

Standards of Conduct Requirements for Gaming Policy and Enforcement Branch Employees

All public service employees swear/affirm to abide by the [Standards of Conduct for Public Service Employees](#) (“PSA Standards of Conduct”), as part of their Oath of Employment. The oath is a condition of employment under the Public Service Act. The Standards of Conduct describe the standards of conduct required of all public service employees, including, but not limited to, responsibilities regarding real or perceived conflicts of interest and confidentiality. Employees of the Gaming Policy and Enforcement Branch (Branch) are also required as a condition of employment to agree that in conjunction with the Standards of Conduct each employee will comply with the following Branch-specific Standards.

The requirement to comply with the PSA Standards of Conduct and the Branch-specific Standards is a condition of employment. Employees who fail to comply with either standards may be subject to disciplinary action up to and including dismissal.

Branch-specific Standards

Branch employees must also comply with the following Branch-specific Standards:

1. Clearance

Pursuant to section 55 of the Gaming Control Act, all Branch employees must undergo a background investigation prior to appointment or employment. Clearance must be renewed at least once every 5 years to ascertain the suitability of the person to remain employed with the Branch.

During the term of their clearance, an employee must immediately report any change in circumstance which may impact clearance to the Registration Division. This is in addition to the BC Public Service Agency Criminal Notification Procedures.

2. Participation in Gaming or Horse Racing

Branch employees are prohibited from participating in any gaming or horse racing activity in which they have a direct involvement in regulating, or where their employment has a real or perceived potential to impact the outcome of the game or horse race (see Appendix A for prohibited activities by position).

3. Financial Interest

Neither Branch employees nor members of their immediate families (defined for the purposes of these guidelines as a spouse and children living at home) may hold a direct or indirect financial interest in any external organizations that are involved in the conduct, management or operation of gaming goods or services.

For purposes of this requirement:

- Financial interest includes investment through ownership of shares or loaning funds to an organization as well as remunerative employment; and,
- Mutual fund investments are acceptable where the employee does not direct the fund’s investment mix.

4. Outside Remunerative and Volunteer Work

Further to the PSA Standards of Conduct on this subject, examples of forms of outside remunerative or volunteer activities that would create a real or perceived conflict of interest include, but are not limited to:

- A Branch investigator contracting, or taking a second job, with a gaming services provider to provide security advice;
- A licensing and grants officer preparing a grant or license application on behalf of an organization, on either a volunteer basis or for remuneration; or
- An advisor working as a volunteer or paid lobbyist for a gaming operator or supplier.

5. Disclosure

In order to ensure complete transparency around matters of conflict of interest, all prospective and current Branch employees must disclose any real or perceived conflicts as part of the clearance process. The disclosure section of the Application for Clearance form asks a series of questions designed to identify any real or perceived conflicts, providing an opportunity for those conflicts to be mitigated or eliminated.

Examples of potential conflicts that must be disclosed include, but are not limited to, involvement by an employee, an employees spouse or relative in:

- The board of a charitable licensee or grant recipient;
- Paid or volunteer activities in an organization that applies for gaming licenses or grants.
- The ownership of a race horse;
- Employment with a gaming services provider; or
- Financial investments in a registered gaming supplier.

The clearance and disclosure process is managed by the Branch's Registration Division, and any information provided is kept strictly confidential.

It is also incumbent on employees to immediately disclose any new real or perceived conflicts that arise during the term of their clearance by submitting an updated disclosure form to the Registration Division.

The GPEB Whistleblower program is available for confidential disclosure of observed or suspected wrongdoing within the Branch.

Additional Obligations for Specified Branch Employees

In addition to the PSA Standards of Conduct and the above Branch-specific Standards:

- Branch Investigators who are appointed as special provincial constables under section 9 of the Police Act must also comply with the [Code of Professional Conduct Regulations](#).
- Stewards, Judges and Inspectors of the Branch's Racing Division must also comply with [The Rules of Standardbred and Thoroughbred Horse Racing](#).

Issued by:

Douglas S. Scott, Assistant Deputy Minister and General Manager
Gaming Policy and Enforcement Branch
Updated: November 16, 2011

**Standards of Conduct Requirements for
Gaming Policy and Enforcement Branch Employees**

Appendix A

PROHIBITED GAMING ACTIVITY						
(Does not apply to games conducted outside of BC)						
POSITION	Horse Racing	Commercial Bingo/CGC	Casinos	PlayNow *see note	Licensed Gaming	Lottery Tickets
Assistant Deputy Minister's Office						
ADM/General Manager	✓	✓	✓	✓	✓	
Manager Strategic Initiatives	✓	✓	✓	✓	✓	
Executive Administrative Assistant						
Policy, Responsible Gambling & Business Services						
Executive Director	✓	✓	✓	✓	✓	
Directors	✓	✓	✓	✓	✓	
Managers						
Policy Analysts						
Responsible Gambling Staff						
Financial / IT Strategies Staff						
Communications Officer						
FOI/Records Management						
Web Developer						
Registration & Certification						
Executive Director	✓	✓	✓	✓	✓	
Directors / Managers	✓	✓	✓	✓	✓	
Investigators	✓	✓	✓	✓	✓	
Investigative Auditors	✓	✓	✓	✓	✓	
Technical Investigators	✓	✓	✓	✓	✓	
Administrative Staff						
Licensing & Grants						
Executive Director	✓	✓	✓	✓	✓	
Directors	✓	✓	✓	✓	✓	
Licensing & Grant Analysts					✓	
Licensing & Grant Clerks					✓	

**Standards of Conduct Requirements for
Gaming Policy and Enforcement Branch Employees**

PROHIBITED GAMING ACTIVITY (cont'd)						
(Does not apply to games conducted outside of BC)						
POSITION	Horse Racing	Commercial Bingo/CGC	Casinos	PlayNow *see note	Licensed Gaming	Lottery Tickets
Investigations & Regional Operations						
Executive Director	✓	✓	✓	✓	✓	
Senior Director	✓	✓	✓	✓	✓	
Directors / Managers	✓	✓	✓	✓	✓	
Investigators	✓	✓	✓	✓	✓	
Complaint Coordinator	✓	✓	✓	✓	✓	
Administrative Staff						
Audit & Compliance						
Executive Director	✓	✓	✓	✓	✓	
Directors	✓	✓	✓	✓	✓	
Auditors	✓	✓	✓	✓	✓	
Inspectors	✓	✓	✓	✓	✓	
Administrative Staff						
Racing						
Executive Director	✓	✓	✓	✓	✓	
Director, Racing Operations	✓	✓	✓	✓	✓	
Manager, Racing Inspections	✓					
Judges, Stewards & Inspectors	✓					
Administrative Assistant						
Internal Compliance and Risk Management						
Executive Director, Internal Compliance & Risk Management	✓	✓	✓	✓	✓	
Directors / Managers	✓	✓	✓	✓	✓	
Administrative Staff						

*Note: The prohibition concerning PlayNow covers every aspect of the site, including purchase of lottery tickets online. It is acceptable to purchase lottery tickets from retail outlets.