



*Policies and Standards for Charities
Policy Changes – April 2018*

INTRODUCTION

The following changes to the Policies and Standards for Charities (cGaming) are effective April 30, 2018. Some changes will require transition time for groups (e.g. Dress code policy) and CGCA's shall communicate this transition time along with this document and a copy of the new policies. OCGA can assist CGCA's in determining appropriate timing if needed.

These policy changes are a result of several factors. These include feedback from Charity Coordinators, CGCA Boards and member charities. As well, provincial direction on Human Rights and AODA have been embedded in the policies.

Changes have been made with the best interests of the entire industry (currently 31 locations with approximately 1900 charitable groups) in mind. Member groups should contact their Charity Coordinator with any questions related to these changes. CGCAs may contact OCGA if they need additional information.

B.3 CONFLICT OF INTEREST

New Policy – Providing CGCA's the ability to react and address bona fide members that are being disruptive to customers, staff or other volunteers in the gaming centre.

- f) Bona Fide members that are being disruptive, abusive or are being an immediate detriment to the success of the gaming centre may be asked to leave immediately. In severe cases, the CGCA may remove the volunteer from the bona fide member list of an organization indefinitely.

B.5 BONA FIDE MEMBERS

Clarification of Existing Policy – Additional wording to enhance consistency in customer service concerns and manage CGCA training resources.

- b) Each Charitable organization must provide and maintain a list of trained bona fide members who are oriented to all policies and standards in advance of carrying out scheduled assignments. This list must include the name of charitable organizations with the names of their trained bona fide members and the respective training dates. To keep numbers manageable and to properly facilitate training and customer service standards, the number of volunteers each charitable organization may utilize during a six-month period must be no greater than twenty volunteers. The dates of this six-month period shall be established and communicated in advance by the CGCA.

To ensure good customer service, ongoing turnover of volunteers (e.g. where each parent of a sports association does one assignment annually) should be avoided. A core group of trained, experienced, and dedicated volunteers is recommended.

B.6 DRESS CODE

Modification of Existing Policy – Removing the option of a white collared shirt as a permanent option for bona fide members unless charity name tags have name and clearly visible logo on them. Charity logoed clothing has proven to be the best in-centre awareness initiative. Reformatted dress code standard into a table to make it easier to understand.

a) The dress code requirements, at a minimum, are noted in the following table:

Dress Item	Required	Not Permitted
Pants	Conservative, dark pants or skirts	Denim jeans, track pants, stretch pants, shorts, capris pants
Shirt	Collared shirt with charity logo (same colour for all volunteers preferred); or vest with charity logo and collared shirt underneath (all same colour preferred)	Tank tops, t-shirts, sleeveless shirts, scarves, sweaters, jackets, or anything that covers up the charity shirt or logo
Nametag	First name of volunteer. Acceptable nametags include embroidery on shirt, pin, lanyard, or sticker. If nametag also has a <u>highly visible</u> charity name / logo it is recognized as a logoed shirt	
Hat	Only if specifically related to the charity identification (e.g., Shriner's Fez, Boy Scouts) or related to health reasons (e.g. cancer treatments)	Any other hat. Baseball caps specifically are not permitted as they distract from a professional look
Footwear	Footwear must be tasteful and appropriate to the role of the volunteer. CGCA's must clearly define any restrictions on footwear in advance. Safety should be considered.	Flip-Flops/beach footwear/Crocs or similar footwear

- b) CGCA's have the flexibility to add additional dress code requirements (in consultation with OCGA) providing these minimum requirements are maintained.
- c) CGCA's shall provide a new volunteer 45 days after they have undergone the mandatory CGCA training to be in logoed dress code. The new volunteer must wear a white collared shirt with a name tag until the logoed material is received.

B.9 AODA

Modification of Existing Policy – Updated wording to reflect the requirements for AODA training and to ensure CGCA’s are in compliance with the act to protect their association and membership. Removal of standard where volunteers assist staff in displaying responsible gaming information as this is no longer a role of the bona fide volunteer.

