



WLA Responsible Gaming Framework

Independent Assessment Panel Evaluation Report – Recertification

LEVEL 4 – Continuous Improvement – British Columbia Lottery Corporation (BCLC), Canada

October 2013



Evaluation outcome

Following evaluation of BCLC's RGF submission by the IAP, I am pleased to inform you that the Panel wishes to recommend you for Level 4 recertification.

The below summaries the IAP's high-level observations regarding the submission and Tables 1 and 2 provide more detail.

General comments

The IAP found the introductory 'Preamble' section to the submission particularly helpful. This provided useful context and background to BCLC's approach to RG and its wider CSR management philosophy. Importantly, it also provided solid evidence of how RG management is embedded into wider organizational goals and governance and management processes. The level of RG integration with these processes and structures is exemplary.

In general, the submission reflects BCLC's continued and significant commitment to RG as well as its aspiration to contribute to leadership in this area at Provincial, national and international levels. The IAP fully agrees that the submission demonstrates that BCLC meets the key requirement for Level 4 recertification – the continued ability to meet Level 4 requirements, including evidencing continuous improvement of program quality.

The IAP was pleased to see the numerous improvements that have been or are in the process of being introduced since the 2009 Level 4 certification. Further, BCLC has responded to many recommendations made by the IAP in its previous evaluation report, and in most cases, solid future improvement opportunities have been identified. However, the IAP encourages BCLC to pay fuller attention to opportunity identification regarding elements discussed in further detail in Table 2.

Although clear progress has been made in enhancing BCLC's approach to program effectiveness evaluation, in some cases there is still some ways to go to step from monitoring to true evaluation mode. Program Elements where fuller attention to evaluation measures is encouraged include the Employee Program, Remote Gaming and Treatment Referral. As BCLC is amongst the first lotteries to be recertified under the WLA RGF umbrella, it places you firmly in the category of international RG leaders, and we expect other lotteries to look to you as such. A leadership position brings an added responsibility, and the IAP looks to you, along with other Level 4 recertified lotteries, to continue to pay special attention to the issue of evaluation. Effective and efficient continuous improvement will only be possible informed by mature evaluation measures, and elevating industry practice in this area is essential to ensure future success.

On a more positive note, BCLC's aspiration to develop deeply integrated and holistic approaches to RG management is commendable – GameSense providing one example where BCLC has developed a umbrella platform that reaches out to most RG stakeholders from employees, to retailers / service providers, to general public as well as problem gamblers. Another example is CSRA, a holistic platform that is being used to assess a wider range of processes and activities and an integrated manner.

Finally, the IAP would like to nominate two Program Elements as case studies on best practice – Research and Player Education. If BCLC is happy for these to be published on the WLA RG case study web page, the IAP would be delighted to offer these as learning tool to peers. Regarding Player Education, this would mean updating the current case study to reflect the current program.

Tables 1 below summarizes IAP's Program Element specific evaluation outcomes and Table 2 provides more detailed commentary.

Table 1 Program Element specific evaluation outcomes *

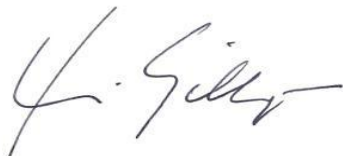
Program Element	Evaluation outcome
1 Research	Best Practice
2 Employee program	Meets minimum requirements at Level 4
3 Retail program	Substantial
4 Game design	Substantial
5 Remote gaming channels	Satisfactory
6 Advertising and marketing communications	Satisfactory
7 Player education	Best Practice
8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

* For the evaluation scale used by the IAP, please refer to Appendix A.

The IAP wishes BCLC every success with your RG program 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, on behalf of the IAP, I wish to extend my warmest congratulations for securing Level 4 recertification and for your continued leadership in Responsible Gaming.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'M. Sillanpaa', written in a cursive style.

