



WLA Responsible Gaming Framework

Independent Assessment Panel Evaluation Report – Certification

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

October 2020



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

You provided a solid, structured, and comprehensive submission. Your RG program is well-integrated in your organisation and it is commendable that the player is in the main lens of your work on RG. You have maintained a high level of Responsible Gambling in your daily activities. In addition, you made continuous progress in developing new RG creative initiatives. A good example is how you coped with the COVID-19 situation. You have extended some RG initiatives, such as self-exclusion, in order to provide adapted and flexible help to the "player" who needs additional measures. As we pointed out in our previous evaluation, the IAP is pleased to read that *"This meant the evolution of our awareness-based RG performance measures to outcome-based measures that incorporated evaluation of outcomes in all new initiatives moving forward."* The evaluation of a program is crucial if we want to know if the measures implemented provide the expected results. Your organisation is among the top ones on this issue.

However, the IAP would like to bring to your attention one issue that we think you need to work on. The main document submitted for your accreditation comprises 6,311 pages, and about 250 are devoted to the introduction and the discussion of the 10 RG elements. This is far too long. We would ask you that you limit the length of your future submission to approximately 100-120 pages. You need to decide what you consider to be the core information and what is "additional or complementary information". The latter should be presented in the appendices. Nevertheless, we would like to congratulate you on your excellent programme, and we understand that pulling together a submission of this length also entails a lot of work on your end which we fully acknowledge.

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", is positioned above the name of the signatory.

Anne Pattberg - Chair – WLA RGF Independent Assessment Panel

Table 1 Program Element specific evaluation outcomes

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

Program Element	Evaluation outcome
1 Research	Meets the level norm
2 Employee program	Meets the level norm
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	Meets the level norm
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

Action Item	Panel's evaluation of completeness	Panel's observations and recommendations
<p>1 Integrated specific RG program into lottery day-to-day operations and decision-making</p>	<p>Completed</p>	<p>It is clear that every effort is made to integrate RG in the day-to-day operation and RG is considered in the decision-making process.</p>
<p>2 Integrated stakeholder feedback and considered their expectations regarding RG program development</p>	<p>Completed</p>	<p>Close collaboration with key stakeholders has been established and there are many examples of joint efforts in the development of RG initiatives.</p>
<p>3 The submission accuracy and reliability has been assured by an external independent assessor</p>	<p>Completed</p>	<p>The submission has been assessed according to "Agreed upon Procedures" by KPMG</p>
<p>4 Established formal internal and external reporting mechanisms on their RG commitments, actions and progress to relevant internal and external stakeholders</p>	<p>Completed</p>	<p>BCLC has extensive reporting and measurement mechanisms in place.</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>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>Meets the level norm</p>	<p>Your research agenda is impressive. You managed to identify burning RG issues and you approached these issues in an inquisitive perspective. Under the umbrella of linking the creative RG initiatives with rigorous assessment, you developed, maintained and provided continuous improvement in research. While conducting internal research, you devoted a large proportion of your budget to external experts. This is a very good blend.</p> <p>In terms of continuous improvement, the IAP appreciates the timing of some studies such as evaluating the gambling activities of your patrons in the COVID 19 period and the KPI tracking study, which provides important data on the evolution of specific gambling behaviors and attitudes. Numerous studies combine the fundamental and applied aspects of RG initiatives such as customising messages, VSE Longitudinal Study, and Player Health Tracking. We particularly appreciate some topics that you are pursuing such as PlayNow Player Health Tool Awareness, access to personal credit in VIP areas, continuous evaluation of GameSense and the Positive Play Scale. Finally, the IAP appreciates your stringent methodological approach in some sensible research area such as you GameSense Mystery Shop Research. Using a mystery shopping design in such an initiative is an outstanding way to evaluate a program.</p>

