



## **WLA Responsible Gaming Framework**

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

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

**October 2023**



## Evaluation Outcome

The below summarises 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 remains a leader in RG. You have over the last three years continuously improved your RG programme and your submission is among the best we have read this year. It is clear, concise, and well to the point. Very much appreciated is the clear overview of the improvements made. Well done! We are very interested to see how you drive your player centric approach, follow the path of verified play and become a social purpose organisation. These are ambitious and profound changes to your business model and the IAP already looks forward to hearing about your work in this area in a future submission.

The IAP is pleased to recommend your re-certification at Level 4 and we will look forward to seeing more innovative and path-finding initiatives in future submissions. 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 re-certification!

Yours sincerely,

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

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)

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

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

| Action Item   | Panel's evaluation of completeness | Panel's observations and recommendations   |
|---|------------------------------------|--|
| <b>1</b><br><b>Integrated specific RG program into lottery day-to-day operations and decision-making</b>  | Completed                          | RG principles are fully observed in the day-to-day operations and decision-making. Monitoring and evaluation measures are in place to check compliance and effectiveness. Your aim is to have 'the healthiest players in the world'. |
| <b>2</b><br><b>Integrated stakeholder feedback and considered their expectations regarding RG program development</b>   | Completed                          |  |
| <b>3</b><br><b>The submission accuracy and reliability has been assured by an external independent assessor</b>   | Completed                          | An independent assessment report by KPMG in accordance with Agreed Upon Procedures has been submitted.   |
| <b>4</b><br><b>Established formal internal and external reporting mechanisms on their RG commitments, actions and progress to relevant internal and external stakeholders</b> | Completed                          |  |

**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><br/><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>Meets the level norm</p> | <p>You have extended your comprehensive research programme by various initiatives. Additionally, you have established several KPIs that inform other parts of your RG programme. The IAP is very impressed to read about the strategic integration of your research programme and the insights you have gained about your players. The player centric approach that you are following becomes very clear in this program element.</p> <p>The route you are taking in making players more aware of the tools you are offering is certainly the right direction. As the panel has also seen in other submissions, the pandemic had a profound impact on gambling behaviour and there is a need for lotteries to react. The panel is very pleased to see that BCLC is taking on this responsibility and has clearly identified this as a risk for its business model.</p> <p>It will be very interesting to hear more about your product portfolio review under the social purpose lens and whether you will be successful in raising player awareness to the various RG tools available. This is highly appreciated, and we would encourage you to share your knowledge in this area with other lotteries around the world.</p> |

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| <p><b>2</b></p> <p><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 that exist to improve the current employee training policies and programs.</li> </ul>   | <p>Meets the level norm</p> | <p>You have significantly improved your already well-designed employee programme. The additions to the training and the new tailored modules are well thought through. You have established several KPIs and other metrics that measure effectiveness. What is not clear from your submission is whether you incentivise certain employee job functions for RG or whether it is part of your performance management system. If this is not the case, you might want to consider incentivising certain roles that are especially critical for RG integration and development.</p>   |
| <p><b>3</b></p> <p><b>Retailer program</b></p> | <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> | <p>Meets the level norm</p> | <p>You have continued to widen your retailer training modules, reviewed its content, and included refresher modules. With regards to the mystery shopping exercise, you are currently doing this in house, whilst in the process of finding a new external provider. It would have been beneficial to receive a better overview of KPIs in this area to better understand how effective the current approach is.</p> <p>Overall, we commend you on the work that you have undertaken and will be interested to see what further learnings and changes you will draw from it moving forward.</p>  |
| <p><b>4</b></p> <p><b>Game design</b></p>      | <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 current game design policies and programs.</li> </ul>               | <p>Meets the level norm</p> | <p>We appreciate that you are currently in a review stage of your current game design approach and will move to an outcome rather than output-based framework. However, unfortunately your submission did not detail any data on how successful your current approach has been and what evaluation measures you have incorporated for this programme element. It would have been helpful to receive more information in this part of your submission. However, we understand that you are currently in a transition phase and the IAP is looking forward to learning about the effectiveness of your new outcome-based approach in your next submission.</p> |

