

Key Regulatory Responsibilities of the Gaming Policy and Enforcement Branch and their Application to the British Columbia Lottery Corporation

Introduction

The Gaming Policy and Enforcement Branch is responsible for the overall integrity and regulation of gaming and horse racing in British Columbia. This includes all provincial gaming conducted, managed and/or operated by the British Columbia Lottery Corporation.

As an agent of the Crown, the Corporation conducts, manages and operates all provincial gaming in the province, including commercial casinos, bingo halls, community gaming centres and lotteries.

Purpose of Document

The purpose of this document is to clarify, for each of four primary areas of the Branch's responsibilities:

- The responsibilities of the Branch with respect to provincial gaming;
- The authority under which the Branch carries out its responsibilities with respect to provincial gaming (including broad authorities under the Gaming Control Act and specific direction from the Solicitor General in response to the recent reviews conducted by the British Columbia Ombudsman and Deloitte & Touche); and
- The implications for, and what the Branch needs from, the Corporation in order for the Branch to fulfill its responsibilities with respect to provincial gaming.

The four areas of Branch responsibility which are addressed include:

1. Registering companies and people;
2. Certifying lottery schemes and gaming supplies;
3. Auditing for compliance with provincial requirements; and
4. Investigating allegations of wrongdoing.

Roles, responsibilities and obligations reflected in this document will be updated if and as necessary.

Under the Gaming Control Act, the Branch is responsible for the overall integrity of gaming and horse racing, a term not defined in the Act. The Branch defines impacts on the integrity of gaming to include all actions, incidents or things which could or may (either actually or by way of perception) corrupt the gaming and/or horse racing industries, or any portions of them, or bring the reputation of, or public confidence in, those industries into disrepute.

1. Registering Companies and People

The Branch ensures the integrity of companies and people involved in B.C.'s gaming industry by registering gaming services providers and gaming workers. This includes:

- Registering all gaming services providers and gaming workers to ensure their integrity in advance of becoming involved in provincial gaming;
- Registering all appointees and employees of the Corporation as gaming workers to ensure their suitability in advance of their appointment or employment;
- As part of the approval process, reviewing ownership, lease agreements, sources of proposed financing involving new locations and relocations of gaming venues;
- Reviewing proposed changes in directors, officers, partners or associates, or the intended acquisition or disposition of shares or securities, or proposed changes in ownership or financing; and approve or deny the intended changes before the proposed changes are finalized;
- Ensuring ongoing suitability of registrants by conducting further background investigations or inquiries;
- Monitoring compliance with conditions of registration, including organizational and financial reporting obligations under Part 8 of the Act; and
- Maintaining a registry of gaming services providers and gaming workers.

Authority

- The General Manager has delegated responsibility for the registration of gaming services providers and gaming personnel to the Executive Director of Registration and Certification pursuant to section 24(3) of the Act. The Executive Director also fulfills the role of Registrar and certifies evidence as required under section 103(2)(a) of the Act.
- As delegated by the General Manager, the Registration and Certification Division has sole authority for conducting background investigations of registrants and applicants for registration pursuant to section 80(1) of the Act.
- Under section 81 of the Act, the General Manager may designate any Branch employee as an Investigator for the purposes of Part 9 of the Act.
- Under section 80(2) of the Act, an Investigator has all the powers and duties that an Inspector has under section 79 of the Act.
- All Registration and Certification Division Investigators are authorized to conduct background investigations pursuant to section 80(1) of the Act.
- The Minister has appointed all Investigators of the Registration and Certification Division, including the Executive Director, as Special Provincial Constables under section 9 of the Police Act.
- Under section 55, it is a condition precedent to the appointment or employment that the prospective appointee or employee must undergo a background investigation to ascertain the suitability of the person for appointment or employment by the Corporation. The registration of all Corporation appointees and employees must be renewed every 5 years.

