



## **WLA Responsible Gaming Framework**

### **Independent Assessment Panel Evaluation Report – Certification**

#### **LEVEL 4 – Continuous Improvement – British Columbia Lottery Corporation (BCLC)**

**May 2017**



## Evaluation Outcome

The below summarizes the IAP's high-level observations regarding the submission, Table 1 provides evaluation outcomes by Program Element and Tables 2 and 3 fuller commentary and recommendations.

## General Commentary

BCLC achieved L4 certification in 2009 and this is your second recertification exercise. You have gone well beyond the tactical and operational level in RG development. RG management is now embedded into your organisation's goals, governance and management process and is a key component in your corporate culture. This integrated and holistic approach to RG management is particularly commendable. You have refined and enhanced your programmes significantly since the last recertification. Many new initiatives informed by research findings have been developed. The IAP fully supports the recertification at L4 and would like to congratulate BCLC on this outstanding submission!

BCLC has spared no efforts in seeking continued improvements in its RG programs and has the aspiration to be among the leaders in RG development. Your Research program and Player Education program are in the category of Best Practice. Your GameSense program is a great success and it is now licenced for adoption in other jurisdictions. Going forward, among the many improvement opportunities identified, the most significant strategic move is to evolve the awareness-based RG performance measures to outcome-based measures and to incorporate evaluation of outcomes in all new initiatives. This initiative is cutting-edge step in the direction expected by the WLA Independent Assessment Panel. If realised as planned, it could serve as a model for other jurisdictions. The IAP fully endorses the view that this is the next stage in the evolution of responsible gambling programs. The IAP looks forward to sharing the successful experience of BCLC in this transformation.

The IAP wishes you every success with your RG program going forward and we look forward to reviewing future submissions from you. Should you wish to discuss any aspects of our feedback or the RGF program in general, I would be delighted to do so at your convenience. Finally, I wish to extend my warmest congratulations for achieving Level 4 certification!

Yours sincerely,

A handwritten signature in blue ink, appearing to read "AP", with a long horizontal flourish extending to the right.

Anne Pattberg

Chair – WLA RGF Independent Assessment Panel

WLA RGF IAP Evaluation Report – May 2017

**Table 1 Program Element specific evaluation outcomes**

(Please see Appendix A for scale used by the IAP)

Program Element	Evaluation outcome
1 Research	Best practice
2 Employee program	Meets minimum requirements
3 Retail program	Meets the level norm
4 Game design	Meets the level norm
5 Remote gaming channels	Meets the level norm
6 Advertising and marketing communications	Meets the level norm
7 Player education	Best practice
8 Treatment referral	Meets the level norm
9 Stakeholder engagement	Meets the level norm
10 Reporting and measurement	Meets the level norm

**Table 2 Evaluation relating to individual Action Items**

<b>Action Item</b>	<b>Panel's evaluation of completeness</b>	<b>Panel's observations and recommendations</b>
<p><b>1</b>  <b>Integrated specific RG program into lottery day-to-day operations and decision-making</b></p>	<p>Completed</p>	<p>BCLC has provided an outstanding submission with a strong integration of its program into day-to-day operations.</p>
<p><b>2</b>  <b>Integrated stakeholder feedback and considered their expectations regarding RG program development</b></p>	<p>Completed</p>	<p>BCLC have used stakeholder feedback in many of the RG program elements, whether from their own employees or third parties to improve your RG programme.</p>
<p><b>3</b>  <b>The submission accuracy and reliability has been assured by an external independent assessor</b></p>	<p>Completed</p>	<p>BCLC have used KPMG as independent assessor with an assessment against "Agreed upon procedures".</p>
<p><b>4</b>  <b>Established formal internal and external reporting mechanisms on their RG commitments, actions and progress to relevant internal and external stakeholders</b></p>	<p>Completed</p>	<p>External and internal procedures have been established and are continuously improved.</p>

