

# From Enforcement to Assistance: Evolving Best Practices in Self-Exclusion

A Discussion Paper by the Responsible Gambling Council  
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RESPONSIBLE GAMBLING COUNCIL



## PREAMBLE

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The Responsible Gambling Council (RGC) is an independent, non-profit organization committed to problem gambling prevention. RGC designs and delivers highly effective awareness programs. It also promotes the identification and adoption of best practices in problem gambling prevention through research and information dissemination.

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While the Review results from the contributions of many, the work is a product of RGC's analysis and RGC assumes responsibility for its content.



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## EXECUTIVE SUMMARY

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### Overview

In 2007, the Responsible Gambling Council (RGC) initiated a thorough review of best practices in self-exclusion (Review). “Best practices” in this Review refer to those policies and practices that are likely to facilitate successful outcomes for people who choose to ban themselves from casinos. While this report identifies the emerging state of best practices in self-exclusion, these must be interpreted within the context of each jurisdiction’s own specific circumstances, service mixes and legal frameworks.<sup>1</sup>

The framework for the Review was constructed around the following nine topics that were identified from the literature and practice:

- Expectations
- Registration
- Counselling and Supports
- Ban Length
- Detection and Management of Breaches
- Ban Scope
- Renewal and Reinstatement
- Promotion
- Regulatory Oversight and Penalties

The methodology used in the Review included:

- Literature and policy review
- Overview of program features at Canadian jurisdictions
- Twelve focus groups across Canada with individuals who had self-exclusion experience
- Interviews with self-exclusion program administrators
- An Expert Forum bringing together experts from around the world
- RGC’s analysis of best practices

### From Enforcement to Individual Assistance

There is no doubt that self-exclusion is an important tool for gaming venues to offer and for patrons to consider when dealing with problem gambling. Many of the focus group participants indicated that self-exclusion played a very significant role in helping them to stop gambling. They also spoke about how good it felt to take control over their gambling. Even those who did not succeed in quitting entirely often reported a reduction in amount of time and money spent and in the frequency of gambling (see also Ladouceur, 2000) after they had self-excluded.

That said, the Review discovered many ways in which the process of self-exclusion can be improved. From a broad perspective these improvements would move self-exclusion from the currently predominant enforcement orientation to an individual assistance orientation. The latter model would place greater emphasis on assisting self-excluding individuals to get the help they need to address their problems and achieve their goals.

### Current Context

When people are considering self-exclusion they are looking for help. They are often experiencing a complex set of emotions, including distress, frustration and fear. To seek help, they have to approach venue staff that are not, in most cases, prepared or trained to handle this range of emotions. As one participant at the Expert Forum put it, “we think of the self-excluder as the person in crisis but we underestimate the crisis caused for the staff member having to respond to this very difficult situation.” Casino employees are not social workers and are often reticent to deal with an unpredictable personal issue. As a result, the problem is typically left to security staff and thereby becomes a “security issue”.

In recent years there have been calls for a shift in perspective on self-exclusion from a “punitive”, enforcement oriented process to a model that is more focused on helping individuals, connecting them with counselling and other supports. While there is a widespread consensus, including among gaming providers, regarding such a direction, the predominant model today continues to be based primarily on enforcement. This is not to say that the detection of breaches and enforcement is perceived to be any less important. Virtually every source consulted in this Review indicated that self-exclusion programs need to have more teeth. However, it is important to put the role

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1. The Review’s focus is on policies and practices that will best support the individual who has chosen to self-exclude. While every effort was made to take into consideration all implications, it is beyond the Review’s scope to anticipate how these best practices would be implemented in individual jurisdictions given that each has its own unique set of regulations, service mixes, financial circumstances, human resource models, etc. to consider.

of enforcement in proper perspective as a component, not the only component, of a program designed to help those individuals interested in self-exclusion to achieve their goals.

### Replacing the One-Size-Fits-All Approach

Many times throughout the Review, participants noted that there is no single type of gambler, and therefore no one set of motivations or expectations underlying self-exclusion. Yet the process of self-exclusion is remarkably similar across most organizations and jurisdictions. The process builds in unnecessary rigidities and systems that act as deterrents and roadblocks rather than supports. There is, for example, continuing debate even among gamblers themselves about ban lengths—though most participants in the Review support a variation in ban lengths tailored to the needs of the individual and his or her circumstances.

### Evolving the Individual Assistance Model

In practice, the evolution from an enforcement model to an individual assistance model is already underway in gaming venues and corporations across Canada and beyond. The Review discovered many changes in policy and practice (e.g., broadening the registration process beyond security; having specially trained staff to discuss counselling options with individuals asking for self-exclusion; including Responsible Gaming Information Centre staff in the self-exclusion process; etc.). Thus the self-exclusion process is already moving out of isolated security offices and into a more integrated, individual assistance effort involving more active participation of onsite casino staff and external organizations. But these changes are just a start. The individual assistance approach to self-exclusion implies changes to many aspects of the process, from registration (including the registration environment and procedure), communications, detection, management of breaches, renewal, reinstatement, promotions, etc.

### What the Individual Assistance Model Is

It is important to be clear that individual assistance, in this context, means responding in a helpful way to individuals' concerns; working through the registration process in a respectful, timely manner; providing information about counselling options (e.g., financial, self-help and treatment referrals) so that individuals may decide what is best for them, according to their own timeframes (i.e., readiness to address their problem); and encouraging these individuals to take advantage of the assistance available.

### What the Individual Assistance Model Is Not

While the Review found widespread consensus for changing the self-exclusion process, there is concern on the part of gaming operators and problem gambling professionals

that casino employees not become drawn into inappropriate “social work” roles and that the detection and enforcement roles are improved, not abandoned. The individual assistance model is meant to be just that: a method of providing support to people with gambling problems, not a replacement for treatment.

The individual assistance model identifies many ways the process of self-exclusion can be implemented in a manner that is much more flexible and responsive. A more detailed description of this model, provided within the context of the nine framework themes, follows.

## Findings

### Expectations

**Clarifying Roles:** Gamblers who sign self-exclusion agreements often see it as a promise to themselves and to the gaming provider not to return and gamble at that venue. Some use self-exclusion as an aid in recovery that is part of a larger process of support and counselling. Some believe that a self-exclusion agreement places primary responsibility on the gaming provider to keep them out even if they breach the agreement they have made.

Gaming providers typically see their roles and responsibilities as a service commitment that they often have limited capability to meet. Over the years, gaming companies have tried to be clear about their responsibilities through carefully worded self-exclusion agreements and communications, placing responsibility fully on the shoulders of the individual. Though this has probably had some legal benefit, it has not alleviated the problem of expectations among the individuals signing the agreements. This should not be surprising, perhaps, since many of the people who sign self-exclusion agreements do so in times of great pressure or distress.

While some differences in expectations may be unavoidable, it is quite possible to create greater clarity around the self-exclusion process through changes in the way the agreements are established and managed as well as through improvements in communication between the gaming providers and those who self-exclude.

### Registration

The registration process is the primary, and often the only, interaction most people who self-exclude have with venue staff or problem gambling specialists. In the past, people seeking self-exclusion were typically ushered by security staff to a small, isolated room and asked to sign several documents. Their pictures were taken and they were then escorted from the premises. The process could take less



than 5 minutes. Many people who chose to self-exclude saw this as a demeaning process that made them feel like criminals. Today, however, there are many innovations in practice that show great potential to make the registration process much more helpful and respectful.

**Expanding Registration Access Points:** Registration is being made available via multiple access points, such as Responsible Gaming Information Centres, treatment providers' offices, regulator or operators' corporate offices or even by mail or online. This is a very positive development. At the same time, while expanding self-exclusion registration to more access points, it is important to ensure that:

- Uniform protocols are established (e.g., all access points must complete the same forms and take the same type and size of pictures)
- Consistent and accurate information is presented to the patron who is self-excluding
- Confidentiality arrangements are clear
- Protocols for the information exchange between the venue and the third party registrant are well delineated
- Methods for processing documents are sound
- Safeguards and checks for each stage of the process are in place

**Modifying the Process within Gaming Venues:** There was consensus in the Review that staff should be specially selected and trained to provide a responsive, respectful and professional process. Staff responsible for self-exclusion might hold any number of positions, including security personnel, shift managers, be from the RGIC, be treatment providers from offsite, etc. At the end of the training, designated staff should be able to actively listen to individuals wishing to self-exclude and to explain the process to them. Furthermore, all information sources in the Review supported a registration process that is:

- Carried out in a respectful, discrete way
- Set in a comfortable place
- Executed in a timely manner

Registration may be the only opportunity to provide individuals with information on self-exclusion. Topics covered during the discussion between staff and the patron should include:

- Roles and expectations of the gaming provider and the person who has chosen to self-exclude
- Ban length options that best meet the individual's needs
- How breaches will be managed

- What happens to the player card and loyalty points
- Whether the person who has self-excluded has more than one player card or is registered under more than one name
- Support options
- Processes for renewal and/or reinstatement
- Confidentiality and privacy arrangements
- The cessation of promotional materials

**Provision of Take-Home Material:** Given the tense nature of the self-exclusion registration process, it may be very challenging to convey the information required in a meaningful way. Yet, much of the information available will be important to the individual and their future decision-making. Therefore, those who self-exclude should be provided with written material to take home and view in less pressured circumstances.

**The Benefits of Follow-Up Contact:** Registration may not be the best time to convey all of the previously listed information. It is proposed that a follow up call be initiated by a designated contact person. The contact person (e.g., RGIC staff) would ensure that the individual understood what was discussed during registration and offer information and/or referral to a treatment agency.

**Loyalty Points and Other Comps:** Patrons who self-exclude need to know what will happen to their points, comps, etc. Patrons who have self-excluded should not be able to continue accumulating points and their existing points should be paid out. Where possible there should be non-cash options for payouts, and these should occur off-site.

## Counselling and Other Supports

Self-exclusion is typically more successful in the context of counselling, family support and other assistance. While some form of mandatory counselling was discussed at various times during the Review, there are many limitations and misgivings about such a process. On the other hand, staff involved in the self-exclusion process can have an important influence on the actions of the patron and should encourage patrons to seek out additional assistance and support. What this means in practice is that staff should advise people who have self-excluded about the availability of local resources and encourage them to take advantage of those resources.

## Ban Length

Virtually every source consulted in this Review called for optional ban length terms. Included in the menu of ban lengths might be bans of a variety of lengths starting at 6 months. In order to determine an appropriate ban length, staff and individuals seeking self-exclusion would have a discussion; the objective of which would be to engage the patron in choosing the ban length they want with the assistance and information they need.<sup>2</sup>

In order to determine an appropriate ban length, staff and individuals would discuss the options available and individuals would select the ban length that they deemed appropriate.

## Detection and Management of Breaches

Detection and enforcement continue to be important elements of self-exclusion but must be seen in their proper context. Most who sign self-exclusion agreements will likely gamble during their ban, as breaching is a typical part of the recovery process (e.g., in our survey of focus group participants, 30% gambled at the banned venue and 59% engaged in other forms of gambling during their bans). At the same time, there is a widespread view among individuals who self-exclude that gaming providers make little effort to detect breaches and help them stay out.

However, there are often considerable challenges in detection and enforcement. Security staff and, in some cases, other staff on the casino floor, are asked to memorize thousands of pictures and identify potential self-excluders as a part of their responsibilities. What's more, most self-exclusion detection processes still depend on paper-based communication systems with photocopied pictures. Where there is a province-wide self-exclusion program in place it is often difficult, if not impossible, for staff in one venue to detect breaches among patrons who are not local.

**Enhancing Detection:** There are many opportunities for enhancing detection, including the addition of facial recognition software<sup>3</sup> or Saskatchewan's i-Care system.<sup>4</sup> Many venues have broadened the circle of employees responsible for detection to beyond security staff. But the involvement of at least all key Level 2 and 3 staff would likely be both feasible and useful.

**Priority-Setting:** Another enhancement used in some places involves priority setting to classify patrons who are most likely to breach their agreements. In such a system, security and surveillance personnel are still responsible for the wider list of people who have self-excluded. The non-security staff are able to concentrate on those most likely to appear in their venue (e.g., based on proximity and/or risk of breaching).

**Information Management:** Many of the experts consulted as part of the Review recommended replacing paper-based identification systems with an electronic information management system. Staff involved with registration could enter patron information into the database. The database could be accessed by designated people, sorted by risk-level and updated over time with additional information relevant to the management of self-exclusion.

**The Question of Enforcement:** Within a self-exclusion model based on individual assistance, ideally the primary question regarding enforcement would be "what is the best option to help individuals deal with their problems?" However, many of those consulted in this Review also strongly advocate for enforcement measures "with teeth". In terms of managing breaches, protocols would include:

- Persons who breach should be discretely approached to verify their identification
- If they are in breach of their agreement, they would be asked to leave the gaming floor, preferably for a private discussion with an internal contact person or RGIC staff. (These discussions should occur after each breach, as should the offer of support and information.)