Maria Sillanpaa
Chair – WLA RGF Independent Assessment Panel
October 2013

Table 2 Evaluation relating to individual Program Elements

Program element	Information to be contained in submission	Panel's evaluation	Panel's observations and recommendations
<p>1 Research</p>	<ul style="list-style-type: none"> ● List and describe the current research policies and programs that support the RG Principles. ● Describe the success of these programs based on the evaluation measure(s) developed in the implementation plan. ● List any gaps and opportunities that exist to improve the current research policies and programs. 	<p>Best Practice</p>	<p>Comprehensive suite of research activities is presented, covering general gaming, RG, product and program element or topic specific areas. Variety of methodologies is being used and research conducted both in-house and by independent parties – also including a number of collaborative initiatives.</p> <p>Submission responds to IAP's recommendations from 2009 regarding monitoring of player and public opinion and tracking of effectiveness of programs.</p> <p>Submission provides improved, and particularly welcomed, evidence on how research findings have informed program development. This included specific cases where results have, for instance, led to policy changes or changes in procedures or launch of new initiatives. Section provides solid evidence of how research can be utilized to evaluate program effectiveness.</p> <p>Innovations include, for instance, the 'xchange' on-line player engagement platform that enables registered players to provide feedback on ideas, topics and games. BCLC is now planning to extend this platform to create an online community for RG practitioners, professionals and academics, evidencing BCLC's commitment to stakeholder inclusivity.</p> <p>Somewhat tactical gap analysis. However, proposed follow up action should further inform BCLC's program development and help systematize the lottery's research needs analysis.</p> <p>Future plans are often discussed under specific initiatives. Beyond these, BCLC has identified three solid opportunities for future action. BCLC's support for the establishment of an academic research center in BC, expected to open in 2013, should also enable systematic tracking of sectoral best practices internationally.</p>

Program element	Information to be contained in submission	Panel's evaluation	Panel's observations and recommendations
<p>2</p> <p>Employee program</p>	<ul style="list-style-type: none"> ● List and describe the current employee training policies and programs that support the RG Principles. ● Describe the success of these programs based on the evaluation measure(s) developed in the implementation plan. ● List any gaps and opportunities that exist to improve the current employee training policies and programs. 	<p>Meets minimum requirements at Level 4</p>	<p>Progress has clearly been made since 2009 certification and BCLC has followed through and enhanced its plan from that time. New initiatives have been launched and existing once revised following robust reviews. BCLC now presents a comprehensive and multi-layered program consisting of a range of training and awareness raising initiatives. Both general and role specific training is offered, and, importantly, general training is now mandatory. This responds to one of IAP's key concerns in 2009.</p> <p>In general, the IAP was pleased to see BCLC's active use of social media in promoting RG and specifically the attention paid on assisting social media community managers to deal with RG issues.</p> <p>Evidence provided on how approach to training has and is evolving further based on feedback and on-going training needs analysis (e.g. introduction and further development of on-line training tools). Lack of refresher training is acknowledged as a gap and the IAP urges BCLC to consider this as a priority. Overall training strategy is being worked on and appears sensible.</p> <p>However, the submission could have been strengthened by stronger evaluation measures – for instance, it was not apparent from the submission how trainee knowledge levels are tested or how the impact of awareness raising campaigns / tools is evaluated. The IAP encouraged BCLC to consider these impact assessments further as part of its strategy development in this area.</p>
<p>3</p> <p>Retailer program</p>	<ul style="list-style-type: none"> ● List and describe the current retailer programs' policies and programs that support the RG Principles. ● Describe the success of these programs based on the evaluation measure(s) developed in the implementation plan. 	<p>Substantial at Level 4</p>	<p>BCLC's retail program is run under the integrated GameSense brand that also focuses on employees and players. A solid program was already presented in 2009 including training, communications and compliance aspects. However, number of new initiatives have been introduced since and existing ones revised / enhanced. Various e-learning and communications tools have been introduced to enable easy, 24/7 access to resources. Retailer training is mandatory, certified and includes an exam. Refresher training for retailer network is currently not provided but has been identified as a gap and is being considered as a future action. Tracking of training completion has been</p>

