

July 2021

Charitable Gaming Review

What We Heard Report

2021 Stakeholder Engagement

Table of Contents

Acknowledgement	5
Executive Summary	6
Background	7
CHARITABLE GAMING REVIEW	8
Methodology	11
WORKING GROUP SESSIONS – THE CHALLENGE	11
FOCUS GROUPS.....	16
YOUR SAY	16
IMPACTS OF COVID-19.....	17
Overarching Themes	18
SIMPLIFY PROCESSES	18
MODERNIZE TECHNOLOGY	19
IMPROVE COMMUNICATION.....	20
Topic 1: Guiding Principles	22
Topic 2: Eligibility	24
DEFINITIONS.....	24
PERIODIC ELIGIBILITY REVIEW	25
CRITERIA FOR ELIGIBILITY	25
STRUCTURE OF ELIGIBLE ORGANIZATIONS.....	27
CAP ON THE NUMBER OF ELIGIBLE ORGANIZATIONS	27
STATUS QUO	28
Topic 3: Use of Proceeds	29
ADMINISTRATION/OPERATIONS.....	29
TIMEFRAME TO SPEND PROCEEDS	30
FEWER RESTRICTIONS ON SPENDING.....	30

Topic 4: Casino Boundaries & Revenue Distribution	31
CASINO REVENUE DISTRIBUTION	32
CASINO BOUNDARIES	33
Topic 5: Casinos.....	35
ALBERTA’S CASINO MODEL.....	35
CASINO VOLUNTEERS	36
CASINO OPERATIONS.....	38
CASINO ADVISORS.....	39
Topic 6: Raffles	42
RAFFLE LICENCES.....	42
LICENCE SUBCLASSES	43
REDUCE FINANCIAL RISK.....	44
RAFFLE EXPENSES.....	45
AUDIOVISUAL DRAW RECORDINGS	45
RAFFLE REVENUE DISTRIBUTION	45
LIMIT LARGE OR ONLINE RAFFLES	45
SYSTEM RECOMMENDATIONS.....	45
Topic 7: Bingo.....	46
SYSTEM CHANGE.....	46
VOLUNTEERS.....	47
VIRTUAL BINGO.....	47
RURAL BINGOS	48
REDUCE COSTS	48
CONCESSIONS	48
REVIEW POLICIES	48
Topic 8: Pull Tickets	49
ELECTRONIC PULL TICKETS.....	49
\$1,000 PRIZE ALLOWANCE.....	49
PULL TICKET MACHINES IN BARS/LOUNGES.....	49
INNOVATION.....	49
Topic 9: AGLC Operations	50
EDUCATION AND AWARENESS	50
LICENSING	52
AGLC EXECUTIVE AND BOARD	52

AUDIT	52
APPEALS	52
Topic 10: Funding Ecosystem	53
FUNDING COORDINATION	53
PLAY ALBERTA	53
Topic 11: CGR Feedback.....	54
INCLUDE CHARITABLE SECTOR	54
WHEN TO IMPLEMENT CHANGES.....	55
DO SOMETHING AND REPORT BACK	55
Next Steps.....	56
Glossary	57

Acknowledgement

Thank you for your participation

AGLC thanks all stakeholders who took time to contribute to the charitable gaming review engagement. We were fortunate to hear from a diverse group of stakeholders from across the province, including charitable organizations, casino advisors, casino operators, and the Alberta Non-Profit/Voluntary Sector Initiative (ANVSI).



Through this process, AGLC has deepened its understanding of the benefits and challenges of the current charitable gaming model experienced by stakeholders. This review would not be possible without the participation of stakeholders and their commitment to maximizing benefit to Albertans from charitable gaming.

AGLC acknowledges the facilitation team from Culture, Multiculturalism, and Status of Women (CMSW) who facilitated the working group sessions, focus groups, and guided AGLC through the engagement process. The success of this engagement would not have been possible without the guidance and efforts of the CMSW facilitation team.

With gratitude,

Kandice Machado
Acting President and CEO, AGLC

Executive Summary

Participants in the charitable gaming review engagement were tasked with identifying and presenting changes to the charitable gaming model in response to the question:

How might we improve charitable gaming to meet the needs of charitable organizations in Alberta?

Throughout the engagement, participants identified challenges with the existing charitable gaming model, what they believe is working, and recommendations for change. Three primary themes became apparent throughout the discussions, which were organized around the different aspects of the charitable gaming model.

Overarching Themes

SIMPLIFY PROCESSES

- Simplify processes and reporting required by charitable organizations
- Minimize regulatory burden for charitable organizations by removing outdated policies

MODERNIZE TECHNOLOGY

- Accept online submissions for applications and financial reporting
- Introduce an online profile system for licence applications and reporting, as well as live chat and FAQ resources

IMPROVE COMMUNICATION

- Improve AGLC communication with stakeholders
- Demonstrate the value of charitable gaming by reporting the impact of the charitable sector to the public

A number of other topics arose throughout the engagement. These included:

- 1) Guiding Principles
- 2) Eligibility
- 3) Use of Charitable Gaming Proceeds
- 4) Casino Boundaries and Revenue Distribution
- 5) Casinos
- 6) Raffles
- 7) Bingos
- 8) Pull Tickets
- 9) AGLC Operations
- 10) Funding Ecosystem
- 11) Charitable Gaming Review (CGR) Feedback

This report aims to present a summary of the ideas and perspectives shared during the CGR engagement that included the working group sessions, final presentations, and focus groups. It does not attempt to include every comment received and does not intend to imply consensus on the part of all participants.





Background

When we provide choices Albertans can trust, we are supporting a more vibrant Alberta.

Alberta Gaming, Liquor and Cannabis (AGLC) is responsible for maintaining the integrity of gaming activities in Alberta, including charitable gaming events. AGLC issues licences to eligible organizations that conduct and manage gaming events, ensures that gaming activities are conducted in accordance with the policies and legislation that govern them, and oversees the use of gaming proceeds by charitable organizations. These proceeds help support thousands of programs and services charitable organizations provide to their communities.

The Criminal Code requires that groups participating in charitable gaming are charitable or religious in nature and that proceeds earned from gaming activities are used for approved charitable or religious purposes. An organization's purposes are considered legally charitable only if they fall within one of the four categories of charity set out in case law related to Commissioners for Special Purposes of Income Tax v. Pemsel. As a result, a charitable organization's purposes must pass the Pemsel test by falling within relief of poverty, advancement of education, advancement of religion, or other purposes beneficial to the community.

Four Criteria to Determine Charitable Purpose

 Aid of the Distressed	 Advancement of Education	 Advancement of Religion	 Community Benefit
Some examples include: <ul style="list-style-type: none">• Women's shelters• Food banks• Victim services• Homeless aid• Addiction/recovery programs	Some examples include: <ul style="list-style-type: none">• School parent advisory groups• Support to libraries• Museum societies• Visual, literary, media and performing arts groups	Some examples include: <ul style="list-style-type: none">• Places of worship• Parishes and congregations• Other religious programs	Some examples include: <ul style="list-style-type: none">• Senior citizens groups• Supporting eligible amateur sports• Community service groups• Health and medical aid/support

CHARITABLE GAMING REVIEW

In early 2019, AGLC began the charitable gaming review to examine how the charitable gaming model is meeting the needs of Albertans and to look for opportunities to improve it.

PURPOSE

The purpose of the charitable gaming review is to:

- confirm and clarify the issues and challenges that charitable organizations have communicated to AGLC and government regarding charitable gaming in Alberta
- support participants as they design, develop, and evaluate a range of options to address those challenges and issues
- develop recommendations that ensure charitable gaming meets the needs of Albertans and remains compliant with legislation
- guide the development of policies and procedures that benefit Albertans and their communities

Principles of Engagement

INCLUSIVE

Commit to seeking out involvement of those directly impacted by possible changes to the charitable gaming model.

ACCESSIBLE

Commit to providing different opportunities for participants to provide input.

OPEN, TRANSPARENT, AND TRUSTING

Provide information that ensures stakeholders can participate in the engagement in a meaningful way. Make efforts to ensure information is accessible to participants. Consider all input equally.

RESPECT AND INTEGRITY

Value stakeholder input and actively listen to their perspectives.

OBJECTIVES

The objectives of the charitable gaming review are to:

- solicit input from a wide range of stakeholders, including charitable organizations that receive proceeds from conducting charitable gaming events, volunteer and municipal organizations, and other stakeholder groups
- gather information to facilitate the development of policies that reflect the needs of charitable organizations and provide maximum benefit to Albertans and their communities
- identify opportunities to reduce red tape

ANTICIPATED OUTCOMES

The anticipated outcomes of the charitable gaming review are:

- charitable gaming policies reflect input gathered through the engagement from a wide spectrum of stakeholders with diverse demographics, backgrounds, and experiences
- a transparent, robust, evidence-informed approach to policy development
- stakeholders are supportive of the engagement approach and have an opportunity to provide input
- stakeholders have a better understanding of the challenges inherent in the model and understand that new policies may not support the individual views of each participant and/or organization

Scope

TOPICS FALLING WITHIN THE SCOPE OF THE REVIEW INCLUDED:

- Outcomes and principles for charitable gaming
- Wait times and distribution of proceeds from charitable casino events
- Use of proceeds earned through licensed charitable gaming events (casinos, raffles, bingos, and pull tickets)
- Volunteer requirements for charitable casino events
- Eligibility of charitable organizations for gaming licensing

OUT-OF-SCOPE TOPICS INCLUDED:

- Host First Nations charitable gaming model
- Online gaming (Play Alberta)
- Elimination of the charitable gaming model
- Any changes to policies that are not within the legal parameters of the Criminal Code