**Table 3 Evaluation relating to individual Program Elements**

Program Element	Information to be contained in submission	Panel’s evaluation	Panel’s observations and recommendations
<p><b>1</b> <b>Research</b></p>	<ul style="list-style-type: none"> <li>● List and describe the current research policies and programs that support the RG Principles.</li> <li>● Describe the success of these programs based on the evaluation measure(s) developed in the implementation plan.</li> <li>● List any gaps and opportunities that exist to improve the current research policies and programs.</li> </ul>	<p>Best Practice</p>	<p>The research program of BCLC was rated as Best Practice by the IAP in the 2013 recertification. Building on this solid base, BCLC has made significant further improvements to its programs and has developed many new initiatives in the past four years. The amount of attention and resources devoted to the research programs is commendable. The shift from an awareness-based to an outcome-based approach and measures have greatly enhanced the effectiveness of the whole RG program. This is a pivotal step taken by BCLC. The IAP highly regards this and looks forward to the report of the empirical evaluations in your next submission. The quarterly tracking of public opinion helps to identify areas that require attention early on and guide appropriate mitigation actions to be taken. Some of the new initiatives such as Positive Play Scale Study, RG Segmentation Study, Gaming Workers Surveys, Seniors Targeted Research, GameSense Brand Refresh Study, Customized RG Messaging Study are good and useful reference to other WLA members. These RG initiatives should be evaluated and reported in your next submission. We recommend that you use results to modify and improve your program.</p> <p>Going forward many improvement opportunities have been identified and new evaluation methods are being developed to support the continuous development of the RG program. The IAP looks forward to sharing the experience of BCLC in taking its RG programs to a more advanced level. The IAP reads on page 10 of the present submission that the budget allocated to Research in 2017 is the lowest one in the last four years. Are there any reasons for this?</p>
<p><b>2</b> <b>Employee program</b></p>	<ul style="list-style-type: none"> <li>● List and describe the current employee training policies and programs that support the RG Principles.</li> <li>● Describe the success of these programs based on the evaluation measure(s) developed in the implementation plan.</li> <li>● List any gaps and opportunities</li> </ul>	<p>Meets minimum requirements</p>	<p>BCLC’s employee program provides general and role -specific RG training. Tailoring programs according to targeted audience is a significant asset in providing employee training. There is also a section on the employee intranet providing RG information. Some new initiatives have been developed since the recertification in 2013; such as the development of the online courses “Play It Right” and “Where’s Your GameSense”. Employee feedback is canvassed via the employee engagement survey and town hall meetings. A major re-design of the RG training for employees is scheduled to complete by the end of 2017. The overall employee program is innovative, comprehensive, and well-integrated. However, BCLC has made some progress in their employee programs, the comments of the IAP in the 2013 recertification on the lack of refresher training</p>

	that exist to improve the current employee training policies and programs.		and on stronger evaluation are yet to be addressed. The IAP sees this situation as an important missing element of their program. With the direction to move from awareness-based program to outcome-based program, BCLC should consider giving a higher priority and more attention in this area.
<b>3 Retailer program</b>	<ul style="list-style-type: none"> <li>• List and describe the current retailer programs' policies and programs that support the RG Principles.</li> <li>• Describe the success of these programs based on the evaluation measure(s) developed in the implementation plan.</li> <li>• List any gaps and opportunities that exist to improve the current retailer programs' policies and programs.</li> </ul>	Meets the level norm	<p>BCLC's retailer program is comprehensive and effective. There is a clear policy governing the operation of the lottery retail network and it covers the promotion of lottery products, display of advertising material, underage restriction and conduct of retailers. The retailer training and certification program covers all selling staff at the retail outlets and includes a knowledge test at the end of the online training program. There is an incentive scheme to encourage retailers to complete the certification within the required period.</p> <p>Retailers are required to check photo ID before selling lottery products to anyone who appears to be under 25 (while the legal age is 19). A mystery shopper program is implemented to monitor compliance. It would be informative to know how this empirical test is conducted, how retailers are selected, how many per year and its frequency. Ongoing communication with the retailers is through the retailer e-Bulletin and the on-line resource platform – the Retailer Hub. A Lottery Retailer Survey is planned to understand the level of RG awareness among the retailers and their willingness and ability in handling players with “red flag” behaviour.</p> <p>The program in place for the gambling facility service providers is adequate. Policies and guidelines have been established, appropriate training (ART and VSE) is provided, and tools (Appropriate Response Guidelines Poster) are available to support the front-line employees. The IAP is pleased with the variety of sources and media used for the training of the retailers.</p>
<b>4 Game design</b>	<ul style="list-style-type: none"> <li>• List and describe the current game design policies and programs that support the RG Principles.</li> <li>• Describe the success of these programs based on the evaluation measure(s) developed in the implementation plan.</li> <li>• List any gaps and opportunities that exist to improve the</li> </ul>	Meets the level norm	<p>A CRS assessment process has been established since 2009 and it applies to all new initiatives in all channels, hence the scope is beyond game design and RG. The initiatives are classified in three categories, representing a vast array of targets. This integrated approach is original and innovative. The IAP is quite pleased with such an approach to game design. Furthermore, it ensures full compliance with the government regulations, corporate policies and guideline in all business development activities. Gamgard is used to identify potential risks to vulnerable players. Where risks are identified, appropriate mitigating measures are developed and there is a formal sign-off process. Continuous effectiveness evaluation is evident from the review of the CRSA and the implementation of the improvement opportunities identifies. The idea of assigning the responsibilities for the CSRA process to the business/project owners</p>