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| <p><b>5</b></p> <p><b>Remote gaming channels</b></p>                   | <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>  | <p>Meets the level norm</p> | <p>Your suite of safeguards has been reviewed and you are tracking various metrics, indicators, and evaluation measures. It would have been helpful at this point in your submission to learn more about the (positive) impact these measures might have on player behaviour and what feedback you have received from players regarding your online features. As part of this we encourage you to consider an escalation module, how you will deal with players that demonstrate problematic play and how you will use these measures in conjunction with your player centric strategy. It was also interesting to see that you introduced an Active Reinstatement Program in 2023 and we look forward to hearing more about the impact of this programme in your next submission.</p> |
| <p><b>6</b></p> <p><b>Advertising and marketing communications</b></p> | <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 include a copy of it / them.</li> </ul> | <p>Meets the level norm</p> | <p>You have continued to improve your sound advertising and marketing approach. Your measures remain commendable and adequate. We can see that awareness of RG measures among players is still relatively low. Therefore, it will be interesting to see how further work on your player centric approach might improve this number in the future. It is good to see that the repositioned Game Sense brand continues to be available to other lotteries but that also MGM resorts have now signed a 5-year deal for it! Well done,</p>   |

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| <p><b>7</b></p> <p><b>Player education</b></p>   | <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> | <p>Best practice</p>        | <p>This part of your submission is certainly one of the most impressive elements. The various targeted initiatives and your set of evaluation measures are impressive as well as your ambitious plans moving forward. We congratulate BCLC for its player education approach which is a pivotal element for any successful and effective RG programme. It was a brave decision to test cancelling Keno promotions for two years to be able to monitor its impact. We are looking forward to hearing more about how your various programme elements, in particular about the impact of your new KI tool Tethr.</p> |
| <p><b>8</b></p> <p><b>Treatment Referral</b></p> | <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 that exist to improve the current policies and programs.</li> </ul>                | <p>Meets the level norm</p> | <p>Your approach remains to go beyond displaying and providing helpline and treatment information at customer contact points. Stakeholder engagement and the holistic approach to treatment referral are important elements for further improvements you have made since your last submission. It will be interesting to see how insights will inform your treatment referral approach in the future. The IAP is looking forward to an update on this in your next submission.</p>  |



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| <p><b>9</b></p> <p><b>Stakeholder engagement</b></p> | <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> | <p>Meets the level norm</p> | <p>You have developed a list of major stakeholders and also established a reconciliation approach on how to engage with indigenous people. Your comprehensive engagement program supports and promotes RG development in the community. The program drives for sharing of information and collaboration on RG efforts. The engagement activities are incorporated in the regular meetings and established working relationships. The engagement program has yielded some good results and identified many improvement opportunities. Despite the already successful approach in the past, the IAP is very pleased to learn that you are planning more two-way communication means for engagement. This is certainly an important element for becoming a successful social purpose organisation. In a future submission we would also like to better understand how stakeholder engagement informs your RG/ESG reporting practices and channels.</p> |
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|--|--|-----------------------------|---|
| <p><b>10</b></p> <p><b>Reporting and measurement</b></p> | <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 implementation plan.</li> <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>Meets the level norm</p> | <p>You are planning to shift your reporting to integrated reporting which means that you combine non-financial and financial information on one document. This might impact the amount of non-financial information you can display in your reporting, especially when it comes to KPIs and targets. Given the amount of good reporting measures in place, we would strongly encourage you to widen your reported non-financial KPIs, especially with regards to social impact reporting. The ones you are currently using might not be very meaningful for an outside stakeholder interested in your RG work, irrespective of the stakeholder group. A benchmarking exercise with other lotteries in this area might be helpful for your future reporting plans.</p> |
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**Appendix A**

**Evaluation scale used by the IAP**

| 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.   |