

## Responsible Gaming Framework: Guidance for Applicants

### LEVEL 2 – SELF-ASSESSMENT AND GAP ANALYSIS

To achieve Level 2 certification lotteries must complete:

1. A self-assessment of your existing RG program. This will help your lottery to determine and describe what RG program elements are already in place, and what needs to be improved. This should be signed off by the CEO. A full analysis is not required for all ten Program Elements at level 2. Nor is it expected that a full program of RG activities will have been developed for each element at this stage.
2. A prioritization of future RG activities based on gaps identified in the self-assessment. For any element that is not yet being addressed by the lottery it should indicate why not and what it would aspire to do in the future.

This template has been developed with a series of questions that can serve as a guide to help your lottery organization to compile your level 2 submission.

### SUBMISSION GUIDANCE & STRUCTURE

#### **Independent Assessment Panel's expectation:**

The Independent Assessment Panel (IAP) is composed of experts in RG. Although they have sector knowledge, they will not have detailed knowledge about your lottery operation. Therefore, it is important that your submission includes as many details for each program element as possible – even though they may seem insignificant to you. Don't forget, the IAP's recommendation to certify you or not for level 2 will be based exclusively on what you describe in your submission.

#### **Recertification:**

If your lottery is recertifying at Level 2, you should outline what has been done in the three years since the initial certification, providing explanation of commitment and future program elements that were included in the initial Level 2 submission and what has not yet been actioned. The submission should also illustrate that the IAP recommendations from the initial Level 2 submission have been put into practice.

#### **Submission Structure:**

##### ***Organizational Profile***

It is important that your submission starts with an introduction that includes an Organizational Profile. This allows the IAP to understand your organizational context, your business priorities and your operational model. You should consider covering the following topics:

- Organizational history and other relevant background, including recent major changes (mergers, takeovers, etc.)
- Ownership structure and/or beneficiaries
- Organizational structure/business model (including high level organizational chart)
- Key business lines and products offered
- Overall revenue and key financial indicators that the lottery feels provide helpful context
- Regulator/regulatory context (to provide a concise summary of regulatory context relating to for instance: how the lottery functions; what is/is not under its direct control especially regarding Responsible Gaming; whether the lottery itself has any role in regulatory enforcement or compliance monitoring etc.)

- General economic, societal and/or cultural context that are relevant to the RG program and its priorities
- Reflect on your wider corporate responsibility strategy here and how Responsible Gaming fits into your overall approach

It is also recommended that the submission should also include an overview of your:

- Formalized organizational level commitments to RG, if any. For example:
  - Responsible Gaming evident in high level organizational objectives, vision, mission, values or equivalent
  - Responsible Gaming roles and responsibilities defined at appropriately senior level
- Evidence of any organizational level Responsible Gaming resources and processes that may have been established at this stage, for instance:
  - At governance and managerial levels
  - Time and financial resources secured

**Alignment to framework**

It is recommended that your submission is structured to reflect the 10 elements of the Responsible Gaming framework, with each of the 10 elements of your submission including information covering these two areas:

- A. Self-assessment of your current policies and programmes
- B. Gap analysis and prioritisation exercise

**Evidence**

This should be provided to support your submission as part of the assessment document but may also be attachments or links to external resources. The IAP’s evaluation is based exclusively on the information you provide with the submission, including supporting documentation.

**INDIVIDUAL PROGRAM ELEMENT GUIDANCE**

This section outlines a series of guidance statements that aim to guide you through Level 2 certification expectations.

<b>INDIVIDUAL PROGRAM ELEMENT</b>	<b>A. Self-Assessment</b> These statements focus on RG measures, activities or initiatives that you may have implemented or you may be in the process of implementing. It is important to note that at Level 2, it is not expected that all of these measures are already in place, or that all will be put in place. In your submission, outline how the lottery fulfils the statement, or not.	<b>B. Gap analysis and prioritisation</b> These questions focus on your self-assessment and gap analysis, which in turn should inform your prioritization of future improvement needs.
<b>1. Research</b>	<b>1.1</b> You are permitted by your governing legislation to conduct, participate or finance RG research <b>1.2</b> Describe your RG research policy and/or program, its aims, program elements, how they are managed, how the research relates to the lottery’s core products, consumer groups and other potential stakeholders. Outline who	<b>1.11</b> List and describe the key gaps in research that your self-assessment has identified