Key Regulatory Responsibilities of the Gaming Policy and Enforcement Branch and their Application to the British Columbia Lottery Corporation

- Under section 56(1) of the Act, the Branch must maintain a registry of all registered gaming services providers and gaming workers.
- Under section 56(3) of the Act, the Branch may attach conditions to registrations.
- Under section 86(1), the Corporation must provide Registration and Certification Division Inspectors or Investigators with any information, records or things requested by the Inspector or Investigator.
- Under section 87 of the Act, the Corporation and its officers and employees:
 - Must submit to an investigation or inspection conducted by the Registration and Certification Division;
 - Must not obstruct or interfere with an investigation or inspection conducted by the Registration and Certification Division; and
 - Must not withhold or refuse to produce any information, record or thing that is requested by an Investigator or Inspector.
- Under section 96 of the Act, the Corporation can not employ or engage a person unless they are appropriately registered with the Branch.
- Under section 35 of the Gaming Control Regulation, it is a condition of registration that all Corporation officials and employees must, depending on their duties, wear, display or produce for inspection, their official gaming worker registration card.

Implications for the British Columbia Lottery Corporation

1. For the purposes of conducting, managing and/or operating provincial gaming, the Corporation may only enter into agreements with registered gaming services providers for gaming services defined under section 1 of the Act and section 3 of the Regulation.
2. Prior to completion of any agreement for the provision of gaming services with respect to the Corporation's conduct, management and/or operation of provincial gaming, the Corporation must ensure that all gaming services providers and lottery retailers have been appropriately registered with the Branch.
3. The Corporation must ensure that all officials and employees that are appointed or employed by the Corporation are appropriately registered by the Branch.
4. All Corporation employees must immediately report to the Registration and Certification Division any conflicts of interest or potential conflicts of interest that could possibly impact their roles and responsibilities as Corporation employees in accordance with the General Manager's directive of April 16, 2007.
5. In general, the Corporation must ensure that all Corporation employees wear or display a GPEB approved BCLC identification card at all times in a manner clearly visible to the public. This card must display the GPEB registration number and date of expiry as provided in the Certificate of Registration. An employee's card must be replaced every time that employee renews their registration. A card must not be issued to any person who does not hold a valid GPEB registration.

Despite the above, Corporation employees whose duties pertain to security or surveillance at gaming facilities are exempted from wearing an identification card while they are working in a gaming facility. However, such employees must produce their identification card for

Key Regulatory Responsibilities of the Gaming Policy and Enforcement Branch and their Application to the British Columbia Lottery Corporation

inspection at the request of a Branch Inspector or Investigator and wear their card at other material times.

6. The Corporation must submit to the Branch, within 30 days after the expiry of a month in which one or more officials or employees cease employment or appointment with the Corporation:
 - a) A list of those former officials and employees for that month, and
 - b) The official gaming worker identification cards of those former officials and employees.
7. The Corporation must maintain an up-to-date listing of all Lottery Operations Agreement holders and advise the Registration and Certification Division, on a weekly basis, of any cancellations, additions, or modifications to the agreements.
8. The Corporation must maintain an up-to-date listing of all Casino, Bingo or Community Gaming Centre Operational Services Agreements and advise the Registration and Certification Division, within two (2) business days, of signing a final version of any cancellations, additions, or modifications to the agreements.

2. Certifying Lottery Schemes and Gaming Supplies

The Minister of Public Safety and Solicitor General has sole authority for approving new lottery schemes in B.C. and the Branch supports the Minister in this activity. The Branch certifies, and ensures the technical integrity of, lottery schemes, gaming equipment and gaming supplies in B.C.'s gaming industry. This includes:

- Establishing Technical Gaming Standards applicable to electronic gaming equipment and non-electronic gaming supplies approved for use in B.C..
- Certifying and approving the integrity of all lottery schemes before they can be used in provincial gaming, including Internet gaming;
- Certifying and approving all electronic and non-electronic gaming equipment before it can be used in provincial gaming, including Internet gaming; and
- Certifying and approving all electronic and non-electronic gaming supplies before they can be used in provincial gaming, including gaming conducted over the Internet.

