WLA Responsible Gaming Framework

Independent Assessment Panel Evaluation Report

LEVEL 2 – Self-Assessment and Gap Analysis – Lotería de Río Negro para Obras de Accíon Social (Lotería de Río Negro)

October 2019

Evaluation Outcome

The below summarizes 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

The panel would like to thank Lotería de Río Negro for their Level 2 submission. Your commitment to RG becomes is apparent when reading your letter and in some program elements the priorities moving forward. The Independent Assessment Panel (IAP) greatly appreciates the straightforward and honest attitude adopted in this submission. We can see that in some areas, it is difficult to exert influence due to the fact that those areas are managed on a national level and not a provincial level. However, we would still recommend that on those areas that are fully in your control you establish more processes and policies and to engage with stakeholders in your jurisdiction. We would also ask you in the next submission to provide us with more evidence and content. In some program elements we could not make a full assessment of your work which makes it difficult for us to judge whether you deserve a Level 2 certification. This is something that needs to be addressed in the future. In summary, you identified the major gaps in your RG program and highlighted some avenues you plan to take in order to improve your RG initiatives.

The IAP wishes you every success with your RG program going forward and we look forward to reviewing future submissions from you. 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 2 certification!

Yours sincerely,

Anne Pattberg

Chair – WLA RGF Independent Assessment Panel

Table 1   Program Element specific evaluation outcomes

For the evaluation scale used by the IAP, please refer to Appendix A.

Program Element	Evaluation outcome
1 Research	Meets minimum requirements
2 Employee Program	Meets the level norm
3 Retail Program	Meets the level norm
4 Game Design	Meets minimum requirements
5 Remote Gaming Channels	Insufficient information provided
6 Advertising and Marketing Communications	Meets minimum requirements
7 Player Education	Meets the level norm
8 Treatment Referral	Meets minimum requirements
9 Stakeholder Engagement	Insufficient information provided
10 Reporting and Measurement	Insufficient information provided

Table 2   Evaluation relating to individual Action Items

Action Item	Information to be contained in the submission	IAP's evaluation of completeness	Commentary
Conduct self-assessment	Copy of self-assessment which has been signed off by CEO.	Completed	
Gap Analysis and identification of priorities based on self-assessment	Based on the findings of the self-assessment, list your gaps and priorities that you plan to work on, in order to integrate the RG Principles into day-to-day operations.	Completed	

Table 2   Commentary relating to Program Elements

Program Element	Requirements at Level 2	Panel's evaluation	Panel's observations and recommendations
1 Research	• List and describe the current research policies (lottery's own or government programs, or NGO programs) and programs that support the RG Principles. • List and describe gaps that exist between current research policies/programs and the RG Principles. • List the priorities in this area.	Meets minimum requirements	You have plans to conduct a provincial prevalence study. This is a good and sensible first step, but the IAP recommends that you collaborate with other lotteries (e.g. provincial lotteries and Lotéria Cordoba, LOTBA etc.), and consider conducting a nationwide prevalence study. We strongly encourage you to establish further priorities on wider research activities. We suggest that some studies be conducted to better understand the need of RG initiatives in your specific jurisdiction. We also welcome that you consider engaging with universities. Third-party verification and independence when conducting research is certainly an asset. In a future submission. it would be beneficial to know how you have incorporated research findings in the development of your RG programme.
2 Employee Program	• List and describe the current employee training policies and programs that support the RG Principles. • List and describe gaps that exist between current employee training policies/programs and the RG Principles. • List the priorities in this area.	Meets the level norm	You have conducted an initial training for high authorities, personnel and agency owners. This is a sensible first step. Now you are planning to build a systemised training approach with polices, assessment and consultation. The IAP suggests that you include a refresher module in that approach which contains regularly updated content. It is not clear whether you have worked with training specialists on the design and content of the training. If there are third parties that might be able to help you in the further design of the training approach, we would encourage you to do so. We also strongly recommend introducing basic training for all employees and consider whether there are certain employee groups that need specialist training on subjects such as customer contact, marketing or game design. Finally, we would encourage you to engage measures of success of your work in this area.
3 Retailer Program	• List and describe the current retailer programs' policies and programs that support the RG Principles. • List and describe gaps that exist between current retailer programs' policies/programs and the RG Principles. • List the priorities in this area.	Meets the level norm	From what the IAP understands there is no formal training established for retailers . This is an honest identification of your gaps in this programme element. However, you have some information (brochures) that you distribute to agencies and sub- agencies. You have also reviewed training programmes by other lotteries in your countries. We recommend that you provide more in-depth training to those areas of your business that sells riskier games such casino games. We would recommend, just as we have recommended under the employee program element, that you consider