<sup>2</sup> If at times the patron wishes to choose a ban length that is less than the 6 months that has been offered, the wish of the individual needs to be respected in so far as it is actually feasible for the venue.

<sup>3</sup> Facial recognition technologies have emerged in recent years as a tool to better detect breaches. Facial recognition has the potential to be a valuable tool. There is, however, much current concern and debate about the capability and usefulness of this technology. While facial recognition software appears to be changing and the limitations in previous versions are being addressed (Williams, 2007), the jury is still out about whether or not this technology should be regarded as an element of best practice in the management of self-exclusion agreements. Successful detection using facial recognition software is reliant on picture quality, lighting, angle, etc. (Williams, 2007). This could mean that the requirements of the technology, i.e. the picture, could make it difficult to operate the self-exclusion program with multiple registrations sites. It will be important then that those who are considering the introduction of this technology take into account the demands of the multi-site registration process. If facial recognition is shown to significantly increase detection rates within a gaming environment, it will still be a tool that needs to work in tandem with human observation and judgment. In the end, a staff member will always have to verify the identity of a patron and decide appropriate action.

<sup>4</sup> The I-Care system was developed and implemented by the Saskatchewan Gaming Corporation (SGC). It integrates self-exclusion within a broader process that proactively tracks gambling patterns and assesses them within a preventative framework. I-Care is intended to identify potentially problematic patterns of play before self-exclusion becomes necessary.

- Persons who breach should be flagged in the database as higher risk.
- Consequences should escalate for each breach with the end point having teeth (e.g., a trespass charge with or without fines).

**Withdrawal of Winnings:** There was a reasonable consensus among the Forum experts that jackpot winnings should not be given to a person who is in breach of their ban. Rather, winnings would be kept in trust funds and used for problem gambling treatment or prevention. It is important to note, however, that the legal status of withholding winnings has not been adequately explored in Canada.

## Ban Scope

Virtually all sources of information in the Review agreed that self-exclusion bans should cover similar types of gambling in a jurisdiction (i.e., cover all casino/racino gambling). This is common practice in Canada. However, at present, there are a number of logistic and pragmatic challenges to this approach. As noted earlier, bans may extend across a broad jurisdiction. Therefore, individuals who self-exclude might gamble in remote places still covered by their bans, but venue staff would be unlikely to recognize or detect them. The introduction of facial recognition technology has the potential to be an important tool to support broad based bans. Similarly, provincial bans may or may not cover gambling on reserves. In the latter case, it would be ideal if provincial governments and aboriginal gaming authorities harmonized their policies.

**Coverage of Non-Casino Gaming Opportunities:** There was agreement in the Review that bans should be broadened to cover non-casino gambling opportunities (e.g., VLTs, lotteries, bingo, Internet). However, given that in some jurisdictions there are thousands of bars, bingo halls etc. with VLTs, detection and management of breaches across a broad gambling network would be very difficult. Thus, the implementation of self-exclusion programs for non-casino gaming is a positive but longer term concept.

## Renewal and Reinstatement

In most cases the ban simply expires and the individual is removed from the self-exclusion list. However, several jurisdictions require the patron to initiate a renewal or reinstatement process. The latter might involve an education session prior to re-entry or an assessment of the individual's risk of relapse.

**Ban Renewal:** There is considerable support for a renewal process with multiple access points. The individual would simply ask for ban renewal, have their picture taken to ensure it is current and select a new timeframe. This

process would be triggered by the gaming operator or a designated agent such as an RGIC. The individual would receive a call or letter that informs him or her that the ban is near completion and asks about the individual's intentions. The contact, by what ever means, should not be promotional or allude to any gambling invitation.

**Active Reinstatement Process:** There could be considerable benefit to the individual and the gaming provider if reinstatement was an active reinstatement process rather than a default process. In this regard, the individual would initiate reinstatement by indicating his or her intentions. If the individual does not initiate reinstatement then the ban would continue.

The active reinstatement process could take a number of different forms (e.g., face-to-face, online or a written process administered through the mail) and represents another opportunity to provide support and information, thereby assisting the individual in making an informed personal choice.

The following content could be provided during the active reinstatement process:

- The option to renew the ban
- Support and information regarding community resources, tips and information (about responsible gambling, odds of winning, risks, etc.)
- The progress and support the individual received during the self-exclusion period
- Documentation (to be signed by the individual) indicating that he or she wishes to return to gambling at the venues, and that the individual is making an informed choice to reinstate.

## Promotion

There was strong sentiment expressed in the Review that self-exclusion is not adequately promoted and communicated to casino patrons. At minimum, patrons should know that if they are having problems with gambling, help is available and self-exclusion is one option. There are two ways that casinos can better inform patrons about the option to self-exclude.

**Active Promotion:** The first way is to actively promote self-exclusion through the casinos' and gaming companies' formidable communications capabilities. Gaming providers already employ many effective strategies to communicate with their patrons (e.g., patron newsletters, promotional materials, RGIC, onsite posters, kiosk, etc.). Any and all of these methods could be used to promote understanding of a company's self-exclusion program.

**Staff Training:** The second way that casinos can inform patrons about self-exclusion is through their staff. That is, primarily as a result of training (but reinforced through other means as well), all staff should know four simple pieces of information:

- That self-exclusion is available
- What self-exclusion involves
- What to say to patrons about self-exclusion
- To whom the patron should be referred for further information or registration

### Regulatory Oversight and Penalties

Third party regulation, administration and sanctions came up a number of times during the Review. The essence of the argument is that there is a real or perceived conflict of interest if gaming venues manage their own self-exclusion programs. Discussion of this issue at the Expert Forum resulted in a number of perspectives.

**Third-Party Administration:** One perspective is that self-exclusion might be administered by a third party. That is, some experts who have studied self-exclusion, particularly researchers, suggest that there be specific regulations and designated oversight of the self-exclusion process. Presumably, regulatory oversight would also involve fines for operators who fail to detect and enforce breaches of self-exclusion agreements.

**Take Proactive Steps First:** A second perspective, supported by some gaming operators, is to focus on developing assistance for individuals rather than further regulation. There is concern that regulatory intervention at this time might introduce requirements that would make self-exclusion more legalistic and enforcement-driven. This could be counter to the recommended individual assistance model which is gaining considerable momentum.

Most jurisdictions examined as part of this Review are currently reassessing their self-exclusion policy frameworks. Therefore it would be very useful to establish these first and evaluate their impact before moving to the regulatory level. This would also provide a stronger base in experience with the individual assistance model prior to determining the necessity of stronger, more centralized regulations.

## Conclusion

The self-exclusion process is quite rightly in transition from an enforcement model to an individual assistance model. This shift is widely supported by those with gambling problems, gaming operators and specialists in problem gambling. Improvements to the current self-exclusion model involve adjustments to most elements of the process: from the way self-exclusion is promoted, to the way it is administered, to ban renewal and reinstatement. These changes will advance a more helpful self-exclusion process with the needs of the individual at its centre.

Ultimately, self-exclusion is a tool to help people in their efforts to overcome gambling problems. This tool requires delicate balancing so that it supports individual initiative but does not replace it. It needs to balance enforcement against disincentives created if there is too much focus on enforcement. It needs to fit each individual's unique circumstance, giving the individual as many options as possible. The more closely self-exclusion is linked with community counselling and other supports, the more likely it is that the individual who chooses to self-exclude will be successful.

## INTRODUCTION

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As legal gambling in Canada has expanded, so too have concerns about problem gambling. Self-exclusion, which allows individuals to ban themselves from casinos, is a key means by which gambling providers have addressed these concerns. In Canada, self-exclusion has become a standard practice, within a broader responsible gambling framework, since the first program appeared in Manitoba in 1989. However, minimal research has been done to evaluate the effectiveness of self-exclusion programs. This means that there is little information to inform best practices with respect to self-exclusion.

To address this issue, the Responsible Gambling Council (RGC), an independent non-profit committed to the research and dissemination of best practices, conducted a review of self-exclusion (Review). “Best practices” in this Review refer to those policies and practices that are likely to facilitate successful outcomes for people who choose to ban themselves from casinos. That is, the Review’s focus is on emerging policies and practices that will best support the individual who has chosen to self-exclude. While every effort is made to take into consideration all implications, it is beyond the Review’s scope to anticipate how these best practices would be implemented in individual jurisdictions, given that each has its own unique set of regulations, service mixes, financial circumstances, human resource models, etc., to consider.

The Review is the first of its kind to take an in-depth look at self-exclusion across a number of Canadian jurisdictions, from the perspective of multiple stakeholders. The following nine issues form the framework for the Review:

1. Expectations
2. Registration Procedures
3. Counselling and Supports
4. Ban Length
5. Detection and Management of Breaches
6. Ban Scope
7. Renewal and Reinstatement
8. Promotion
9. Regulatory Oversight and Penalties

Each chapter in the Review addresses some or all of these nine issues from a different perspective. Chapter One provides a synopsis of the published literature on self-

exclusion. Chapter Two details self-exclusion program features currently in practice in Canadian jurisdictions. Chapter Three looks at self-exclusion from the perspectives of individuals with gambling problems. Chapter Four provides details of program administrators’ experiences with self-exclusion. Chapter Five draws together the opinions of experts with specialized knowledge of self-exclusion programs. Chapter Six, the concluding chapter, offers RGC’s analysis of best practices in self-exclusion based on its consideration of information provided in the preceding chapters.

## Methodology

The methodology used in the Review includes:

### Literature and Policy Review

RGC reviewed academic research, governmental reports and policy documents related to self-exclusion in Canada and abroad. This information set the framework for this Review.

### Canadian Self-exclusion Program Features

Operators from all eight Canadian jurisdictions provided information on their self-exclusion program’s features, including:

- Number of active participants
- Number of reinstatements
- Number of breaches
- Program purpose
- Ban coverage
- Promotion
- Responsible Gaming Information Centre involvement<sup>5</sup>
- Registration procedures
- Possibility for offsite registration
- Duration of registration
- Staff involved in registration
- Information provided during registration
- Ban length
- Detection/enforcement
- Breaches
- Information management
- Counselling/education/referral
- The reinstatement process
- Option for early reinstatement
- Evaluation

<sup>5</sup> Also known as Responsible Gaming Resource Centres (RGRC, Nova Scotia), Responsible Play Information Centres (RPIC, British Columbia), or Gaming Information Centre (GIC, Prince Edward Island).

## Focus Groups with Those Who Have Self-excluded

Focus groups were held with individuals who had self-exclusion program experience. The focus groups were conducted in the following provinces:

- British Columbia
- Manitoba
- Ontario
- Nova Scotia
- Prince Edward Island
- Saskatchewan
- Quebec

Prior to beginning each focus group, participants completed a survey to collect demographic information and information about their gambling behaviours prior to and during self-exclusion. The survey allowed for the collection of quantitative data to complement the qualitative information gathered in the focus groups.

The focus groups were moderated by one RGC researcher while another RGC researcher took notes. All the focus groups were recorded, transcribed and analyzed. Key themes from the focus groups were identified.

## Interviews with Self-Exclusion Program Administrators

RGC interviewed individuals involved in running self-exclusion programs in Nova Scotia, Prince Edward Island, Quebec, Ontario, Manitoba, Saskatchewan and British Columbia. All but two interviews were recorded and transcribed. Detailed notes were taken for those interviews which were not recorded. Transcripts and notes were analyzed and key themes were identified.

## Expert Forum

RGC conducted a 2-day forum with the participation of international experts on self-exclusion, including regulators, operators, gaming providers who manage the programs, treatment providers, researchers, individuals who have signed self-exclusion agreements and policy makers. During the Forum, current research and knowledge on best practices in self-exclusion were discussed as Forum attendees explored the factors that impede and facilitate the optimal functioning of self-exclusion and shared ideas on how to enhance the effectiveness of self-exclusion programs. Key themes from the Forum were identified. Forum attendees also completed an electronic survey at the start and conclusion of the Forum that assessed their opinions of self-exclusion programs. Findings from the end survey are included in this report.

## RGC's Analysis of Best Practices in Self-exclusion

Using its definition of best practice in self-exclusion (i.e., those policies and practices that are likely to facilitate successful outcomes for people who choose to self-exclude) RGC synthesized and carefully considered the findings from the afore-mentioned information sources.

## Limitations

There are a number of limitations to this study that should be noted. First, focus group participants were recruited via advertisements and not through a random sample. Thus, the focus group participants may not be representative of all people who have self-excluded. However, generalization of findings beyond this sample is enhanced by the large sample size, gathered across a number jurisdictions (12 focus groups, N=76). The coalescence of themes observed across the focus groups also suggests that saturation was reached.

Second, the qualitative data gathered through the program administrator interviews and Expert Forum is based largely on the opinions of participants. These opinions, though based on experience and observation, are subjective.

Third, while the surveys for the focus groups and Expert Forum were developed based on a thorough review of the literature, they did not undergo any psychometric testing. Thus, the reliability and validity of the surveys cannot be determined.