Authority

- The General Manager has delegated responsibility for certification and compliance respecting the technical integrity of gaming equipment, gaming supplies and lottery schemes used in provincial gaming to the Executive Director of Registration and Certification pursuant to section 24(3) of the Act.
- Under section 81 of the Act, the General Manager may designate any Branch employee as an Investigator for the purposes of Part 9 of the Act.
- The Minister has appointed all Investigators of the Registration and Certification Division, including the Executive Director, as Special Provincial Constables under section 9 of the Police Act.
- Under section 75(1) of the Act, the Corporation can not use, or permit the use of, gaming equipment in connection with a lottery scheme unless the Branch has issued a certificate of technical integrity.
- Under section 75(2) of the Act, the Corporation must advise the Branch if any gaming equipment has been repaired, altered or upgraded or has malfunctioned, and the Corporation must not use the gaming equipment until the use has been approved in writing.
- As per the General Manager's Directive dated March 14, 2007, the Corporation must ensure all gaming supplies used in conjunction with a lottery scheme have been approved in writing by the Branch, and advise the Branch if any such supplies have been found to be defective. Gaming supplies that have been repaired or altered must be further approved in writing by the Branch.
- Gaming equipment is defined under section 74 of the Act.
- Gaming supplies are defined in section 1(1) of the Act, and sections 6 and 7 of the Regulation.
- Under section 86(1), the Corporation must provide Registration and Certification Division Inspectors or Investigators with any information, records or things requested by the Inspector or Investigator.

Key Regulatory Responsibilities of the Gaming Policy and Enforcement Branch and their Application to the British Columbia Lottery Corporation

- Under section 87 of the Act, the Corporation and its officers and employees:
 - Must submit to an investigation or inspection conducted by the Registration and Certification Division;
 - Must not obstruct or interfere with an investigation or inspection conducted by the Registration and Certification Division; and
 - Must not withhold or refuse to produce any information, record or thing that is requested by an Investigator or Inspector.

Implications for the British Columbia Lottery Corporation

1. Prior to conducting and managing any new or modified lottery scheme, the Corporation must ensure that the technical integrity of the new or modified lottery scheme has been approved in writing by the Executive Director of Registration and Certification.

If supported by the Corporation, a company wanting to provide gaming equipment or gaming supplies to BCLC may request a limited approval for testing by BCLC under a GPEB limited review application process. Details of the conditions and limitations of the limited review application are outlined in see Appendix A.

2. Prior to using gaming supplies in the conduct and management of a lottery scheme, the Corporation must ensure that the technical integrity of the gaming supplies has been approved, either individually or according to the type of gaming supply, in writing by the Executive Director of Registration and Certification.
3. The Corporation must immediately advise the Executive Director of Registration and Certification in writing if any gaming supplies used in lottery schemes have been altered, upgraded or repaired, or have been found defective in manufacture or design, and the Corporation must not use such gaming supplies after any alteration, upgrade or repair, until the further use has been approved in writing by the Executive Director of Registration and Certification. For clarity, specific conditions for reporting are articulated in the technical standards outlined for each machine. Generally, the Branch must be notified when a significant alteration, upgrade, or repair occurs, or when a significant defect is found in the manufacture or design of a lottery scheme.
4. The Corporation must permit Branch Inspectors, Investigators, and registered technical personnel contracted by the Branch, to enter and inspect any area of the business premises of the Corporation where:
 - a) Provincial gaming is conducted, managed and/or operated by the Corporation; and
 - b) Gaming equipment and/or gaming supplies used in the conduct, management, operation or presentation of gaming are operated, conducted, stored or tested.
5. The Corporation must permit Branch Inspectors, Investigators, and registered technical personnel contracted by the Branch, to access and inspect, audit and examine any written, electronic or computerized information, documents, records or things in possession of the Corporation which the Inspectors or Investigators determine are necessary to carry out their responsibilities.