			working with a third-party training provider to develop basic tailored training for all agencies and more comprehensive training for those agencies that sell riskier games. We also encourage you to consider the introduction of a mystery shopper approach in all establishments.
4 **Game Design**	• List and describe the current game design policies and programs that support the RG Principles. • List and describe gaps that exist between current game design policies/programs and the RG Principles. • List the priorities in this area.	Meets minimum requirements	The IAP understands that you only control a limited number of game launches directly as they are designed among different lotteries in your country. We agree with your priority that the establishment of a protocol is a sensible first step. It would need to include a set of requirements what risk factors need to be considered before new games are launched. These risk factors needed to be integrated in a rigorous development process. Having an understanding of potential risk factors and a formalised game design process in place might help you to establish a sustainable product portfolio. We are looking forward to hearing more about your long-term plans in this area in a future submission.
5 **Remote Gaming Channels**	• List and describe the current remote gaming channels policies and programs that support the RG Principles. • List and describe gaps that exist between current remote gaming channels policies/programs and the RG Principles. • List the priorities in this area.	Insufficient information provided	We understand that you are allowed to sell online games. Unfortunately, your submission is not very specific as to what kind of responsible gaming measures you provide. As we understand when looking at your website, you have to receive a log-in to the site via your game rooms. This approach already provides you with some sort of control who is trying to access remote gaming. You also have an age-verification in place and provide on your website information how to play sensibly online, including a self-test. All these are good measures, but the IAP needs to hear more about whether you have self-exclusion facilities, mandatory or voluntary limits etc. available. Due to the lack of information, we cannot adequately assess this program element and would appreciate if you could elaborate further in a future submission. In any case we would strongly encourage you to conduct more rigorous risk assessments, establish a set of performance measures on your player population to better understand playing behaviour (and to spot potentially problematic behaviour) and how RG measures are applied online.

6 **Advertising and Marketing Communications**	● List and describe the current advertising and marketing communications policies and programs that support the RG Principles. ● List and describe the gaps that exist between the current advertising and marketing communications policies/programs and the RG Principles. ● List the priorities in this area. ● List the marketing code(s) national/regional that you follow (include copy in submission).	Meets minimum requirements	You have established your own RG slogan and apply a set of principles informally. The IAP agrees that the establishment of a code is a natural first step. We also recommend that you introduce a formalised process to ensure compliance with your code. Furthermore, we encourage you to work with other lotteries in your jurisdiction or via your regional association to learn from their approach. With those lotteries in your country, you could consider establishing a set of universal principles that you will use for all advertising created in Argentina.
7 **Player Education**	● List and describe the current player education policies and programs that support the RG Principles. ● List and describe gaps that exist between current player education policies/programs and the RG Principles. ● List the priorities in this area.	Meets the level norm	You have established a number of initiatives and material such RG campaigns, flyers, leaflets, posters etc. Many materials display helpline numbers, both on the terrestrial environment as well as in the digital. We encourage you to be particularly focused on game rooms and casino in your approach to player education. This is because of the bigger focus on risk. We also recommend that you engage with other lotteries to learn from their experience in this area. Finally, we encourage you to set out a policy and principles on how you would like to engage in player education and what success means for you, the latter should be based on some set of evaluation measures.
8 **Treatment Referral**	● List and describe the current treatment referral policy of the lottery and programs that support the RG Principles. ● List and describe gaps that exist between treatment referral policy and programs and the RG Principles. ● List the priorities in this area.	Meets minimum requirements	You have identified a number of gaps in your submission and seem to be in discussion with the ministry to establish support for pathological gamblers in your jurisdiction. The IAP recommends that you design a treatment referral approach, establish procedures, include this into your RG training for both retailers and employees and finally conduct research to evaluate its effectiveness, especially when you are planning to conduct regular campaigns. Additionally, the IAP recommends that you systematically monitor this element and eventually evaluate its effectiveness.

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Stakeholder Engagement | • List and describe the current stakeholder engagement policies and programs that support the RG Principles.
• List the stakeholders and identify the key stakeholders from this list.
• List and briefly describe any stakeholders that have been engaged on RG issues.
• List and describe the gaps that exist between the current stakeholder engagement   policies /programs and the RG Principles.
• List the priorities in this area. | Insufficient information provided | Unfortunately, this section of your submission is not very specific on gaps and priorities. As such we cannot make a full assessment of your work. We would recommend that you identify key stakeholders and consider how you can engage with them. Maybe you could engage with them either directly or via a questionnaire to find out about their preferences, concerns and needs.

We encourage you to engage with other lotteries to hear more about their experience in this area. We would also recommend that you use the results from your engagement to improve your RG program and include elements for improvement in your training and reporting approach. |
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Reporting and Measurement | • List and describe the current public reporting policies and programs that support the RG Principles.
• List and briefly describe any public reporting of RG activities.
• List and describe the gaps that exist between current public reporting   policies/programs and the RG Principles.
• List the priorities in this area. | Insufficient information provided | You state that you have already established an annual report which contains information on RG. Unfortunately, you did not report any of it content in the present submission. We suggest that you establish a set of targets and performance indicators for your reporting. Regular reporting will certainly help you to drive continuous improvement and will at the same time integrate RG in your overall compliance processes. We are looking forward to hearing ore about your efforts in this area in a future submission. |

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.

Appendix B   Resources referred to in this report

- WLA RGF Research Guide - http://www.world-lotteries.org/cms/images/pdf_member/csr/rgf_research_guide.pdf
- WLA RGF Retail Program Guide - http://www.world-lotteries.org/cms/images/pdf_member/csr/rgf_retailer_program_guide.pdf
- WLA Best Practice Marketing and Communications Guidelines - http://www.world-lotteries.org/cms/index.php?option=com_content&view=article&id=383&Itemid=100197&lang=en
- WLA RGF Reporting Guide - http://www.world-lotteries.org/cms/index.php?option=com_content&view=article&id=4052&Itemid=1002075&lang=en
- WLA RGF template for level 2 certification - http://www.world-lotteries.org/cms/images/pdf/rgf_docs_ab10092009/rgf_level2_template/WLA-RGF_L2_template_July_2012_En.pdf