Program element	Information to be contained in submission	Panel's evaluation	Panel's observations and recommendations
	<ul style="list-style-type: none"> List any gaps and opportunities that exist to improve the current retailer programs' policies and programs. 		<p>improved.</p> <p>Specifically regarding Gambling Facility Service Providers, number of policy and procedure updates have been introduced and training revised or enhanced. The IAP was pleased to see the new initiative on incentivizing service providers via the Excellence award. However, information on sanctions as they relate to retailers or service providers would have been welcome.</p> <p>Number of innovations are evident, include for Lotto Signature RG Training for retailers and social media training for service providers.</p> <p>Gaps and opportunities are identified and define a number of pathways for continuous improvement. The IAP was pleased to see the initiative relating to the creation of a national standard for service provider training.</p> <p>For further commentary on GameSense, see under Player Education.</p>
<p>4</p> <p>Game design</p>	<ul style="list-style-type: none"> List and describe the current game design policies and programs that support the RG Principles. Describe the success of these programs based on the evaluation measure(s) developed in the implementation plan. List any gaps and opportunities that exist to improve the current game design policies and programs. 	<p>Substantial at Level 4</p>	<p>Solid and significant progress has been made since 2009. BCLC presents an extensive program covering not only all aspects of its game design but extending the CSRA process to cover marketing and advertising materials as well as other related campaigns and initiatives. Furthermore, the standards applied in the process extend beyond RG to cover wider corporate responsibility considerations. This integrated process also utilizes GAM-GaRD, bringing an element of independence to the assessment process.</p> <p>BCLC's objective to embed RG throughout its operations is also evident from its efforts to ensure that the CSRA process is as user-friendly as possible and its use enabled by smart technology. The RG team is also coaching those with direct design responsibilities to ensure smooth transition of operational accountability directly to brands in due course.</p> <p>The Program Element shows strong links to Player Education, particularly in the casino and CGC context.</p>

Program element	Information to be contained in submission	Panel's evaluation	Panel's observations and recommendations
			<p>Solid evidence of continuous effectiveness evaluations and corresponding actions. Again, the gaps and opportunities section point out pathways for continuous improvement.</p> <p>The IAP wishes to commend BCLC efforts in developing an approach that seeks to integrate a number of dimensions to one holistic assessment framework – in terms of scope of topics covered, range of activity assessed, methodologies that are used as well as the way the framework itself is implemented. The success of this approach will provide a leading edge example to the rest of the industry.</p>
<p>5</p> <p>Remote gaming channels</p>	<ul style="list-style-type: none"> ● List and describe the current remote gaming channels policies and programs that support the RG Principles. ● Describe the success of these programs based on the evaluation measure(s) developed in the implementation plan. ● List any gaps and opportunities that exist to improve the current remote gaming channels policies and programs. 	<p>Satisfactory at Level 4</p>	<p>Since the 2009 submission, the number of products being offered via PlayNow.com has increased substantially and now includes, for instance poker, casino table games and sports betting as well as a full range of lottery products.</p> <p>Prior to expanding the product offer to include these higher risk games, BCLC commissioned an independent expert review of its site to ensure RG alignment. Since the evaluation, BCLC has introduced various new safeguards and enhanced existing ones as well as increased RG information content on its site.</p> <p>Legal compliance audits have been responded to and the eGaming team has been brought into the CSRA process ensuring that every new product is evaluated pre-launch.</p> <p>The above largely responds to IAP's recommendations in 2009. However, regular monitoring of player behavior still remains under consideration and the IAP recommends that BCLC pursues this as a priority – this will ensure that BCLC remains aligned with leading practices by its peers and identifies focused and effective actions to ensure continuous improvement.</p>