Key Regulatory Responsibilities of the Gaming Policy and Enforcement Branch and their Application to the British Columbia Lottery Corporation

6. The Corporation must permit Branch Inspectors and Investigators to immediately remove or copy any information, documents, records or things from the Corporation for technical integrity purposes.

The Branch will provide the Corporation with a receipt for any records or things removed. In principle, the Branch will ensure that the Corporation retains copies or originals of any materials which the Branch removes. However, if the volume of material is so large that such an effort is unreasonable, the Branch will ensure the Corporation receives copies as soon as practicable.

7. Upon written or verbal request, the Corporation must immediately, or as soon as available, provide any information, documents, records or things an Inspector or Investigator deems necessary to ensure the technical integrity of gaming equipment. The Corporation may request a time extension in extenuating circumstances.

3. Auditing for Compliance with Provincial requirements

The Branch conducts regular and periodic inspections, audits or investigative audits (generally referred to as audits) of all provincial gaming to ensure compliance with all applicable legislation, regulation, public interest standards and directives. These audits are developed in the context of a risk management framework and acceptable risk tolerances for both the Branch and the industry. This work includes:

- Establishing and maintaining an audit framework, audit and inspection standards, and policies and procedures for all gaming operations and the use of provincial gaming revenues;
- Verifying all provincial gaming is conducted in compliance with gaming legislation, directives, public interest standards, policies and procedures;
- Verifying service providers and the Corporation comply with all audit and compliance requirements;
- Subjecting all commercial gaming sites to routine audits and, as necessary, random and/or occasional audits;
- Subjecting the Corporation to routine audits and, as necessary, random and/or occasional audits concerning its conduct, management and operation of all forms of provincial gaming and its management of provincial gaming revenues as they impact Branch responsibilities;
- Reviewing and monitoring the Corporation's compliance regime. This includes, but is not limited to the Corporation's:
 - Internal audit programs;
 - Operational gaming audit programs; and
 - Quality assurance programs.
- Responding to complaints from:
 - The public, regarding activities that may compromise the integrity of gaming; and
 - The Corporation, pertaining to non-compliance by a service provider.

Authority

- The General Manager has delegated responsibility for conducting audits of provincial gaming, including provincial gaming conducted, managed and operated by the Corporation, to the Executive Director of Audit and Compliance pursuant to section 24(3) of the Act.
- Section 27(3)(c) of the Act authorizes the Branch to make inquiries into any matter that effects or could reasonably effect the integrity of gaming.
- Under section 78(1) of the Act, Audit and Compliance Division Auditors are designated as Inspectors for the purposes of Part 9.
- The powers and duties of an Inspector are set out under section 79(1) of the Act.
- Under section 86(1), the Corporation must provide Auditors or Inspectors with any information, records or things requested by the auditor.

Key Regulatory Responsibilities of the Gaming Policy and Enforcement Branch and their Application to the British Columbia Lottery Corporation

- Under section 87 of the Act, the Corporation and its officers and employees:
 - Must submit to an audit or inspection conducted by the Audit and Compliance Division;
 - Must not obstruct or interfere with an audit or inspection conducted by the Audit and Compliance Division; and
 - Must not withhold or refuse to produce any information, record, or thing that is requested by an auditor or Inspector.