CONSTRAINTS

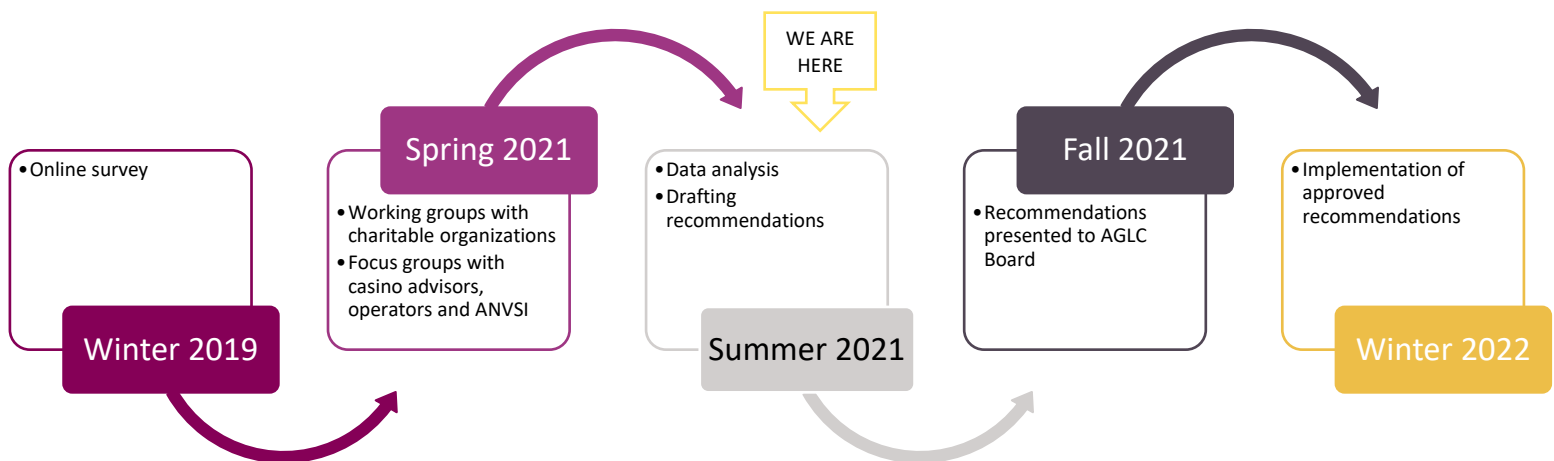
Criminal Code

- Any changes to charitable gaming policies cannot contravene the Criminal Code. The Criminal Code requires that provincial governments and charitable organizations conduct and manage gaming events.
- The Criminal Code requires that groups participating in charitable gaming are charitable or religious in nature, and that the proceeds from gaming activities be directed to charitable or religious purposes. The criteria used to determine eligibility includes relief of poverty, advancement of education, advancement of religion, and other purposes beneficial to the community.

Casino Proceeds

- The amount of proceeds available from casino events is limited by the number of casino facilities available for charitable events and the level of patron play. This means there is a limited amount of casino events that can be held in one year.

Project Process Map



2019 ONLINE SURVEY

In early 2019, AGLC enlisted Grant Thornton to administer a survey for the charitable gaming review. The survey gathered input from licensed charitable organizations about how the charitable gaming model could be updated and strengthened to ensure Albertans and their communities continue to benefit from the proceeds generated through charitable gaming events (casino, raffle, bingo, and pull ticket events).

The survey was sent to more than 6,700 charitable organizations eligible to hold a gaming licence in Alberta. Over 3,800 organizations responded, resulting in a 57 per cent response rate.

Survey Results

THE MAIN ISSUES IDENTIFIED IN THE SURVEY WERE:

- Wait times and distribution of proceeds from charitable casino events
- Use of proceeds earned through licensed charitable gaming events (casino, raffle, bingo, and pull ticket events)
- Volunteer requirements for charitable casino events
- Eligibility of charitable organizations for a gaming licence

An in-depth summary of the 2019 online survey results can be found [here](#).

Methodology

2021 Stakeholder Engagement

Between February 2 and April 27, 2021, AGLC conducted engagement sessions consisting of:

- working group sessions with charitable organizations; and
- focus groups with casino advisors, casino operators, and Alberta Non-Profit/Voluntary Sector Initiative (ANVSI).



The working group sessions and focus groups were facilitated by staff from Culture, Multiculturalism and Status of Women (CMSW) who have expertise in public engagement and support the charitable sector. AGLC staff were available during the working group sessions to provide information and clarification for participants as required. AGLC staff were also present to take notes and record data.

The purpose of this engagement was to validate information gathered through the online survey and receive input into changes to the charitable gaming model.

WORKING GROUP SESSIONS – THE CHALLENGE

The stakeholder engagement approach that encouraged community members to identify a range of options in a very short period of time was chosen. During the process, participants developed criteria to guide the design of the options, developed a range of options, and then evaluated the options.

This approach sought to understand people’s needs and to support the development of effective solutions to meet those needs.

The original timeline for the working group sessions was from February 3 to February 18, 2021.

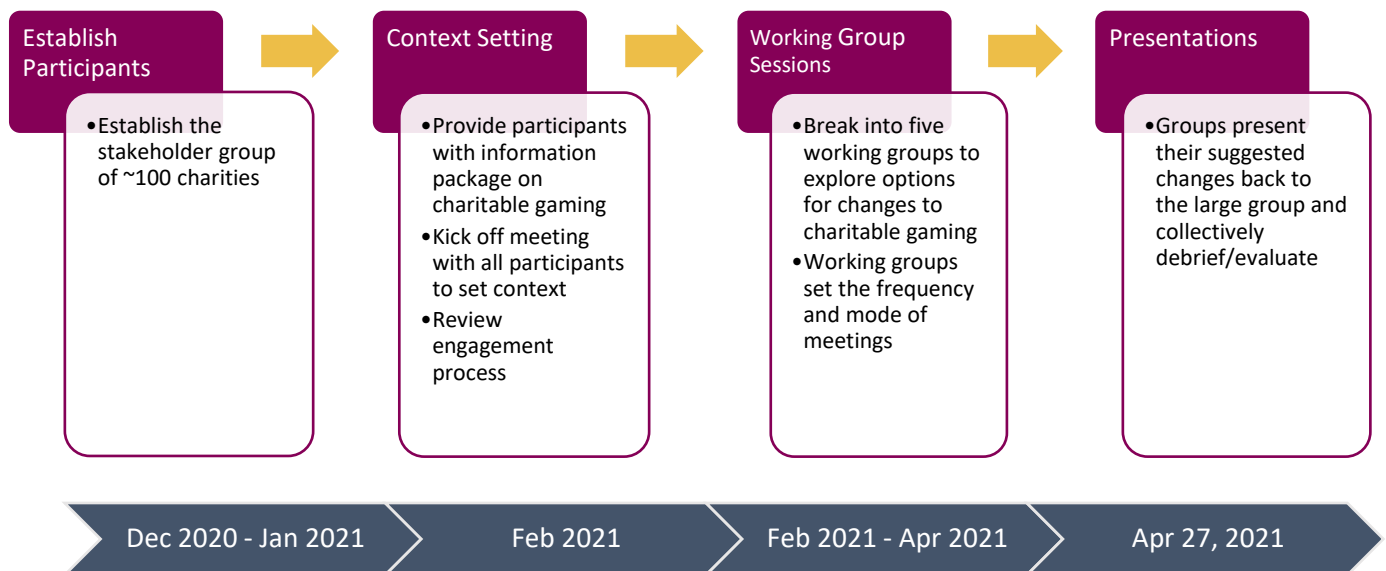
Working Group Session Extension

PROJECT TIMELINE EXTENDED BY TWO MONTHS

After two weeks of the working group sessions, participants expressed concern with the timeline of the public engagement. They indicated that the process did not allow enough time to provide quality feedback and that the charitable sector was facing Covid-related impacts and associated stressors.

AGLC extended the timeline for the working group sessions by two months (to the end of April 2021) to give participants time to provide quality feedback on the charitable gaming model.

Process



ESTABLISH PARTICIPANTS

Working groups included participants from northern Alberta, Edmonton, central Alberta, Calgary, and southern Alberta. The online survey conducted in January 2019 offered the opportunity for respondents to volunteer to participate in future working group sessions. More respondents volunteered than were required so participants were selected from the volunteer list based on the following criteria:

- 1) Regional representation
- 2) Type of organization
- 3) Individuals involved with more than one organization
- 4) Leaders in the charitable sector

Location of participants

LOCATION	START NUMBER OF PARTICIPANTS	END NUMBER OF PARTICIPANTS	CHANGE IN PARTICIPATION
Edmonton	13	12	-1
Calgary	12	8	-4
North	12	7	-5
Central	19	16	-3
South	12	8	-4
Province-wide	29	26	-3
Total	97	77	-20

Type of organizations represented

TYPE OF ORGANIZATION	START NUMBER OF PARTICIPANTS	END NUMBER OF PARTICIPANTS	CHANGE IN PARTICIPATION
Agricultural Fair or Exhibition	3	3	0
Aid of the Distressed	8	6	-2
Arts	7	6	-1
Children's Groups, Social Service, and Educational	3	3	0
Community Leagues/Associations	4	4	0
Education Groups	12	10	-2
Fundraising Groups	2	2	0
Historical Resources	5	3	-2
Medical/Health Aid and Relief	6	6	0
Multicultural Groups/Cultural Preservation	11	9	-2
Nature Conservation	1	1	0
Religious Activities	1	0	-1
Seniors, Veterans, Service, and Fraternal Groups	5	4	-1
Sports	20	14	-6
Support Services to Charitable Organizations	11	8	-3
Youth Groups	3	3	-0
Total	102	82	-20

*Please note the totals under **Types of Organization** will be slightly higher than the total count as some participants represented multiple organizations.

CONTEXT SETTING

Participants were provided with the [Background Information for the Charitable Gaming Review](#) package two weeks before the kickoff meeting. It included information on:

- The purpose and objectives of the review.
- The Terms of Reference for the working group
- Historical overview of Alberta’s charitable gaming model, including how charitable gaming started and evolved.
- Alberta’s current charitable gaming model, including an overview of the current model (casinos, raffles, bingos, and pull ticket licensing), eligibility, distribution of proceeds, wait times, use of proceeds, and volunteer requirements.
- Overview of previous consultations.
- A report containing a summary of stakeholders concerns with the current model and ideas on possible changes.

The kickoff meeting was held on February 2 and 3, 2021. The desired outcomes for the kick-off meeting included:

- Participants understood the charitable gaming review’s stakeholder engagement outcomes, process, and expectations.
- Participants built a shared understanding of key information (e.g. charitable gaming, stakeholder concerns, change elements) that informed their input during the working group sessions.
- Objectives of the working group sessions were clarified, including identifying potential principles to guide charitable gaming in Alberta.
- Participants felt excited and prepared to proceed with the next step of the process.
- Participants built a deeper shared understanding of the challenges inherent to the model.
- Participants became familiar with their working group teammates.
- Working groups determined their approach, developed a plan, and confirmed next steps to tackle the challenge.



WORKING GROUP SESSIONS

The larger group of participants were assigned to one of five smaller groups of between 15 – 20 people. Each group was assigned a facilitator, a note-taker, and an AGLC subject-matter expert to support their work.

Each of the five small groups had four scheduled meetings, each planned for three hours, between March and April, with one to two weeks between each meeting.

For three meetings, the first portion of the meeting was spent brainstorming new ideas. The rest of the meeting typically involved ‘testing’ and refining ideas and adding more ideas by exploring the following:

- The implications for charitable organizations across the province.
- Whether ideas addressed the needs and challenges small groups identified at the beginning of February.
- How well ideas align with the principles and outcomes small groups identified at the beginning of February.
- Consequences of the ideas to other parts of the charitable gaming system.