## CHAPTER ONE: LITERATURE AND POLICY REVIEW

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Self-exclusion is a program that allows individuals to ban themselves from a gambling venue or venues, either permanently or for a specific time period (Nowatzki & Williams, 2002; Ladouceur et al, 2000; Blaszczynski et al, 2007). In essence, self-exclusion creates a barrier between an individual and opportunities to gamble (Blaszczynski et al, 2007). While problem gambling experts recommend that individuals who have self-excluded participate in treatment programs, self-exclusion is not a treatment for problem gambling unto itself (Nowatzki and Williams, 2002; Blaszczynski et al, 2007).

Self-exclusion is an agreement between an individual and a gaming provider. The legal status of self-exclusion is unclear. Napolitano (2003) argues that self-exclusion is not a legal contract, but an arrangement between an individual and a gaming provider in which the individual asks to be banned from the venue for a determined time period. As part of this arrangement, the individual accepts that if they are found in breach of the ban they will be removed from the venue and face possible penalties (Napolitano, 2003).

Creating an effective self-exclusion program is a challenging undertaking as there are a number of issues (i.e., those identified in the Review framework) that must be addressed if self-exclusion programs are to be successful. The challenge of addressing these issues is compounded by the fact that there is limited published literature available on the subject, with only a handful of studies published to date (Ladouceur et al, 2000; Ladouceur et al, 2006; O'Neil et al, 2003; Nowatzki & Williams, 2002; Steinberg & Velardo, 2002; Napolitano, 2003; Nower and Blaszczynski, 2006). A discussion of these studies, organized according to the nine framework issues, follows.

### Expectations

There can be a significant difference between what people who have self-excluded expect of self-exclusion and what the programs actually deliver. People who self-exclude may have unclear or unrealistic expectations with regard to its enforcement and support (O'Neil et al, 2003; Ladouceur et al, 2006): that is, they may not be sure if the onus is on them to stop themselves from gambling or whether it

is the venue's responsibility (Ladouceur et al, 2006). In turn, some venues expect people who have self-excluded to take full responsibility for respecting their agreements (O'Neil et al, 2003).

### Registration

Many of the details of self-exclusion programs are similar across jurisdictions. Those who want to self-exclude approach venue staff and the individual is taken to a room where they complete the requisite paperwork and have their photograph taken (Nowatzki & Williams, 2002; Ladouceur et al, 2000; Blaszczynski et al, 2007). Some jurisdictions also offer offsite registration (Nowatzki & Williams, 2002; Ladouceur et al, 2000) or mail-in registration (Iowa Gaming Association).

In order to manage expectations and clarify responsibilities, both the role of the person who is choosing to self-exclude and the role of the venue must be clearly articulated during the registration process (Blaszczynski et al, 2007).

As part of the registration process, staff may inform the individual of treatment options for problem gambling and/or provide a referral to a problem gambling counsellor (Nowatzki and Williams, 2002; Blaszczynski et al, 2007). However, Nowatzki and Williams (2002) recommend that information on treatment resources, including the contact information of helping professionals, should be provided as a standard part of the self-exclusion registration process. Furthermore, immediate referral to mental health services may be needed if a patron requesting self-exclusion is in a state of crisis (Blaszczynski et al, 2007). As such, staff who handle self-exclusion applications should have the training to effectively respond to the emotional distress that can lead people to request self-exclusion (Blaszczynski et al, 2007).

It is also a common practice for the names of individuals who have self-excluded to be removed from venue/operator mailing lists (Nowatzki & Williams, 2002; Napolitano, 2003).

### Counselling and Supports

There is consensus among problem gambling researchers that self-exclusion is most effective for those people who acknowledge that they have a gambling problem and take their own steps to address it, such as seeking counselling or other forms of support (Nowatzki & Williams, 2002; O'Neil et al, 2003; Blaszczynski et al, 2007). However, support must be available to all who self-exclude and many individuals who have self-excluded have criticized

self-exclusion programs for not providing enough support during the ban period (Ladouceur et al, 2000; Ladouceur et al, 2007). Interviews that O'Neil et al (2003) conducted with people who had self-excluded suggest that people want better treatment links, including access to a range of support services.

That said, not all people seeking self-exclusion are at a point where they want or are receptive to professional help (Ladouceur et al, 2000; Ladouceur et al, 2007). Ladouceur et al (2000) found that 49% of study participants who had signed self-exclusion agreements had considered seeking therapy but only 10% had actually done so. Research on treatment for problem gambling (Griffiths and McDonald, 1999), as well as for other addictive behaviours (Hiller et al, 2002; Ilgen et al, 2006), suggests that treatment only benefits those who are receptive to it. Thus, mandatory counselling may not be effective and, for some, could even be a deterrent to entering into a self-exclusion agreement (Ladouceur et al, 2000; Nowatzki & Williams, 2002).

A response to the need for better access to treatment and support comes from Blaszczynski et al (2007), who have developed the “gateway model” for self-exclusion. This model creates a bridge to community-based resources by using clinically-trained “self-exclusion educators” to act as case managers for people who have self-excluded. The educator offers monitoring and support to help people who have self-excluded gain control over their gambling and provides options for additional services that might be needed (Blaszczynski et al, 2007). A pilot of the gateway model is currently underway in Quebec (Ladouceur et al, 2007).

## Ban Length

There is debate as to the optimal length of self-exclusion bans (Nowatzki & Williams, 2002). While Steinberg and Velardo's (2002) survey of people who have self-excluded found that 0% of respondents preferred permanent self-exclusion, the National Council on Problem Gambling (2003) in the United States advises against lifetime bans, as they are a potential deterrent to entering the program at all. There is support for enabling people to select their own ban lengths to suit their specific needs and goals (Napolitano, 2003; Blaszczynski et al, 2007). However, there is a lack of empirical evidence to suggest what length of ban would prevent the risk of an individual relapsing into problem gambling behaviour (Ladouceur et al, 2006).

## Detection and Management of Breaches

A key issue with respect to enforcement is detection. Most venues rely on staff to identify people who breach their agreements. However, since many self-exclusion programs span multiple venues that have large customer bases, it is not reasonable to expect staff to effectively identify all people who have self-excluded in a given jurisdiction (Nowatzki and Williams, 2002; O'Neil et al, 2003; Blaszczynski et al, 2007), particularly if these individuals have taken measures to avoid detection, such as disguising themselves (Nowatzki and Williams, 2002). To address this issue, several problem gambling researchers (Nowatzki and Williams, 2002; O'Neil et al, 2003; Blaszczynski et al, 2007; Kelly and Collins, 2002) recommend mandatory computerized identification checks at venue entry points.

The available evidence confirms that breaches often go undetected. A study by Ladouceur et al (2000) found that 36% of participants breached their bans a median of six times. Furthermore, participants said that they were often not detected when they returned to the casino (Ladouceur et al, 2000). Similarly, a study by Steinberg and Velardo (2002) also found that breaches were common, with 20% of participants reporting that they breached their bans more than nine times.

The findings from Ladouceur et al (2000), Ladouceur et al (2006) and Steinberg and Velardo (2002) are echoed by interviews that O'Neil et al (2003) conducted with people who have self-excluded, counsellors and venue managers in which “[t]he dominant theme of most interviewee suggestions regarding improvements to [self-exclusion] relate[s] to a desire for detection to be consistent and comprehensive” (p.91).

While detecting breaches is important, another aspect of effective enforcement is the system of penalties in place for those who breach their bans. Nowatzki and Williams (2002) note the need for penalties, both for people who have self-excluded and for venues, since those who enter self-exclusion agreements have little external motivation to abide by their terms without the threat of consequences (Ladouceur et al 2000; Nowatzki & Williams, 2002). Common penalties are trespassing charges and fines. While these provide a deterrent to breaching, they also have the potential to compound the problems of people who have self-excluded by criminalizing them and imposing further financial hardships on them (Interchurch Gambling Taskforce, 2000; Napolitano, 2003), which may be contrary to the spirit of self-exclusion (Napolitano, 2003).



## Ban Scope

Regardless of how robust a venue's self-exclusion program is, its effectiveness will be limited if participants are able to gamble in other venues that do not feature self-exclusion (Nowatzki & Williams, 2002; de Bruin et al, 2001).

Concerns about non-casino gambling by people who have self-excluded are supported by the available evidence. Ladouceur et al (2000) and de Bruin et al (2001) found that approximately 50% of participants gambled outside of the casinos from which they were banned. Similarly, Steinberg and Velardo (2002) found that over one-third of participants in their study had problems with non-casino gambling.

“...49% of study participants who had signed self-exclusion agreements had considered seeking therapy but only 10% had actually done so...”

Some jurisdictions are attempting to address this issue. For example, Nova Scotia recently approved an informed player choice system (IPCS) that will provide the player with feedback to make informed choices, including a self-exclusion option (Schellinck and Schrans, 2007). However, the researchers who evaluated the pilot of this system reported that only 2% of participants in the pilot used the self-exclusion feature (Schellinck and Schrans, 2007).

## Renewal and Reinstatement

It is not uncommon for people who have self-excluded to be required to renew their agreements at one of the venues from which they have banned themselves (Nowatzki & Williams, 2002). This practice has been criticised by some researchers in the field (Nowatzki & Williams, 2002; Collins and Kelly, 2002), who suggest that returning to a venue to renew the agreement may trigger gambling behaviour. Therefore, renewal should be available offsite or by mail or email so as to avoid this risk (Nowatzki & Williams, 2002; Collins and Kelly, 2002). Nowatzki and Williams (2002) also suggest that if people who have self-excluded wish to reinstate, they should be required to attend a responsible gambling education seminar as part of that process.

## Promotion

For a program to have an impact, people must use it. Nowatzki and Williams (2002) estimate that only 0.4% to 1.5% of Canadian problem gamblers have signed self-exclusion agreements and this low level of utilization suggests that individuals who may be candidates for self-exclusion are unaware of its existence (Nowatzki & Williams, 2002; Ladouceur et al, 2000). Thus, the promotion of self-exclusion is a point of concern and needs to be improved (O'Neil et al, 2003; Steinberg and Velardo, 2002; de Bruin et al, 2001; Interchurch Gambling Taskforce, 2000; Ladouceur et al, 2000).

In terms of evidence, Steinberg and Velardo's (2002) survey of people who have self-excluded found that only 5% of participants learned about self-exclusion from advertising at the venue itself and 11% learned about it from venue staff. In comparison, 39% learned of self-exclusion from family or friends (Steinberg and Velardo, 2002). Studies by Ladouceur et al (2000) and O'Neil et al (2003) also found that participants commonly reported that self-exclusion is not well-advertised. In terms of the presence of visible advertising in venues, a study by the Interchurch Gambling Taskforce (2000) in Australia, found that only 10% of the 41 venues investigated had visible promotion of self-exclusion programs.

In contrast to the studies from North America and Australia, a Dutch study that looked at self-exclusion at Holland Casino (de Bruin et al, 2001) found that approximately 74% of people who have self-excluded and 84% of problem gamblers who were surveyed knew of the venue's self-exclusion program. These higher rates of awareness may be the result of Holland Casino's comparatively proactive prevention policy in which patrons who appear to be at-risk of developing a gambling problem are approached by casino staff and given information on programs such as self-exclusion (de Bruin et al, 2001).

## Regulatory Oversight and Penalties

Since self-exclusion is an industry-based program, there is a potential conflict of interest in that self-exclusion may negatively affect providers' revenues (O'Neil et al, 2003).

To address this issue, several problem gambling researchers suggest that an independent regulator should oversee self-exclusion programs (O'Neil et al, 2003; Collins and Kelly, 2002; Ladouceur et al, 2006; Blaszczynski et al, 2007). In particular, Blaszczynski et al (2007) suggest that:

*...an optimal system would remove the responsibility for overseeing the self-exclusion programme from the gaming operator in favour of an independent third party with clearly defined and delineated lines of responsibility and reporting (p.66).*

Such a regulatory body provides means by which self-exclusion programs can be objectively monitored and audited, bringing transparency to the system (Blaszczynski et al, 2007).

If regulations of self-exclusion programs are put into place, then consequences for venues who fail to meet these regulations will likely follow. There is some support for sanctions against venues found negligent in the administration of self-exclusion agreements, particularly in situations where staff have not reported breaches or the name of a person who has self-excluded has not been removed from the venue's, or provider's, mailing list (Napolitano, 2003). For example, a casino in Iowa was recently fined \$20,000 for sending direct mail advertising to a patron who had self-excluded (Associated Press, 2007).

## CHAPTER TWO: CANADIAN SELF-EXCLUSION PROGRAM FEATURES

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In order to inform best practices, it is important to consider the current state of self-exclusion programs across Canada. This information is presented in the chart that follows.