Implications for the British Columbia Lottery Corporation

1. The Corporation must permit Branch Auditors or Inspectors to enter and inspect any area of the business premises of the Corporation where:
 - a) Provincial gaming is conducted, managed and/or operated by the Corporation; and,
 - b) Gaming equipment and/or gaming supplies used in the conduct, management, operation or presentation of gaming are operated, conducted, stored or tested.
2. The Corporation must permit Branch Auditors or Inspectors to access and inspect, audit and examine any written, electronic or computerized information, documents, records or things in possession of the Corporation which the Auditors or Inspectors determine are necessary to carry out their responsibilities.
3. The Corporation must permit Branch Auditors or Inspectors to immediately remove or copy any information, documents, records or things from the Corporation for audit/inspection purposes.
4. The Branch will provide the Corporation with a receipt for any records or things removed. In principle, the Branch will ensure that the Corporation retains copies or originals of any materials which the Branch removes. However, if the volume of material is so large that such an effort is unreasonable, the Branch will ensure the Corporation receives copies as soon as practicable.
5. Upon written or verbal request, the Corporation must immediately, or as soon as available, provide any information, documents, records or things an Auditor or Inspector deems necessary for the purposes of an audit or inspection. The Corporation may request a time extension in extenuating circumstances.

4. Investigating Allegations of Wrongdoing

The Branch ensures the integrity of gaming by investigating, or assisting law enforcement agencies in the investigation of, complaints or allegations of criminal or regulatory wrongdoing in provincial gaming in the province. This includes:

- Investigating complaints and allegations of wrongdoing in provincial gaming in the province for the purpose of prosecution and/or administrative hearings;
- Conducting investigations in relation to allegations of wrongdoing internal to the Corporation;
- Conducting all investigations in relation to allegations of wrongdoing, including investigations involving licensees and registrants.
- Investigating and/or assisting law enforcement agencies in investigating illegal gambling activity;
- Ensuring all complainants are advised of the outcome of complaints in a timely manner to enhance public confidence in the integrity of gaming;
- Gathering and maintaining intelligence concerning the extent, type, and nature of unlawful activity in gaming and horse racing; and
- Identifying trends in unlawful gaming activity by tracking complaints and allegations.

Authority

- Pursuant to section 24(3) of the Act, the General Manager has delegated sole authority to the Executive Director, Investigations and Regional Operations Division (Investigations Division), to:
 - Independently direct confidential investigations in relation to Criminal Code and Act offences including any other matter that may affect the integrity of gaming;
 - Exercise the discretion, under section 85 of the Act, to place a gaming site under video surveillance as part of an investigation under section 81(2); and
 - Certify evidence as required under section 103(2)(a) of the Act.
- As delegated by the General Manager, the Investigations Division is solely responsible for all investigations conducted under section 81 of the Act.
- Section 27(3)(a) of the Act authorizes the Branch to conduct investigations respecting the integrity of all gaming, including provincial gaming.
- Under section 81 of the Act, the General Manager may designate any Branch employee as an Investigator for the purposes of Part 9 of the Act.
- Under section 80(2) of the Act, an Investigator has all the powers and duties that an Inspector has under section 79 of the Act.
- All Investigations Division Investigators appointed under section 81 of the Act are:
 - Authorized to conduct investigations for the administration and enforcement of the Act and have all the powers and duties that an Inspector has under section 79; and

Key Regulatory Responsibilities of the Gaming Policy and Enforcement Branch and their Application to the British Columbia Lottery Corporation

- Delegated the authority to request, under section 86(1) of the Act, information, records, or things from the Corporation that are deemed to be relevant to an investigation.
- The Minister has appointed all Investigators of the Investigations Division, including the Executive Director, as Special Provincial Constables under section 9 of the Police Act. For this purpose, Investigators are empowered to enforce the Criminal Code and all Provincial Statutes of B.C. to the extent necessary.
- Under section 81(4) of the Act, the Branch must report to the Corporation the results of investigations, if the investigation is undertaken at the request of the Corporation, or if the General Manager deems it appropriate.
- Under section 86(1) of the Act, the Corporation must provide to the Investigations Division any information, records or things requested by the Investigators that are relevant to an investigation.
- Under section 86(2) of the Act, the Corporation must notify the Investigations Division immediately about any conduct, activity or incident which potentially involves or involved:
 - The commission of an offence under a provision of the Criminal Code that is relevant to gaming; or
 - The commission of an offence under the Act or the regulations.
- Under section 87, the Corporation and its officers and employees:
 - Must submit to an investigation conducted by the Investigations Division;
 - Must not obstruct or interfere with an investigation conducted by the Investigations Division; and
 - Must not withhold or refuse to produce any information, record or thing that is requested by an Investigator or Inspector.

