Responsible Gaming Framework
Guidance for Applicants

LEVEL 3 – PLANNING & IMPLEMENTATION

To achieve Level 3 certification, lotteries are required to have:
1. Allocated sufficient resources to support the implementation of specific RG programs.
2. Initiated the development of internal and external communications activities to inform relevant stakeholders of the lottery's RG commitments.
3. Initiated the implementation of engagement processes that support the development of a RG program.

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 3 submission.

SUBMISSION GUIDANCE & STRUCTURE

Independent Assessment Panel's expectation:
Fully developed Responsible Gaming programs are NOT expected at Level 3. However, the Independent Assessment Panel will look for balance between level of implementation already achieved and depth of future action planning. As a general rule, the further along your lottery is with your actual (and evidenced) program implementation, the lesser the Independent Assessment Panel's expectation is regarding future action plans, and vice versa.

Recertification:
If your lottery is resubmitting at Level 3, you should describe 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 3 submission and what has not yet been actioned. The submission should also include text that illustrate that the IAP recommendations from the initial Level 3 submission have been put into practice.

Submission Structure:

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 organogram)
- 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 to include an overview of your:

- Formalized organizational level commitment to RG
    - Where Responsible Gaming is evident in high level organizational objectives, vision, mission, values or equivalent
    - Responsible Gaming roles and responsibilities are defined at an appropriately senior level
- Evidence of organizational level Responsible Gaming resources and processes that have been established, for instance:
    - At governance and managerial levels
    - Time and financial resources secured

Alignment to framework

It is recommended that your submission is structured by the Individual Programme Element Guide that is detailed below. This reflects the 10 elements of the Responsible Gaming framework and covers three key areas:

A. Self-assessment of your current policies and programmes
B. Planning and implementation progress and future plans
C. Monitoring and evaluating the effectiveness of your program

Monitoring and Evaluation

It is important to note the difference between monitoring and evaluation when compiling your submission. The following lists a couple of examples to illustrate this:

RG initiative	Monitoring	Evaluation
Employee program	Number of staff trained Hours of training provided	Did it increase levels of RG knowledge? Did it change behaviours?
Player education	Number of RG website hits	Were users satisfied that they found the information they needed?
Treatment referral	Number of calls to the help line	Who called and why? Were callers satisfied with the information / support they received?
Stakeholder engagement	Number of engagements with community groups	What improvements in our program were informed by these engagements? Has stakeholder opinion changed about your organization as a result of these engagements?

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 describes a series of guidance statements that aim to guide you through Level 3 certification expectations.

Responsible gaming framework element	A. Self-Assessment These statements focus on the overall structure of the RG measures and require you to itemize the individual policies and programs that support each elements.	B. Planning and Implementation These statements allow you to describe how you have implemented each element or plan to	C. Monitoring and Evaluation These questions allow you to demonstrate you have started to consider evaluating the effectiveness of your program.
1. Research	1.1 You are permitted by your governing legislation to conduct, participate or finance RG research 1.2 Describe your RG research policy and/or program, its aims, program priorities, how they are managed, how the research relates to the lottery's core products, consumer groups and other potential stakeholders. Describe how the research priorities are identified, who conducts and funds the research, how are results usually shared and used internally 1.3 If a problem gambling prevalence survey been conducted in your jurisdiction, describe who it was done by and 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 1.4 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 1.5 You conduct research/surveys on marketing & 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 1.6 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 1.7 You collaborate with universities or research institutions in order to develop and/or conduct RG studies 1.8 Your organization has established a research agreement with health & addiction treatment centres 1.9 You have carried out any other form of research not covered above that you think would be of relevance to your submission 1.10 If you have shared research findings on a state, national or international level, describe how you have done this	– Title(s) of the person(s) responsible for implementing the program or initiative – Objectives for this program – Audiences this program targets – Tactics (how the objectives are being or will be achieved) – Budget requirements – Timelines	1.11 List and describe the performance related indicators you are monitoring and the insights you expect to gain 1.12 Describe any external or independent reviews you have or are planning to commission 1.13 Give examples of improvements you have made as a result of your evaluation