The program features chart contains terminology and acronyms specific to certain programs and jurisdictions, such as:

**AADAC** - Alberta Alcohol and Drug Abuse Commission

**AGA** – Nova Scotia Alcohol and Gaming Authority

**AFM** – Addictions Foundation of Manitoba

**AGLC** – Alberta Gaming and Liquor Commission

**BCLC** – British Columbia Lottery Corporation

**Community Gaming Centres** – Expanded bingo halls in British Columbia, some of which feature electronic machines

**Gaming Information Centre** – Resource centre located onsite at the Charlottetown Driving Park that offers information and resources on safer gambling and problem gambling

**GCO** – Gaming Control Officers: the senior security officials in charge of corporate and gaming floor security in non-reserve casinos in Saskatchewan

**iCare** – An “Intelligent Player Care program” that consists of a suite of integrated prevention-based responsible products, such as player databases and player tracking software (iCare Responsible Gaming Program)

**iTrak** – iCare’s incident reporting and tracking software used for casino security and surveillance

**REC** – Racing Entertainment Centre

**SGC** – Saskatchewan Gaming Commission

**MLC** – Manitoba Lotteries Corporation

**OLG** – Ontario Lottery and Gaming

**REC** – Racing Entertainment Centre. Racetracks in Alberta that feature electronic machines

**RGIC** – Responsible Gaming Information Centre. Resource centres located onsite at casinos in Ontario and Saskatchewan that offer information and resources on safer gambling and problem gambling

**RGRC** – Responsible Gaming Resource Centre. Resource centres located onsite at casinos in Nova Scotia that offer information and resources on safer gambling and problem gambling

**RPIC** – Responsible Play Information Centre. Resource centres located onsite at casinos and Community Gaming Centres in British Columbia that offer information and resources on safer gambling and problem gambling

**SGC** – Saskatchewan Gaming Corporation

**SIGA** – Saskatchewan Indian Gaming Authority

**SLGA** – Saskatchewan Liquor and Gaming Authority

## Canadian Self-Exclusion Program Features

	STATISTICS			PURPOSE	BAN COVERAGE	TOTAL NUMBER OF VENUES COVERED
	<i>Self-exclusions in 2007</i>	<i>Reinstatements in 2007</i>	<i>Breaches in 2007</i>			
<b>AB</b>	764	758	711 (includes multiple breaches by one person)	To provide the option for individuals to voluntarily ban themselves from all Alberta casinos and RECs if they feel it is in their best interest not to participate in casino/REC gambling.	All casinos and RECs in Alberta (including gaming floor, restaurants, lounges and entertainment venues located on the premises).	22 casinos and 3 RECs
<b>BC</b>	4,637 at casinos/ community gaming centres; 146 at bingo halls	Not applicable	6,031 at casinos/ community gaming centres; 133 at bingo halls	To provide a self-help tool for people who want to take a break from casino/bingo gambling; to provide treatment referrals to people concerned about their gambling.	One program for all BCLC casinos and community gaming centres; another program for commercial bingo halls.	17 casinos (including slots at racetracks), 10 community gaming centres. Separate self-exclusion program for BCLC's 17 bingo halls.
<b>MB</b>	Approximately 200-230	52	Not available	To help people who are having problems with gambling take a break from casino gambling and encourage support and referral to address their problems.	Both MLC casinos. The two First Nations casinos are not part of MLC's program; they have a separate program. VLT sites not included.	2 casinos
<b>NS</b>	75	2	60	To help patrons concerned about their gambling stay away from the casino and to encourage counselling.	Both casinos in NS	2
<b>ON</b>	3,039	1,424	Not available	To provide a self-help tool for patrons who want to take responsibility for their gambling, and for those who may feel they have a problem with gambling.	All casinos and racetrack slot operations in ON. Self-exclusions from Casino Windsor also include all Harrah's Entertainment casinos.	27 (including slots-at-tracks, OLG casinos, and resort casinos)
<b>PEI</b>	22	3	None	To provide people with concerns about their gambling an option of a permanent or short-term break from gambling.	The one casino in PEI (gaming floor only)	1
<b>PQ</b>	1,309	1,366*	Approximately 9,000 (includes repeat breaches)	To help people concerned about their gambling to stop gambling and to guide them towards resources if needed.	Any or all of Loto-Quebec's gaming venues	5
<b>SK</b>	Approximately 144 per year	Less than one annually	Approximately 84 per year (includes voluntary and involuntary bans)	To help people concerned about their gambling to exclude themselves.	All SGC casinos (information is also shared with SIGA)	2

\* The number of agreements that expired.

## Canadian Self-Exclusion Program Features

	PROMOTION OF SELF-EXCLUSION	INFORMATION CENTRE INVOLVEMENT	REGISTRATION		
			Procedures	Offsite Option	Duration of Process
<b>AB</b>	Brochures and posters available throughout venues; casino, REC and AGLC staff program promotion; word of mouth; website.	Where RGIC kiosks are located, RGIC staff are responsible for training casino/REC management, security and designated staff in the delivery of self-exclusion program. RGIC staff, along with the security supervisor/duty games manager, approach individuals who are detected in breach of their SE agreement. RGIC staff ask individuals detected breaching if they would like to discuss the situation, provide them with problem gambling resource materials and treatment referrals, and log the breach.	Individual is taken to a private area and advised of the details of the program. Paperwork is completed and signed; the individual has the option for a 48 hour waiting period before the application is processed. Information on community problem gambling treatment resources is provided and staff may set up an appointment with an AADAC counsellor or other problem gambling resource person. The self-exclusion application is then entered into centralized computer system at which time it is made available to all casino/RECs.	AGLC or AADAC offices throughout the province	15 – 45 minutes (depends if the individual want to discuss problem gambling resources)
<b>BC</b>	Signs in washrooms and signs and pamphlets throughout venues; information on BCLC's website.	When on shift, Responsible Play Information Officer will sit in on the registration process.	Administered by security. Patron information is circulated to all venues. Patrons' names are removed from mailing lists. Player card is cancelled.	BCLC's corporate offices	20 – 30 minutes
<b>MB</b>	Brochures available at the RGIC, other locations in casinos, and at AFM offices; information on MLC and Casinos of Winnipeg websites.	RGIC participates in registration and provides support and referrals as directed by Shift Manager, and may see client for counselling. When engaging in a discussion with guest, RGIC staff can offer self-exclusion as an option, if appropriate.	Although registration, photos and monitoring are administered by security, the process is led by a Level 3 senior manager who often involves the RGIC staff. The Level 3 senior manager provides support and referral. Player card is cancelled.	MLC's corporate office and AFM's office	15 minutes to 1-1.5 hours (depending on the situation)
<b>NS</b>	Brochures and pamphlets; signs at entrance; casino staff; RGRC; casino website.	Patrons referred to RGRC before and/or after registration for information and possible treatment referrals.	Administered by security. Patron's information is collected and photos are taken. Patron is given information on treatment and resources.	AGA's office	10 – 30 minutes
<b>ON</b>	Brochures provided by casino staff; RGICs (Casino Windsor and Fallsview Casino Resort); OLG websites.	Casino staff may refer people who have self-excluded to RGIC for resources on problem gambling and treatment.	Administered by security; patrons given information on treatment options and escorted off site.	Not available	Approximately 20 minutes
<b>PEI</b>	Signs in washrooms and at entry points to the gaming floor; information at the Responsible Gambling Information Centre and the venue website.	RGIC staff provide information, educational tools and referrals to people who have self-excluded. RGIC staff also act as advocates for patrons during the self-exclusion process.	Administered by security. RGIC staff provide support and information on treatment options. Player card is cancelled and player's profile is flagged in the player club system.	RGIC staff and security go to the addiction treatment facility	20 – 45 minutes
<b>PQ</b>	Responsible gaming Information centers (Centres du hasard), on misesurtoi.ca website, Loto-Quebec website. Brochures are available at our customer service counters in all gaming venues.	RGIC's main role is education, although it may suggest people seek self-exclusion where appropriate.	Administered by security investigators. There are two self-exclusion options, one with mandatory counselling and one without. Player card is cancelled.	Certain crisis centers, treatment providers' offices and Quebec City office. Casino investigators may go to a patron's house.	Approximately 30 minutes
<b>SK</b>	Signs in washrooms; RGIC (brochures and rolling Power Point); casino website. iCare identifies all high risk players in the database and Level 2 Casino floor staff and the RGIC coordinator are trained to interact with those players to provide them with appropriate information including self-exclusion.	Using iCare, RGIC staff place alerts on banned players. RGIC staff contact players who have breached their bans and put returning people who have self-excluded on watch status.	Administered by GCOs in a VIP room. Patrons have the option to talk to RGIC staff.	SGC's office (photos must be taken at the casino)	15 – 20 minutes

## Canadian Self-Exclusion Program Features

	REGISTRATION			DETECTION/ENFORCEMENT PERSONNEL
	<i>Staff Involved</i>	<i>Information Provided</i>	<i>Counselling/Support</i>	
<b>AB</b>	RGIC staff; casino/REC security staff or designate; AGLC self-exclusion support staff	Brochure and FAQs about the self-exclusion program; AADAC helpline number; information on other sources of assistance	Referral to AADAC's problem gambling services and/or information on other community problem gambling resources are provided.	On-duty casino/REC security personnel (the AGLC provide all security personnel with training on the administration of the voluntary self-exclusion program)
<b>BC</b>	Security staff for registration and photo. Casino managers/ supervisors and or RPIC staff provide support and referral.	Pamphlets/brochures	Patrons provided with phone to call helpline. Patrons asked if they want a referral to counselling and are contacted within 24 hours if they do.	Gaming floor staff and surveillance staff. RGIC staff may assist with breaches.
<b>MB</b>	Security staff for registration and photo; Casino shift managers (Level 3) play lead role in providing support and referral (with option to involve the RGIC staff in that capacity which is often done).	Pamphlets/brochures on self-exclusion, financial counselling, and problem gambling helpline and treatment services	Shift manager (or other Level 3 manager) is key person in providing support or referral directly, or having the RGIC staff do so when they are onsite. RGIC is staffed by an AFM professional Monday – Saturday (12pm – 8pm) and on call during all other casino operating hours. Patron can book appointment with AFM staff and other referrals are provided.	Shift managers and security/surveillance staff; security programs manager maintains iTrak
<b>NS</b>	Supervisors, managers and security staff. RGRC staff assist where possible.	Information package (includes treatment and responsible gambling resources)	Staff encourage the use of the RGRC and recommend that people who have self-excluded call the problem gambling helpline.	Shift managers, supervisors, security and surveillance staff
<b>ON</b>	Security and managers	Pamphlets/brochures on problem gambling and treatment providers	Staff provide a brochure with treatment options/providers that are available. Patrons are referred to RGIC for information and resources.	Security staff at entry points, security manager/investigators, pit/shift managers
<b>PEI</b>	Security and RGIC staff	Information package (includes treatment and responsible gambling resources)	RGIC gives information on resources and sets up referrals for treatment, credit counselling, etc.	Security, Customer Service Supervisors and RGIC staff
<b>PQ</b>	Security	Information on resources available	Counselling is offered during registration assessment. Social worker and psychologist available on call 24 hrs to handle crisis situations.	Investigators and surveillance staff; two agents per shift look for breaches and problem gamblers
<b>SK</b>	GCOs; security and surveillance staff; managers	Information package (includes information on self-exclusion, problem gambling, community resources and treatment providers)	Patron can contact RGIC for referral to outside agencies.	GCOs, floor managers and security staff

## Canadian Self-Exclusion Program Features

PROGRAM FEATURES					
	<i>Ban Length Options</i>	<i>Detection/ Enforcement Methods</i>	<i>Breaches</i>	<i>Information Management</i>	<i>Counselling/ Education/Referral</i>
<b>AB</b>	6 months 1 year, 2 year or 3 years	The pictures, personal information and agreement expiry date for all people who have self-excluded are shared with all casinos/RECs through a centralized computer system. Detection is reliant on venue and RGIC staff using information in the computer system.	Individuals are escorted off the premises and may be charged with a general offence under the Gaming and Liquor Act (maximum penalty is a \$10,000 fine and/or 6 months imprisonment).  RGIC staff will also take the opportunity to discuss the situation with the individual and provide problem gambling resource materials and offer a referral to AADAC or other problem gambling services.	Information is kept confidential and is stored in a centralized computerized database: the Gaming Information Network (GIN). People who have self-excluded may be contacted for feedback during program evaluations.	The program does not have any reinstatement conditions. However, in 2008, AGLC in partnership with AADAC, will be developing a mandatory reinstatement program.
<b>BC</b>	6 months 1 year, 2 year or 3 years	Facial recognition software	Patron asked to leave and escorted out. Charges/fines possible but not used in practice. After 3 breaches patrons are contacted and reminded of their bans and encouraged to seek treatment.	iTrak Databank collects information (smaller venues don't have iTrack); breaches are recorded; venues have books with patron photos and bulletins	Referral to counselling provided on the form and offered at time of self-exclusion.
<b>MB</b>	2 years (indefinite if patron does not reinstate)	Visual detection from photographs on the iTrak system (electronic security report system); facial recognition was implemented in December 2007.	Shift manager involved with all breaches and encourages patron to seek treatment. Shift manager often asks RGIC staff to speak with the patron about support and referral. Charges/fines are possible but rare.	Patron photos on the computerized iTrak system, an electronic security reporting system	Mandatory attendance at half-day education program operated by the AFM prior to reinstatement.
<b>NS</b>	Lifetime/ indefinite	Visual detection by photos	There is currently no penalty for breaching. A person who is detected breaching will be removed from the property and issued a Protection of Property Act notice. If the person violates this notice, the police are called and they issue a Summary Offence Ticket, which carries a maximum fine of \$500.	A binder with patron information and photos, referred to on regular basis	Not applicable
<b>ON</b>	Lifetime/ indefinite (minimum 6 month term)	Visual detection by photos. Player's cards are flagged using computer software.	First breach receives a verbal warning. Repeated breaches may result in a site trespass and/or trespassing charges (fine of \$120), at the discretion of security staff.	Hard copies of paperwork and photographs kept; electronic database being developed	Patrons provided with brochures on treatment options
<b>PEI</b>	6 months – 3 years	Visual detection by photos; surveillance team uses cameras	On the first breach, the person is reminded of the agreement's conditions. Repeated breaches will result in criminal charges.	Reports and tracking forms are printed and given to security; surveillance has access to photos and incident reports	Referrals to addiction services, credit counselling, mental health services; provides information on GA meetings and contacts
<b>PQ</b>	3 months – 5 years	Visual detection by photos	No legal ramifications	Patron information and photos stored on computer database	Mandatory (1-2 hr) session with counsellor to evaluate gambling behaviour if the participant opts for the "gateway treatment model" pilot project*
<b>SK</b>	Up to 5 yrs	Facial recognition software; iCare flags the player cards of people who have self-excluded	Patron receives a warning letter for the first breach. Repeated breaches result in charges under the Alcohol and Gaming Act (\$150 fine).	Information updated in iTrak at the time of self-exclusion; data password protected and available to Level 2 trained staff and security	Prior to self-exclusion RGIC staff may work with at-risk patrons to help develop personal responsible gambling strategies; referrals provided in the information package they receive at the time of self-exclusion registration or from RGIC staff