However, the facilitators for each small group adjusted process, questions, and timing based on the needs and interest of the small groups, always working towards providing thoughtful feedback on changes to the Charitable Gaming Model.



During the working group sessions it became clear that some participants were interested in discussing raffles and bingos/pull tickets in more detail. Two optional breakout sessions (one for raffles and one for bingo/pull tickets) were held to bring together people who have experience with these gaming streams to discuss challenges and brainstorm solutions. The discussions from these two breakout sessions were shared with all five small groups so everyone could discuss the implications and alignment with principles. There were 10 participants in the raffle breakout session and six participants in the bingo/pull ticket breakout session.

PRESENTATIONS

On April 28, 2021 the five groups presented their ideas on the question of:

How might we improve charitable gaming to meet the needs of charitable organizations in Alberta?

FOCUS GROUPS

In addition to the working group sessions, a series of focus groups were conducted with:

- Casino advisors - A cross-section of advisors representing different regions of the province were selected to participate in a focus group. Fourteen casino advisors participated in the focus group.
- Casino operators – Traditional casinos from across the province were asked to identify representatives to participate in a focus group. Twelve individuals participated in this focus group.
- Alberta Non-Profit/Voluntary Sector Initiative (ANVSI) - ANVSI is a collaboration between the non-profit/voluntary sector and the Government of Alberta. ANVSI provides a mechanism to identify and resolve issues relating to this sector. AGLC attended an ANVSI meeting to provide information on the charitable gaming review and to collect feedback. Eleven people were present at this meeting.

The conversations in these focus groups were prompted by the following questions:

- What is working well in the current charitable gaming model?
- Where are the challenges in the current charitable gaming model?
- What improvements or enhancements could be made to charitable gaming that would maximize benefit to all Albertans?
- What final key message do you want to leave with AGLC as they make recommendations and decisions on changes to charitable gaming in Alberta?

YOUR SAY

AGLC established an email address (yoursay@aglc.ca) where Albertans, charitable organizations, and other stakeholders had the opportunity to provide feedback on the charitable gaming model. This email address was available throughout the engagement and the information collected is included as part of the engagement process.

IMPACTS OF COVID-19



While the Covid-19 pandemic has made a review of Alberta's gaming model more challenging, the pandemic has also raised important questions regarding the future of fundraising through charitable gaming and operational requirements for casino and bingo facilities (e.g., physical distancing requirements as identified by the Chief Medical Officer of Health).

Impact of Covid-19 on charitable organizations:

- Casino facility closures resulted in a reduction in funding for licensed organizations
- Opportunity to sell raffle tickets online
- Introduction of virtual bingo
- Insecurity of future funding as casino assignments have been shifted to future dates
- Inability to make future predictions about gaming revenue

Impact of Covid-19 on the charitable gaming review:

- Having to conduct sessions online for this review had some positive and some negative implications:



Pros	Cons
<ul style="list-style-type: none">▪ Ability to bring stakeholders from across the Province together easily▪ Use new modalities of technology to collaborate on ideas▪ Ability for AGLC staff and facilitators to work closely with the participants and record all thoughts/answer questions in real-time	<ul style="list-style-type: none">▪ Required more time to ensure everyone was comfortable with the technology and had adequate time to collaborate virtually▪ Lacked in-person connection, which reduced the opportunity for informal conversations among participants▪ Some participants had difficulty using technology

Overarching Themes

Recurring ideas and subjects raised throughout the engagement

In the working group sessions and focus groups, several themes were raised consistently. Participants shared their challenges with the existing charitable gaming model, what they believe is working, and recommendations for change. Through these discussions, recommendations for certain items reached consensus throughout the groups, while other recommendations were singular issues presented by specific stakeholders.



All participant groups, across many of the discussion topics, asked for simplification of processes, modernization of AGLC’s technology, and improved communication with charitable organizations.

SIMPLIFY PROCESSES

SIMPLIFY AGLC PROCESSES AND REPORTING FOR CHARITABLE ORGANIZATIONS

- All participants raised the need to simplify processes and reporting required by AGLC of charitable organizations. Participants also asked for simplification and clarification on AGLC applications, definitions, criteria, and forms.
- In alignment with the Government of Alberta’s red tape reduction initiative, participants presented the opportunity to minimize regulatory burden, and challenged AGLC to innovate and find efficiencies.
- Participants noted that AGLC should not only add new policies when appropriate, but remove outdated, cumbersome policies as well.
- Casino operators noted that casino paperwork is required for AGLC daily.

SIMPLIFY WRITTEN CONTENT

- Several participants highlighted the opportunity for AGLC to streamline and simplify its policies by using clear, concise, and plain language in its policy handbooks.
- Participants suggested that AGLC simplify and make more user-friendly the way it communicates and implements policy changes.
- Though AGLC includes a glossary of definitions in all its policy handbooks, participants asked AGLC to consider improving the glossary to clarify the terms and intent of terminology.

MODERNIZE TECHNOLOGY

ONLINE SUBMISSIONS

- Across all participant groups, there was consensus on the need for AGLC to begin accepting online submissions for applications and use of proceeds requests. Participants spoke of large amounts of paper that must be produced and submitted to AGLC.
- Participants suggested that the future online system offer a hover-over feature to provide directions or definitions, and guide volunteers in completing online forms.
- Participants suggested that the request for a casino licence be made available online, with the use of electronic signatures, so volunteers can easily complete the forms. Participants also noted the need to update the pull ticket system to allow the submissions of applications to be done online.
- While the majority of participants thought that all gaming-related paperwork should be electronic, others noted that AGLC should still allow alternative methods of submission for those with technology-access issues.

ONLINE REPORTING

- All working groups reached consensus on the need for online reporting, including financial reporting.
- Specifically, some participants requested that AGLC provide an online confirmation receipt indicating the report was received and reviewed.

FAQ AND ONLINE CHATS

- The need for an online FAQ resource was highlighted by many participants.
- Several participants spoke of the challenges of receiving inconsistent responses from AGLC staff. An online FAQ was presented as an opportunity to promote consistent messaging from AGLC staff.
- Participants also requested that AGLC introduce an online chat feature where dedicated staff can provide support for charitable organizations that are completing applications or financial reporting.

ONLINE PORTAL

- Participants suggested an online portal is needed where charitable organizations can submit and store applications, so that organizations are not required to reapply. Charitable organizations would be responsible for updating their information in the portal.
- The online portal would improve the way charitable organizations and AGLC access and sort information. The portal could provide the capability for electronic signatures.

CASINOTRACK SYSTEM

- Casino operators and advisors expressed concerns with the CasinoTrack system, which is used to record gaming revenue from casino table games. Operators suggested that CasinoTrack should be updated or replaced.
- Operators noted that they should not be required to submit manual forms to AGLC when the information is entered into CasinoTrack because the information is duplicated. They also proposed that charitable organizations not be required to keep casino records for two years, because the information is already stored in CasinoTrack.
 - Clarification: Charitable organizations may be required to retain financial records for longer periods of time for other reporting bodies such as Canada Revenue Agency.
- One participant suggested that charitable organizations should have the option to complete applications via CasinoTrack and submit applications online. Currently, CasinoTrack technology does not have this capability.

CASINO OPERATING TECHNOLOGY

- Casino operators noted that casino technology needs to be updated.
- Specifically, operators noted that a cashless wagering system is the way of the future, and that other jurisdictions are beginning to accommodate this technology.

ELIMINATE FAX

- Both casino operators and working group participants suggested that AGLC stop accepting gaming applications via fax and move exclusively to electronic submissions.



IMPROVE COMMUNICATION

AGLC COMMUNICATION WITH CHARITABLE SECTOR

- Participants suggested that AGLC could take a stronger role in communicating to Albertans about the good work done by charitable organizations.
- Some participants proposed that AGLC have a dedicated webpage to promote small raffles throughout the province.
- Other participants suggested that AGLC improve its stakeholder communication to ensure that charitable organizations are aware of and understand its messages.
- To improve accessibility, participants suggested that AGLC make all documents translatable to assist groups where English is not the first language.

“Many people do not understand Alberta’s charitable model and where the money goes.” – Working Group Participant

AGLC CLIENT SERVICE

- Several participants suggested that AGLC’s client service could be enhanced in terms of providing timely, consistent responses to charitable organizations. Participants proposed a process be developed to support the reporting of unsatisfactory service.
- Other participants recommended that AGLC assign staff to charitable organizations according to geographic area, which could provide a consistent AGLC contact for charitable organizations.

FOCUS ON IMPACT

- There was consensus from participants on the desire for AGLC to report the positive impact of charitable gaming in Alberta. As one participant noted, “Demonstrate value by talking about results.”
- Participants suggested that AGLC develop a data collection system that measures the results and impact of charitable gaming, rather than simply reporting on how gaming proceeds were spent. This system could report on the impact of charitable programs, such as the demographic of who was served by the program, and the value that the program brought to the community. The system would also report on charitable organizations that distribute gaming proceeds to other community groups.
- Participants suggested that AGLC work in partnership with the charitable sector to understand the outcomes these organizations are trying to achieve and to report on those impacts. Rather than measuring and following the dollars, AGLC could report on the impacts of the work performed by charitable organizations to demonstrate the value of charitable gaming to Alberta.
- With more focus on the impact of charitable gaming, participants noted the importance of ensuring the system is based on the needs of the community. As new social needs emerge, the charitable gaming model must adapt.



“Demonstrate value by talking about results.”

– Working Group Participant

Topic 1: Guiding Principles

Guiding Principles of Gaming

What principles should guide the charitable gaming model?

Participants in the working group sessions suggested the following principles are important to guide the design of and decisions about charitable gaming in Alberta:

EQUITY

Participants were careful to note that equity does not mean equal; however, policies for eligibility, accessibility of gaming events, and distribution of proceeds should be perceived as equitable. Funds from charitable gaming may be hard to access for many cultural groups and some work needs to be done to identify and remove barriers for historically marginalized groups/organizations

There were also suggestions for greater checks and balances by AGLC to ensure an equitable process for all organizations.

FLEXIBILITY

Charitable organizations suggested that policies must adapt to the needs and practical realities of the charitable sector. Flexibility also involves innovation and forward thinking, such as being able to respond to emerging sector trends.

MAXIMIZE BENEFIT TO ALBERTANS

Participants indicated that eligible organizations should represent the diverse needs of Albertans and funds should be used to address issues that Albertans think are important. Gaming funds should be used within Alberta to meet the needs of Albertans.

EFFICIENCY

Participants suggested that the current charitable gaming system is complicated, as it processes information from the licence application to reporting. It needs to be simple enough to minimize confusion among charitable organizations and also reduce red tape for these groups.

CONSISTENCY

Participants suggested that consistency is important because the consistent application of policy results in equity. Consistency is important in relation to the rules for eligibility, use of proceeds, and licensing across all types of groups.