Implications for the British Columbia Lottery Corporation

1. The Corporation must permit Investigations Division Investigators to enter and inspect any area of the business premises of the Corporation where:
 - a) Provincial gaming is conducted, managed and or operated by the Corporation; and
 - b) Gaming equipment and/or gaming supplies used in the conduct, management, operation, or presentation of gaming are operated, conducted stored or tested.
2. The Corporation must permit Investigations Division Investigators to access and inspect and examine any written, electronic, or computerized information, documents, records or things in possession of the Corporation which the Investigators determine are necessary to carry out their responsibilities.
3. Upon written or verbal request, the Corporation must immediately, or within two (2) business days, provide any information, documents, records or things an Investigations Division Investigator deems necessary for the purposes of an inspection or investigation. The Corporation may request a time extension in extenuating circumstances and the Branch will consider operational issues and respond to such requests on a case by case basis.

Key Regulatory Responsibilities of the Gaming Policy and Enforcement Branch and their Application to the British Columbia Lottery Corporation

4. The Corporation must permit Investigations Division Investigators to immediately remove or copy any information, documents, records or things from the Corporation for investigation purposes.
5. The Investigations Division Investigators will provide the Corporation with a receipt for any records or things removed. In principle, the Branch will ensure that the Corporation retains copies or originals of any materials which the Branch removes. However, if the volume of material is so large that such an effort is unreasonable, the Branch will ensure the Corporation receives copies as soon as practicable.
6. The Corporation must immediately notify the Investigations Division of any suspicious conduct, activity or incident that occurs in relation to provincial gaming that may involve:
 - a) The commission of an offence under the provisions of the Criminal Code that is relevant to, or may impact the integrity of, gaming;
 - b) A contravention to the Gaming Control Act or related regulations that is relevant to, or may impact the integrity of, gaming; or
 - c) Any other matter that is relevant to, or may impact the integrity of, gaming.For further clarification, see Appendix B attached.
7. The Corporation must immediately notify the Investigations Division of all known wins or multiple wins by retailers (including retail managers and employees), regardless of size or situation, as soon as the Corporation is aware of such an instance occurring. The Corporation must report all such known wins or multiple wins in a way that is consistent with, and preferably using, section 86 reports.
8. The Branch will review each file concerning a win or multiple win by a retailer/retailer employee received from the Corporation and will, where appropriate and/or necessary, conduct an independent investigation.
9. The Corporation is not required to hold in abeyance any prize payouts of retailer or retailer employee wins reported to the Investigations Division unless otherwise notified by the Division.
10. Upon notification by the Investigations Division, the Corporation must hold in abeyance any compliance reviews¹ (including all wins by retailer managers and employees) on any matter under review or investigation by the Investigations Division until notified by the Investigations Division that its review or investigation has been completed.
11. The Investigations Division will notify the Corporation when the review or investigation is concluded and of its findings.
12. All lottery retailers are legally obligated to report any suspicious conduct, activity or incident that occurs in relation to provincial gaming directly to the Investigations Division through the applicable section 86 reporting process outlined by the Investigations Division.
13. The Corporation must ensure all BCLC Hot Line customer service staff members direct any calls they receive from retailers or retail employees that pertain to suspicious conduct, activities or incidents to the Investigations Division (including through GPEB's toll-free number, available for retailers to report suspicious conduct, activity or incidents).

¹ For the purposes of this document, any review or investigation undertaken by the Corporation's Security Department is referred to as "compliance reviews."