	current game design policies and programs.		and having the CSR team involved at the sign-off process for compliance monitoring is sound and should help driving the social responsibility commitment throughout the entire organisation and develop the desired corporate culture. This element is particularly well-developed and integrated in the RG best practices.
<b>5</b> <b>Remote gaming channels</b>	<ul style="list-style-type: none"> <li>List and describe the current remote gaming channels policies and programs that support the RG Principles.</li> <li>Describe the success of these programs based on the evaluation measure(s) developed in the implementation plan.</li> <li>List any gaps and opportunities that exist to improve the current remote gaming channels policies and programs.</li> </ul>	Meets the level norm	PalyNow.com is the on-line gaming platform of BCLC. It has incorporated all the conventional RG safeguards (limits setting and self-exclusion etc) for player protection. The Player Agreement helps enforce positive play. RG information for player education is provided under the GameSense section. All new initiatives on PlayNow.com are subject to the CSR Assessment process. PlayNow.com has also received RG check iGaming Accreditation from the Responsible Gambling Council. While the current RG program on this on-line platform is considered acceptable, the IAP would like to encourage BCLC to further explore improvement opportunities now enabled by technology advancement. On the recommendations of the IAP about regular monitoring of player behaviour, BCLC is evaluating the benefits of implementing this capability and how best this capability should be acquired. Perhaps BCLC could learn from those WLA members who have developed this capability and have used it to enhance its RG programs and player protection measures such as generating alert messages to the player when signs of potential gambling problems are emerging.
<b>6</b> <b>Advertising and marketing communications</b>	<ul style="list-style-type: none"> <li>List and describe the current advertising and marketing communications policies and programs that support the RG Principles.</li> <li>Describe the success of these programs based on the evaluation measure(s) developed in the implementation plan.</li> <li>List any gaps and opportunities that exist to improve the current advertising and marketing communications policies and programs.</li> <li>List the national / regional marketing code(s) that you refer to (if any) and please</li> </ul>	Meets the level norm	<p>The GPEB has established Advertising and Marketing Standards for the gambling industry in British Columbia. The standards include specific RG requirements. BCLC has incorporated the standards in your internal guidelines, which are applied to all channels and also to the service providers. The IAP considers this approach to be comprehensive, well-thought-through and covers all of your products. There is also a robust review and sign-off process under the CSRA to ensure compliance.</p> <p>In response to the comments of the IAP in the 2013 recertification, you have significantly enhanced your monitoring and effectiveness evaluation measures. Moving from an awareness-based RG performance measures to outcome-based measures is also implemented in this element. Among the monitoring implemented by BCLC, we find (1) Unaided advertising recall; (2) Measures that attract the most attention; and (3) Channels providing the strongest recall. The IAP recognises that it is far from easy to have an empirical approach on advertising and marketing communications. BCLC has already opened the door in a creative way to achieve this goal. You are to be congratulated for this initiative. New initiatives have been developed and improvements implemented. In addition to responsible marketing, you are also committed to the marketing of responsible gambling. RG</p>

	include a copy of it / them.		information/messages are carried in all adverting materials and displayed in all outlets as well as on social media. Many improvements have been made in the GameSense program which is the engine for delivering RG information and messages. More information on GameSense is in the Player Education section. Well done and we would very much encourage you to share your practice especially with North American lotteries.
7 Player education	<ul style="list-style-type: none"> <li>• List and describe the current player education policies and programs that support the RG Principles.</li> <li>• Describe the success of these programs based on the evaluation measure(s) developed in the implementation plan.</li> <li>• List any gaps and opportunities that exist to improve the current player education policies and programs.</li> </ul>	Best Practice	<p>The GameSense program was launched in 2009 and it is the centrepiece of BCLC's RG program and the focus of RG education and information resources. It is targeted to players in all channels with a focus on special population segments, each with different risks, including seniors, youth, families, sports bettors, different ethnic groups etc..</p> <p>The program comprises online (including social media) and offline resource materials, TV and print advertising, information centres in gambling facilities, helpline and free counselling services. This comprehensive, integrated and empirical approach is commendable and the program has undergone several pertinent and evidence-based updates and improvements over the years. The program was already recognised as Best Practice by the IAP in the 2013 recertification which the IAP would like to express again- Additionally, it is certainly a good reference for other WLA members.</p> <p>While many improvement opportunities have been identified and plans are in hand for the implementation of the enhancements, the most significant one for the future development of the program will be the shift from awareness-based performance measures to outcome-based measures. Evaluation of outcomes will be incorporated in new initiatives. This will drive significant improvement in the effectiveness of RG programs. The IAP looks forward to sharing the successful experience of BCLC in this transformation and we would like to congratulate you on your approach.</p>
8 Treatment Referral	<ul style="list-style-type: none"> <li>• List and describe the current treatment referral policies and programs that support the RG Principles.</li> <li>• Describe the success of these programs based on the evaluation measure(s) developed in the implementation plan.</li> <li>• List any gaps and opportunities</li> </ul>	Meets the level norm	<p>The treatment services are managed by the Gaming Policy and Enforcement Branch of the Province Government. The counselling and treatment services for the problem gamblers and their families are free and the program is a global leader in the use of Feedback Informed Treatment, which is recognised as best practice.</p> <p>The RG program of BCLC includes promoting the awareness of the treatment and support services available across all gambling channels throughout the province. The information about treatment is very well provided and advertised. This information is conveyed through all customer contact points, the Help Line, GameSense program and in the employees and retailer training. In addition, the level of public awareness is</p>