TRANSPARENCY

Participants indicated that all parties involved in the charitable gaming model should be held accountable and that decisions about how gaming proceeds are used should be made in a transparent manner. Some

participants expressed concern that charitable organizations have attempted to contact politicians or special interest groups to further their cause rather than going through the standard AGLC process.

“Non-profits and charities are not trying to take advantage of government and their funds. They are an asset to government, and worth significant investment. We are all trying to build the best society we can, together. Government and community have different strengths and solutions. They are both important.” – Working Group Participant



Topic 2: Eligibility

Eligibility for a Gaming Licence

Throughout the eligibility conversations, participants focused on the theme of simplifying processes.

DEFINITIONS

REVIEW OF COMMUNITY/PUBLIC BENEFIT DEFINITION

Many participants suggested that the terms “community benefit” and “public benefit” currently used in existing charitable gaming policies require better definition, an equity lens, and consistent application. Some participants suggested that assessing public benefit based on the quantity of people affected (e.g., membership, program attendance) is outdated and should not be part of the definition. Others recommended there be a panel created with stakeholder input to redefine the terms with better focus on impact and accessibility. Other participants observed that a cultural definition of community benefit is not included in the current definitions.



DEFINITION OF CHARITABLE

Several participants indicated the need to clarify the terms “charity”, “charitable purpose”, and “self-interest/benefit”. They see these terms as key language within the charitable gaming model and believe that the current interpretations of what meets a charitable purpose leaves many groups ineligible for gaming licensing. Some participants suggested the four categories of eligible charitable purpose that fall within the Pemsel test, and are used within AGLC charitable gaming policies, could be better defined. They cited difficulty in defining “special interest”, “self-interest”, and “benefit”.

Some participants believe AGLC has adopted the Canada Revenue Agency (CRA) definitions of “charity” and “charitable benefit”. They view these terms as difficult to define and believe they may have eliminated many worthy charitable organizations from being eligible for charitable gaming licensing. Other participants, however, recognize that while there are similarities between the CRA’s definition of charitable status and AGLC’s policies for gaming licensing eligibility, AGLC does not rely on the definitions of “charitable” used by other entities. These participants stated that organizations should only be required to prove public benefit in accordance with the *Societies Act* and CRA, and should not be required to comply with AGLC policies to be found eligible for gaming licensing. There were also comments that AGLC should adopt CRA’s definition of “charitable” to maintain consistency.

There were also opinions that charitable purposes (Pemsel test criteria) are open to interpretation, which leads to frustration over inconsistent application of eligibility approvals or denials. There were suggestions that the four criteria to determine eligibility should be reviewed.

“A modern system needs to address the notion of “charitable” and the way this money goes back into society for social good. There is a need to look at the place of gambling in society and the social contract for giving revenue from charitable gaming back to organizations by understanding charitable purpose. There needs to be understanding of the purpose of this funding, what it is meant to achieve, and the role we all play (e.g. building a playground, supporting a homeless shelter). There needs to be balance on what is funded through the charitable gaming model and what government funds through other programs.”

– Focus Group Participant

PERIODIC ELIGIBILITY REVIEW

There was a lack of consensus among participants regarding periodic eligibility reviews. Many participants recommended periodic reviews to determine if continued eligibility is warranted, suggesting a range of every three to seven years. There was support among some participants that AGLC should review groups proactively, and not wait until a problem arises. Other participants, however, did not agree that a re-evaluation process is required.

CRITERIA FOR ELIGIBILITY

Participants agreed on the need to update eligibility criteria for gaming licensing, though recommendations varied.

Themes included:

Demonstration of Need

- Eligibility could include a demonstrated need for funds and a commitment to use those funds within 24 months of receipt or before the next licence period
- AGLC could vet organizations to determine their relevance to community and citizens, and whether their purpose is appropriate to receive gaming proceeds
- An organization’s cause should have some weight in the approval process

Outside Review

- Organizations need to make their case to AGLC and/or have the charitable sector participate in a peer review eligibility process
- In conjunction with the charitable sector, update and/or redefine categories of data collected, such as “Aid of the Distressed”

Increased Scrutiny

- Greater scrutiny by AGLC and increased screening during the intake/qualifying process would enhance the process, as well as assessing the health of an organization prior to approving eligibility; there are trusted sector tools that measure this

Diversity Among Eligible Organizations

- Collectively, organizations approved for gaming licensing should represent the diverse needs of Albertans

Open Eligibility

- Licences should be available to non-profit organizations that are not incorporated societies or registered charities
 - Clarification: Within current AGLC policies, organizations that apply for raffles with a total ticket value of \$20,000 and less are not required to be incorporated but are still required to have a charitable purpose.

Tie Eligibility to Charitable Status

- Eligibility for gaming licensing should be tied to charitable status or a “charitable plus” model

The following statements reflect feedback on eligibility for gaming licensing where there was not consensus.

- “Make room for more new organizations at the trough”
- “Equitability of licensing. Is it right that all who apply are approved and yet some feel they can’t apply and are excluded?”
- “There should be a weighting system for eligibility with clear criteria”



STRUCTURE OF ELIGIBLE ORGANIZATIONS

Some participants had specific recommendations for gaming licensing eligibility related to effectiveness of organizational governance, and the role of paid members.

Participants believe oversight of board governance is important, while others added that it should come from the Government of Alberta or Canada Revenue Agency, not AGLC.

Some participants specified that eligibility criteria for gaming licensing needs to be updated to ensure that organizations do not have to choose between receiving gaming funds and including paid staff and contractors in their active membership.



CAP ON THE NUMBER OF ELIGIBLE ORGANIZATIONS

The review heard several concerns about competition for gaming licensing and allocation of scarce resources. There were varying opinions on how to manage the numbers of organizations eligible for gaming licensing.

Many participants recommended creating a cap to limit the number of eligible organizations and to review the eligibility of existing organizations. There was feedback that AGLC must develop new criteria to establish how many organizations can be approved for gaming licensing at any given time to ensure there is enough money to be equitably distributed. Some participants questioned if, once approved for a gaming licence, there should be a limit to how many times an organization could receive gaming funds through the conduct of licensed gaming events. Another question raised was whether a system of “once in, always in” should remain.

One recommendation was to use the number of eligible organizations in 2021 as a base and only add new groups as existing groups discontinued gaming licensing through attrition. Another recommendation that did not have consensus was to limit the number of groups based on categories or relevance.

There was no consensus on capping the number of eligible organizations with many wondering who would decide on the cap, or if it meant eligibility would be limited to a certain number of years. Moreover, participants observed that organizations could lose funding and no longer be able to continue operations if their eligibility was revoked.

STATUS QUO

There was considerable support and agreement to maintain existing elements of charitable gaming eligibility policies.

- Maintaining the existing four pillars to determine eligibility: relief of poverty, advancement of education, advancement of religion, and community benefit
- Keeping levels of eligibility for AGLC events as they are with registered charities and non-profit societies

Topic 3: Use of Proceeds

How charities may spend gaming revenue

Proceeds raised from licensed charitable gaming activities must be used for approved charitable or religious purposes. Participants in the working group sessions and focus groups identified challenges with current use of proceeds policies and provided ideas for how they could be improved. Simplifying processes was again a clear theme throughout all the use of proceeds discussions.

Simplify

SIMPLIFY AND CLARIFY ELIGIBLE EXPENSES

- Rules for spending casino funds could be simplified by specifying which expenditures are NOT eligible, rather than general categories specifying which are eligible. Create a short list of prohibited uses and allow the organization to determine how to use the money
- Approval timelines for new use of proceeds applications could be decreased and processes simplified
- Providing transparent and upfront approval of eligible expenses is important
- Could move to the approval of projects rather than itemized pieces

ADMINISTRATION/OPERATIONS

Many participants noted the importance of gaming proceeds to support their organizations' administrative expenses. They strongly recommended increasing the maximum amount permitted to be used for administrative expenses and broadening the types of eligible administrative expenses, including some support for administrative staff expenses. Some participants, however, were concerned with whether there would be any proceeds "left for the sector" after staffing expenses are paid.

Some participants wanted to see "a significant amount built in for overhead" or unlimited use of gaming proceeds for administrative expenses. Many participants, however, supported 15 to 20 per cent of gaming proceeds for administrative expenses.

The Alberta Non-Profit/Voluntary Sector Initiative (ANVSI) addressed the connection between achieving a charitable purpose and adequate resources. For example, working on ending homelessness requires significant resources of people with expertise and time to solve the problem. ANVSI believes these staff expenses should not be viewed as administrative costs; rather, they are program costs critical to achieve the goal.

TIMEFRAME TO SPEND PROCEEDS

Several participants supported the implementation of a more flexible timeframe to use gaming proceeds and suggested the limit be extended for longer than the current two years. Others stated the maximum retention amount of \$75,000 should be increased. One recommendation suggested reducing the number of groups that have proceeds in the bank, with the goal of spending proceeds within a two-year period for urban organizations, or three-year period for rural organizations. This recommendation further stated that proceeds should be collected by AGLC, pooled, and redistributed to meet the needs of organizations negatively impacted by the Covid shut down.

Another recommendation, though one that did not have consensus, suggested that proceeds not spent within two years be placed into a pool. The organization's next licence could be delayed until need and meaningful use of proceeds are demonstrated.

Other recommendations focused on circumstances under which organizations should be allowed to retain their proceeds: charitable organizations maintaining a contingency account equal to six months of annual income or a maximum of \$500,000, or two to three licence periods for a capital project or reserve fund.

FEWER RESTRICTIONS ON SPENDING

Participants strongly supported fewer restrictions and greater flexibility related to the use of gaming proceeds. Participants stated that their agencies, groups, and organizations should be trusted as experts in their respective areas with a focus on outcomes, not specific expenses. They felt the role of AGLC is to regulate gaming, not oversee the minutiae on use of proceeds.

There was some support for keeping gaming proceeds within Alberta to support charities, regardless of mission.

