered, and should be made available immediately so as to fully disclose the Ministers expectations in relation to the control board roles and remuneration, and allow for better consideration by the stakeholders.

Please note this submission has not received approval by our association as time didn't allow for same, and should be treated as an individual submission. [REDACTED] used to indicate a relevance and connection to the greater racing industry.

Yours sincerely



Wayne Dossetto