\* There are currently two self-exclusion options in Quebec. The first is the standard option that does not feature counselling, the second is an enhanced option that features counselling and support as part of the "gateway treatment" model.

## Canadian Self-Exclusion Program Features

	REINSTATEMENT		PROGRAM EVALUATION
	<i>Process</i>	<i>Early reinstatement option</i>	
<b>AB</b>	Reinstatement occurs upon the expiry of the agreement. There is the option to re-enter the program for 6 months, 1, 2 or 3 years.	None	Comprehensive evaluation of the program completed in 2007
<b>BC</b>	No formal process. Patron can apply to extend ban prior its end through a letter to BCLC. Renewal usually done after expiration.	None	Currently being conducted through the Centre for Social Responsibility
<b>MB</b>	Patron must request reinstatement in writing and attend a mandatory gambling education course at AFM.	None	None
<b>NS</b>	AGA investigates and decides whether patron should be allowed to reinstate.	After six months	No formal evaluation
<b>ON</b>	Patron submits a written request for reinstatement and meets with staff to complete reinstatement forms. Patron must then wait 30 days before returning to the site.	After six months. Patrons who have excluded 3 times in 3 years must wait 5 years before applying for reinstatement.	None
<b>PEI</b>	Patron submits a written request for reinstatement to general manager and security manger. RGIC staff contact patron and set up an appointment for the reinstatement process, which includes signing the legal document and receiving RG information package. Patron must then wait 30 days before returning to the gaming floor.	None	Not applicable
<b>PQ</b>	Patrons in the “gateway” pilot are called 1 month before ban expiry to schedule a mandatory appointment with a counsellor prior to reinstatement.	None	The “gateway” pilot being evaluated by Ladouceur et. al
<b>SK</b>	A self-exclusion patron can request to have the ban extended. Individuals are required to return to the casino to confirm their identifications and update photos for facial recognition.	Patrons can appeal to the banning committee to terminate bans longer than one year. Appeals are considered under exceptional circumstances. Unsuccessful appellants can apply to SLGA.	Security and responsible gaming staff evaluate effectiveness; also evaluated by the internal auditor



## CHAPTER THREE: FOCUS GROUPS WITH THOSE WHO HAVE SELF-EXCLUDED

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### Background

A total of 12 focus groups were held with 76 individuals with self-exclusion program experience. The focus groups were conducted in the following provinces:

- British Columbia
- Manitoba
- Ontario
- Nova Scotia
- Prince Edward Island
- Saskatchewan
- Quebec

Focus groups participants were recruited through counselling agencies, newspaper advertisements and RGC's website. Participants were screened for eligibility and divided into people who had self-excluded once, and people who had self-excluded twice or more. Participants were given a \$100 gift certificate to the local mall as an honorarium and refreshments were provided.

Prior to the start of each focus group, participants were given a survey that collected demographic information and information on their gambling activities before and during self-exclusion.

The focus groups were moderated by one RGC researcher while another RGC researcher took notes. All the focus groups were recorded and transcripts of the recordings were made for the analysis. All participants signed consent forms and all transcripts and recordings are stored on RGC's secure computer network.

### Survey Findings

Prior to beginning each focus group, participants completed a survey that collected demographic information and information about their gambling behaviours prior to and during self-exclusion. All 76 focus group participants completed the survey.

### Demographic Information

Seventy-nine per cent of focus group participants had self-excluded one time, while 21% had self-excluded two or more times. The average length of time that participants had gambled prior to self-exclusion was 14 years (N=74).

In terms of demographics, 47% of the focus group participants were male, 53% were female and their mean age was 52 years old. Twenty-two per cent of participants had completed high school, 48% had completed all or part of a post secondary program and 17% had completed all or part of a post graduate program. The breakdown of household income (N=75) is as follows: 18.7% of participants had incomes less than \$20,000, 26.7% of participants had incomes between \$20,001 and \$40,000, 20% of participants had incomes between \$40,001 and \$60,000, 25.3% of participants had incomes between \$60,001 and \$100,000 and 9.4% of participants had incomes greater than \$100,001. It should be noted that income was not associated with the amount of money spent per gambling session.

### Gambling Behaviour Prior to Self-Exclusion

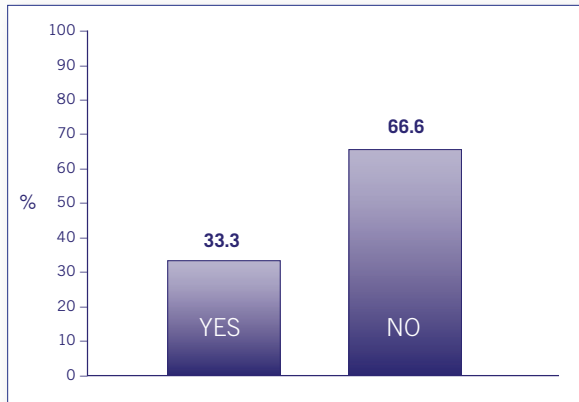
Focus group participants (N=71) reported that, on average, they gambled approximately two to four times per week prior to self-exclusion and that a typical gambling session lasted an average of 5.8 hours, during which they spent an average of \$742.39.

### Gambling Behaviour During Self-Exclusion

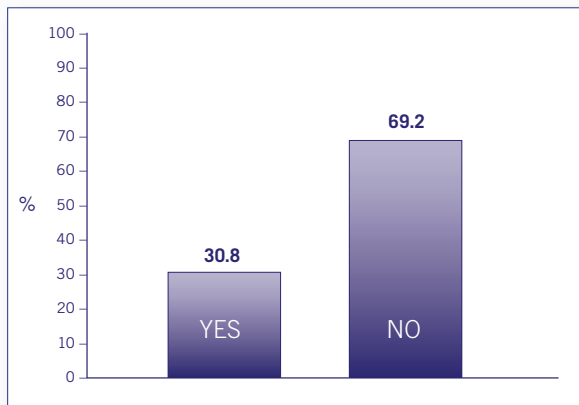
During self-exclusion, focus group participants reported (N=71) that, on average, they gambled at least once every three months. Furthermore, focus group participants reported that a typical gambling session lasted an average of 3.4 hours, during which they spent an average of \$243.49.

One third of focus group participants reported breaching their self-exclusion agreements by gambling at the venues from which they had self-excluded (see Figure 1). Among focus group participants who had breached their agreements, 69.2% were not detected. (see Figure 2).

**Figure 1.**  
Participants who breached self-exclusion (N=75)

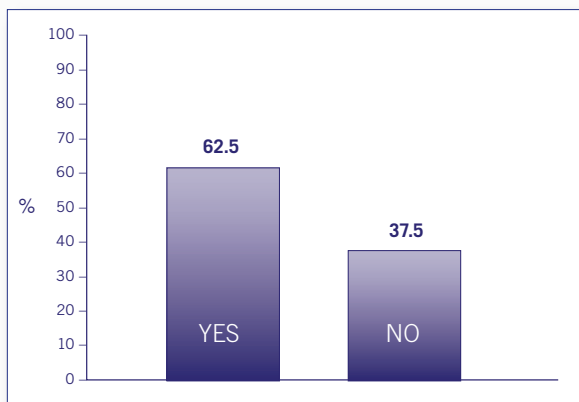


**Figure 2.**  
Participants who were discovered breaching (N=26)



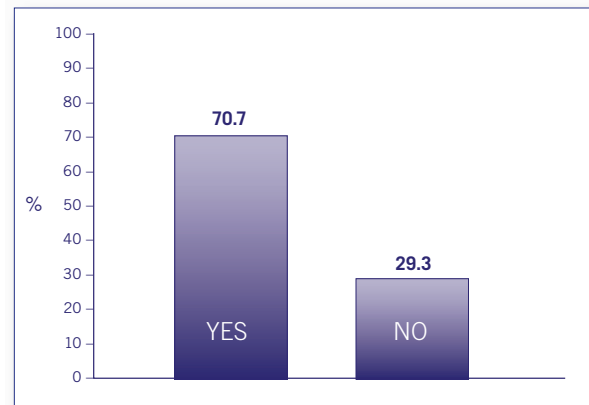
Being detected was not a deterrent for the majority of focus group participants who breached their agreements. Among those participants who were detected when they breached, 62.5% reported that they went on to breach again (see Figure 3).

**Figure 3.**  
Participants who breached again after being discovered (N=8)



In addition to breaches, focus group participants were asked about their gambling activities in venues that were not covered by their self-exclusion agreements. Fifty-nine per cent reported that they had engaged in other forms of gambling during their bans. When looking at overall gambling activities during self-exclusion (e.g., including gambling at the banned venue(s) and at sites not covered by the ban), 70.7% of participants reported that they had participated in gambling of some sort (see Figure 4).

**Figure 4.**  
Participants who gambled while self-excluded (N=75)



### Comparison of Gambling Prior to and During Self-Exclusion

In comparing gambling activities prior to and during self-exclusion, focus group participants reported gambling less often and for shorter lengths of time during the period of self-exclusion. Participants also reported spending less money in a typical gambling session while self-excluded. Thus, while approximately 70% of focus group participants reported that they gambled during self-exclusion, the results of the focus group survey suggest that there was a notable reduction in the gambling activities of participants while self-excluded.

### Summary

- Focus group participants gambled an average of 14 years before self-excluding.
- The majority of focus group participants had self-excluded for the first time.
- One third of focus group participants breached their bans and most of them were not detected during these breaches.
- Fifty-nine per cent of focus group participants gambled at venues not covered by the ban during the self-exclusion period.

- Self-exclusion did not stop the majority of focus group participants from gambling (70% reported engaging in some form of gambling during this period), however, self-exclusion was associated with a marked reduction in the amount of time and money spent on gambling and the frequency of their gambling.

## Discussion Findings

The findings presented are an amalgam of the results from all of the focus groups and represent common and recurring points. The content of the discussion from the focus groups is organized according to the nine issues that form the framework of this study. (Because focus group findings for the first issue, Expectations, also touch on other related issues such as motivations and actual experiences, these issues are considered in the Expectations section.)

### Expectations

Participants reported that common motivations to self-exclude included severe financial hardship, including bankruptcy. Participants also frequently reported that they had “hit rock bottom” and the stress caused by their gambling problems was affecting their physical and mental health. It was also not uncommon for participants to cite family and social pressures as motivations.

Participants reported a range of feelings prior to self-exclusion. These included desperation, suicidal thoughts, despair, guilt, shame, embarrassment and a perception that they were stupid. Some participants also stated that they felt ambivalent about going through with self-exclusion and were fearful about how they would adjust to life without gambling.

During the registration process, participants commonly reported feeling good, proud, and relieved. In terms of negative feelings, some participants said that they felt embarrassed and that they were being treated like criminals. Some participants also felt angry at the casino and were confused about the terms of the program.

Immediately after signing up for self-exclusion, participants commonly reported feeling free and relieved. Many participants also said that once they had self-excluded they felt like they were more in control of their lives. However, some participants also said they were angry at the casino for all the money they had lost while gambling and were anxious about the consequences if they breached their bans.

After they had been excluded for some time, many participants said they still felt relieved and that they were regaining a sense of calm in their lives. However, some participants reported that they continued to have gambling urges and others missed the social element of the casino. Participants also frequently complained that they were not able to go to the casino for shows or social events.