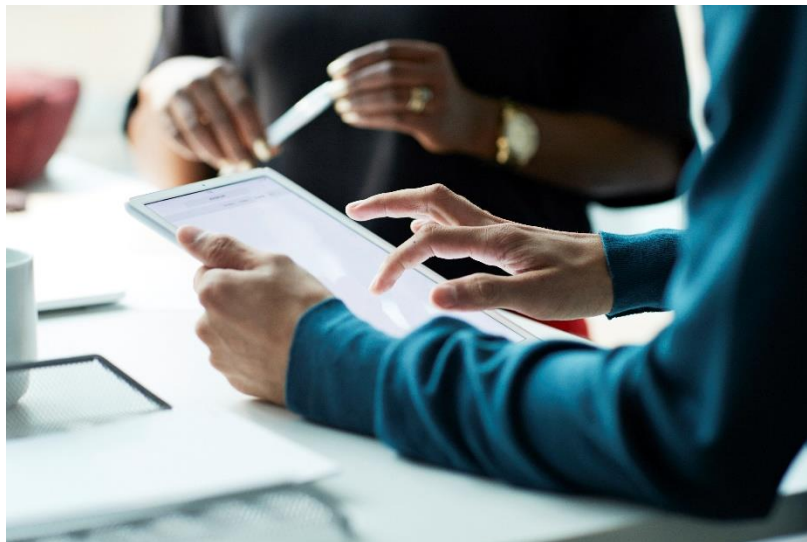
“Charitable gaming should be a first-resort funder enabling non-profits through funding rather than a last resort funder restricting funding.” – Working Group Participant



Topic 4: Casino Boundaries & Revenue Distribution

Distribution of casino revenue and casino region boundaries

Under the current charitable gaming model, charitable organizations access casinos within their designated region, which is usually the region in which the organization's head office is located. Input from written submissions, the 2019 survey, and participants in the working group sessions and focus groups consistently showed concern that this system results in regional disparities in wait times for casino events and the amount of proceeds earned from those events.



The sense of disparity felt by some groups extends beyond the direct financial proceeds. Various forms of greater 'cost' were identified: rural groups shoulder greater costs related to transportation and are required to spend all funds in two years when there might be three years between casino events.

CASINO REVENUE DISTRIBUTION

Participants in the working group sessions were asked this question:

How should casino revenue be distributed?

PROVINCIAL POOLING OF ALL CASINO REVENUE

Throughout the review, all participant groups identified provincial pooling as one potential method to distribute casino revenue more equally across charitable organizations. Many thought that all casino revenues should be pooled provincially and distributed equally to charitable organizations.

“The current method of distributing casino proceeds and perhaps casino location allocation requires a concerted action to make it more fair and equitable for the benefit of all charities and religious groups in Alberta.” – Working Group Participant

POOLED SLOT REVENUE

Much of the input from written submissions received between 2019 and 2021 suggested that slot revenue should be distributed equally on a province-wide basis. This would result in smaller organizations in rural areas receiving a much more even share of the total gaming revenue.

REVENUE POOL CONTRIBUTIONS

There were some suggestions that a portion of all casino revenue (table game and slot revenue) should be pooled and distributed equally across the province, or distributed to rural organizations to reduce the regional disparity and cover some of the additional costs that organizations outside Edmonton and Calgary incur. This could be accomplished by:

- Taking a small percentage (e.g., 10 per cent) of urban proceeds and adding them rural pooling.
- Pooling a portion (e.g., 20 per cent) of revenues generated in each region and distributing it equally to all regions.

POOL ALL RURAL

Casino operators and advisors suggested that all casino revenue generated outside Edmonton and Calgary should be pooled and distributed evenly to all charitable organizations located outside those cities.

INCREASE THE POOL

Participants requested an increase in the percentage of revenue provided to charitable organizations and operators with a corresponding decrease in the percentage of revenue provided to the Government of Alberta’s General Revenue Fund.

TIERING GROUPS/SLIDING SCALE

Several participants proposed different systems that involves tiering or sliding scales of gaming event licensing and revenue distribution based on need.

- Slotting groups based on the following classification:
 - a) CRA registered charities to hold a casino event every 12-18 months

b) Alberta Society (broad based) to hold a casino event every 18-24 months

c) Alberta Society (special interest groups) to hold a casino event every 36 months

This could prevent a special interest group that serves a smaller group of clients from competing with a larger organization that serves many more clients through a broader impact and/or social mandate

- Provide a base amount for all charitable organizations in addition to a formula or schematic that distributes the remaining funds based on need and impact
- Utilize a tiered system based on the size of an organization/number of members
- Provide greater benefit to groups serving a larger geographic area

LARGER REVENUE ORGANIZATIONS NOT ELIGIBLE FOR CASINOS

Some participants proposed that organizations that currently conduct large raffles and/or lotteries, such as hospital foundations, should not have access to casino events. They suggested that this would reduce wait times for casino events.

STATUS QUO (POOLING BY REGION)

Some expressed that they did not want the current pooling system to change. They noted, "Money should stay where spent/earned and not be distributed province wide."

CASINO BOUNDARIES

How should casino boundaries change to create more equity?

OPEN UP ALL CASINOS TO EVERYONE

Participants also suggested that charitable groups be able to choose any casino in the province.

ELIMINATE/REDRAW CASINO BOUNDARIES

Some written submissions proposed that casino boundaries be redrawn or eliminated.

"Give eligible groups in Alberta equal opportunity to be licensed at casinos other than those in their designated region. Allow them to be licensed at casinos that match their need for funds versus their designated region. The hope is that this prevents licensed organizations from "taking more than they need" from the system, and allows for increased collaboration between organizations." – Working Group Participant

ACCESS TO CASINOS IN EDMONTON AND CALGARY

Participants provided a range of suggestions to allow organizations outside Edmonton and Calgary to have access to casino events in those two cities, where revenue earned from casino events is much greater

- Move 150 groups from Camrose to Edmonton and 150 from Calgary Rural to Calgary
- Make rural organizations eligible for a casino in Edmonton or Calgary every few years
- Rural organizations from the surrounding Edmonton area should be considered for casino events in Edmonton
- Rather than having to travel to Camrose, give rural communities surrounding Edmonton access to draw dates at the new Century Casino by the airport
- Merge St. Albert with Edmonton casinos
- Designate a casino in Edmonton area that serves rural areas (like is set up in Calgary) if this helps balance access/distribution
- Include organizations that currently access St. Albert and Camrose in the urban casino slotting because they currently have high wait times for casino events and their pool is a lot less than others
- Allow charities outside of Calgary to access all casinos in Calgary



Topic 5: Casinos

Casinos provide significant funding opportunities for Alberta's charitable organizations



ALBERTA'S CASINO MODEL

Participants strongly supported maintaining the involvement of licensed charitable organizations and volunteers in the conduct of casino events. Many view charities, rather than government, as the best option to operate casino events. There was equally strong opinion that revenue from casino events should not be made into a grant program. Some considered the charitable casino model in Alberta the envy of charitable organizations in other jurisdictions because of the amount of gaming revenue earned by charitable organizations in Alberta.

While a considerable number of participants supported maintaining the status quo, many participants also recognized the need to tweak, though not substantially change, the charitable casino model. Suggestions for improvement included:

- “Consider having volunteer specialists who know how to navigate this system. We rely on the organization to “right-set” everyone and ensure the right people are there to be involved in casinos. Don’t want to undervalue the piece of what organizations and volunteers bring to the table”
- “Give charities a choice: less money but no volunteers, or more money and provide volunteers”
- “Reduced volunteer commitment during Covid has made finding volunteers very easy. If we can make it work through Covid, we could keep the volunteers to a minimum and still have an independent third party protecting the integrity of gaming in Alberta”
- “Need to have a system that appreciates the diversity and passion of volunteers for their investment in organizations/initiatives”

Elimination of the charitable gaming model was considered an out-of-scope topic. However, feedback was provided, particularly from casino operators, that the current charitable casino model should be eliminated.

- The charitable model is obsolete and needs to be changed. Alberta is the only jurisdiction that has this model of volunteers. Due to changes in our environment, volunteers should be eliminated totally and all patrons directed to one cash cage, that being the facility operators’
- The fact that this virus will be with us for years to come and volunteers are close to each other further substantiates the need to eliminate the volunteer model. The volunteer model is antiquated and needs to be eliminated
- Consider building a system around the needs of volunteer run non-profit societies



“Increase flexibility on volunteer requirements to encourage a valuable volunteer experience.” – Working Group Participant

CASINO VOLUNTEERS

Participants provided a range of recommendations and observations related to roles, challenges, and expenses:

FLEXIBLE VOLUNTEER ROLES

- “Increased flexibility for volunteer requirements to work in multiple positions”
- “Allow paid staff of charitable organizations to work casino events”
- “Allow for a pool/base of volunteers from which all organizations can draw”
- “AGLC to maintain a registered and vetted volunteer database with no more need to complete the Casino Volunteer Application form except for new people. Once completed, the volunteer is “good for life”, similar to ProServe certification”
- “No longer require volunteers to be bonafide members of the organization conducting the event”

VOLUNTEER CHALLENGES

- “Even with fewer volunteers needed, it’s hard to recruit”
- “Where parking is a challenge, casino owners need to ensure there is enough parking available for volunteers at their facilities”
- “The location of the assigned casino can make it more or less difficult to find volunteers due to the amount of driving and the need to book hotels”
- “Weather impacts volunteers’ ability to get to events, especially if casinos are not close”
- “Safety for late working hours”
- “Fear coming to the casino during the pandemic”
- “Geography makes things even more challenging; rural areas have fewer citizens to pull from and they are further away”

Simplify

SIMPLIFY AND CLARIFY RULES, CRITERIA, AND DEFINITIONS

Participants suggested clarifying or simplifying the following terms:

- Definitions (e.g. members for positions, women’s shelters)
- Volunteer age requirement because most volunteers are predominantly seniors
- Review rules and regulations, terms and conditions, and criteria to improve clarity
- Either all volunteers or no volunteers should be required to complete background check forms
- Standardize policy for all casinos: Rules and regulations for minor casinos are different than those for major casinos
- Rules and regulations are outdated and leave a lot of room for personal interpretation. In some cases, volunteers are required to know more than should be needed in a ten-hour shift once every couple of years

VOLUNTEER EXPENSES

- “Allow all volunteer-related costs to be covered by gaming proceeds (e.g., travel, accommodations)”
- “Remove volunteer-related costs from organization expenses and take the money out of the pool”
- “Allow volunteer groups to provide their own refreshments payable from their casino account or paid from the pool. Volunteer meals need to be served in a timely manner to not impede volunteer duties”
- “Remove the 100 km rule”
- “Establish a centralized fund of 7 per cent of the per event revenues from each region to cover travel expenses”
- “Revise the current travel and expense policies to reduce unfair costs that rural organizations incur to volunteer at casinos versus organizations located near casinos”

REDUCE NUMBER OF VOLUNTEERS

- “Maintain Covid volunteer requirements post-Covid; the casino operation runs smoothly but reduces the strain on organizations to find volunteers”
- “Require three volunteers at a casino event only if little or no money is taken away from licensed group by the operator”
- “Eliminates or reduces need for advisors if there are fewer volunteers which frees up money for charitable organizations”
- “If you want to keep volunteers, keep two or three in a couple key positions (e.g. opening, mid-day, and closing GM)”

“Because of Covid, we have reduced the amount of volunteers and it is working.” – Focus Group Participant

MOVE SOME ROLES TO OPERATORS

Casino facility operators observed that volunteers cannot be expected to have the level of training and information required to understand all processes, and that they have limited time to prepare for the event which can impact the level of service delivery.