Program element	Information to be contained in submission	Panel's evaluation	Panel's observations and recommendations
<p>6</p> <p>Advertising and marketing communications</p>	<ul style="list-style-type: none"> ● List and describe the current advertising and marketing communications policies and programs that support the RG Principles. ● Describe the success of these programs based on the evaluation measure(s) developed in the implementation plan. ● List any gaps and opportunities that exist to improve the current advertising and marketing communications policies and programs. ● List the national / regional marketing code(s) that you refer to (if any) and please include a copy of it / them. 	<p>Satisfactory at Level 4</p>	<p>Again BCLC has taken on board the IAP's recommendations from 2009 and has implemented many improvements to ensure 'responsible marketing' as well as 'marketing of responsibility' – for instance, a marketing 'specification matrix' has been developed which in essence appears to be a marketing communications development and sign off process. Also, BCLC has refreshed its RG messaging due to observed audience habituation.</p> <p>GPEB and NASPAL standards have been incorporated in policies to guide and assess marketing communications and a number of compliance monitoring processes are in place including regular audits /reviews to ensure compliance by casinos and CGCs. Guidelines for social media RG messaging have also been developed.</p> <p>The gap analysis identifies the need to pay special attention to niche audiences, for instance, retirees, First Nations etc. Opportunity identification remains at somewhat generic level.</p> <p>Continuous improvement is evidence, however, the submission could have been strengthened by fuller information on effectiveness evaluation, although the IAP notes that some of this has been covered in the Research section.</p>
<p>7</p> <p>Player education</p>	<ul style="list-style-type: none"> ● List and describe the current player education policies and programs that support the RG Principles. ● Describe the success of these programs based on the evaluation measure(s) developed in the implementation plan. ● List any gaps and opportunities that exist to improve the 	<p>Best Practice</p>	<p>Since 2009 certification and the launch of GameSense at that time, significant further improvements have been implemented – again either via enhancement of existing initiatives or via launching of new ones. Use of social media has increased significantly, probably making BCLC one of the most active sectoral users of this new medium internationally.</p> <p>Solid evidence on monitoring and effectiveness evaluations, including some leading examples of monitoring the use of web and social media resources. Innovations include, for instance, paid SEO tactics to guide web searches to RG resources.</p> <p>Attention is being paid to the most vulnerable groups and these have also been identified as priority targets for future improvements.</p>

Program element	Information to be contained in submission	Panel's evaluation	Panel's observations and recommendations
	current player education policies and programs.		GameSense provides another example of BCLC's ambition to develop holistic approaches to RG management. The program is managed and developed as an integrated platform covering employees, retailers / service providers as well as players. As such it continues to offer a solid case study for industry peers and the IAP wishes to recommend that the current case study on WLA RG site be updated to reflect the current program.
8 Treatment Referral	<ul style="list-style-type: none"> ● List and describe the current treatment referral policies and programs that support the RG Principles. ● Describe the success of these programs based on the evaluation measure(s) developed in the implementation plan. ● List any gaps and opportunities that exist to improve the current policies and programs. 	Meets minimum requirements at Level 4	<p>Comprehensive and well structured program. Some improvements introduced since initial Level 4 certification. Some further steps in monitoring public awareness of available resources, and a new evaluation tactic initiated aiming to seek feedback from PG Treatment Counselor community. Following the IAP's recommendations in 2009, the latter is a positive, although somewhat limited step. The IAP, therefore, recommends that BCLC deepens and systematizes this dialogue further.</p> <p>BCLC's approach is clearly strong in its focus on prevention and exclusion; however, the IAP raised some concerns whether available treatment options are sufficient and effective. In the absence of deeper evaluation this remains an open question. The IAP appreciates that treatment is provided by GPEB, not by BCLC. However, appreciating the current effectiveness of treatments offered is an important responsibility for BCLC itself.</p> <p>In this instance, gap analysis and opportunity identification remained limited and weakened the submission.</p>
9 Stakeholder engagement	<ul style="list-style-type: none"> ● List and describe the current stakeholder engagement policies and programs that support the RG Principles. ● Describe the success of these programs based on the evaluation measure(s) 	Substantial at Level 4	Broad and comprehensive program with a wide range of activities. In general, BCLC's stakeholder inclusive approach to RG management and program design is evident from information presented in this section as well as elsewhere in the submission. Distinct improvements from 2009, including the introduction of a new strategic plan. Stakeholders have been remapped and a framework for actual engagement developed.

