

March.25.2025



Raffle Terms & Conditions

Review

What We Heard

POLICY AND PUBLIC AFFAIRS

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Acknowledgement

Thank you for your participation!

Alberta Gaming, Liquor and Cannabis (AGLC) would like to thank all those who participated in the raffle survey. We were fortunate to receive feedback from a diverse group, including representatives of licensed charities and raffle ticket managers who conduct a variety of raffle events.

Through this process, AGLC has deepened its understanding of the benefits and challenges experienced by those that are involved in organizing raffle events in the province.

Thank you for your time,

Kandice Machado
Chief Executive Officer (CEO), AGLC



Background

Raffle Terms & Conditions Handbook Review

AGLC is committed to regular reviews of policy handbooks to ensure the policy content is updated and refreshed to reflect AGLC's current regulatory environment.

Purpose

As part of the Raffle Terms & Conditions (RTC) Review, AGLC identified the need for an external consultation to capture the sentiments and concerns of a wide-ranging group of raffle stakeholders, including licensed charities and raffle ticket managers on the proposed amendments to raffle policies.

This external consultation aligns with AGLC's guiding principle of maintaining integrity by:

- supporting the integrity of licensees' and registrants' operations and activities;
- promoting fair, reliable and stable practices; and
- protecting revenues generated and ensuring oversight, transparency and appropriate use.

This report provides an analysis of the perspectives and opinions of those taking part in the Raffle Terms & Conditions handbook consultation.

The findings highlight the need for careful consideration and clear regulatory guidelines to address the concerns and opportunities presented by this proposed policy shift, while ensuring a fair and competitive market.

Methodology

Engagement Survey

On October 9, 2024, AGLC invited licensed charities and raffle ticket managers to participate in an online survey. Through the survey, AGLC sought to understand the perspectives of various groups on the proposed changes to the RTC. The survey outlined significant changes and requested participants to rate their level of support for each change. Respondents were also offered the opportunity to provide written feedback for each of the amended policy sections, and for the changes overall.

The survey remained open until November 8, 2024.

Response Rates

The survey was sent to 132 recipients. Fifty-four responses were received, including 19 charity executive members (35 per cent), 18 charity staff members (33 per cent) and 17 raffle ticket managers (31 per cent).

Of the 54 recipients, 39 per cent conduct raffle events with total ticket value less than \$20,000. Fifty-six per cent conduct raffle events with total ticket value more than \$20,000, 22 per cent conduct raffle events with total ticket value more than \$100,000, and 26 per cent conduct raffles with a full range of total ticket values.

41 per cent

OVERALL RESPONSE RATE

54 of 132 recipients submitted responses.

Feedback from participants exhibited a range of viewpoints explained below in the “survey results”.

Data Limitations

Based on the response rates, the results of this survey may equally reflect the perspective of charity executive members, charity staff members and raffle ticket managers as there were similar number of respondents from each of the three categories.

The results may reflect the perspective of groups that conduct raffle events with total ticket value more than \$20,000 to a greater degree than those that conduct raffle events with total ticket value more than \$100,000.

It is assumed respondents’ feedback embodies the views of the charities they represent. Further, AGLC is unable to determine the opinion of those that chose not to complete the survey.

Scope

The following information was considered in-scope and out-of-scope for the RTC review:

In-Scope:

- Feedback on the policy amendments that AGLC proposes as part of this review.
 - Other suggested amendments brought forward by stakeholders may be considered as part of a future handbook review.

Out-of-Scope:

- Alberta's Charitable Gaming Model:
 - eligibility for a raffle licence; and
 - use of gaming proceeds.
- Amendments to the Criminal Code (Canada), the *Gaming, Liquor and Cannabis Act* (GLCA), or the Gaming, Liquor and Cannabis Regulation (GLCR).

Next Steps

HOW AGLC WILL ADDRESS ADDITIONAL FEEDBACK

Feedback from respondents that was not related to the proposed policy amendments is not included in this What We Heard report.

