



Know your limit, play within it.

September 3, 2019

To: British Columbia Lottery Corporation (BCLC)
All Registered Gaming and eGaming Service Providers

Re: **Reporting to the General Manager by BCLC and Gaming Service Providers
Section 86(2) *Gaming Control Act*, and Section 34(1)(t) *Gaming Control Regulation*
(as applicable)**

This Memorandum consolidates and replaces the Memoranda for the General Manager, Gaming Policy and Enforcement Branch (GPEB) dated July 17, 2015, in relation to reporting requirements for BCLC and Gaming Service Providers.

GPEB is responsible for the overall integrity of gaming and horse racing in British Columbia, as outlined in Section 23 of the *Gaming Control Act* (GCA).

Section 86(2) of the GCA requires the lottery corporation, a registrant, and a licensee to notify the General Manager, GPEB, immediately about any conduct, activity or incident occurring in connection with a lottery scheme or horse racing, if the conduct, activity or incident occurring in connection with a lottery scheme or horse racing involves or involved the commission of an offence under the *Criminal Code* of Canada that is relevant to a lottery scheme or horse racing or the commission of an offence under the GCA.

Additionally, Section 34(1)(t) of the *Gaming Control Regulation* (GCR) requires a gaming service provider, unless they are a lottery retailer, to immediately report to the General Manager, GPEB, any conduct or activity at or near a gaming facility that is or may be contrary to the *Criminal Code* of Canada, the GCA, or the GCR.

When reporting to/notifying the General Manager, GPEB, the expectation is that BCLC and/or gaming service providers will provide comprehensive details in the first instance to ensure meaningful notification to meet reporting obligations. This will ensure that GPEB can immediately assess the notification and determine if the matter requires regulator intervention.

It is the collective responsibility of GPEB, BCLC and all Gaming Service Providers to protect personal information. Information received from Gaming Service Providers is communicated to GPEB securely, and GPEB takes its responsibilities around the collection, use, and disclosure of personal information very seriously. Gaming services providers are reminded not to distribute the reported matter without the approval of GPEB.

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For the notification requirements under Section 86(2), reporting requirements under Section 34(1)(t) and any directive from the General Manager regarding reporting requirements, see attached Appendix “A”.

The BCLC and Gaming Service Providers who are:

- Class A, B, or C casino service providers;
- Class A and B bingo service providers; or
- Community Gaming Centre service providers

will use the new File Transfer Protocol Secure (FTPS) Server described in Appendix “B” using the required reporting template in attached Appendix “C”.

Gaming Service Providers who do not possess a class of registration specified above will continue reporting to the General Manager through their existing Section 86(2) reporting process.

Your obligation to report conduct, activities, or incidents in accordance with Section 86(2) and Section 34(1)(t) to the General Manager does not alleviate you of any contractual requirements to report matters to the BC Lottery Corporation.

Please ensure this updated document is distributed to the appropriate staff in your organization. Your cooperation is much appreciated.

Yours sincerely,

A handwritten signature in black ink, appearing to read "S MacLeod", written in a cursive style.

Sam MacLeod
General Manager and Assistant Deputy Minister

Appendix A

Section 86(2) and Section 34(1) (t) Reporting Requirements

The reporting/notification requirements under section 86(2) of the GCA, section 34(1)(t) of the GCR, and directives issued by the General Manager regarding reporting requirements includes but is not limited to the following conduct, activities or incidents:

- a) Cheating at play; including:
 - a) collusion between players, or dealers;
- b) Thefts; including:
 - a) theft affecting the integrity of the game;
 - b) thefts from the house or a lottery retailer site;
 - c) thefts by a registered gaming worker;
 - d) thefts from patrons including Internal Voucher System tickets;
 - e) thefts committed against charitable gaming;
- c) Money Laundering; which may be indicated by:
 - a) unusual financial transactions;
 - b) suspicious LCT &/or PGF account activity;
 - c) suspicious electronic funds transfer;
 - d) suspicious financial transaction;
 - e) un sourced funds including third party bank drafts;
- d) Loan sharking; which may be indicated by:
 - a) chip exchange;
 - b) cash exchange;
 - c) un sourced chips;
- e) Robbery involving a gaming facility or a patron leaving the gaming facility;
- f) Threats or harassment by or against a Registered Gaming Worker;
- g) Assault, including sexual assault by or of a Registered Gaming Worker;
- h) Conducting unauthorized lottery schemes;
- i) Counterfeit gaming chips, currency and lottery tickets;
- j) Minors found in or participating in gaming activities in a gaming facility;
- k) Minors playing PlayNow.com;
- l) Persons legally prohibited from gaming facilities;
- m) Unregistered Gaming Service Providers;
- n) Fraud involving lottery tickets, casino chips, or lottery schemes;
- o) Personation or false identification incidents which include attempts to claim prizes or payouts.
- p) Weapons possession, or carrying a concealed weapon;
- q) Extortion

Appendix B

File Transfer Protocol Secure Server

The new File Transfer Protocol Secure (FTPS) Server for submitting Section 86(2) Reports to GPEB applies to:

- The BC Lottery Corporation;
- Class A, B, or C, casino service providers;
- Class A and B bingo service providers; and
- Community Gaming Centre service providers

The Gaming Policy and Enforcement Branch (GPEB) has created a new File Transfer Protocol Secure (FTPS) Server to facilitate a secure method of transmitting Section 86(2) Reports to the Branch. The FTPS Server uses the FileZilla Client platform and must be installed on appropriate local computer terminals within gaming facilities.

Completed Section 86(2) Reports following the template found in Appendix “C” will be uploaded and transferred to GPEB through the FileZilla Client. Once the Report is transferred from the local computer to GPEB’s FTPS Server, the General Manager will be notified in accordance with Section 86(2) GCA and Section 34(1)(t) of the GCR (as applicable).

If the General Manager determines a Section 86(2) Report requires additional information for the purposes of an investigation or investigative audit, GPEB will issue a Section 86(1) Request for you to provide further information within a specified time period.

As part of the FTPS System implementation, GPEB will be providing further guidance to BCLC and Gaming Service Providers on the new reporting process and associated procedures. If technical difficulties are encountered when reporting through the FTPS server, Reports must still be received by GPEB. The existing regional email addresses which are noted at the bottom of the Section 86(2) Report template for each region, should be used to submit reports. Technical questions regarding connectivity to the FTPS server should be addressed to:

GPEB.LOB@gov.bc.ca

Appendix C



**Gaming Policy and Enforcement Branch
Enforcement Division**

**Section 86(2) Gaming Control Act &
Section 34(1)(t) Gaming Control Regulation**

REPORT TO GPEB – PLEASE SUBMIT WITHOUT DELAY

CONFIDENTIAL

This document is the property of the Gaming Policy and Enforcement Branch. It is confidential and shall not be disclosed or divulged, in whole or in part, without prior consent of the Executive Director of the Enforcement Division, Gaming Policy and Enforcement.

DATE: Click to enter a date.

ITRAK #: Click here to enter text.

SERVICE PROVIDER: Click here to enter text.

LOCATION: Click here to enter text.

OCCURRENCE: Choose an item.

DATE AND TIME OF OCCURRENCE: Select date and enter time.

DETAILS OF THE OCCURRENCE: Including all subject details, what happened, when it happened, where it happened, how it happened, why it happened, if a gaming worker is involved, who was notified and what actions were taken.

Click here to enter text.

Police Called: Yes No:

Attended: Yes No

Police Force: Click here to enter text.

File Number: Click here to enter text.

Investigating Officer(s) & Badge # Click here to enter text.

Submitted By: Click here to enter text.

GPEB Registration #: Click here to enter text.

SUBMIT BY FTP CLIENT

Regional Reporting Office
E-MAIL Regional Reporting Office Email Contact