Operators provided these recommendations:

- “Move cage workings in house (don’t require volunteers)”
- “Have rules for table games match rules for slot games and poker – money still goes to charities, but no volunteers, all in house”
- “Replace volunteers with actual casino personnel for the chip bank”
- “Mitigate the workload for AGLC on all charities’ casino tracking and licensing”

Advisors provided these recommendations:

- “Move responsibility for some of the transactions to the operators (e.g. chip running)”
- “Replace volunteers with casino personnel for the chip bank functionality and have costs paid by the charities”

Other feedback provided through written submissions included:

- The minimum wage portion of these positions could be taken from the charitable proceeds pool (assumption that the operators will hire fewer positions than the current number of volunteers required). Making these paid positions would provide employment at a time when it is desperately needed.
- Licensed charitable organizations could provide three volunteers for casino events – General Managers, bankers, and count room supervisors – all other positions could be staffed by the casino operators

Some were opposed to using casino employees rather than volunteers and wanted to see the status quo remain.

CASINO OPERATIONS

“It is important to have charities/volunteers involved for community perception.” – Focus Group Participant

COMMUNITY PERCEPTION

Casino operators acknowledged the importance of public opinion on charity involvement in casino events and recommended these measures:

- Have a charity ambassador present at the casino during the event, instead of volunteers in cash cages
- Have a Kiosk at the front entrance of the casino for charitable organizations to share information about their organization

NUMBER OF CASINO FACILITIES

Participants provided conflicting recommendations regarding the number of casino facilities, with some support to maintain the moratorium on issuing new casino facility licences, and some support for building more casinos.

STANDARDIZE PROCEDURES ACROSS CASINOS

Advisors recommended standardizing some procedures for all casino facilities, for example, where to access keys for the cash cage. They also questioned why they had to wait at the end of the event at some locations for security to conduct a sweep.

ORGANIZING CHARITIES

Advisors noted the time-consuming effort to align all charitable organizations to their casino event schedules.



COMBINE CAGES

Casino operators and advisors provided these suggestions:

- Follow the First Nations casino model related to the cash cage
- Allow cash cage volunteers to move into count room positions, as occurs in rural casinos
- Front line of charity cage should operate differently, such as running slot and table cage windows at the same cage

RISK TO OPERATIONS

Casino operators noted the current model presents risks to their operations if volunteers or advisors do not arrive or are not able to travel to the location because currently table games cannot operate without them. If the current operational/volunteer model is maintained, a backup plan is required.

They also noted other challenges:

- Volunteer requirements to run table games limits the hours those games can be open/operating
- Having volunteers impacts the consistency and efficiency in dealing with table game customers
- Charities do not participate in covering ongoing costs related to table games, such as progressive software, shuffle master and other table game leases, table maintenance, AGLC annual fees, and playing cards
- Money handling/exchange is compromised without due diligence vetting of volunteers

Some participants noted that it is, “currently extremely difficult for the average volunteer to read, understand and implement AGLC policies.”

The Alberta Non-Profit/Voluntary Sector Initiative (ANVSI) observed that, “If money available keeps going down, then decisions would need to be made around whether it’s worth it for an organization to find the volunteers to staff these casinos.”

CASINO FACILITY REVENUE

Casino operators noted that if their recommendation to take over cage operations is adopted, they will require more money to operate. They also recommended compensation to charities decrease by seven per cent for rural locations.

Though some recommended a, “full review of the regulated monopoly and capital gain of casino facilities and their operators” and that there be a “fixed fee/revenue for casino operators”, there was not consensus on this.

CASINO ADVISORS

What challenges and opportunities exist with the current role of casino advisors?

CUSTOMER SERVICE

Casino operators identified these challenges:

- Requiring an advisor to be present in order to conduct casino events is a challenge, especially if advisors are delayed by inclement weather, or travel from far away, and are delayed or prevented from attending
- Advisors are technically hired by charities – this can make it difficult for casino operators to make requests of advisors
- Casino operators have an expected level of customer service that is not always delivered by the individuals staffing the cash cage or advisors

AGLC TO COORDINATE AND REVIEW ADVISORS

Advisors provided these recommendations:

- Create a scheduling or calendar system so that advisors can indicate their availability. This would also help organizations to know who all the advisors are
- AGLC could coordinate/assign advisors to casino events to ensure hours are equally distributed among advisors
- AGLC could reconsider how many advisors they licence every year as there currently isn't enough work/shifts for current advisors

There were several recommendations that organizations have an accessible and on-demand ratings and review system for the casino advisors they hire.



BETTER COMMUNICATION WITH ADVISORS

Both casino operators and advisors noted communication from AGLC could be enhanced in the following areas:

- Providing messaging to advisors and operators (e.g., number of cashiers charities need, roles of volunteers). Clear messaging is particularly important during a pandemic situation.
- Communication with advisors about new developments and current operations.

RISK RELATED TO THE ROLE OF ADVISORS

Casino operators identified the following challenges related to the role of advisors:

- Operators have no control over the behaviour of advisors and cannot direct them, which could result in fines if breaches occur
- Sometimes there are conflicts between casino advisors and casino operators related to training, money handling, anti-money laundering (AML) procedures for large cash transactions, or casino operations

“The true stakeholders in this casino model, right from the beginning, have been charities. They should continue to be at the top of that list.” – Casino Operator

KEEP ADVISORS

The working groups participants noted that the current advisor structure should be maintained with no or little change.

REMOVE ADVISORS ROLE

There was also a contrasting opinion to, “remove the advisor role for volunteers”.

Casino operators provided these observations and recommendations:

- Advisors could act on behalf of charities on site, but volunteers could no longer be required
- Reduce the current compensation for advisors and ensure charities follow casino operators’ in-house rules (terms and conditions)
- Casinos can perform the advisor role at a lower cost. This will eliminate problems related to staffing and ensure the presence of required personnel by AGLC at the chip bank
- Casino operators could absorb casino advisors which would translate into full-time jobs with benefits

Some advisors provided these observations and recommendations:

- “Get rid of advisors and volunteers in casinos”
- “More money to charities (~\$10 million) if not paying advisors and meals for that many volunteers”

Topic 6: Raffles

Raffles have become a significant source of revenue of charitable organizations in Alberta



The charitable gaming review mainly focused on casino events; however, participants also provided feedback related to raffles. Raffles are an important part of charitable fundraising in Alberta and range from small dollar to multimillion-dollar events. With the introduction of electronic raffles in 2019, raffles grew in popularity and provided organizations with more opportunities to increase revenue. In 2020/21, AGLC expanded the raffle framework by:

- accommodating online bearer ticket raffles
- removing total ticket value (TTV) restrictions on electronic raffle components
- removing the maximum TTV for all raffles (creating limitless raffles)
- introducing large progressive raffles
- easing a number of other raffle regulatory restrictions.

Raffles also experienced growth during the Covid-19 pandemic in that they experienced fewer pandemic related restrictions than other gaming streams.

Participants in the working group sessions identified concerns and provided recommendations regarding the conduct of raffles and how they are licensed. In addition, a separate focus group was organized to focus solely on raffle events.

RAFFLE LICENCES

Several participants recommended that charitable organizations have the option to apply for one raffle licence to conduct a certain number of raffles over a period of time, under a certain total ticket value. For example, one participant suggested a five-year raffle licence to conduct continual raffle draws that do not exceed \$1,000. Another participant suggested that charitable organizations could be licensed to conduct the same raffle scheme multiple times a year, or the same raffle scheme year after year.

One participant noted that AGLC should accommodate charitable organizations in selling ticket packages from multiple raffle licences. For example, if Raffle #1 offered two tickets for \$30 and Raffle #2 offered three tickets for \$40, the charitable organization could offer a package for \$60 for tickets from both raffle

licences where 40 per cent of revenue goes to Raffle #1 and 60 per cent of ticket sales goes to Raffle #2. To clarify, AGLC allows charitable organizations to offer ticket packages from multiple raffle licences. However, ticket purchasers must have the option to purchase a single ticket from a single raffle licence.

LICENCE FEES

- Several participants recommended that AGLC increase licence fees for raffles with total ticket values over \$1 million.
- One participant suggested that licence fee revenue should be added to a fund to support charitable organizations travelling to conduct charitable gaming events.

RAFFLE LICENCE NUMBER EARLIER

- Several participants suggested that AGLC issue a raffle licence number prior to the approval of the raffle application, to enable charitable organizations to finalize advertisement materials. Another participant noted that charitable organizations could be issued a “licensee” number, instead of a raffle licence number, that could be included on raffle materials. They suggested that this option could be available to charitable organizations with a proven track record of conducting raffle events.

Simplify

SIMPLIFY RAFFLE TERMS & CONDITIONS

- Participants reached consensus on the need for raffle policy to be simplified and made easier to understand for charitable organizations.
- Participants suggested there should be separate Raffle Terms & Conditions for each different type of raffle, such as percentage draws (50/50s), progressive raffles, and sports drafts. It was also suggested that AGLC clarify the definitions for different types of raffle and provide sample raffle rules or templates for different types of raffles.
- In contrast, one participant suggested fewer definitions and types of raffles.
- Instead of using the term “bearer ticket” raffle, one participant suggested that it should be referred to as a single-day, in-person raffle.

LICENCE SUBCLASSES

- Participants proposed the development of additional raffle licence subclasses based on total ticket value (TTV). Currently, the Gaming, Liquor and Cannabis Regulation (GLCR) permits two raffle licence subclasses: raffles with a TTV \$20,000 and less, and raffles with a TTV more than \$20,000. Participants suggested that the subclasses could differ according to criteria such as TTV, the type and size of the charitable organization, and whether the organization is already licensed.
- Participants noted that the higher the TTV of the raffle, the more oversight and regulation it should have. Larger raffles conducted by larger, staff-run organizations should be required to undergo more reporting and financial review. Raffles conducted by smaller, volunteer-run organizations could have simplified licensing and reporting procedures.
- It was also suggested that a peer group familiar with raffle rules could approve raffles with a smaller TTV. To clarify, other charitable organizations could not approve licences on AGLC’s behalf.

“One size fits all approach is not appropriate.”

– Working Group Participant

Modernize Technology

IMPROVE PROCESSES WITH TECHNOLOGY

ONLINE TRACKING SYSTEM

- Participants suggested adopting an online tracking system where charitable organizations could submit all raffle licence amendments. This would allow licence amendments requests to be completed quickly and would also provide benefit to charities by having one place where all the information would be recorded. As one participant said, it would create an electronic ‘paper trail’.