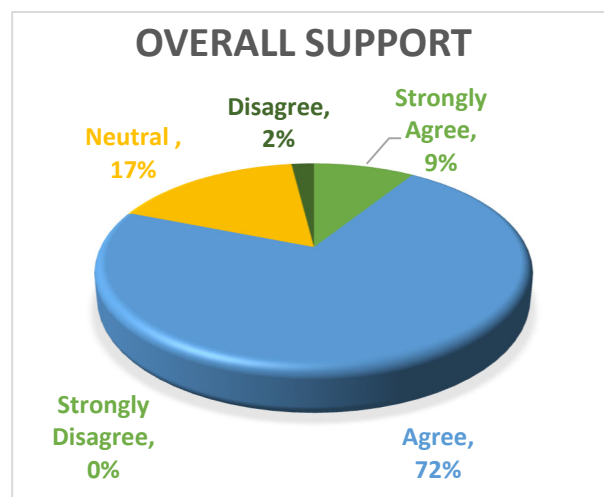
AGLC regularly reviews its handbooks and will explore additional feedback during a future review of the RTC. This will ensure AGLC is able to properly consider the proposed changes, consult with internal and external stakeholders prior to implementation and confirm policy amendments reflect the needs of raffle stakeholders.

Survey Results:

Overall Support

Overall, survey respondents agreed with the proposed policy changes:

- Over 80 per cent of respondents agree or strongly agree to the proposed policy changes overall.
- Some of the comments included:
 - “I have always felt that the AGLC does an excellent job assisting if there is confusion through the process, these proposed adjustments seem to be positive in regard to administration on the club/charity side.”
 - “These policy revisions sound reasonable and simplify processes.”



Section 2

Proposed Changes

- The prize list, including prize description and value, would be included as a requirement for raffle rules. If the prize list is deemed too extensive to be included in the raffle rules, a website link may be provided.
 - Results: 7.4% strongly agreed, 57.4% agreed, 16.7% neutral, 11.1% disagreed, 7.4% strongly disagreed
- The method in which tickets can be purchased (e.g., online, raffle sales unit (or combination of both), in person etc.) would be included as a requirement for raffle rules.
 - Results: 11.1% strongly agreed, 55.6% agreed, 31.5% neutral, 0% disagreed, 1.9% strongly disagreed
- For electronically issued bearer tickets with a manual draw method, the ticket and ticket stub would be required to include the ticket number, issued date and time and the RSU identifier from which the ticket was generated.
 - Results: 7.4% strongly agreed, 33.3% agreed, 53.7% neutral, 3.7% disagreed, 1.9% strongly disagreed
- Licensed charities would have the option to offer single tickets instead of being required to offer them and would still have the option to contact AGLC and request an amendment to the ticket offering after it has been set.

- Results: 27.8% strongly agreed, 44.4% agreed, 20.4% neutral, 5.6% disagreed, 1.9% strongly disagreed
- A draft copy of each ticket type (e.g., regular or discount prices) would need to be provided to AGLC for raffles with a total ticket value more than \$20,000.
 - Results: 9.3% strongly agreed, 48.1% agreed, 20.4% neutral, 14.8% disagreed, 7.4% strongly disagreed
- A progressive raffle licence would be issued for a single progressive raffle event, or a series of events up to a 24 month period. A progressive event is concluded when 100 per cent of the progressive prize is won.
 - Results: 11.1% strongly agreed, 42.6% agreed, 44.4% neutral, 0% disagreed, 1.9% strongly disagreed
- For raffles using an electronic raffle system (ERS), a financial control plan would need to be submitted with the raffle application, specifying: procedures for the purchase and distribution of tickets and secure receipt and deposit of revenues; frequency of revenue deposits; draw method (a computer would be used to select the winner (RNG) or manual draw);
 - Results: 5.6% strongly agreed, 37% agreed, 38.9% neutral, 9.3% disagreed, 9.3% strongly disagreed

Section 3

Proposed Changes

- The requirement to have a record or control system that includes the number of sellers expected to work each event for a charity using an electronic raffle system (ERS) would be removed.
 - Results: 26% strongly agreed, 50% agreed, 20% neutral, 4% disagreed, 0% strongly disagreed

Section 4

Proposed Changes

- Current subsections would be combined to create a new consolidated “Registration” section, which provides general information and registration requirements for all gaming suppliers, gaming worker suppliers and raffle workers. The current policy requirements and intent would not be altered.
 - Results: 11.1% strongly agreed, 50% agreed, 38.9% neutral, 0% disagreed, 0% strongly disagreed
- Electronic raffle system (ERS) administrator requirements for granting ERS access privileges would be simplified. The ERS administrator(s) must ensure that ERS access privileges are assigned to each individual user, based on the requirements needed to perform their specific position duties, and immediately revoked for individuals that no longer require, or no longer are authorized to have access.