Program element	Information to be contained in submission	Panel's evaluation	Panel's observations and recommendations
	<p>developed in the implementation plan.</p> <ul style="list-style-type: none"> ● List any gaps and opportunities that exist to improve the current stakeholder engagement policies and programs. ● List the stakeholders that have been engaged on RG issues. ● Briefly describe how you have integrated / considered stakeholder feedback and expectations regarding your RG program and its development during the last period. 		<p>Clear examples throughout the submission on how engagement with various stakeholders has informed BCLC's program evaluation and development. The IAP was especially pleased to see BCLC's use of social and digital media tools being used in engagement. The 'xchange' platform providing an example of innovative use of technology to enable leading edge engagement strategies with a specific aim to collaborate and innovate with stakeholders.</p> <p>The IAP was pleased to see submission covering not only on how BCLC has engaged with its stakeholders but also how BCLC has been engaged by various parties.</p> <p>In future submissions, the IAP looks forward to learning about the success of the Stakeholder Engagement Strategic Plan based on established goals and evaluation measures.</p>
<p>10</p> <p>Reporting and measurement</p>	<ul style="list-style-type: none"> ● Describe the key audiences for your reporting program and how you disseminate disclosures to them. ● Describe the current internal and external reporting program. ● Describe the success of these programs based on the evaluation measure(s) developed in the implementation plan. ● List any gaps and opportunities that exist to improve the current policies and programs. ● Describe the current external 	<p>Satisfactory at Level 4</p>	<p>BCLC operates in a mature and demanding accountability and transparency context and has fully complied with various regulatory reporting requirements. Beyond this, a wide range of internal and external reporting channels and platforms have been developed to communicate on BCLC's RG, CSR and wider organizational performance. Clear progress has been made since 2009 and, at the time the submission was issued, BCLC's first combined CSR & financial report was being prepared. The IAP wishes to commend BCLC for this commitment, taking it closer to leading international reporting practice. The IAP further wishes to commend BCLC for its systematic peer benchmarking as well as structured internal engagement to inform the development of its reporting roadmap.</p> <p>The submission also covers BCLC's extensive Strategic Planning process, which, beyond overall organizational goals, defines the lottery's CSR and RG goals. Internal reporting to the Board against defined goals and KPIs is regular and systematic.</p> <p>Reporting plan appears to mostly focus on RG awareness indicators. The IAP</p>

Program element	Information to be contained in submission	Panel's evaluation	Panel's observations and recommendations
	<p>independent assessment program and its key outcomes and learning points.</p> <ul style="list-style-type: none"> • List any gaps and opportunities that exist to improve this program. 		<p>encourages BCLC to focus on these further to ensure movement towards indicators that also enable impact evaluation.</p> <p>Specific independent assessment exercises as they relate to different Program Elements are described. These are commendable and certainly form part of BCLC's assurance plan and approach. However, the submission lacks information on BCLC's current or planned approach to seeking assurance over their external reporting. In this context, you may find it useful to study the AA1000 Assurance Standard to inform your decisions regarding desired approach to report assurance. AA1000 Assurance Standard can be found here http://www.accountability.org/images/content/0/5/056/AA1000AS%202008.pdf and a related guidance document for reporting organizations seeking assurance here http://www.accountability.org/images/content/1/9/194/Guidance%20for%20Reporting%20Organisations%20Seeking%20Assurance%20to%20AA1000.pdf</p> <p>To facilitate networking and learning amongst WLA members specifically relating to reporting, the WLA office has compiled a database of members who produce public CSR / sustainability / RG reports. This database is available on the WLA web site under the RG section. Going forward, BCLC is encouraged to inform WLA of its reporting so that its reports can be referred to in the database.</p> <p>Gaps and opportunity identification remained limited and the IAP encourages BCLC to explore these further. Evaluation of the Program Element <i>per se</i> remained weak at this stage and the IAP looks forward to seeing BCLC's evolving approach to this as reporting matures.</p>

Appendix A

Evaluation scale used by the IAP

Evaluation recommendation	Evaluation outcome (used for individual Program Elements)	Notes
Certification recommended	Best Practice Peer Case Study	Used only at Level 4 when a Program Element performance clearly beyond RGF requirements 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. In exceptional cases, the IAP may recommend this assessment outcome at lower certification levels as well.
	Substantial	Strong consensus amongst IAP regarding performance going beyond specific level requirements, for instance, some innovative measures and tactics, substantial evaluation plans or existing evaluation practices, strong evidence of continuous improvement.
	Satisfactory	Meets specific level requirements in a balanced way.
	Meets minimum requirements	Does not meet all program element requirements in a balanced and/or satisfactory way, however, overall element performance sufficient for certification.
Certification not recommended	Does not meet requirements to a satisfactory level	Some program element specific requirements clearly not met; for instance, no gap analysis (all levels), prioritization missing (Level 2), monitoring and evaluation plans missing or not sufficient (Level 3), no continuous improvement opportunities identified (Level 4).
	Insufficient	Clear gaps in reporting against level requirements; intent of the program element not fully understood.
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.