	<p>conducts and funds the research, how are results usually shared and used internally.</p> <p><b>1.3</b> If a problem gambling prevalence survey been conducted in your jurisdiction, describe who it was done by, whether the results were made available to you. Provide an overview of relevant study results, including those related to lottery participation, and how these have been considered or acted on by the lottery.</p> <p><b>1.4</b> Your organization has commissioned player research/surveys or developed internal research capability and/or tools to carry out your own research. Describe how RG principles were included in those studies. Provide an overview of the research and describe how these studies have been considered or acted on by the lottery</p> <p><b>1.5</b> You conduct research/surveys on marketing &amp; advertising practices to ensure minimization of the impact of problem gambling. Describe how your research has informed the development of your RG program or its elements.</p> <p><b>1.6</b> You conduct specific research on RG best practices and/or have you consulted the RG research programs of other WLA members or relevant research institutions</p> <p><b>1.7</b> You collaborate with universities or research institutions in order to develop and/or conduct RG studies</p> <p><b>1.8</b> Your organization has established a research agreement with health &amp; addiction treatment centres</p> <p><b>1.9</b> You have carried out any other form of research not covered above that you think would be of relevance to your submission</p> <p><b>1.10</b> If you have shared research findings on a state, national or international level, describe how you have done this</p>	<p><b>1.12</b> Outline how you plan to enhance your RG program to further address research priorities</p> <p><b>1.13</b> If you have not identified research as a priority for improvement, please outline why</p>
<p><b>2. Employee training</b></p>	<p><b>2.1</b> Describe the size and categories of your workforce – i.e. the number of employees and key groups.</p> <p><b>2.2</b> You already have an employee training program that addresses RG principles. Describe the different program elements and the content of the training as relates to RG. For example:</p> <ul style="list-style-type: none"> <li>• Under age purchases</li> <li>• Identifying signs of gambling problem</li> <li>• Information on treatment referred program available in your jurisdiction</li> <li>• Helpline referral number</li> <li>• Game design</li> </ul> <p><b>2.3</b> You have defined a policy, or a code or equivalent that specifies expected RG related employee behaviours and/or values. If so, this document is covered as part of your employee training program</p> <p><b>2.4</b> Outline how the RG training program is delivered/implemented, by whom and how often. For instance:</p> <ul style="list-style-type: none"> <li>• Training sessions</li> <li>• Internal publications, intranet, etc.</li> <li>• Communications on RG content &amp; responsibilities</li> <li>• Presentations at staff conferences/meetings</li> <li>• Any other methods</li> </ul> <p><b>2.5</b> Outline which employee categories have received RG training/information to date</p> <p><b>2.6</b> Your program includes periodic refresher courses</p>	<p><b>2.9</b> List and describe the key gaps in employee training that your self-assessment has identified</p> <p><b>2.10</b> Outline how you plan to enhance your RG program to further address employee training priorities</p> <p><b>2.11</b> If you have not identified employee training as a priority for improvement, please outline why</p>

	<p><b>2.7</b> Your organization conducts evaluations of the RG training program. Outline how you are communicating results and to whom</p> <p><b>2.8</b> You have studied or benchmarked the employee training programs of other WLA members</p>	
<p><b>3. Retailer program</b></p>	<p><b>3.1</b> Describe the size and categories of your retailer network.</p> <p><b>3.2</b> Describe what RG issues your retailer training program covers, e.g.:</p> <ul style="list-style-type: none"> <li>• Underage gaming</li> <li>• Protection of other vulnerable groups</li> <li>• Treatment referral</li> <li>• Hotline help number</li> <li>• Training for new games</li> </ul> <p><b>3.3</b> You have formalized your RG related expectations and responsibilities for your retail community (e.g. in a RG Code or equivalent)</p> <p><b>3.4</b> Outline how the RG program components are delivered/implemented, by whom, when and how often. For instance:</p> <ul style="list-style-type: none"> <li>• Formal policy or code defining RG expectations and responsibilities</li> <li>• Retail training sessions</li> <li>• Provision of RG materials via retailers to players</li> <li>• Internal publications &amp; communication on RG content &amp; responsibilities</li> <li>• RG content via internet</li> <li>• Presentations at staff conferences/meetings</li> <li>• Support and information provision via a support center or RG liaison officer</li> <li>• Retail audits or other compliance monitoring (e.g. mystery shoppers)</li> <li>• Incentives to encourage retailers to consider RG</li> <li>• Sanctions if retailer in default</li> <li>• Any other method</li> </ul> <p><b>3.5</b> Describe what retailers have received RG training/information to date</p> <p><b>3.6</b> Your retailer program includes periodic refresher courses</p> <p><b>3.7</b> You assess retailers' awareness of RG issues and their responsibilities. For instance, you conduct assessments/tests to determine the RG knowledge level/retention of retailers who have completed the training program</p> <p><b>3.8</b> Outline how your retail program includes any other measures that promote RG Principles, and whether you have studied or benchmarked the retailer programs of other WLA members</p>	<p><b>1.1</b> List and describe the key gaps in retailer program that your self-assessment has identified</p> <p><b>1.2</b> Outline how you plan to enhance your RG program to further address retailer priorities</p> <p><b>1.3</b> If you have not identified your retailer program as a priority for improvement, please outline why</p>
<p><b>4. Game design</b></p>	<p><b>4.1</b> There are legal constraints in your jurisdiction as to the types of games you can offer</p> <p><b>4.2</b> Outline what games you offer</p> <p><b>4.3</b> Outline how do you typically source your games and products – i.e. from third party suppliers or in- house design</p>	<p><b>4.11</b>List and describe the key gaps in game design that your self-assessment has identified</p>

