

BCLC Investigations Protocol for
Educating, Warning, Sanctioning or
Barring Patrons

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Corporate Security &
Compliance

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RE: BCLC Investigations Protocol for Educating, Warning, Sanctioning or Barring Patrons

BCLC Investigations Protocol for Educating, Warning, Sanctioning or Barring Patrons

When the behaviour, activity or conduct of a patron:

- is considered a risk to his or her safety or the safety of others;
- is considered unacceptable or suspicious in nature;
- is inconsistent with anti-money laundering strategies.

and a decision is made to escalate action to be taken to correct the behaviour, activity or conduct, a BCLC Investigator will make a verbal notification to the Service Provider representative that has been identified to BCLC by the Service Provider as the main Point of Contact for the purposes of this protocol.

Note: If the behaviour, activity or conduct is, or possibly is, unlawful in nature, the required notification will be made to the appropriate Law Enforcement agency and this protocol is not applicable.

Note: The Service Provider should identify a main Point of Contact with a designate(s) to allow for the necessary notification to be communicated in a timely manner.

Subsequent to the verbal notification, the BCLC Investigator will follow up with an email notification to the Point of Contact and designate(s).

Course of Action Options

Depending on the circumstances, the following are possible courses of action:

1. **Service Provider Session with Patron to Educate** is appropriate when:
 - The patrons behaviour, activity or conduct is not considered serious in nature and/ or there is no or limited previous history.
2. **Service Provider Session with Patron to Warn**
 - The patron's behaviour, activity or conduct is minor in nature and reasonable efforts have been made to educate, or a session to educate is not appropriate.
3. **BCLC Investigator Interview of Patron to Educate**
 - The patron's behaviour, activity or conduct is minor in nature and the Service Provider has had a session(s) to educate the patron or the Service Provider chooses to have the BCLC Investigator have the session to educate the patron or a session to educate by the Service Provider is not appropriate.
4. **BCLC Investigator Interview of Patron to Warn**
 - The patrons behaviour, activity or conduct is such that a warning is appropriate for the circumstances and/ or a Service Provider session(s) to educate was unsuccessful and/ or a session(s) to educate by BCLC Investigator was unsuccessful.
5. **Immediate barring from gambling pending an interview by a BCLC Investigator**
 - The patron was previously educated and/ or warned on the behaviour, activity or conduct and /or the behaviour, activity or conduct is considered serious in nature.
6. **BCLC Sanctions that could possibly be imposed:**
 - Not permitted to play with un-sourced chips.
 - Not permitted to play with un-sourced funds.
 - Requirement to open and utilize a Patron Gaming Fund account.

7. BCLC Provincial Barring up to five (5) years

- Reasonable efforts have been made to educate the patron and/or a previous warning or warnings did not correct the behaviour, activity or conduct, and/or the circumstances are considered egregious.

Notification by BCLC Investigator to Service Provider

When a BCLC Investigator makes the initial notification to the Service Provider Point of Contact (SP POC) and designate(s) about an identified issue with the behaviour, activity or conduct of a patron, the notification will include:

- a description of the issue with as much detail as possible and appropriate;
- what course of action is considered appropriate by BCLC.

Notwithstanding the above, when the notification is made and when appropriate, a consultative process can be exercised by the SP POC and BCLC Investigator to determine the appropriate course of action.

The BCLC Investigator will share with the SP POC as much information as possible that can be shared without compromising the integrity of the investigation or breach the patron's privacy.

Course of Action

Session with Patron to Educate

When the course of action is to educate the patron, the BCLC Investigator will:

- request that an SP representative (SP Rep.) conduct the session to educate; or
- advise that a BCLC Investigator will conduct the session to educate.

The option is available to the SP POC to choose not to be involved in the process to educate the patron.

By Service Provider - When the course of action is for the patron to be educated by a SP Rep, the session to educate will take place on the next occasion when the patron is on site or as soon as is practicable.

Note: As soon as is practicable is defined as the earliest appropriate opportunity for both the patron and the Service Provider without unreasonable or unjustified delay.

The session to educate will be documented in CRS (iTrak) by the SP Rep. detailing the discussion with the patron and what if any acknowledgement of the issue and commitment to comply was made by the patron.

By BCLC Investigator -When the course of action is for the patron to be educated by a BCLC Investigator, the session to educate will take place as soon as is practicable.

Note: As soon as is practicable is defined as the earliest appropriate opportunity for both the patron and BCLC Investigator.

When the session to educate by the BCLC Investigator is to take place:

- The SP Rep. will be requested to identify an appropriate room that will ensure privacy.
- The SP Rep. will be requested to approach the patron and request attendance to meet with the BCLC Investigator.
- The SP Rep. will not be included in the session unless specifically requested by the BCLC Investigator. However, there may be occasion when a patron requests the presence of a SP Rep. during the session with a BCLC Investigator; in these situations the BCLC Investigator will determine if having a SP Rep. present as an observer is appropriate and or practical.
- If the BCLC Investigator is unable to make arrangements beforehand for an interpreter, if necessary, a request will be made to the SP to assist with providing an interpreter.