2. Employee Program	2.1 Describe the size and categories of your workforce – i.e. the number of employees, key groups and RG related responsibility profiles 2.2 You have you defined a policy, or a code of conduct or equivalent that specifies expected RG related employee behaviours and/or values 2.3 You already have an employee training program that addresses RG principles. Describe the different program elements and the content of the training that relates to RG. For example: • Under age purchases • Identifying signs of gambling problem • Information on treatment referred program available in your jurisdiction • Helpline referral number • Game design • The role of employees and retailers in delivering on RG commitments • Why your lottery is committed to RG • How your lottery engages with employees and other stakeholders on RG 2.4 Describe how your RG training program is delivered/implemented, by whom and how often. For instance: • Training sessions • Internal publications, intranet, etc. • Communications on RG content & responsibilities • Presentations at staff conferences/meetings • Any other methods 2.5 You provide formal training to employees. Describe the content, frequency, target audiences, attendance requirement and monitoring methods 2.6 You have studied or benchmarked the employee training programs of other WLA members. Describe the actions implemented following these studies	– Title(s) of the person(s) responsible for implementing the program or initiative – Objectives for this program – Audiences this program targets – Tactics (how the objectives are being or will be achieved) – Budget requirements – Timelines	2.7 Describe how you assess employee awareness of RG issues and their responsibilities 2.8 List and describe the performance related indicators you are monitoring and the insights you expect to gain 2.9 Describe any external or independent reviews you have or are planning to commission 2.10 Give examples of improvements you have made as a result of your evaluation
3. Retailer Programme	3.1 Describe your retailer network including size, type of retailers and your contractual relationship with them 3.2 Describe what RG issues your retailer training program covers, e.g.: • Underage gaming • Protection of other vulnerable groups • Treatment referral • Hotline help number • Training for new games • Role of retailers in RG • Why your lottery is committed to RG • How your lottery engaged with stakeholders on RG, including the retailers	– Title(s) of the person(s) responsible for implementing the program or initiative – Objectives for this program – Audiences this program targets – Tactics (how the objectives are being or will be achieved) – Budget requirements – Timelines	3.9 Describe how you assess retailer awareness of RG issues and their responsibilities 3.10 List and describe the performance related indicators you are monitoring and the insights you expect to gain 3.11 Describe any external or independent reviews you

	3.3 You have formalized your RG related expectations and responsibilities for your retail community (e.g. in a RG Code or equivalent) **3.4** Describe how the RG program components are delivered/implemented, by whom, when and how often. For instance: • Formal policy or code defining RG expectations and responsibilities • Retail training sessions • Provision of RG materials via retailers to players • Internal publications & communication on RG content & responsibilities • RG content via internet • Presentations at staff conferences/meetings • Support and information provision via a support centre or RG liaison officer • Retail audits or other compliance monitoring (e.g. mystery shoppers) • Incentives to encourage retailers to consider RG • Sanctions if retailer in default • Any other method **3.5** You provide formal training to retailers. Describe the content, frequency, target audiences, attendance requirement and monitoring methods **3.6** Describe any other measures your retail program includes that promote RG Principles **3.7** 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 **3.8** You have studied or benchmarked other WLA members' retail programmes. Describe the actions implemented following these studies		have or are planning to commission **3.12** Give examples of improvements you have made as a result of your evaluation
4. Game Design	**4.1** There are legal constraints in your jurisdiction as to the types of games you can offer **4.2** Describe what games you offer **4.3** Describe how do you typically source your games and products – i.e. from third party suppliers or in- house design **4.4** You ask your games supplier if they have information on the RG component of the game it is providing to you **4.5** 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 **4.6** You offer innovative games. Describe the analysis of their potential risk factors prior to their launch. Provide the results and your response **4.7** Describe what variables/RG criteria are considered when offering a new game, and provide information on the game evaluation process itself **4.8** Describe how you make sure your games don't appeal to children and other	– Title(s) of the person(s) responsible for implementing the program or initiative – Objectives for this program – Audiences this program targets – Tactics (how the objectives are being or will be achieved) – Budget requirements – Timelines	**4.11** Describe how your games have been assessed either by third parties or proprietary assessment tools **4.12** List and describe the performance related indicators you are monitoring and the insights you expect to gain **4.13** Describe any external or independent reviews you have or are planning to commission **4.14** Give examples of improvements you have