<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 the level norm</p>	<p>The employee training program is multidimensional and relies on solid ethical premises. As indicated in our previous report, you moved away from a “universal” program towards an idiosyncratic approach. The IAP is also pleased to see that you address the “health” of your employee in a holistic perspective. This is commendable and the best approach to implement. Years ago, you emphasised the importance of assessing the outcomes of your RG initiatives. In some specific instances, this approach led you to modify elements of your training. You clearly mentioned <i>“Where’s GameSense program was no longer providing the education and understanding we want each of our employees to possess.”</i> » The data indicated that a new approach was needed. Again, this is a great example to illustrate the importance of the assessment. In the same line of thought, Appropriate Response Training (ART) is a program tailored according to subgroups and individuals pursuing a variety of objectives. The periodic evaluation of this RG initiative is well in place and should provide useful data to improve the program. Among other interesting initiative is the revisit of your VSE program. Its regular update brings valuable information in its improvement. In brief, you have developed an outstanding employee program, targeting different goals well grounded in empirical approach.</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. ● List any gaps and opportunities that exist to improve the current retailer programs’ policies and programs. 	<p>Meets the level norm</p>	<p>You train over 4000 lottery and gaming retailers on RG principles and actions across the province. You have developed many relevant initiatives to capture different needs of retailers and to promote responsible attitudes among them. Integrating assessment in the delivery of your programs is optimal and gives you the opportunity to fine-tune your approach on a regular basis. The constant use of a mystery shopper programme is the optimal way to assess the compliance of your retailers. So far, you have used this procedure in a constant and systematic way. Providing information of your VSE program to retailers is a great initiative and illustrates its importance. The IAP particularly appreciates the “Lottery Retailer Research”: it is the best way to know the specific needs of your retailers and more importantly, to assess if the content and format of your training achieve its main goals. Finally, the integration of different elements of your training in the context of GameSense is coherent and comprehensive.</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>Meets the level norm</p>	<p>This element was well-appreciated and evaluated very positively by the IAP in your previous submission. In addition to the use of Gamgard, you integrated many additional initiatives to assess the potential risk of a game, such as the Player Health Assessment, Play Planner, RG Check, etc. Although these initiatives are usually described in other sections of the applications, such as player education element, its inclusion under Game design is innovative, commendable and original. The IAP would raise a question how BCLC copes when results do not reach their original goal. For example, the Slot Education program, another initiative taken by BCLC to assess the potential risk of a game has the following objective” <i>The delivery of player education aligns with our corporate strategy goal that no one should be harmed from gambling offered by BCLC as well as the commitment to Informed Decisions within the Player Health strategy.</i>” (p. 122). It is reasonable to assume that this goal is, at times, potentially not meet. How does BCC cope with such a situation? We would also ask the same question in the case that Gamgard reveals that a product has a high potential risk for the player.</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>Meets the level norm</p>	<p>PlayNow.com offers many interesting RG features that the players can chose and use in order to facilitate responsible gambling activities. These features are well-integrated in the general perspective of a global health approach. This coherent and systematic lens increases the potential impact of your overall RG program. Your constant monitoring of the use and outcomes of your approach allows you to adapt your contribution to different context. A good example is that during the COVID-19 period, you adapted your GameSense advisors’ role to players over the phone and through online chat. This is a great way to adapt your efforts to the intricacies of the different situations that the player go through.</p> <p>In addition, your empirical approach regarding the content and modalities of the messages posted on remote channels is interesting and should be maintained. The results will have a great impact and will be useful to other lottery corporation around the world.</p>

<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>Meets the level norm</p>	<p>Your Marketing and Advertising strategies were recognised by the IAP as optimal, integrated and meeting high standards. You have successfully maintained this level of performance and more importantly, in some areas, you continue to improve your work. Under the umbrella of the Player Health Marketing, you emphasise the following four components: (1) Informed Decisions; (2) Positive Play; (3) GameSense; and (4) Referral and Support. We can read the details on how you integrate these four components in you approach. These components are guiding you in designing and articulating your marketing procedures. Finally, the upgrade of your GamSense Center will surely provide a positive impact on your players who decide to use this service. The IAP suggests that you monitor and assess the impact of these new initiatives.</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 current player education policies and programs. 	<p>Meets the level norm</p>	<p>As a pathway to excellence, it is interesting to read that your “...<i>ambition is to have the healthiest players in the world.</i>” (p. 184). We appreciate your high (!) ambition. It is a significant attitude to express your motivation in promoting Responsible Gambling. It would be nice if you could find a way to empirically support your goal.</p> <p>Nevertheless, your Player Education program is by far meeting the highest standards in the field. As we mentioned in the previous sections, providing help from your GameSense advisors during the difficult period of COVID-19 is a good example of your constant commitment to your players’ health. It would be useful to evaluate this specific modality of RG services among the BCLC players. You have revisited your GameSense, Loyalty program, and VSE Reinstatement programs. This fine-tuning approach is a great example of what WLA means by “continuous improvement” for Level 4 certification. For example, the assessment of the location of your GameSense advisor illustrates the importance of integrating an empirical approach in order to improve your program. Finally, as shown in segmentation research, Segment 5 is probably the most difficult players to deal with in a RG context. Your efforts to identify these players and to develop a strategy to promote healthy gambling behaviors need to be highlighted and commendable.</p>

<p>8</p> <p>Treatment Referral</p>	<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. 	<p>Meets the level norm</p>	<p>Your treatment referral service is well structured, integrated in your RG activities and adequately promoted in BC community. Flyers and related material to inform the players and the public about the availability of this service are well-developed. In your next submission, the IAP would appreciate data on the use of your treatment referral service, the type of individuals who use it, and their satisfaction level.</p>
<p>9</p> <p>Stakeholder engagement</p>	<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) developed in the implementation plan. ● 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>Meets the level norm</p>	<p>You have precisely and exhaustively listed your stakeholders. Your objectives and principles are clearly explained. The table presented on page 225 and 226 provides a comprehensive summary of your involvement with your stakeholders and how you communicate with them. This information is well-articulated and gives a detailed picture of your engagement. It is great to hear that you provided all NASPL members with the opportunity to use the GameSense program for free. This offer should be welcomed with great interest by the different lotteries in North America. May we suggest that you report in your next submission how many have taken up this opportunity and how they used it.</p> <p>Finally, your plan to create an integrated annual report that highlights your <i>“progress in implementing our corporate strategy and social purpose, as well as our sustainability and social responsibility efforts”</i> is commendable and a brief summary of the report, its effectiveness to reach stakeholders and your future plans should be included in your next submission.</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 second external independent assessment program and its key outcomes and learning points. ● List any gaps and opportunities that exist to improve this program. 	<p>Meets the level norm</p>	<p>As stated in our previous report, you have fully complied with various regulatory reporting requirements in place in BC. You have clearly pursued a transparent commitment in your internal and external reports. This open attitude is supported by the fact that your reports are available online, where all you stakeholders can read and comment on them. Your efforts to publish research data and VSE outcomes are appreciated by the IAP. Such information should be accessible outside your organisation. We strongly suggest that you continue this initiative.</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.