Many participants said that the mere fact that self-exclusion existed was helpful. Participants felt that self-exclusion provided a chance for them to think about and assess their gambling behaviours and their lives in general. They also reported that self-exclusion gave them a break from gambling and helped them save money.

Self-exclusion appeared to provide participants with a sense of self-determination. Many participants reported that they liked the fact that self-exclusion was self-initiated because this gave them a sense of empowerment. They also felt that by signing the contract they were taking responsibility for their lives.

### Registration

Most focus group participants described the following basic elements to the self-exclusion registration process:

- The individual approached casino staff, who then called security.
- The individual was accompanied to a room in the casino (usually the security office) where application forms were signed and pictures were taken.
- Security staff escorted the individual off the casino premises.

Most focus group participants thought that the registration process was easy but some experienced administrative errors that prolonged the process. These included waiting a long time before someone was available to process their applications, incorrect entry of their names or personal information, or their photographs not turning out.

“I waited 20 minutes...feeling that...I had been [caught] shop lifting or something.”

Participants also reported differences with respect to their experiences with staff. While some found the staff to be supportive, helpful and compassionate, others encountered staff who were rude, uncaring, and disrespectful. Some participants also reported that they felt like casino staff tried to talk them out of self-exclusion. Many participants complained that they felt they were treated like criminals by security staff during the registration process. This feeling was often exacerbated by the environment in which the registration was processed, which was typically in an isolated room that was part of the security offices.

With respect to support during the registration process, participants reported that little was available in terms of formal crisis management, care or support. Furthermore, participants reported that little counselling or treatment information was provided, both at the time of registration and during self-exclusion.

Participants suggested that there should be more support and counselling provided as part of the registration process. Participants also suggested that more resource information on problem gambling treatment be provided when signing-up for self-exclusion.

They also suggested that the staff be better-trained and more sympathetic, and that there be more convenient ways of registering for bans. Furthermore, some participants felt that self-exclusion should be administered by people who were not employees of the casino.

### Counselling and Other Supports

Most participants sought some kind of support to complement self-exclusion. Types of support included counselling (problem gambling, mental health, financial), support groups (including Gamblers Anonymous) and formal treatment programs. Additionally, participants reported receiving informal support from family and friends, as well as religious and spiritual support.

However, participants felt there was a lack of follow-up (by the venue) during self-exclusion. It was suggested that there should be an option for counselling and support services and that staff involved in self-exclusion programs should “check in” on self-excluders during the ban period.

There was some debate among participants about making counselling a mandatory part of self-exclusion. While many agreed this was a good idea, some felt it could be problematic.

Those in favour of mandatory counselling stated that there was a need to support those in self-exclusion programs. They also felt that counselling would enable those who had self-excluded to get to the root of their problems.

Participants who had reservations about mandatory counselling felt that while counselling was a good idea it only worked with people who wanted to change. It was also noted that people could “cheat” by lying to the counsellor and also that mandatory counselling might deter people from self-exclusion.

### Ban Length

Participants warned that bans should not be too short and it was suggested that anything less than 6 months would be ineffective. However, participants also felt that shorter bans might be good for providing a break from gambling that allowed people to evaluate their situations and make decisions about their needs.

**“I think some people need a lifetime ban...whereas some people just need a break....I think you have to have options.”**

In general, participants felt that longer bans were better because they felt that most gamblers with problems do not realize how serious their problems are at the time of self-exclusion. Most participants recommended a minimum ban length of one year because they felt that shorter bans were easy to wait-out and did not provide enough time for people who had self-excluded to stabilize and develop healthier behaviours.

However, some participants also noted that the ideal ban length depends on the type of gambler. While gamblers with severe problems may require lifetime bans, people whose gambling problems are less severe might just need “time out” to reflect on their gambling behaviour.

One interesting idea from the focus groups was a shorter self-exclusion ban that would serve the purpose of giving the individual a “cool-down” period. The ban would be combined with counselling and, at its conclusion, the individual would have the option to continue the ban and/or counselling.

Most participants felt that bans lasting longer than two years were appropriate for people with serious gambling problems. Some in the group felt that bans should last for at least five years.

Most participants felt that giving people the option of selecting the length of their ban was a good idea.

There was some debate among participants as to whether or not lifetime bans were more effective than bans that

were time-limited. Participants who were members of Gamblers Anonymous tended to feel that self-exclusion should be for life. Some participants felt that bans should be for life but that there should be an option to reinstate.

There were those in the focus groups who felt that some people might not need lifetime bans because they were able to safely return to gambling after taking a break.

Some participants felt that lifetime bans would be a deterrent to self-exclusion.

### Detection and Management of Breaches

Most participants felt that casinos should be more diligent about detection. Indeed, the most commonly reported short-coming of self-exclusion was the lack of monitoring and enforcement. There was a concern raised by participants that casino security was too lax and it was noted that casinos seemed to lack effective identification systems. Some participants also felt that casino security staff did not always enforce penalties and that people who were caught breaching their bans were frequently let go without consequences.

Participants acknowledged that self-exclusion can be challenging for casino staff to enforce because of the number of people who are self-excluded. Participants noted that people with gambling problems who have self-excluded were at risk of breaking their bans because they have difficulty controlling their urges to gamble. What's more, while participants felt that management of breaches should be improved, they also expressed concern that more intrusive detection measures might constitute a violation of players' privacy.

Suggested detection improvements included adding new detection technologies like facial recognition, fingerprint scans, and mandatory player cards that would be scanned upon entry. Participants conceded that such improvements would be expensive and complicated and there were concerns that if player cards were mandatory, people who had self-excluded could share cards with non-excluded players.

Participants also felt that staff were not well-trained with respect to problem gambling issues. Therefore, in addition to improved detection measures, participants suggested that the casino staff responsible for self-exclusion should be better trained.

Participants expressed concern that the penalties for breaching self-exclusion bans were too light. Many felt that enforcement and penalties needed to be more severe and that the threat of criminal convictions or fines and the accompanying humiliation were strong deterrents to

breaching self-exclusion. (In fact, many said the threat of being criminally charged if caught provided the incentive they needed to stay out the casino).

However, others felt that fines would not be an effective deterrent since those with gambling problems have already sustained substantial financial losses that might make the amount of the fine seem inconsequential. It was also suggested that fines might only compound financial hardships and that community service might be a better option.

Most participants agreed that the practice of confiscating jackpots from players who have self-excluded will deter people from breaching their bans. However, some participants felt that if a banned player won a jackpot, the casino should pay out because it had not detected them. It was noted that a jackpot winner who had self-excluded could get someone else to collect the prize. It was also noted that the hope of winning is not the only reason people gamble.

*The practice of confiscating jackpots...will deter people from breaching their bans.*

There were a range of opinions among participants regarding shifting the emphasis of self-exclusion from enforcement to support. It was suggested by some participants that self-exclusion could incorporate a combination of both approaches. Thus, there could be an escalation of consequences for breaches depending on the number of times a ban had been broken. These escalating penalties could be outlined in the terms of the self-exclusion agreement so that people who self-exclude would know what to expect.

### Ban Scope

There was mixed opinion among participants with respect to partial bans (i.e., prohibited access to some areas, such as the gaming floor, but permitted access to other parts of the venue, like the restaurant). Many participants liked the absoluteness of self-exclusion that came from knowing that they could not return to the casino under any circumstances. However, others thought that partial bans or play restrictions could help them gamble within their limits. Participants also commented that they would like to be able to enjoy a casino's non-gambling amenities, such as restaurants and live shows.

Most participants liked the fact that the ban covered all the casinos in their province of residence. However, many also expressed the desire for the bans to be nation-wide. The majority of participants also said that they wished self-exclusion applied to other gambling venues, particularly VLT sites. While participants acknowledged

that self-exclusion at VLT sites would be difficult, they noted that the temptation to gamble on VLTs after self-excluding from casinos could be strong—a problem that was exacerbated by the high accessibility of VLTs in the provinces where they were available.

A common complaint about self-exclusion is that banned individuals cannot take advantage of a casino's non-gambling amenities, such as restaurants, entertainment or social functions. Thus, some participants felt that instituting partial bans might be a way to address this concern.

### Renewal and Reinstatement

One problem identified with time-limited bans was that people who have self-excluded need to re-apply every time the ban lapses, creating the opportunity to return to gambling.

It was suggested that casinos notify individuals prior to the conclusion of their bans so the ban could be extended or renewed. They also suggested that there be more convenient ways (i.e., outside of the venue) of renewing bans.

*Individuals should be notified before their ban ends so the ban can be extended or renewed.*

Many participants thought it would be a good idea to have a mandatory assessment by a problem gambling counsellor before being permitted to return

to the casino. However, some concerns were raised with this idea. Participants felt that people could lie to the counsellor during the assessment, telling them whatever they thought would get them back into the casino. It was also noted that making the assessment mandatory might be a deterrent for people entering self-exclusion.

### Promotion

Most focus group participants had learned of self-exclusion from someone outside the casino, most commonly from friends, family, a counsellor or members of a support group. For participants who had learned about self-exclusion at a casino, the most common sources for this information were pamphlets, casino staff, and other people who had self-excluded.

Most participants agreed that the promotion of self-exclusion needs to be improved. However, participants also commonly acknowledged that, regardless of the level of promotion, it would still be difficult to approach staff on the gaming floor when in a state of crisis because of the personal and embarrassing nature of the situation. Some participants also noted that most regular gamblers

do not pay attention to responsible gaming signage and information.

### Regulatory Oversight and Penalties

In general, focus group participants felt that casinos had an obligation to protect their customers from the potential harms of gambling. In this regard, participants often drew a comparison between the expectations of establishments that serve alcohol with respect to the safety and wellbeing of their customers, suggesting that gambling providers should adhere to similar principles. However, there was general scepticism among participants about the degree to which casinos would do this given that a more socially responsible approach might decrease their profitability.

It was suggested that self-exclusion should be administered by an independent third party.

Many participants felt that casinos should be penalized if they do not hold up their end of self-exclusion agreements. In particular, participants felt that fines for casinos might motivate them to be more diligent in detecting breaches. It was also suggested that the proceeds of the fines could be used to fund problem gambling services.

However, participants acknowledged that it would be very difficult for casinos to be completely effective with respect to enforcement given the high number of people who have self-excluded. Some people in the focus groups also felt that it was an individual's responsibility to abide by the terms of self-exclusion and that casinos should not be held accountable for an individual's mistakes.

### Summary

In summary, the following themes emerged from the twelve focus groups:

- Self-exclusion is not considered to be a panacea for problem gambling. The majority of participants acknowledged that personal responsibility was crucial to the success of the self-exclusion, as well as to the success of problem gambling treatment in general.
- There should be more convenient ways to register for self-exclusion, such as offsite or by mail.
- Self-exclusion needs to be more compassionate and supportive. Thus, more assistance should be available for people who are in crisis when they self-exclude, more resource information on problem gambling services should be available at the time of registration and more support should be offered during the ban.

- Better-trained staff are needed to administer self-exclusion and deal with the needs of problem gamblers.
- Mandatory counselling was not frequently recommended, although providing access to optional counselling was deemed to be helpful.
- Cooling-off periods after the registration process that allow people who have self-excluded to reverse their decision were seen as counterproductive and undesirable.
- Bans shorter than 6 months were seen as ineffective.
- There should be a choice of ban lengths to suit different situations. People who have problems with gambling but whose gambling patterns are moderate or episodic might need shorter bans, while people with severe gambling problems could need longer bans.
- There should be an option for irrevocable lifetime bans.
- There was mixed support for mandatory player cards or identification being required to gain entry to gambling venues.
- There needs to be better enforcement of the bans. While there is a recognition of an individual's own responsibility with respect to self-exclusion, bans need to be taken more seriously by casino staff and the consequences need to be swift, certain and consistent.
- Consequences for breaching bans are not severe enough. Escalating penalties were seen as a positive step and there was a belief that enforcement could be combined with support.
- Confiscating jackpots from players who have self-excluded will deter people from breaching their bans.
- Self-exclusion should extend to more venues than just casinos, such as VLT sites.
- Mandatory assessments as a condition of reinstatement are seen as a potential deterrent. Furthermore, participants felt that individuals could be dishonest about their gambling behaviour in order to get a positive assessment that would allow them to reinstate.
- There is not enough promotion of self-exclusion within casinos.
- There is general scepticism that casinos are not invested in running robust self-exclusion programs because doing so might negatively affect their business. Thus, self-exclusion should be administered by an independent third party.
- Gaming providers should be penalized if they are negligent in the enforcement of self-exclusion, although many also acknowledged the challenges that casinos face with respect to enforcement.





## CHAPTER FOUR: INTERVIEWS WITH SELF- EXCLUSION PROGRAM ADMINISTRATORS

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### Background

RGC interviewed individuals involved in the administration of self-exclusion programs in Nova Scotia, Prince Edward Island, Quebec, Ontario, Manitoba, Saskatchewan and British Columbia. A total of 22 individuals were interviewed: seven operators, three regulators, eight security staff and four responsible gaming representatives.