ONLINE APPLICATION AND REPORTING

- Participants reached consensus on the need for online licence applications and financial reporting, providing charitable organizations with the ability to apply for and “close” a raffle electronically.
- It was noted that an online system could also provide templates, applications, and reports for different types of raffles. The online system could offer a simple registration process through AGLC for smaller raffles.
- Participants suggested the benefit of an online system would include more timely review of raffle reports, so that they can be closed when they are finished (even if before their original deadline). A participant recommended the submission of the final financial report could trigger the licence to be completed. Another recommended that a button on the online submission could “close” the raffle, otherwise the licence would remain open. One participant suggested that charitable organizations not have to wait until after the raffle date to close a raffle, even if the raffle sells out in a few days.

ELECTRONICAL RAFFLE SYSTEM (ERS) TECHNICAL STANDARDS

- It was suggested that a third-party company be permitted to capture the raffle ticket sales and eliminate the need for purchasers to provide their credit card information more than once.
 - Clarification: AGLC currently requires all third-party companies providing electronic raffle systems to charitable organizations to be registered gaming suppliers. Electronic raffle systems cannot store personal information of ticket purchasers.

AGLC TO CREATE ERS PLATFORM

- One participant recommended that AGLC create a platform for online ticket purchasing that charitable organizations may use at no cost to the charitable organization, as an alternative to charitable organizations using an electronic raffle system from a registered gaming supplier.

REDUCE FINANCIAL RISK

- Participants noted it is a challenge for charitable organizations to estimate ticket sales in order to apply for the appropriate raffle licence (TTV \$20,000 and less, or TTV more than \$20,000).
- Several participants suggested that AGLC remove the 20 per cent guarantee for percentage draws and allow percentage prizes to be based solely on ticket sales. This change would reduce financial risk for charitable organizations by not requiring them to guarantee 20 per cent of the total ticket value for percentage draws.

RAFFLE EXPENSES

- One participant suggested that charitable organizations should be able to pay raffle expenses with revenue after the raffle event. Current policy requires expenses to be paid with non-gaming funds prior to the raffle event.
- Another participant noted that the financial reporting budget sheet should be more flexible for a variety of allowable expenses.

AUDIOVISUAL DRAW RECORDINGS

- Participants reached consensus on the need to change the requirement for charitable organizations to make an audiovisual recording of all raffle draws with a total ticket value more than \$20,000. One participant suggested that this policy be reverted to requiring raffles with a TTV over \$100,000 to be recorded. Another participant suggested that AGLC could randomly choose which raffle draws must be recorded, and notify the charitable organizations at the time of licence approval whether a recording of the draw is required.



RAFFLE REVENUE DISTRIBUTION

- Some participants suggested charitable organizations that conduct large raffles be required to give a percentage of their raffle revenue to a provincial pool that could be distributed to other charitable organizations or supplement grant programs.

LIMIT LARGE OR ONLINE RAFFLES

- It was proposed that AGLC should limit the number of online raffles a charitable organization may conduct per year.
- Another participant suggested that AGLC monitor the number of large raffle licences approved each year within specific communities.

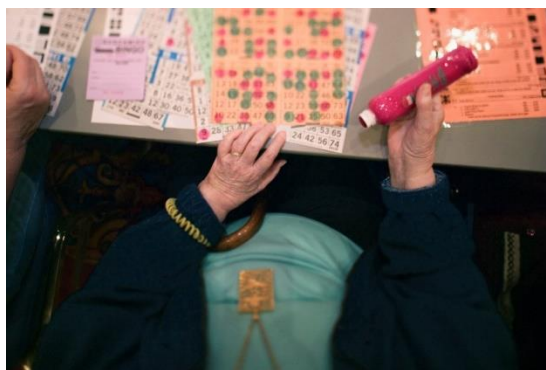
SYSTEM RECOMMENDATIONS

- Participants agreed that many good changes have been made to the raffle framework and that a major overhaul to the raffle system is not required. However, some tweaks to the system would be beneficial.

Topic 7: Bingo

Bingo

The charitable gaming review mainly focused on casino events; however, participants also provided feedback related to bingo. During the working group sessions, a separate working group was formed to discuss challenges and opportunities specific to bingos. Six participants chose to participate.



SYSTEM CHANGE

- Participants noted that bingo would benefit from a complete review, outside of the charitable gaming review.
 - Clarification: AGLC conducted a review of bingo policy in 2018-19 and released the revised Commercial Bingo Handbook in April 2020. An additional red tape reduction update was completed in November 2020.
- Several participants presented the idea that bingos should be operated like casinos, where private operators run the bingo halls.
 - Clarification: Currently, bingo facility licensees are made up of bingo associations who work cooperatively in the operation of a bingo hall.
- One participant questioned why there are still two streams of bingo: association and community bingo. Another noted that the requirements for bingo events should be proportional to the number of days and number of games conducted per week.
 - Clarification: Licensed bingo facilities, or association bingo, refers to a group of licensed charitable organizations that conducts bingo in a licensed bingo facility and operates four or more bingo events a week. Community bingo refers to a licensed charity that conducts bingos from its own facility, no more than three days per week.
- Participants noted that processes should be embraced that foster innovation in sustainable fundraising, such as virtual bingo.
- One participant suggested AGLC should not require commercial bingo halls to belong to Bingo Alberta, because it is quite costly.
 - Clarification: AGLC does not require commercial bingo halls to belong to Bingo Alberta.
- Participants asked AGLC to permit charity-owned and operated bingo halls to adopt and implement sound business strategies. They also requested that AGLC accept responsible innovation.

VOLUNTEERS

FLEXIBILITY IN ROLES

- Several participants spoke of the challenges in predicting the number of patrons that will attend a bingo event and the inability to send volunteers or staff home if they are not needed. Participants proposed that AGLC should increase the flexibility of volunteer roles to allow volunteers to take on different roles.
 - Clarification: AGLC policy does not state how many volunteers are required to operate a bingo event.
- By increasing the flexibility on volunteer requirements, AGLC will enhance the volunteer experience.
 - Clarification: Flexibility has been provided to the bingo halls on using volunteers or paid staff in several positions. Bingo halls may decide to reduce volunteers based on operational requirements. Those who are not members of the charity may volunteer in any position that is not a mandatory position.

REDUCE NUMBER OF VOLUNTEERS

- Several participants indicated they would like the opportunity to reduce the number of volunteers required at bingo events.
- Another participant suggested that eligible organizations be permitted to share the number of volunteers required and pool the proceeds.
 - Clarification: AGLC currently allows charitable organizations to conduct shared events.

VIRTUAL BINGO

- Participants requested that virtual bingo be embraced and allowed to continue after the Covid-19 pandemic. Suggestions for improving the virtual bingo platform included making it more user-friendly, easier to find for players, and decreasing the lag time during the game.
 - Clarification: AGLC does not maintain or deliver the virtual bingo platform. The platform is offered through YouTube.
- One participant proposed that AGLC grant a single dedicated licence to multiple charitable organizations that are owners and operators of a commercial bingo hall to conduct Bingo Alberta virtual bingo.
- Another participant noted that AGLC should allow in-person and virtual bingo simultaneously.
 - Clarification: AGLC already permits simultaneous in-person and virtual bingo.
- A potential future challenge was presented by a participant who asked, “What happens to the bingo industry if paper bingo cards disappear because the cost increases and manufacturers want out?”



RURAL BINGOS

- Participants noted that many organizations do not have the capability or interest in forming an association bingo. In rural communities, if no other organizations want to join for an association bingo, then organizations are limited to the number of days that they may conduct community bingo or virtual bingo events. Another participant commented that rural communities can only conduct community bingo events and cannot reap the benefits from association or virtual bingo.
 - Clarification: AGLC allows groups to come together to form an association bingo.
- One participant proposed that rural charitable organizations conducting community bingo events rent their halls to other organizations to conduct another community bingo on other days that the hall is available.
 - Clarification: AGLC currently allows charitable organizations to rent their facilities to other charitable organizations to conduct community bingo events.

REDUCE COSTS

- Participants suggested the licence fee to charitable organizations be lowered from \$20 per event.
 - Clarification: AGLC recently lowered the event licence fee from \$30 to \$20.
- Participants also recommended further examination of costs incurred by organizations, proceeds, and revenues earned.

CONCESSIONS

- One participant noted that concessions should be allowed to earn revenue.
 - Clarification: AGLC does not place any restrictions on the income of bingo concessions. Bingo halls may have profitable concessions.

Enhance Communications

ENHANCE COMMUNICATION BETWEEN AGLC AND BINGO STAKEHOLDERS

- Some participants suggested that communications, such as emails, sent from AGLC to bingo halls do not always get passed on to the licensed charitable organizations.
- Participants requested that AGLC provide updates and notification online.
- One participant proposed that AGLC provide improved communications regarding the rules and expectations for charitable organizations.

REVIEW POLICIES

- One participant recommended the removal or reduction of unnecessary operational policy, and continued involvement from charitable organizations in the development of bingo policy.
- Participants asked for clarification regarding the purpose of the financial review of the bingo facility operator.
- Participants recommended a change to the requirement for members of a bingo association to attend all bingo association meetings.
 - Clarification: AGLC does not regulate the meeting practices of bingo associations.
- One participant noted that community bingos should be able to use digital units.
 - Clarification: AGLC allows community bingos to use digital units.
- Another participant commented on the need to strengthen principles of shareholder responsibilities in bingo associations.
 - Clarification: AGLC is not responsible for the governance of bingo associations.

Topic 8: Pull Tickets

Pull Ticket Discussion Topics

In addition to participating in the working group sessions, six participants chose to participate in a separate bingo/pull ticket session to provide specific feedback related to those gaming streams.

ELECTRONIC PULL TICKETS

Participants suggested that electronic pull tickets should be permitted, in addition to current pull ticket availability. Participants also requested more innovation in the distribution of pull tickets.

\$1,000 PRIZE ALLOWANCE

Several participants indicated that all charitable organizations should have the opportunity to sell winning tickets valued at more than \$1,000, regardless of how many days per week they are selling tickets.

PULL TICKET MACHINES IN BARS/LOUNGES

There was consensus that pull ticket sales should not be permitted within licensed facilities, such as bars and lounges. Participants are concerned that it would negatively impact charitable gaming funds.

“Innovation and sound business concepts with rational policies would significantly increase proceeds to our charities.”

– Working Group Participant

INNOVATION

Participants suggested researching global innovations regarding pull ticket distribution. Participants believe innovation and sound business concepts with rational policies will significantly increase proceeds to organizations.

Topic 9: AGLC Operations

Suggested changes to AGLC operations

The main purpose of the charitable gaming review was to explore changes to the charitable gaming model. However, participants also shared suggestions for improvement to AGLC processes, procedures, and operations.