	<p><b>4.4</b> You ask your games supplier if it has information on the RG component of the game it is providing to you</p> <p><b>4.5</b> You offer games that are also available in other jurisdictions. If so, you check if negative effects have been observed. Provide the results and your response, if any.</p> <p><b>4.6</b> You offer innovative games. Outline the analysis of their potential risk factors prior to their launch. Provide the results and your response, if any.</p> <p><b>4.7</b> Describe what variables/RG criteria are considered when offering a new game, and provide information on the game evaluation process itself, if this is in place.</p> <p><b>4.8</b> The potential risks and RG components of your games have been evaluated by independent research</p> <p><b>4.9</b> Describe how you make sure your games don't appeal to children and/or other vulnerable groups</p> <p><b>4.10</b> Give details of how your program includes any other measures that promote RG Principles</p>	<p><b>4.12</b> Outline how you plan to enhance your RG program to further address game design priorities</p> <p><b>4.13</b> If you have not identified game design as a priority for improvement, please outline why</p>
<p><b>5. Remote gaming channels (Refers to Internet/mobile gaming)</b></p>	<p><b>5.1</b> You are legally permitted to offer remote gaming channels</p> <p><b>5.2</b> If you offer this form of gaming, provide full details of what games and on what platform</p> <p><b>5.3</b> You conduct your own risk assessment of games offered prior to launch and/or used a risk assessment done in another jurisdiction. Give information on the risk assessment process itself and any results.</p> <p><b>5.4</b> Describe the RG measures you apply to your remote gaming channels</p> <p><b>5.5</b> Outline how you make sure that your online/internet games and products do not appeal to children and/or other vulnerable groups.</p> <p><b>5.6</b> You assess the RG impact of the games you offer once they are online. Give details of how this is done and any results.</p> <p><b>5.7</b> You have studied or benchmarked other WLA members' RG approaches to remote gaming channels</p>	<p><b>5.8</b> List and describe the key gaps in remote gaming that your self-assessment has identified</p> <p><b>5.9</b> Outline how you plan to enhance your RG program to further address remote gaming priorities</p> <p><b>5.10</b> If you have not identified remote gaming as a priority for improvement, please outline why</p>
<p><b>6. Advertising and marketing communications</b></p>	<p><b>6.1</b> Outline what marketing and advertising channels and tactics do you typically use (e.g. print, broadcast, social media, etc.). Provide a short overview highlighting channels &amp; tactics used for both commercial and RG marketing and communications.</p> <p><b>6.2</b> Your organization adheres to advertising standards from the applicable lottery association – i.e. NASPL, EL, WLA</p> <p><b>6.3</b> Your organization adheres to other marketing codes in force in your jurisdiction</p> <p><b>6.4</b> You have developed your own RG advertising code. Provide further information and context.</p> <p><b>6.5</b> All your advertising campaigns meet the code standards/principles applied mentioned above. Describe how you ensure compliance by relevant parties (e.g. internally, by your agencies and your retail community)</p> <p><b>6.6</b> Outline what RG advertising principles do you follow, e.g.:</p> <ul style="list-style-type: none"> <li>• Do not promote lottery games as an alternate to work or means of escape from a bad financial situation</li> <li>• Do not appeal to minors</li> <li>• Do not promise win</li> <li>• Do not focused on particular ethnic group</li> <li>• Any other RG principles</li> </ul> <p><b>6.7</b> You have developed RG branding and messaging</p>	<p><b>6.10</b> List and describe the key gaps in advertising and marketing communications that your self-assessment has identified</p> <p><b>6.11</b> Outline how you plan to enhance your RG program to further address advertising and marketing communications priorities</p> <p><b>6.12</b> If you have not identified advertising and marketing communications as a priority for improvement, please outline why</p>