- Results: 13% strongly agreed, 57.4% agreed, 27.8% neutral, 1.9% disagreed, 0% strongly disagreed
- The requirement to submit a draft copy of the raffle management contract with the raffle application would be removed. If required, AGLC may request a copy.
 - Results: 24.1% strongly agreed, 46.3% agreed, 27.8% neutral, 1.9% disagreed, 0% strongly disagreed

Section 6

Proposed Changes

- Current policy would be clarified to state that if a draw occurs and it is determined that not all ticket stubs were placed into the draw, the charity must notify AGLC immediately and submit a Discrepancy Report within three days. The example explaining how the situation is normally resolved will be removed and AGLC will provide this guidance separately based on the circumstances of the situation.
 - Results: 14.8% strongly agreed, 70.4% agreed, 13% neutral, 1.9% disagreed, 0% strongly disagreed
- Current policy would be clarified to state that if a draw occurs and it is determined that more than one eligible ticket with the same number was placed in the draw, the charity must notify AGLC immediately and submit a Discrepancy Report within three days. The example explaining how the situation is normally resolved will be removed and AGLC will provide this guidance separately based on the circumstances of the situation.
 - Results: 16.7% strongly agreed, 70.4% agreed, 11.1% neutral, 1.9% disagreed, 0% strongly disagreed

Section 7

Proposed Changes

- The requirement to involve The Office of the Public Guardian and Trustee if there is a winner under the age of 18 years old would be removed. Should this situation occur, the ticket would be void and a redraw must be conducted.
 - Results: 11.1% strongly agreed, 72.2% agreed, 11.1% neutral, 3.7% disagreed, 1.9% strongly disagreed
- The requirement to provide online prize distribution procedures at the time of application would be removed.
 - Results: 14.8% strongly agreed, 70.4% agreed, 13% neutral, 1.9% disagreed, 0% strongly disagreed

Section 8

Proposed Changes

- Current policy would be clarified to state that licensed charities that conduct only small raffles (total ticket value (TTV) \$20,000 and less) do not require a designated gaming bank account. Gross raffle revenue must be deposited into a non-gaming account for the payment of prizes and expenses, and the remaining raffle proceeds must be spent on charitable purposes.
 - Results: 25.9% strongly agreed, 44.4% agreed, 24.1% neutral, 3.7% disagreed, 1.9% strongly disagreed
- Current policy would be clarified to state that licensed charities that conduct small raffles (TTV \$20,000 and less) in addition to other types of charitable gaming (e.g., bingo or casino) must conduct raffle revenue, cost of prizes and approved raffle expenses through a separate non-gaming account. After the last draw date and once all of the raffle transactions have cleared the bank account, the raffle proceeds must be deposited into an existing gaming bank account and must be spent on approved use of proceeds.
 - Results: 9.3% strongly agreed, 51.9% agreed, 27.8% neutral, 9.3% disagreed, 1.9% strongly disagreed
- Current policy would be clarified to state that for raffles with a TTV more than \$20,000, raffle revenue, cost of prizes and approved raffle expenses must be conducted through a designated gaming account; separate gaming accounts are required for each raffle more than \$20,000. Once the raffle transactions have cleared the bank, the raffle proceeds may be transferred to another gaming bank account and must be spent on approved use of proceeds.
 - Results: 13% strongly agreed, 55.6% agreed, 20.4% neutral, 5.6% disagreed, 5.6% strongly disagreed

Section 10

Proposed Changes

- Licensed charities would have the option to hire a third-party individual instead of a professional accountant to prepare the financial reports. This will align with the Charitable Gaming Policies Handbook (CGPH).
 - Results: 20.4% strongly agreed, 51.9% agreed, 24.1% neutral, 3.7% disagreed, 0% strongly disagreed
- Prize vehicle transportation logs, payroll records and all business and financial records of any entity would be removed from the list of raffle records that must be kept for two years.
 - Results: 18.5% strongly agreed, 48.1% agreed, 29.6% neutral, 3.7% disagreed, 0% strongly disagreed

Feedback and Clarification

Survey respondents brought attention to the following items and AGLC is pleased to provide additional clarification:

- Two respondents expressed concern over having to include an itemized prize list, including description and value of each prize, as part of their raffle rules. One respondent noted this may be cumbersome for smaller raffles, while another mentioned the list is obtainable from the licensee's website and that adding the list to raffle rules would just make them longer and less readable than they already are.
 - Clarification: It is noted in policy that if the prize list is extensive, the raffle rules may reference where the prize list may be located online.
- One respondent recommended that draft tickets should be limited to ticket type, not ticket tier (e.g. a draft should not have to be submitted for each price point, but instead one sample for all discounted ticket types, and one for all standard ticket types).
 - Clarification: Policy states that a draft copy of each ticket type (e.g., regular or discount prices), not tier, must be provided.
- One respondent indicated that while a licensed charitable organization may convert tickets from one price category to another price category, the process of having to do so can create undue administrative burden on the licensed organization. Instead, just a total ticket value (TTV) should be required with the discretion of price point distribution left with the charities.
 - Clarification: The raffle licensing department confirms the TTV calculation by using the number of tickets that will be sold and at what price point, so it is necessary information for the charity to provide to AGLC.
- One respondent felt that because many charities are operated solely by volunteers, offering their time when available and not necessarily according to a schedule, it would be difficult to know the frequency of revenue deposits as part of the financial control plan for ERS operated raffles.
 - Clarification: While the frequency of deposits may not be predicted exactly, it is important to provide the anticipated frequency of deposits to ensure the security of gaming funds and that they are deposited in a timely manner.
- One respondent disagreed with removing the requirement to involve The Office of the Public Guardian and Trustee if there is a winner under the age of 18 years old. They noted it may be difficult to determine if the winner is a minor and complete a re-draw depending how much time has passed. They suggested to either leave the current requirement in place or change it to read that the prize be administered by the adult guardian.

- Clarification: It has been confirmed with legal counsel that the requirement to involve The Office of the Public Guardian and Trustee if there is a winner under the age of 18 years old is not necessary. Charities are responsible for having measures in place to confirm the age of the selected winner before distributing the prize so that in the event a selected winner is under the age of 18 years old, the ticket is voided, and a new winner is selected.
- Respondents expressed uncertainty over the clarified policy regarding bank statements. It was noted that having multiple gaming accounts, one for each raffle over \$20,000 can be confusing, onerous and expensive. It was suggested to amend the policy to require separate bank accounts only for raffles over \$100,000. Another respondent suggested that the transactions for small raffles should be conducted through a gaming account from start to finish, versus transferring only the proceeds to a gaming account once all the raffle transactions have cleared the bank account.
 - Clarification: The policy regarding gaming bank accounts and raffle events has not changed – the updated wording seeks to clarify procedures already in place. The licensing process requires a unique bank account for each raffle; however, this concern can be considered as part of a future policy and process review.
 - Clarification: Rather than closing gaming bank accounts, they may be re-used for future raffles, once the event transactions are completed within a group’s financial reporting period. The bank account can then be re-used in the next reporting period.
- Respondents expressed concern regarding the decision to remove payroll and financial records of entities that receive gaming proceeds from the licensed charity from the list of records that must be kept for two years.
 - Clarification: Payroll and financial records of the licensed charity are still required to be kept for two years. The item being removed from the list of records to be kept is the requirement to keep payroll and financial records from any entity that receives any of the licensed charity’s gaming proceeds either directly, indirectly or through a series of transactions.
- Respondents expressed concern with allowing charities the option to hire a third-party individual to prepare gaming financial reports. It was suggested that larger charitable organizations should be required to hire a professional accountant instead of having the option to hire a third-party individual.
 - Clarification: this amendment aligns with the Charitable Gaming Policies Handbook (CGPH) the charity still has the option to decide whether hiring a third-party or a professional accountant is more beneficial for their organization.
- One respondent expressed concern that cancelling subscription offerings at the conclusion of each raffle licence presents challenges for charities and buyers. They suggested that when a licence ends, the subscription should not end, but instead pause until the next licence is approved at which point the subscription would resume with a notification to the buyers notifying them of the same (with the option to opt-out before the charge is incurred). It was suggested that an opt-out model for subscriptions where players would be able to opt-out at any time if they wish to cancel would reduce administrative burden and allow for continuity without inconveniencing subscribers unnecessarily.

- Solution: Policy has been amended to allow subscriptions to carry over into a new licence period, provided a notification is sent to the buyer advising of the new raffle licence number and licensing period, confirmation of ticket pricing and any additional information outlining any changes from the previous raffle licence. The notification must also offer the opportunity to discontinue/opt out of continued participation and provide a mechanism for the buyer to change their ticket preferences (e.g., add, reduce or change ticket selections, such as change from a discount ticket package to a single ticket purchase).