**Key Regulatory Responsibilities of the Gaming Policy and Enforcement Branch
and their Application to the British Columbia Lottery Corporation**

14. The Corporation has committed to work with the Branch to develop a coordinated approach to enhance lottery retailer compliance with reporting requirements. This approach will include, but is not limited to, contributing to the development of communication plans, disseminating information related to GPEB and relevant GPEB programs through its sales network, and participating in periodic evaluations of retailer compliance and retailer knowledge of their roles and responsibilities.
15. The Investigations Division will develop processes for receiving reports of suspicious conduct, activities or incidents from retailer including a toll-free number, email and Internet reporting functions.
16. The Corporation must provide monthly written reports to the Investigations Division which itemizes all reports submitted by the Corporation to the Investigations Division under section 86 of the Act.
17. The Investigations Division will reconcile the monthly report to ensure completeness and accuracy of the receipt and contents of the reports from the Corporation, and will notify the Corporation of any discrepancies.
18. The Investigations Division will provide periodic feedback to the Corporation, in relation to any deficiencies noted with respect to the section 86 reports and related information, records, or things provided by the Corporation under section 86(1) of the Act.

Appendix A – Limited review application process

Limited Review Application Process for Companies Seeking to Contract with the British Columbia Lottery Corporation

If supported by the Corporation, a company wanting to provide gaming equipment or gaming supplies to BCLC may request a limited approval for testing by BCLC under a GPEB limited review application process.

This process will not replace GPEB's current due diligence requirement consisting of a full and thorough background investigation of all applicants for registration.

Under this process:

- Applicants submitting an Initial Review Application(s) will authorize GPEB to conduct criminal record, financial and related jurisdictional checks to assess suitability for Limited Approval to supply gaming products for testing purposes. There will be no charge for this application;
- The gaming equipment or supply under consideration must be independently tested and issued a Certificate of Technical Integrity by GPEB prior to operating in a live environment;
- The testing period under this process would be limited to 90 days. However, the Corporation may request to have this testing period extended and consideration for such requests will be addressed on a case-by-case basis;
- The applicant company is not permitted to sell, lease, licence or otherwise distribute their products in British Columbia under this form of approval;
- All normal operating controls, policies and procedures for gaming equipment must be in place (as if the equipment were being used under regular circumstances); and
- GPEB would audit the operation of the equipment (as if the equipment were being used under regular circumstances).

Appendix B – Section 86 reporting by BCLC

British Columbia Lottery Corporation Section 86 Reporting Requirements

Section 86(2) of the Gaming Control Act requires the British Columbia Lottery Corporation to notify the Gaming Policy and Enforcement Branch Investigations and Regional Operations Division without delay, about any conduct, activity or incident occurring in connection with a lottery scheme or horse racing, (including incidents at a gaming facility or in relation to any of the Corporation's lottery products) that may be considered contrary to the Criminal Code of Canada, the Act or Gaming Control Regulations, or that may affect the integrity of gaming or horse racing. This includes, but is not limited to:

- a. Cheating at play;
- b. Theft affecting the integrity of the game (e.g.. thefts from the house or by a gaming worker);
- c. Theft of lottery products from a lottery retailer;
- d. Any theft or wrongdoing in relation to lottery products, gaming equipment or gaming supplies from the Corporation; inventory before the lottery product is distributed to lottery retailers;
- e. Prize claims by an individual with an alleged stolen lottery ticket;
- f. Fraud;
- g. Any suspicious or alleged fraud or theft by a lottery retailer/retail employee;
- h. Any forgery of any lottery tickets;
- i. Money laundering;
- j. Persons suspected of passing counterfeit currency;
- k. Loan sharking;
- l. Robbery;
- m. Assault;
- n. Threats against, or intimidation of gaming employees;
- o. All lottery retailer lottery wins or lottery retailer employee lottery wins;
- p. All suspensions, revocations, or cancellations of Lottery Operator Agreements with lottery retailers;
- q. Unauthorized lottery schemes;
- r. Unauthorized gaming by minors;
- s. Unregistered gaming workers; and
- t. Unregistered service providers.

The Corporation need not report incidents already reflected in section 86 reports forwarded to the Investigations and Regional Operations Division by service providers and lottery retailers (and copied to the Corporation).