

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

All public service employees swear/affirm to abide by [Standards of Conduct for BC Public Service Employees](#) (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 standards required of all public service employees, including, but not limited to, responsibilities regarding real or perceived conflicts of interest and confidentiality.

The Standards of Conduct also set out employee responsibilities for reporting incidents of wrongdoing relevant to the BC Public Service or making a [public interest disclosure](#) under the Public Interest Disclosure Act (PIDA). As part of the Core Policy Manual employees must also adhere to the [Information and Communications Technology \(ICT\) Agreement](#).

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

### **Branch-specific Standards**

Branch employees must 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. The enhanced security clearance as managed through the Personnel Security Screening Office and [GPEB Clearance](#) must be renewed at least once every 5 years to ascertain the suitability of the person to remain employed with the Branch.

During their five (5) year registration, an employee must immediately report any change which may impact clearance or put them in a conflict of interest with the Standards to their Executive Director and the Director of Personnel Registration. 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 (unless otherwise noted) 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 including exemptions).

### **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 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 or auditor 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 GPEB Clearance 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 employee's 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 Licensing, Registration and Certification 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 Director, Personnel Registration, Licensing, Registration and Certification Division.

### **Additional Obligations for Specified Branch Employees**

In addition to the 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:**

Sam MacLeod, Assistant Deputy Minister and General Manager  
Gaming Policy and Enforcement Branch  
Updated: December 2, 2019

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

**Appendix A**

<b>PROHIBITED GAMING ACTIVITY</b> (Does not apply to games conducted outside of BC)						
<b>POSITION</b>	<b>Horse Racing</b>	<b>Commercial Bingo/CGC</b>	<b>Casinos</b>	<b>PlayNow<sup>1, 2</sup></b>	<b>Licensed Gaming<sup>4</sup></b>	<b>Lottery Tickets</b>
<b>Assistant Deputy Minister's Office</b>						
ADM/General Manager	✓	✓	✓	✓	✓	✓ <sup>3</sup>
Executive Directors	✓	✓	✓	✓	✓	
Executive Coordinator	✓	✓	✓	✓	✓	
Executive Administrative Assistant						
<b>Strategic Policy &amp; Projects</b>						
Executive Director	✓	✓	✓	✓	✓	
Director	✓	✓	✓	✓	✓	
Policy/Project Analysts						
Communications Officer						
Administrative Staff						
<b>Licensing, Registration &amp; Certification</b>						
Executive Director	✓	✓	✓	✓	✓	
Directors/Managers	✓	✓	✓	✓	✓	
Director Certification	✓	✓	✓	✓	✓	✓
Investigators	✓	✓	✓	✓	✓	
Investigative Auditors	✓	✓	✓	✓	✓	
Technical Investigators	✓	✓	✓	✓	✓	✓
Licensing Analysts/Agents					✓	
Administrative Staff/Clerks						
<b>Community Supports</b>						
Executive Director	✓	✓	✓	✓	✓	
Directors/Managers	✓	✓	✓	✓	✓	
Responsible Gambling Staff						
Program Advisors						
Administrative Staff/Clerks						

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

<b>PROHIBITED GAMING ACTIVITY (cont'd)</b> <b>(Does not apply to games conducted outside of BC)</b>						
<b>POSITION</b>	<b>Horse Racing</b>	<b>Commercial Bingo/CGC</b>	<b>Casinos</b>	<b>PlayNow<sup>2, 3</sup></b>	<b>Licensed Gaming</b>	<b>Lottery Tickets</b>
<b>Compliance</b>						
<b>Executive Director</b>	✓	✓	✓	✓	✓	
<b>Directors/Managers</b>	✓	✓	✓	✓	✓	
<b>Auditors/Gambling Inspectors</b>	✓	✓	✓	✓	✓	
<b>Racing Judges/Stewards/ Inspectors</b>	✓					
<b>Administrative Staff</b>						
<b>Enforcement</b>						
<b>Executive Director</b>	✓	✓	✓	✓	✓	
<b>Directors/Managers</b>	✓	✓	✓	✓	✓	
<b>Investigators</b>	✓	✓	✓	✓	✓	
<b>Intelligence Analysts</b>	✓	✓	✓	✓	✓	
<b>Administrative Staff</b>						
<b>C&amp;E Secretariat</b>						
<b>Executive Director</b>	✓	✓	✓	✓	✓	
<b>Manager</b>						
<b>Administrative Staff</b>						
<b>Operations</b>						
<b>Executive Director</b>	✓	✓	✓	✓	✓	
<b>Directors/Managers</b>	✓	✓	✓	✓	✓	
<b>IT/Finance//Records/FOI/ Workforce Planning Staff</b>						
<b>Administrative Staff</b>						

**Notes:**

1. 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).
2. Upon Executive Director approval, employees that require a PlayNow account for operational testing/review purposes may register an account on the site, however, the employee must not deposit any funds into their account, nor should they make any withdrawals. If required, test funds may be placed into the account after receiving written approval from the ADM/General Manager.
3. The General Manager is prohibited from participating in British Columbia based lottery games (for example, BC49 or BCLC Scratch and Win tickets). However, s/he may participate in nationally-based lottery games (for example, LOTTO 6/49 and LOTTO MAX).