Ontario Lottery and Gaming is committed to fostering a fully accessible and responsible gaming environment and strives to provide the best possible gaming entertainment in the most socially responsible and respectful manner. Information regarding OLG’s Responsible Gaming program is embedded in the training for volunteers and is the responsibility of the gaming centre staff.

Knowledge about Responsible Gaming, Human Rights and the Accessibility for Ontarians with Disabilities Act (AODA) will empower volunteers to recognize and respond to customers’ individual needs.

Volunteers must sign off on the Human Rights and AODA training material provided prior to participating in their roles and responsibilities at a Charitable Gaming Centre.

- a) Volunteers are expected to assist as required, with the identification of anyone who appears to be under 25 years of age or intoxicated as per OLG policy. Legal age to enter is 18 years of age – in some locations with liquor licenses – 19 years.
- b) Volunteers must acknowledge that they have read and understand the AODA/Human Rights Customer Service training materials provided by OCGA and sign off in the compliance log book that they understand their responsibilities under AODA and Human and Rights prior to participating at the Gaming Centre.
- c) Be knowledgeable about responsible gambling and the Play Smart program.

B.11 RECEIVING OF SHARES

Modification of Existing Policy – Updated policy to expand definition and repercussions of late volunteers, additional clarity on Roles and Responsibilities, and an initial warning on dress code infractions.

- c) Financial repercussions for non-compliance include:
 - Dress code – ¼ share per occurrence
 - One trained volunteer attending – ½ share per occurrence
 - No trained volunteers attending – 1 full share
 - Trained volunteer arriving late or leaving early – up to ½ share per volunteer based on portion of assignment missed
 - Roles and Responsibilities or non-compliance with Policies and Standards not listed in B.11.c – ¼ share per occurrence

Any penalty less than ¼ share for volunteer arriving late or leaving early must be approved in advance by OCGA.

- d) CGCA's may issue a warning without financial penalty or escalation for a charitable organization's first non-compliance of dress code. The financial repercussion and escalation policy is intended to address consistent issues with an organization.

New Policy – Added to address scheduling changes with advance notice to ensure that the Charity Coordinator has sufficient time to manage the change and to put the onus on the organization to fill their obligations.

- f) A charitable group that contacts the CGCA/Charity Coordinator at least 5 business days in advance to notify that they cannot attend a scheduled assignment will not be assessed a compliance escalation penalty. Any group that provides less than 5 days' notice is subject to escalation.

B.12 BANKING REQUIREMENTS

Modification of Existing Policy – Removal of unneeded dual authorization requirement to send electronic funds transfers as charities must be able to receive EFT funds, not send them.

- a.iii) Assignment shares from OLG will be transferred by the CGCA via electronic funds transfer so the Permittee must ensure that its account has the capability of receiving EFT payments.

New Policy – Clarification on existing AGCO policy. Adding to cGaming policies for consistency.

- a.v) Organizations are not permitted to transfer funds from the designated business account into another account. All approved expenses (as per the Permit) must be paid directly from the designated business account unless specifically permitted by the Municipality.

New Policy – Process for dealing with any remaining cGaming funds that can't be used for approved use of proceeds by an organization.

- a.vi) If an organization is unable to use their cGaming proceeds for approved uses in the community, the Municipality shall direct the funds be returned to the CGCA for distribution on a pro rata basis to its current membership (e.g. Organization dissolution, change of objects and purposes)

Modification of Existing Policy – Significantly increased flexibility for groups in methods of payment for approved use of proceeds.

c) Credit / Debit Cards

- a. The Permittee may use credit cards (personal or in the name of the organization), personal debit cards, or PayPal to pay for approved expenses subject to the following conditions:
 - i. Supporting detailed receipts/invoices must be submitted with the monthly Report to Municipality; Payment confirmations will not suffice.
 - ii. Payment to the account or reimbursement to an individual must be paid separately from the designated business account using online banking or by a cheque and match the total amount of the eligible receipts during the period. Fees or interest charges may not be paid from this account.