			made as a result of your evaluation
	vulnerable groups **4.9** Describe any other measures your game design program includes that promote RG Principles **4.10** You have studied or benchmarked other WLA members' Game Design Programmes. Describe the actions implemented following these studies		
5. Remote Gaming Channels	5.1 You are legally permitted to offer remote gaming channels 5.2 If you offer this form of gaming, provide full details of what games and on what platform 5.3 You conduct your own risk assessment of games offered prior to launch and/or use a risk assessment done in another jurisdiction. Give information on the risk assessment process itself and any results 5.4 Describe the RG measures you apply to your remote gaming channels 5.5 Describe how you ensure your online/internet games and products do not appeal to children or other vulnerable groups. 5.6 You assess the RG impact of the games you offer once they are live. Give details of how this is done and any results **5.7** You have studied or benchmarked other WLA members' RG approaches to remote gaming channels. Describe the actions implemented following these studies	– Title(s) of the person(s) responsible for implementing the program or initiative – Objectives for this program – Audiences this program targets – Tactics (how the objectives are being or will be achieved) – Budget requirements – Timelines	5.8 List and describe the performance related indicators you are monitoring and the insights you expect to gain 5.9 Describe any external or independent reviews you have or are planning to commission 5.10 Give examples of improvements you have made as a result of your evaluation
6. Advertising and marketing communications	6.1 Describe what marketing and advertising channels and tactics you typically use (e.g. print, broadcast, social media, etc.). Provide a short overview highlighting channels & tactics used for both commercial and RG marketing and communications 6.2 Your organization adheres to advertising standards from the applicable lottery association – i.e. NASPL, EL, WLA **6.3** Your organization adheres to other marketing codes in force in your jurisdiction **6.4** You have developed your own RG advertising code. Provide further information and context 6.5 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) 6.6 Describe what RG advertising principles you follow, e.g.: • Do not promote lottery games as an alternate to work or means of escape from a bad financial situation • Do not appeal to minors • Do not promise win • Do not focused on particular ethnic group • Any other RG principles 6.7 You have developed RG branding and messaging	– Title(s) of the person(s) responsible for implementing the program or initiative – Objectives for this program – Audiences this program targets – Tactics (how the objectives are being or will be achieved) – Budget requirements – Timelines	**6.10** List and describe the performance related indicators you are monitoring and the insights you expect to gain 6.11 Describe any external or independent reviews you have or are planning to commission 6.12 Give examples of improvements you have made as a result of your evaluation