All except two of the interviews were recorded and transcripts were made from the recordings for the analysis. In the case of the interviews that were not recorded, detailed notes were taken.

The discussions during the interviews were fluid. The content of the interviews is organized according to the Review framework. Not all interviewees were asked the same questions. The findings presented are an amalgam all of the interviews and represent common and recurring points. As with the focus groups, findings for the first issue, Expectations, also touch on other related issues such as motivations and actual experiences, therefore these issues also appear in the Expectations section.

### Findings

#### Expectations

Interviewees felt that people self-exclude for a range of reasons. It was often noted that while some people who have self-excluded recognized that they had gambling problems and wanted to quit gambling, others chose to self-exclude as a temporary break from gambling. Family pressures were also commonly identified as motivations for self-exclusion. Furthermore, some interviewees had observed self-exclusions that were motivated by anger at the casino due to heavy losses or unsatisfactory service.

In general, interviewees stated that the purpose of self-exclusion is to help people stop gambling for either the short or long-term. It was also frequently noted that self-

exclusion can be a source of assistance for people seeking help for gambling-related problems.

Interviewees tended to think that people who signed self-exclusion agreements expected casinos to stop them from returning. There was some concern among the interviewees that people who have self-excluded can have unrealistic expectations of self-exclusion. Interviewees frequently commented that some of those who chose to self-exclude thought that it would solve their gambling problems. Interviewees also noted that a minority of people expected the casino to take full responsibility for enforcing their exclusion.

Most interviewees felt that their programs were effective for the majority of people who have self-excluded. However, it was often noted that self-exclusion is most effective for those people who take the responsibility to not return to the casino. It was also felt by some interviewees that the effectiveness of self-exclusion could be improved if more people took advantage of treatment options and resources.

#### Registration

While it was acknowledged by some interviewees that security staff were not always the best-equipped to handle the emotional situations that might arise during self-exclusion, the general sentiment among program administrators was that security staff had the appropriate training and sensitivity. Some interviewees also noted that in their casinos, it was shift managers and responsible gaming staff that handled self-exclusion registrations, instead of security personnel.

Interviewees who worked at casinos with RGICs reported that the Centres were most involved in the early stages of self-exclusion. Specifically, the RGICs referred people to the casino staff who would carry out the registration process and provided information on counselling and treatment.

*Cooling-off periods  
are a bad idea.*

Most interviewees felt that people who self-excluded were given sufficient information on the program. In general, the program administrators did not think it would be helpful to provide too much information during the registration process. It was noted that most people who self-exclude just want to complete the process as quickly as possible and do not want to talk for very long.

Most interviewees felt that cooling-off periods were a bad idea and that if someone wanted to self-exclude, their application should be processed as soon as possible.

## Counselling and Supports

Most interviewees thought mandatory counselling was a good idea in theory but not practical. Common concerns were that it would be a deterrent to registering and hard to enforce. The general sentiment of the interviewees was that counselling was important and beneficial, but only for those people who want it.

## Ban Length

Interviewees identified long ban lengths, particularly lifetime bans, as one of the most ineffective features of self-exclusion because they were unenforceable and logistically problematic. More specifically, interviewees felt that longer bans could be a deterrent to signing up and were harder to enforce because the photographs of people who have self-excluded become out of date, making it more difficult to identify them if they returned to the casino. However, it was felt that lifetime bans are workable when there is an option to reinstate.

There was also the concern that some people ban themselves impulsively or under pressure from other people (e.g., family and friends) and that these individuals may be more likely to breach a longer ban but they may respect a shorter one. Thus, there was the sentiment among program administrators that shorter bans were less intimidating and easier to abide by. However, some interviewees also noted that the ideal ban length is subjective and depends on the needs of the person in question.

Most interviewees felt that there should be options for ban lengths, as different people have different needs.

## Detection and Management of Breaches

Program administrators made a number of suggestions for improving the detection of people who have self-excluded. While some thought that facial recognition systems should be a standard feature of self-exclusion enforcement, others noted that facial recognition does not work well in practice. Instead of facial recognition or other types of electronic detection systems, some suggested that more surveillance personnel were needed on the gaming floor. It was also suggested that family members could be incorporated into self-exclusion enforcement and could alert casino staff if a person who had self-excluded was returning.

The use of mandatory player cards was also commonly discussed. However, many program administrators felt mandatory player cards would be inconvenient and cumbersome for most players and impractical for large destination casinos. There were also concerns about privacy issues that might stem from the universal use of player cards.

The opinions of program administrators were mixed with respect to player tracking systems. Some felt that a system like iCare—an “Intelligent Player Care program” consisting of a suite of integrated prevention-based responsible products, such as player databases and player tracking software (iCare Responsible Gaming Program)—represented a more proactive approach to finding players who have gambling problems than the more reactive approach of self-exclusion. However, some interviewees were unsure as to how to effectively use the information collected through a player tracking system. It was also commonly noted that the use of such a system would have to be balanced with privacy concerns.

*There needs to be deterrents to give self-exclusion “teeth.”*

Most program administrators agreed that self-exclusion should be designed to help people, not to punish them. They raised concerns about enforcement-focused self-exclusion, including that it requires too much in terms of resources, punishes people who already have difficulties and does little to help people resolve their gambling problems.

But moving toward a greater focus on support also raised concerns, including the question of how to handle people who repeatedly breach their bans and the fact that not everyone who self-excludes is open to taking part in supportive programs.

Opinions on fines were mixed. Some program administrators felt that fines would not deter people from breaching their bans because the amount of the fine would likely be small in comparison to their gambling debts. There was also concern about penalizing and criminalizing people who had chosen to ban themselves.

However, program administrators also felt that there needed to be deterrents to give self-exclusion “teeth”. Suggestions included a system of escalating punishments that could include both fines and the option for community service.

Several interviewees felt that jackpots should not be awarded to people who had self-excluded. However, the optics and potential legal issues of not paying out jackpots were considered problematic. On the whole, interviewees who supported the forfeit of jackpots for people who had self-excluded felt that this consequence had to be clearly stipulated in self-exclusion agreements. It was also noted that confiscating jackpots would be hard to enforce for table games.

## Ban Scope

While some interviewees felt it would be good to be able to offer play restrictions, virtually all interviewees felt that partial bans would be difficult to implement and enforce.

Most felt that extending self-exclusion bans to VLT sites was a good idea in theory, but many had concerns that it would be difficult to implement such a system given the wide distribution of VLT sites. It was also noted that the managers of establishments with VLTs would need special training on how to manage self-exclusion. Furthermore, interviewees noted that there were potential privacy issues with self-exclusion at VLT sites since the staff at these establishments would have access to information about individuals who have self-excluded.

## Renewal and Reinstatement

Program administrators did not provide comments on renewal; however most interviewees agreed that there should be some kind of re-entry program for self-exclusion. Some interviewees thought that RGICs should be more involved in self-exclusion reinstatement.

*There should be some kind of re-entry program for self-exclusion.*

There was a general concern that mandatory reinstatement assessments would be a deterrent to self-exclusion.

There were also concerns

that assessments would be expensive and time consuming and that there were potential liability issues if a person who had self-excluded was cleared to return to the casino only to relapse into problem gambling.

## Promotion

The responses of program administrators varied with respect to the promotion of self-exclusion. Most self-exclusion programs had brochures and many program administrators reported that their casinos had responsible gaming advertising in the washrooms. Information on self-exclusion was also provided by Responsible Gaming Information Centres (RGICs), although not all casinos had RGICs. Self-exclusion information was also frequently available on the casinos' websites. In general, interviewees felt that the promotion efforts in their venues were adequate.

## Regulatory Oversight and Penalties

Program administrators did not provide detailed comments about regulation of gaming providers. Only two related points were made:

Some interviewees thought that RGICs should be more involved in self-exclusion, particularly in terms of program management.

Most interviewees felt that casinos should not be fined because, given their resources, the casinos do the best they can to enforce self-exclusion.

## Summary

In summary, the following themes emerged from the interviews with program administrators:

- Most felt that their self-exclusion programs were effective for the majority of people who had self-excluded.
- Some felt that people who had self-excluded sometimes had unrealistic expectations of self-exclusion.
- Most thought counselling for people who had self-excluded was a good idea but it was generally felt that counselling should not be mandatory.
- Program administrators were generally opposed to cooling-off periods for self-exclusion applications.
- Most felt that there should be options for ban lengths, since different people have different needs.
- Long ban lengths, particularly lifetime bans, were thought by most to be ineffective because they could deter people from registering for self-exclusion and are more challenging to enforce.
- Most felt that self-exclusion should help people, not to punish them. However, it was felt by many that self-exclusion needs escalating punishments to deal with people who repeatedly breach their bans.
- While some supported the introduction of mandatory player cards, many thought this would be impractical.
- There was support for the forfeit of jackpots for players who have self-excluded, although concerns were raised about optics and legality.
- There was support for the idea of self-exclusion for VLT venues, but many had concerns about how such a system would be effectively implemented and managed.
- Most felt that mandatory reinstatement assessments would be a deterrent and create liability issues.



## CHAPTER FIVE: EXPERT FORUM

### Background

The Expert Forum was held October 22 to 24, 2007 in Toronto, Ontario. Attendees consisted of 38 experts on self-exclusion from North America, Europe and Australia, including regulators, operators, gaming providers who manage the programs, treatment providers, researchers, individuals who have signed self-exclusion agreements and policy makers. The proceedings of the Forum were moderated by a professional facilitator and consisted of presentations, large group discussions and smaller break-out group discussions. Forum attendees also completed an electronic survey at the start and conclusion of the Forum that assessed their opinions of self-exclusion programs.

During the Forum, current research and knowledge on best practices in self-exclusion were discussed as Forum attendees explored the factors that impede and facilitate the optimal functioning of self-exclusion. Forum attendees shared ideas on how to enhance the effectiveness of self-exclusion programs.

### Survey Findings

Forum attendees participated in an electronic survey at the end of the Forum to gauge their general opinions on self-exclusion. (Please see Appendix V for a copy of the survey). Presentation of the results of the end survey is organized according to seven of the nine framework issues (no questions on ban scope and promotion were asked in the end survey).

#### Expectations

Six per cent of attendees felt that self-exclusion is “an agreement between an individual and gaming provider to prevent the individual from gambling,” 28% indicated self-exclusion is “an expression of commitment by the individual to stop gambling,” and 66% indicated that self-exclusion is both.

#### Registration

Six per cent of Forum attendees felt that an independent body should manage the registration process, 79% felt it should manage both registration and reinstatement and 15% felt it should manage neither.

#### Counselling and Supports

Eighty-nine per cent felt counselling should play a role in self-exclusion and 11% felt it should be mandatory.

#### Ban Length

Six per cent indicated ban lengths should be 1 to 2 years, 12% indicated that the agreements should be for life, and 82% indicated that the ban lengths should be optional.

#### Detection and Management of Breaches

Eleven per cent indicated facial recognition systems should be used to detect people who breach, 9% felt that pictures of people who have self-excluded should be circulated among venue staff, 20% were in favour of mandatory player cards to enter venues, 11% were in favour of mandatory identification checks to enter venues, 46% were in favour of all these options and 3% were in favour of none of these options.

In terms of punishment for breaching, 8% indicated that people who breach should be ejected without consequences, 11% indicated that people who breach should forfeit any jackpot won, 6% indicated that people who breach should be criminally charged, 61% felt that people who breach should be subject to a system of escalating punishments and 14% felt that people who breach should not face any consequences.

**61% felt that there should be escalating punishments.**

#### Ban Scope

The end survey did not include any questions on ban scope.

#### Renewal and Reinstatement

Forty-nine percent indicated that they did not support mandatory counselling/assessment for reinstatement and 51% indicated that they did support mandatory counselling/assessment for reinstatement.

#### Promotion

The end survey did not include any questions on promotion.

## Regulatory Oversight and Penalties

Twenty-seven per cent indicated that they did not think that independent bodies should regulate and enforce self-exclusion, while 59% indicated that they thought that they should and 14% did not know.

Fifty-six per cent of Forum attendees indicated that they did not think gaming providers that fail to detect individuals who breach should be fined, 34% indicated they should be fined, and 9% did not know.

## Breakout Discussion Findings

Forum attendees were asked to discuss a list of ten questions that cut across the nine framework issues. (For a list of the questions that were discussed by the breakout groups, please see Appendix VI). Attendees were divided into five breakout discussion groups. Each breakout group had a different focus and each group discussed two of the ten questions. The leader of each breakout group presented the points of discussion from the groups to the rest of the Forum attendees. (For a summary of the discussions from each breakout group, see Appendix VII). The professional facilitator then engaged the group as a whole in discussions on each of the breakout group topics. Discussion from the larger group is included where relevant. The following presentation of the discussions is organized according to the nine framework issues.

### Expectations

The members of the counselling-focused group thought that one of the most important issues discussed at the Forum was measuring the success of self-exclusion. One member of this group stated that the ultimate measure of success for self-exclusion is the degree to which it reduces the frequency, intensity and length of an individual's gambling. Thus, even if people breach their bans, they may still be gambling less than they did before self-exclusion.