- iii. Organizations can use VISA Debit cards which can be 'loaded' with smaller amounts, which act similar to cash, as an option to reduce liability and risk

d) Online Banking

- a. The Permittee may use online banking with their designated business account to pay for approved expenses subject to the following conditions:
 - i. Charities must submit a print out of the transaction from the source (bank website) as a part of their report to the municipality and keep supporting receipts/invoices for review should the municipality request them;
 - ii. Online banking can be used for approved use of proceeds expenses only and only to the bank's preauthorized payees (e.g. Hydro One, Bell, VISA, etc.)
 - iii. All transactions must be approved by two designated signing authorities on the account.

B.13 REPORTING

Modification of Existing Policy – Added clarity on accounting method used in monthly reporting to municipality.

- a) The Permittee must provide the permitting authority with a use of proceeds report (Appendix C) signed and verified by the designated signing authorities on all expenses paid from the proceeds derived from charitable gaming. The report must be filed within 30 days of the end of the previous month (e.g. March bank statement and use of proceeds report must be submitted by end of April 30th) in order for the municipality sufficient time to meet their 60-day reporting deadline to OLG. Reporting is *Cash-Basis* method and *not Accrual*.

New Policy – Added additional flexibility on reporting, allowing groups to scan and email monthly reports to the municipality. The municipality has the discretion to request originals as needed.

- b) The municipality has the option to accept emails of scanned signed monthly reports with the following conditions:
 - An attestation report with two original signatures must be submitted with the organization's permit application to approve the electronic reporting method
 - The originals must be kept on file by the organization and be made available upon request.
 - The Municipality can exercise the option to request either format (emails or originals) from any participating organization at any time.

B.14 PARTICIPATION REQUIREMENTS

New Policy – Policy created to increased participation and engagement of charity groups both in the centre and in the community. As these groups are stakeholders and receive a share of the net revenue, promotion of cGaming increases awareness and revenues for all the groups in the CGCA both short term and long term.

Charitable Organizations benefit directly from the growth in revenues and player base at the Charitable Gaming Centres. As partner, Charitable Organizations are required to promote the centre and participate in initiatives developed by the CGCA to the best of their ability. In order to foster growth and support the centre and the CGCA Charitable Organizations, some participation is required.

Charitable Organizations must, at minimum complete *two* of the following participation requirements during a twelve-month period (established by the CGCA) Failure to comply within prescribed timeframes will result in financial and escalation policies outlined in B.11 and C.11 of the Policies and Standards and may result in removal from CGCA membership.

- *Plan / participate in a charity event at the centre*
- *Host an off-site cheque presentation with the CGCA (their AGM, event, etc.)*
- *Attend or host a photo-op / chq presentation / media event at the centre*
- *Reference the centre in Media Articles (Newspaper, Local News, etc.)*
- *Tag the centre on Social Media posts*
- *Promote the centre in publications (Newsletter)*
- *Gaming Centre logo / site recognition on the organization's website*
- *Gaming Centre logo on the organization's letterhead*
- *Gaming Centre logo on their materials (poster / brochure / program / etc.)*

C.2 MEMBERSHIP

New Policy – This policy was added for clarity of the pre-existing contractual role of OCGA for compliance and support. This is in the CGCA's OLG contract to ensure that the interests of the charities in a community are protected in extremely difficult situations. Situations where CGCAs are in significant breach of their OLG contract or regularly acting with conflicts of interest are some examples.

- g) If it is determined by both OCGA and OLG that a CGCA is in actual or alleged breach, or anticipated breach, of any of the OCGA and/or OLG requirements and are not acting in the best interests of the member charities, OLG reserves the right to direct OCGA to provide direct support and oversight of the CGCA and any staffing resources until a resolution is attained.

C.3 CONFLICT OF INTEREST

New Policy – Adding an additional standard under conflict of interest for clarity

- c) The CGCA board members shall declare a conflict of interest and abstain from any board discussions or decisions that directly impact a charitable organization that they represent including but not limited to scheduling, policy compliance, and volunteer issues.

C.4 CHARITY COORDINATOR

New Policy – Adding additional clarity on the relationship between the Charity Coordinator and the OCGA and contractual compliance requirements to the Policies and Standards. Existing standard (n) becomes two standards.