	<p><b>6.8</b> Your advertising and marketing communications program includes other measures that promote RG principles</p> <p><b>6.9</b> You have studied or benchmarked other WLA members’ RG approaches to their advertising and marketing communications</p>	
<b>7. Player education</b>	<p><b>7.1</b> You have an RG policy, code or the equivalent, and it includes a section on RG related information provision to the public</p> <p><b>7.2</b> You have a RG logo or catchphrase such as “Play Responsibly”. Describe where and how is it displayed.</p> <p><b>7.3</b> You produce materials or flyers to be made available at public other than at retailer locations.</p> <p><b>7.4</b> Your website contains information on problem gambling.</p> <p><b>7.5</b> You have a brochure and/or a section on your website on the realities of lottery play</p> <p><b>7.6</b> You promote a helpline number to the public. Outline how this information is made available.</p> <p><b>7.7</b> Your organization has an RG awareness campaign. Outline which stakeholders this program targets.</p> <p><b>7.8</b> There is an RG day/week in your jurisdiction. Describe how you are involved in it.</p> <p><b>7.9</b> Your player education program includes other measures that promote RG Principles.</p> <p><b>7.10</b> You have studied or benchmarked the player education programs of other WLA members.</p>	<p><b>7.11</b> List and describe the key gaps in player education that your self-assessment has identified</p> <p><b>7.12</b> Outline how you plan to enhance your RG program to further address player education priorities</p> <p><b>7.13</b> If you have not identified player education as a priority for improvement, please outline why</p>
<b>8. Treatment referral</b>	<p><b>8.1</b> There is a treatment referral policy in place in your jurisdiction. Outline who it is funded by.</p> <p><b>8.2</b> Information about the service/help line/contact centre, etc. promoted to your players in your organization’s communications instruments (website, magazines, advertisements, retailers’ written material, etc.). Briefly describe how this is done.</p> <p><b>8.3</b> You are legally allowed to develop your own treatment referral program. Outline whether you have done this and what it comprises.</p> <p><b>8.4</b> You have a RG policy or code (or equivalent) in place already, and it makes reference to treatment referral</p> <p><b>8.5</b> You collaborate with a referral center or helpline to identify and/or assist problem gamblers. Outline the type of cooperation, collaborative measures that promote RG, referral support, etc.</p> <p><b>8.6</b> You promote research in this field to maintain adequate RG measures to support player treatment services and prevent gambling problems.</p> <p><b>8.7</b> Your treatment referral program includes any other measures that promote RG Principles.</p> <p><b>8.8</b> You have studied or benchmarked the treatment referral programs of other WLA members.</p>	<p><b>8.9</b> List and describe the key gaps in treatment referral that your self-assessment has identified</p> <p><b>8.10</b> Outline how you plan to enhance your RG program to further address treatment referral priorities</p> <p><b>8.11</b> If you have not identified treatment referral as a priority for improvement, please outline why</p>
<b>9. Stakeholder engagement</b>	<p><b>9.1</b> Your RG policy, code or the equivalent in place already specifically refers to stakeholder engagement.</p> <p><b>9.2</b> You engage with your stakeholders on all or any of the nine other RG framework elements. Outline which stakeholders for which elements and provide information on the process used (example: if consultation led to changes in your approach/content). This activity may have included dialogue with your regional and international peers, suppliers, staff, industry associations, treatment services, experts, academics, etc. in order to advance your RG program development and share knowledge.</p> <p><b>9.3</b> You have created a working group to liaise with stakeholders on RG. Outline the role of the working group.</p> <p><b>9.4</b> Your lottery has processes in place that aim to systematically collate feedback from stakeholders (these may</p>	<p><b>9.7</b> List and describe the key gaps in stakeholder engagement that your self-assessment has identified</p> <p><b>9.8</b> Outline how you plan to enhance your RG program to further address stakeholder engagement priorities</p> <p><b>9.9</b> If you have not identified stakeholder engagement as a priority for</p>

	<p>involve, for instance, monitoring customer complaints, feedback from retailers, monitoring use of treatment services, feedback from community advisory groups, etc.). Describe these measures and any outcomes for your RG program.</p> <p><b>9.5</b> Your stakeholder program include any other measures that promote RG Principles.</p> <p><b>9.6</b> You have studied or benchmarked the stakeholder engagement programs of other WLA members</p>	<p>improvement, please outline why</p>
<p><b>10. Reporting and measurement</b></p>	<p><b>10.1</b>Your organization’s plan of RG activities/budget is subject to review and/or approval by the government.</p> <p><b>10.2</b>You report publicly on RG, perhaps via your annual financial report, as part of a wider CSR / sustainability report, web-based reporting, etc. Provide details together with supporting documentation (including relevant reports, web-links, etc.) and brief description of target audiences, both internal and external, of your RG reporting.</p> <p><b>10.3</b>Your reporting and measurement program include any other measures that promote RG Principles</p> <p><b>10.4</b>You have studied or benchmarked the RG reports of other WLA members</p>	<p><b>10.5</b>List and describe the key gaps in reporting and measurement that your self-assessment has identified</p> <p><b>10.6</b>Outline how you plan to enhance your RG program to further address reporting and measurement priorities</p> <p><b>10.7</b>If you have not identified reporting and measurement as a priority for improvement, please outline why</p>