	that exist to improve the current policies and programs.		regularly monitored. Efforts made by BCLC on this element is commendable.  In response to the comments of the IAP in the 2013 recertification, BCLC has expanded the engagement activities and collaboration with the GPEB and the treatment providers in the province. Another good addition to the programme.
9 Stakeholder engagement	<ul style="list-style-type: none"> <li>● List and describe the current stakeholder engagement policies and programs that support the RG Principles.</li> <li>● Describe the success of these programs based on the evaluation measure(s) developed in the implementation plan.</li> <li>● List any gaps and opportunities that exist to improve the current stakeholder engagement policies and programs.</li> <li>● List the stakeholders that have been engaged on RG issues.</li> <li>● Briefly describe how you have integrated / considered stakeholder feedback and expectations regarding your RG program and its development during the last period.</li> </ul>	Meets the level norm	<p>The stakeholder engagement strategy has been established since 2012 with the aims to foster open and frank discussions, two-way dialogue and on-going measurement and evaluation of BCLC's performance as a responsible organisation. Your stakeholder mapping is thorough and comprehensive. The engagement purposes, channels, activities are well-defined and planned with dedicated resources and clear responsibility assigned in the organisation. Many new initiatives have been implemented since the 2013 recertification. There is clear evidence that the engagement program has contributed to the improvements of the RG programs and has helped advancing the RG efforts in the community.</p> <p>The leadership position of BCLC in the RG development is well-recognised in the national and international level. This is evident from how it has been engaged by various parties to share its expertise and experience.</p>
10 Reporting and measurement	<ul style="list-style-type: none"> <li>● Describe the key audiences for your reporting program and how you disseminate disclosures to them.</li> <li>● Describe the current internal and external reporting program.</li> <li>● Describe the success of these programs based on the evaluation measure(s) developed in the</li> </ul>	Meets the level norm	Being a Crown corporation, BCLC has fully complied with various regulatory reporting requirements. Your commitment to transparency is demonstrated by its internal and external reporting efforts. A stand-alone Social Responsibility Report is published every year. You applied the GRI G4 Guidelines and cover your efforts and achievements in reducing gambling harm and promoting responsible gambling. In terms of internal reporting, your divisional VPs are required to provide yearly performance report against the Strategic and Operating plans along with a status update overview of responsible gambling programs and projects and highlights of responsible gambling accomplishments.

	<p>implementation plan.</p> <ul style="list-style-type: none"> <li>● List any gaps and opportunities that exist to improve the current policies and programs.</li> <li>● Describe the current second external independent assessment program and its key outcomes and learning points.</li> <li>● List any gaps and opportunities that exist to improve this program.</li> </ul>		<p>To further develop your CSR and RG programs, BCLC is going to adopt an outcome-based approach and to develop new metrics to better understand how the programs are influencing players. This new approach will greatly enhance the effectiveness monitoring and evaluation and support continued enhancements to the RG programs. The IAP believes the KPI's when chosen wisely, will provide sound results to improve their reporting and measurement initiatives.</p>
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Evaluation recommendation	Evaluation outcome (used for individual Program Elements)	Notes
Certification recommended	Best Practice	When a Program Element performance, for the concerned level, is clearly beyond RGF norm and demonstrates, for instance, innovative policies, practices or evaluation measures. Best practice case studies will be shared on WLA's web site under RG case studies section with applicant's permission.
Certification recommended	Meets the level norm	Meets specific level norm in a balanced and fully satisfactory way.
Certification recommended	Meets minimum requirements	Meets the minimum requirements for this programme element.
Full evaluation not possible	Insufficient information provided to enable full evaluation	Information or evidence provided in the submission is not sufficient to allow for adequate assessment by the IAP.