EDUCATION AND AWARENESS

EDUCATION FROM AGLC TO STAKEHOLDERS

Participants noted that many people do not understand Alberta's charitable gaming model and how revenue is distributed. Some volunteers also experience difficulties in interpreting AGLC charitable gaming policies. To support learning for new charitable organizations, participants suggested that experienced charitable organizations could provide mentorship to new organizations. In addition, many participants suggested that AGLC could provide:

- raffle-specific training for new volunteers
- sample templates or real-world examples of raffle rules that apply to common types of raffles
- examples showing how to conduct different types of raffles to ensure charitable organizations conduct them appropriately

AGLC currently offers the Gaming Information for Charitable Groups (GAIN) program to help organizations better understand charitable gaming policies. Some participants proposed mandatory GAIN training for all administrators from charitable organizations. AGLC could ensure an executive member from each organization has completed GAIN online training within a reasonable timeframe, and as updates emerge. Annual updates could also be provided. This would promote consistent knowledge across charitable organizations.

AGLC also offers Charity Link, an email newsletter that provides up-to-date information on charitable gaming in Alberta. Additionally, gaming bulletins are shared with stakeholders to highlight important changes to policy and provide AGLC staff contact information should the stakeholder have any questions.

AGLC STAFF EDUCATION/AWARENESS

There was consensus among participants that some AGLC staff would benefit from a better understanding of policies, procedures, and reporting required of charitable organizations. Some participants also suggested that not all AGLC staff interpret policies, procedures, and reports in the same way, which makes it difficult for charities.

Charitable organizations believe some AGLC staff would benefit from learning more about the differences among non-profit organizations, non-profit societies, and CRA charitable organizations in Alberta.



“AGLC treats all non-profit organizations, non-profit societies, and charities as a homogenous group; they are not.”

– Working Group Participant

Simplify

SIMPLIFY AGLC REPORTING

- Many participants noted that reporting should be simplified by requiring charitable organizations to submit detailed receipts only in the case of an audit, rather than through regular financial reports or to provide receipts only upon request, rather than with every report.
- Others participants proposed that charitable organizations report how gaming proceeds were spent, instead of submitting a budget for approval and seeking permission from AGLC on amendments to that budget. Participants requested simplified forms and online reporting.
- Participants noted that changes to financial reporting would reduce the administrative burden on charitable organizations and enable them to focus time and resources on program delivery.
- One participant group suggested volunteers could be removed from the reporting process when paid staff are available to complete the reports.
- Some participants suggested certain organizations be eligible for less complex reporting, such as smaller organizations, licensed non-profit organizations, or those in “good standing”. Other participants suggested that new licensees be required to provide AGLC with more detailed reporting during their first few years of conducting gaming events.
- Some participants proposed that AGLC separate raffles and casinos on annual financial reports. Others proposed that AGLC provide a financial checklist and provide email/text notifications to alert charitable organizations upcoming due dates.

LICENSING

- Participants suggested a continuous application process for gaming licences would be beneficial, with organizations not required to re-apply for a gaming licence. The organization would notify AGLC when the licence should be closed.
- One participant suggested AGLC change its licensing application so that organizations apply separately for a casino, raffle, bingo, or pull ticket licence.
 - Clarification: AGLC currently offers only separate licence applications for each gaming streams.
- Casino operators noted that charitable organizations currently receive equal funding for casino events regardless of the cause of the organization. They recommended that casino licensing should take into account the cause, size, and number of members in the organization.

AGLC EXECUTIVE AND BOARD

- Several participants recommended AGLC strive for better diversity in its Board, leadership and staff, and embrace new and diverse thinking.
- Participants suggested the AGLC Board include a fair representation of rural and small charitable organizations. Others noted that Board members be volunteers, not paid.

AUDIT

- Casino advisors recommended AGLC hire an independent auditor to complete audits on behalf of AGLC.
- Participants recommended AGLC capitalize on existing audit processes.
- One participant noted that charitable organizations should not be required to repay funds to their gaming accounts that are deemed unapproved use of proceeds following an audit.



APPEALS

- Participants proposed that the current process of appeal to AGLC's Vice President, Regulatory Services, be replaced with three members of the charitable sector to adjudicate the appeal of use of proceeds.
- Further, participants highlighted that all processes should have an appeal process.
 - Clarification: A licensee, registrant, or applicant may apply to AGLC's Board for a hearing if:
 - a licensee has allegedly contravened the *Gaming, Liquor and Cannabis Act*, the *Gaming, Liquor and Cannabis Regulation*, or AGLC policies resulting in an administrative sanction (i.e., warning, fine, suspension, cancellation);
 - a condition was imposed on a gaming, liquor, or cannabis licence or registration;
 - the applicant was refused a gaming, liquor, or cannabis licence or registration; or
 - a person's liquor, cannabis, containers, gaming terminals, gaming supplies have been seized.

Topic 10: Funding Ecosystem

A Coordinated Funding System

Charitable organizations that earn proceeds through the conduct of licensed charitable gaming events may be viewed as part of a larger system that may also include federal, provincial, and municipal funding. Participants requested more consistency across funding bodies and better coordination among different organizations to reduce red tape and support community organizations to be successful.



FUNDING COORDINATION

Participants requested coordination of federal, provincial, and municipal funding to ensure adequate support for organizations serving Albertans. There are concerns that these disconnects could result in a shortfall in necessary core funding. While organizations requested coordination among revenue sources, they believe that gaming proceeds should not be default funding for organizations serving the needs of communities such as poverty, addiction, mental health, and domestic violence. These needs should be funded through government, not gaming proceeds.

The closures of gaming facilities during the Covid-19 pandemic has intensified this issue even further. The charitable sector experienced a substantial reduction in funding through gaming, which has been a secure source of funding they could depend on to support their charitable program delivery.

One of the working groups suggested AGLC take a series of recommendations from this process to advocate for changes to federal law.

“Non-profits and charities are an asset to government and are worth significant investment.” – Working Group Participant

PLAY ALBERTA

Online gaming, such as Play Alberta, was identified as an out-of-scope topic. However, many participants suggested that some of the revenue generated through Play Alberta be designated to charitable organizations. They noted that Play Alberta generated revenue during the pandemic while casinos were closed. There is concern that Play Alberta will result in a reduction of players from casinos, which would reduce casino revenue for the charitable sector.

Topic 11: CGR Feedback

Recommendations regarding the Charitable Gaming Review



INCLUDE CHARITABLE SECTOR

Participants indicated they would appreciate being involved in a collaborative approach to improving the current gaming model beyond the current review process. Many participants indicated a desire to continue to work toward solutions that impact their sector. The following suggestions were provided for further work:

- A sector peer review on the eligibility process
- Create a mechanism to gather ongoing, meaningful input from charitable organizations
- Create third party, non-biased appeal board/ombudsman
- Create a focus group to audit internal processes and consistencies

“Don’t do anything for us without us.”

– Working Group Participant

Participants indicated that involving the charitable sector in additional open and honest conversations about the charitable gaming model is an opportunity for AGLC. This will ensure the sector is in a position to understand the consequences of any changes made to the model.

Participants asked that AGLC evaluate its role as a regulator and move to a more supporting and facilitating role.

WHEN TO IMPLEMENT CHANGES

There was consensus among participants that it is time to update the charitable gaming model. There were, however, differing ideas on when to implement changes. Some participants indicated that any significant changes to eligibility criteria for casino revenues and wait times for casinos should be made following the pandemic.

Other participants wanted to implement ideas as soon as possible to prioritize recommendations that had consensus. Others suggested phasing in changes over time so as not to overwhelm organizations with mass changes, especially as they are recovering from the Covid-19 pandemic.

DO SOMETHING AND REPORT BACK

Over the last several years, charitable organizations have shared concerns regarding the lack of action from the 2010 MLA Advisory Committee on the Distribution of Proceeds from Licensed Casino Events. Participants in the charitable gaming review expressed skepticism that little or no change would also result from this review.

Next Steps

Next steps in the charitable gaming review include further data analysis and modelling based on feedback gathered from the 2019 survey, working group sessions, and focus groups. All data collected will help to inform recommendations.

The review team is committed to transparency by keeping stakeholders updated on the outcomes of this engagement. After AGLC's Board has reviewed the recommendations, they will be shared publicly in the Final Report for the charitable gaming review. This report will include an overview of this engagement and the recommendations that followed.

FOR MORE INFORMATION, CONTACT:

Nicole Witwicki, AGLC

Email: Nicole.Witwicki@aglc.ca

Phone Number: 780-668-6999

Glossary

The following definitions appear in AGLC's Charitable Gaming Policies Handbook (CGPH) and are intended to provide context regarding current definitions of charitable gaming-related terminology.

"Active delivery of a program or service" means the volunteer membership of the applicant or a licensed group establish, maintain control of and deliver the group's regular/ongoing program(s) and services to the community.

"Broad based membership" means:

- a) membership is open to the general public;
- b) membership does not depend on an individual's relationship with a particular individual or individuals;
- c) membership is representative of the larger community; and
- d) membership is not restricted by gender, ethnic, racial or cultural background, age, ability, religion, income, or sexual orientation, wherever possible.

"Charitable community benefit" means a benefit delivered to the community or a significant segment of the community in one of the areas recognized as charitable by AGLC.

"Charitable gaming" means bingo, casino table games, raffles, and pull ticket sales conducted by eligible groups that have been licensed by AGLC.

"Charitable group" means a non-profit group determined by AGLC to meet licensing eligibility requirements. AGLC is not bound by the definition of "charity" used by other authorities or jurisdictions.

"Charitable or religious purpose" means a purpose that is recognized as charitable by AGLC and includes the following:

- a) relief of poverty;
- b) advancement of education;
- c) advancement of religion; and
- d) other purposes beneficial to the community.

"Community" for the purpose of determining an eligible **"community benefit"** means a community of persons within a geographic location or a community of persons who share a common interest, for example in the arts, culture, or sports.

"Licence" means a licence issued by AGLC to a charitable or religious group or the board of a fair or exhibition authorizing the group or board to conduct one or more gaming events.

"Licensee" means the charitable or religious group or the board of a fair or exhibition holding a valid licence issued by AGLC.

"Operating costs" means expenses related to the operation of a facility and any expenditure on assets whose value is used up within the same year. Operating costs include, but are not limited to:

- a) utilities;
- b) purchase of fixtures and furnishings;
- c) insurance;

- d) property taxes;
- e) janitorial costs and supplies; and
- f) repairs and maintenance.

“Proceeds” means the gross gaming revenue less gaming prizes and expenses, and the commission paid to charities at whose licensed gaming events AGLC conducts provincial lotteries. It also includes all interest, dividends or other income earned on gaming proceeds deposited in interest accounts or held, with AGLC approval, in deposit certificates or investments made by a trustee.

“Significant segment of the community” means:

- a) programs and services are reasonably available to all members of the general public who qualify and wish to participate;
- b) the beneficiaries are not numerically insignificant relative to the community to which the programs and services are provided; and
- c) membership or participation does not depend on a personal relationship to any particular individual or individuals.