The session to educate will be documented in CRS (iTrak) by the BCLC Investigator with details of the discussion with the patron and what if any acknowledgement and commitment to comply was made by the patron.

Note: The CRS (iTrak) may in some cases have restricted access.

In addition to documenting in CRS (iTrak), the BCLC Investigator will provide the SP POC with an email summary.

Repeat a Session to Educate

On each occasion when deciding on a course of action, the circumstances will be assessed on a case by case basis and an available option can be to repeat a session to educate.

Session with Patron to Warn

When the course of action is to warn the patron, the BCLC Investigator will:

- request that a SP Rep. conduct the session to warn; or
- advise that a BCLC Investigator will conduct the session to warn.

The option is available to the SP POC to choose not to be involved in the process to warn the patron.

Service Provider session with patron to warn

When the course of action is for the patron to be warned by a SP Rep, the session to warn will take place on the next occasion when the patron is on site or as soon as is practicable.

Note: As soon as is practicable is defined as the earliest appropriate opportunity for both the patron and the Service Provider without unreasonable or unjustified delay.

A session to warn involves advising the patron that to continue the behaviour, activity or conduct could result in:

- A Service Provider site barring.
- A Service Provider imposed sanction.
- A BCLC Provincial barring up to 5 years.
- A BCLC imposed sanction.

The session to warn will be documented in CRS (iTrak) by the SP Rep. detailing the discussion with the patron and what if any acknowledgement of the issue and commitment to comply was made by the patron.

BCLC Investigator session with patron to warn

When the course of action is for the patron to be warned by a BCLC Investigator, the session to warn will take place as soon as is practicable.

Note: As soon as is practicable is defined as the earliest appropriate opportunity for both the patron and BCLC Investigator.

A session to warn involves advising the patron that to continue the behaviour, activity or conduct could result in:

- A BCLC Provincial barring up to 5 years.
- A BCLC imposed sanction.

When the session to warn by a BCLC Investigator is to take place:

- The SP Rep. will be requested to identify an appropriate room that will ensure privacy.
- The SP Rep. will be requested to approach the patron and request attendance to meet with the BCLC Investigator.
- The SP Rep. will not be included in the session unless specifically requested by the BCLC Investigator. However, there may be occasion when a patron requests the presence of a SP Rep. during the session with a BCLC Investigator; in these situations the BCLC Investigator will determine if having a SP Rep. present as an observer is appropriate and or practical.
- If the BCLC Investigator is unable to make arrangements beforehand for an interpreter, if necessary, a request will be made to the SP to assist with providing an interpreter.

The session to warn will be documented in CRS (iTrak) by the BCLC Investigator with details of the discussion with the patron and what if any acknowledgement and commitment to comply was made by the patron.

In addition to documenting in CRS (iTrak), the BCLC Investigator will provide the SP POC with an email summary.

Note: The CRS (iTrak) may in some cases have restricted access.

Repeat a Session to Warn

On each occasion when deciding on a course of action, the circumstances will be assessed on a case by case basis and an available option can be to repeat a session to warn.

BCLC Investigator Interview

When the behaviour, activity or conduct of a patron is or possibly is identified as an Anti-Money Laundering associated risk and it is necessary to satisfy the requirements of FINTRAC regulations and guidelines, BCLC Corporate Security and Compliance will direct a BCLC Investigator to conduct an interview of the patron.

Patron Interview objectives may be to determine:

- source of funds, and or;
- employment /company, and or;
- other information as needed.

Subsequent to the interview, the following are possible outcomes:

- patron is permitted to continue play
- sanctions / restrictions
- BCLC Provincial barring

BCLC Provincial Barring pending an interview by a BCLC Investigator

When a patron has been previously educated and or warned about behaviour, activity or conduct, and or the behaviour, activity or conduct, is serious or egregious in nature, an assessment will be performed by BCLC Corporate Security and Compliance.

BCLC Corporate Security and Compliance will determine if the patron will receive an immediate BCLC Provincial barring pending an interview by a BCLC Investigator to prevent a recurrence or continuance of the behaviour, activity or conduct in question.

When a patron receives a BCLC Provincial barring pending an interview by a BCLC Investigator, if a BCLC Investigator will possibly not be available to conduct the interview when the patron is in attendance at the site, direction may be given to the Service Provider to allow the patron to gamble if:

- the patron commits to not repeat the behaviour, activity or conduct that resulted in the barring, and;
- the patron must agree to contact the BCLC Investigator as soon as possible; and
- the Service Provider will provide the patron with the name and number of the BCLC Investigator the patron is to contact to schedule an interview.

BCLC Provincial Barring

When a patron has been previously educated and or warned about behaviour, activity or conduct, and or the behaviour, activity or conduct, is serious or egregious in nature, an assessment will be performed by BCLC Corporate Security and Compliance.

BCLC Corporate Security and Compliance will determine:

- if the patron will be categorized as an Undesirable and receive an immediate BCLC Provincial barring of up to five (5) years.
- if a sanction or sanctions will be imposed on the patron.

Sanctions

BCLC Sanctions that could possibly be imposed:

- Not permitted play with un-sourced chips.
- Not permitted play with un-sourced funds.