	6.8 Describe any other measures your advertising and marketing communications program includes that promote RG Principles **6.9** You have studied or benchmarked other WLA members' RG approaches to advertising and marketing communications. Describe the actions implemented following these studies		
7. Player Education	**7.1** You have an RG policy, code or the equivalent, and it includes a section on RG related information provision to the public **7.2** You have developed specific RG branding/messaging. Describe where and how is it used **7.3** You produce materials or flyers to be made available at public other than at retailer locations **7.4** Your website contains information on problem gambling **7.5** You have a brochure and/or a section on your website on the realities of lottery play **7.6** You promote a helpline number to the public. Describe how this information is made available **7.7** Your organization has an RG awareness campaign. Describe which stakeholders this program targets **7.8** There is an RG day/week in your jurisdiction. Describe how you are involved in it **7.9** Describe any other measures your player education program includes that promote RG Principles **7.10**You have studied or benchmarked the player education programs of other WLA members. Describe the actions implemented following these studies	– Title(s) of the person(s) responsible for implementing the program or initiative – Objectives for this program – Audiences this program targets – Tactics (how the objectives are being or will be achieved) – Budget requirements – Timelines	7.11 List and describe the performance related indicators you are monitoring and the insights you expect to gain 7.12 Describe any external or independent reviews you have or are planning to commission 7.13 Give examples of improvements you have made as a result of your evaluation
8. Treatment Referral	**8.1** There is a treatment referral policy in place in your jurisdiction. Describe who it is funded by **8.2** Information about the service/help line/contact centre, etc. promoted to your players in your organization's communication channels (website, magazines, advertisements, retailers' written material, etc.). Briefly describe how this is done **8.3** You are legally allowed to develop your own treatment referral program. Describe whether you have done this and what it comprises of **8.4** You have a RG policy or code (or equivalent) in place already and it makes reference to treatment referral **8.5** You collaborate with a referral centre or helpline to identify and/or assist problem gamblers. Describe the type of cooperation, collaborative measures that promote RG, referral support, etc. **8.6** You promote research in this field to maintain adequate RG measures to support player treatment services and prevent gambling problems. **8.7** Describe any other measures your treatment referral program includes that promote RG Principles	– Title(s) of the person(s) responsible for implementing the program or initiative – Objectives for this program – Audiences this program targets – Tactics (how the objectives are being or will be achieved) – Budget requirements – Timelines	**8.9** List and describe the performance related indicators you are monitoring and the insights you expect to gain **8.10**Describe any external or independent reviews you have or are planning to commission **8.11**Give examples of improvements you have made as a result of your evaluation

	8.8 You have studied or benchmarked the treatment referral programs of other WLA members. Describe the actions implemented following these studies		
9. Stakeholder engagement	**9.1** Your RG policy, code or the equivalent in place specifically refers to stakeholder engagement **9.2** You engage with your stakeholders on all or any of the nine other RG framework elements. Describe 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 **9.3** You have a formalized on-going stakeholder engagement mechanisms e.g. advisory boards, working groups etc. to inform the development of your RG program. Describe the details of these **9.4** Your lottery has processes in place that aim to systematically collate feedback from stakeholders (these may 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 **9.5** Describe any other measures your stakeholder program includes that promote RG Principles **9.6** You have studied or benchmarked the stakeholder engagement programs of other WLA members. Describe the actions implemented following these studies	– Title(s) of the person(s) responsible for implementing the program or initiative – Objectives for this program – Audiences this program targets – Tactics (how the objectives are being or will be achieved) – Budget requirements – Timelines	**9.7** List and describe the performance related indicators you are monitoring and the insights you expect to gain **9.8** Describe any external or independent reviews you have or are planning to commission **9.9** Give examples of improvements you have made as a result of your evaluation
10. Reporting and measurement	**10.1** Your organization's plan of RG activities/budget is subject to review and/or approval by the government **10.2** You report on your RG programme and performance to internal stakeholders e.g. employees, senior management, the board **10.3** 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. **10.4** Describe any other measures your reporting and measurement program includes that promote RG Principles **10.5** You have studied or benchmarked the RG reports of other WLA members. Describe the actions implemented following these studies	– Title(s) of the person(s) responsible for implementing the program or initiative – Objectives for this program – Audiences this program targets – Tactics (how the objectives are being or will be achieved) – Budget requirements – Timelines	**10.6** List and describe the performance related indicators you are monitoring and the insights you expect to gain **10.7** Describe any external or independent reviews you have or are planning to commission **10.8** Give examples of improvements you have made as a result of your evaluation