- n) Charity Coordinators have a critical dotted lined reporting relationship to the OCGA and are required to follow these Policies and Standards. Local policy may not conflict with provincial policies regardless of direction from the CGCA.
- o) The Charity Coordinators are expected to work with the OCGA to exchange information and share lessons learned and best practices and are expected to attend all scheduled provincial coordinator meetings.

C.6 – AODA

Modification of Existing Policy – Updated wording to reflect the requirements for AODA training and to ensure CGCA’s are in compliance with the act to protect their association and membership.

CGCA is responsible in ensuring that individual charitable organizations are knowledgeable about the OLG’s Responsible Gaming program and have received OCGA approved training on the Accessibility for Ontarians with Disabilities Act (AODA/Human Rights) and are committed to fostering a responsible gaming environment.

- a) All members of the CGCA Executive are required to be knowledgeable about the OLG’s Responsible Gaming program and the AODA.
- b) CGCA’s are required to provide OCGA approved AODA training material to all member charitable organizations and volunteers and keep a record (log book) with sign-off from each volunteer that participates at the Charitable Gaming Centre. The CGCA must provide access to the training material and log book to the CGCSP at all times.

C.8 SCHEDULING

Modification of Existing Policy – Updated Policy to reflect the intent and to provide direction on process

- c) The CGCA will develop a local policy regarding how charitable organizations are selected to fill additional timeslots. This policy must provide equal opportunity to all groups and is subject to approval by OCGA. Groups with ongoing compliance issues shall not be considered for additional assignments. This process must also be communicated to all charities, to the municipality and must also respect the conditions on the permits and municipal direction.

C.12 REPORTING AND RECORDS

New Policy – Policy to provide OCGA with information required to ensure compliance with both the CGCA and the OCGA contract with OLG

- h) The CGCA shall provide OCGA a copy of their annual financial statements upon request.

C.13 COMMUNICATIONS

New Policy – Added policy to address privacy concerns for individual organizations and avoid misinterpretation. In most cases funding amounts vary between groups due to Municipal direction. This also

ensures that information on groups that have had a reduction in shares or have compliance issues does not become public.

- e) The CGCA shall only share the annual schedule, financial distribution, and penalty information with the group to whom the information belongs. The summary reports of this information may not be distributed broadly across all groups. Charitable Organizations can exercise their right to see the transactions of the CGCA through an individual meeting with the board and /or Charity Coordinator.

APPENDIX A ADMINISTRATION ALLOWANCE

Modification of Existing Policy – Added clarification on the use of admin funds by the CGCA.

Administrative funds shall not be used for marketing and promotion purposes that would fall under the contractual responsibility of the CGCSP (Operator). E.g. Player acquisition, Product Marketing, Player appreciation, etc. Any requests for other purposes must receive prior approval from OCGA (e.g. Special Events)

Modification of Existing Policy – Adjusted calculation to related to actual fixed and variable costs incurred by CGCA's with slight adjustment to accommodate for increases in expenses.

CGCA's with up to 40 member charitable organizations

- Administrative allowance includes all expenses related to the CGCA.
- **Maximum:** Base of \$47,000 + (number of member charities X \$270)
- With a lower number of charities to support the Charity Coordinator shall be part-time.

CGCA's with more than 40 member charitable organizations

- Administrative allowance includes all expenses related to the CGCA.
- **Maximum:** Base of \$72,000 + (number of member charities X \$270) to a maximum of \$99,000
- With a higher number of charities to support there likely will be a need for a full-time Charity Coordinator.

CGCA's in remote locations (as determined by OCGA)

- Additional \$2,500 travel allowance

Administrative allowance has been determined based on experience from the sites in operation.

- The base amounts include consideration for \$9000 in travel costs associated with attending all of the following: quarterly Charity Coordinator meetings, OCGA AGM/Fall Conference, and the Canadian Gaming Summit. It also includes fixed costs including: accounting, insurance, fixed office costs, and bank charges.
- The variable amount per charity includes costs that scale with the size of membership including: office supplies, postage, training, meeting costs, and charity awareness

The cap will be reviewed annually for adjustment as required.