### Registration

A number of groups discussed aspects of the registration process. Issues that were raised included the provision of information, referrals to treatment and counselling, ban length, the option of offsite registration, the sensitivity of the staff who administer the program and the redemption of loyalty points. Each of these issues will be discussed in turn.

In terms of the information that providers currently give to people who have self-excluded, the members of the

counselling-focused group discussed a range of resources that they were aware of. These included:

- Websites with information on problem gambling and treatment
- Referrals to credit and financial counselling
- Information about what to expect from counselling
- Pamphlets on where to seek treatment
- Responsible gaming representatives onsite at casinos
- Helpline information

The group members agreed that there should be a package of print materials given at the point of registration that includes information on the self-exclusion program, problem gambling helpline information and locally relevant information on problem gambling counselling and financial counselling.

**“Give information on how to get the most out of self-exclusion and what it means.”**

A member of the counselling-focused group noted that there is no “one-size-fits-all” approach to self-exclusion and while some people may want to talk about treatment information as part of the registration process, many just want to get it over with as quickly as possible. Regardless, members of the group felt it was important to provide an information package to all people who self-exclude because while they may not be in a position to consider treatment at the point of self-exclusion, information on treatment may be helpful at a later point. The information in this package should include the following:

- A detailed description of the self-exclusion program
- Contact information for problem gambling helplines
- Contact information for local problem gambling treatment providers
- Contact information for additional support, such as financial counselling

The ban length-focused group suggested that different self-exclusion options could be presented to people when they self-exclude, depending on what they are looking for and how they define their situations. Thus, a person who just wants a break could choose self-exclusion for a year but someone who considers their gambling problem an

illness could choose self-exclusion for life. The pros and cons of different self-exclusion options could be presented to people at sign-up.

The enforcement-focused group felt that people should be able to self-exclude from all venues in a jurisdiction at once. The promotion-focused and enforcement-focused breakout groups both felt that there should be the option to register for self-exclusion somewhere other than at the venue. Options for offsite registration that were noted include the offices of a counsellor or treatment provider, the corporate offices of a gaming operator or mail-in and online registration. In addition to offsite registration, a member of the promotion-focused group noted that most registrations at venues occur in the security offices and that there should be an onsite alternative that is more comfortable and less intimidating. This group member suggested that Responsible Gaming Information Centres might serve this role.

In terms of the role of security staff, the enforcement-focused breakout group proposed that security should not be the primary administrator of self-exclusion. In this regard, the practices of Manitoba Lotteries Corporation and Harrah's Entertainment were cited as good models. In both cases, shift managers handle self-exclusion and security only comes in towards the end of the registration process. Regardless, it was agreed that the staff who

handle self-exclusion registration need to be sensitive and well-trained.

*People should be able to redeem their reward points for non-monetary rewards.*

The Forum-wide discussion session addressed the question of the management of individuals' loyalty

program points when they self-exclude. In some places, the points are the property of the individual and venues cannot withhold them. There was consensus in the Forum that people should be able to redeem their reward points for non-monetary rewards at the moment of self-exclusion registration.

## Counselling and Supports

There was consensus in the counselling-focused breakout group that too much emphasis is placed on combining self-exclusion with counselling. Members of this group were wary of self-exclusion being perceived as forcing people into treatment, as opposed to presenting treatment as an option. One member of the counselling-focused group stated that it cannot be assumed that everyone who seeks self-exclusion needs counselling and that self-exclusion alone might be enough for some people. There was also concern that there is a risk of stigmatizing people who self-exclude by making them think that they need to

see a "shrink". In response to these concerns, another member of the counselling-focused group suggested that information on counselling should be presented in a way that minimizes potential stigma. As an example of how this might work, another group member described Manitoba Lotteries Corporation's approach to self-exclusion, which is called "engage, connect, refer." This is intended as a supportive approach in which casino shift managers and responsible gaming staff engage patrons who are concerned about their gambling, determine their needs, and provide them with information resources that may be helpful to them.

Members of the ban length-focused breakout group agreed that there should be a relationship between self-exclusion and treatment services, although there was some debate as to the ideal nature of this relationship. Members of the ban length-focused group challenged the concept of self-exclusion as a gateway to treatment because people who self-exclude have different needs and objectives. Not all want treatment per se, opting instead for other services like Gamblers Anonymous. Others may simply use the ban as a tool for their recoveries. Furthermore, some people may self-exclude after seeking treatment, not vice versa. Thus, one member of the ban length-focused group suggested that self-exclusion is best thought of as a component to successful treatment.

One issue that arose in the breakout groups was the potential for any mandatory aspect of a self-exclusion program to be a deterrent to registration. There was consensus in the counselling-focused group that making aspects of self-exclusion mandatory would be a deterrent for entering self-exclusion. However, group members agreed that they did not know the extent to which mandatory requirements are an actual deterrent.

## Ban Length

There was a consensus in the ban length-focused breakout group that people who self-exclude should have a choice of ban lengths. A choice of ban lengths was considered important because it allows those who self-exclude to choose a ban that best suits their needs. There was also consensus in the ban length-focused group that there should always be the option of lifetime self-exclusion.

One member of the ban length-focused group said that he liked Ontario's self-exclusion program, in which the ban is indefinite, because this puts the responsibility in the hands of the individual who has self-excluded. Instead of Ontario's 6 month minimum, this group member felt that the minimum amount of time an individual should wait before being eligible for reinstatement is a year. This model of an indefinite ban with the option to reinstate after a one year minimum was supported by all members of the ban

length-focused group. However, one member of the group expressed concern that indefinite bans may be a deterrent and suggested that the promotion of such a model should downplay the fact that the ban is indefinite and should emphasize the option to reinstate after a year.

The ban length-focused group also discussed the issue of increasing ban lengths for people who self-exclude more than once. One member of the group felt that if a person asks for self-exclusion for second time, the ban should be permanent because they have shown that they cannot gamble safely. This idea received mixed support among other group members. One member of the group suggested that permanent bans for those who self-exclude a second-time might discourage people from re-applying. Instead, this group member suggested that self-exclusion should be permanent after the third time.

Forum attendees overall expressed support for the idea of a choice of ban lengths, including lifetime bans, to suit the diverse needs and objectives of people who self-exclude.

### Detection and Management of Breaches

Two of the key issues that arose in the breakout groups were the detection of breaches and penalties for breaches.

With respect to detection, there was consensus in the counselling-focused breakout group that no detection system is foolproof. While members of the counselling-focused group suggested that there needs to be some sort of detection system that demonstrates a venue's diligence and responsibility with respect to self-exclusion, the group was unable to come up with any clear-cut suggestions for effectively detecting breaches. Though facial recognition systems are often thought of as an important detection tool, a member of the counselling-focused group who was familiar with this technology noted that facial recognition is only effective about 25% of the time. Members of this group suggested that the emphasis should not be on detection, but on providing support to people who have self-excluded and encouraging them to be responsible for their actions.

*Emphasis should be on providing support.*

Members of the enforcement-focused breakout group noted that the volume of customers in many venues is too high for staff to effectively detect self-exclusion breaches. Members of this group also noted that not all venue employees have access to photographs of people who have self-excluded because of privacy issues. Regardless, members of the promotion-focused breakout group noted that even with access to photographs, it is difficult for

venue security to identify people who have self-excluded with only a photograph for reference.

In terms of current practices, one member of the enforcement-focused group stated that venues run by Harrah's Entertainment have created user accounts for all people who have self-excluded at each of their properties and all self-exclusion data is uploaded to Harrah's computer network so that all Harrah's venues have access to it. It was noted in the discussion that not all venues have the IT capability to enable them to share and manage self-exclusion data with other venues. Thus, computer systems will need to be enhanced across all venues if there is to be the infrastructure for cross-venue information sharing.

The need for controlled access to gaming venues as a means to enforce self-exclusion was noted in several breakout groups. A member of the counselling-focused group stated that the only effective way to detect people who are breaching their bans is through the use of electronic ID cards to gain access to the venue. A member of the non-casino gaming-focused group raised concerns that imposing mandatory identification checks to enter a gambling venue might violate the Charter of Rights and Freedoms. In response, others in the group noted that gambling is not a right and that people often have to show ID to do things like buy alcohol or board an airplane. People could cheat a self-exclusion system that required identification checks or card-only access by using fake ID or borrowing a non-excluded person's player card. One group member acknowledged this was likely, but felt that it would constitute a minority of people who have self-excluded. Furthermore, this group member noted that if a provider exercised due diligence by instituting mandatory ID checks or card-only access, it would be protected from liability if people tried to cheat the system.

In terms of penalties, members of the enforcement-focused breakout group felt that self-exclusion programs have no "teeth". One member of this group noted that in most jurisdictions, providers "bluff" to make the penalties seem worse than they actually are. The enforcement-focused group members felt that enforcement needs to be system-wide in order to be effective. However, there was debate regarding appropriate penalties. While trespassing charges and fines are common penalties in most jurisdictions, members of the enforcement-focused group noted that these fines are often too small to be a deterrent. Furthermore, people caught breaching their self-exclusion agreements are rarely fined. Regardless, members of the enforcement-focused breakout group had concerns about the negative optics of fining problem gamblers and many in the group felt that fining people for violating self-exclusion is like punishing the victim, since people who have self-excluded tend to already have financial troubles as a result of their gambling. The point was also raised by



one member of the enforcement-focused group that other public health interventions for addictive behaviours, like alcohol abuse, do not involve fining people.

Instead of fining, people caught in breach of their bans might have the option of alternative penalties, such as attending counselling. This perspective also emerged in the counselling-focused breakout group, where one group member observed that there are two schools of thought with respect to breaches: one is to mete out harsh punishments to deter people from coming back and the other is to use the breaches as an opportunity to see if the person needs additional support and resources.

Another penalty that was commonly discussed was the forfeiture of jackpots for players who have self-excluded. Members of the enforcement-focused group expressed concern about the optics of this practice. Furthermore, it was noted that some people who breach their self-exclusion agreements are excited by the risk of getting caught. Thus, winning a jackpot is not their sole motive for returning to the venue. Members of the enforcement-focused group also noted that confiscating jackpots is legally ambiguous and might not be feasible in all jurisdictions.

*Jackpot money should go to charity or problem gambling programs.*

These concerns notwithstanding, the consensus of the enforcement-focused group was that withholding jackpots is a strong disincentive for people who have self-excluded to re-enter the venue. The practice of withholding jackpots was supported by the Forum as whole. However, Forum attendees felt that the confiscated money should not be kept by the venue but should go to charity or to fund problem gambling programs.

There was a general consensus in the enforcement-focused group that there should be progressive penalties for people who are caught breaching their self-exclusion agreements. This could include fines or community service, with the penalty becoming more severe with each consecutive breach. Members of this group felt it was important that the escalation of penalties had to include the possibility of going to court, as fear of having a public record of their offense is a powerful motivation for people who have self-excluded to honour their agreements. However, it was also noted that if penalties become too harsh, they could be a deterrent to self-exclusion.

## Ban Scope

One member of the breakout group that focused on the issue of non-casino gaming felt that if self-exclusion is a positive initiative for casinos then it should apply to all gaming products. Though most members of the group agreed, some expressed concern about the cost and logistics of implementing and managing non-casino self-exclusion programs. While the consensus of this group was that implementing self-exclusion for non-casino gambling would be challenging, it was nonetheless possible.

## Renewal and Reinstatement

The counselling-focused group discussed the mandatory education program that people who have self-excluded in Manitoba must attend in order to reinstate. While many group members had concerns about such a program being a deterrent to registration, a group member from Manitoba noted that the education course has the potential to instill knowledge that might help people recognize warning signs of a relapse after they return to gambling.

## Promotion

The members of the breakout group that focused on promotion felt that a casino's chief responsibility with respect to promoting self-exclusion is to educate its employees on the program. The group felt that promoting self-exclusion to customers came next in terms of importance. While members of the group felt that providers have a responsibility to promote responsible gaming to the general public, they did not feel that self-exclusion needed to be promoted per se because it is typically accessed as a last resort by customers concerned about their own gambling.

In addition to self-exclusion related training for all staff, members of the promotion-focused breakout group felt that providers need to create a "culture of responsible gaming" among their staff, which would not only be positive for patrons, but would also be good for staff morale.

In terms of strategies to promote self-exclusion, one member of the promotion-focused breakout group discussed Holland Casino's policy in which frequent customers are given responsible gaming brochures that include self-exclusion forms. Another member of this breakout group suggested that if card-only access was standard for venues across Canada, brochures on responsible gaming and self-exclusion could be distributed with player cards. Others in the group agreed, and it was noted that integrating self-exclusion and responsible gaming information into a venue's promotional material would make the provision of this information less stigmatizing.

In order to assess how well self-exclusion is promoted in a venue, the promotion-focused breakout group agreed that evaluations could be conducted to determine the level of awareness of self-exclusion among both staff and people who have self-excluded.

### Regulatory Oversight and Penalties

The breakout group that focused on non-casino gaming also discussed the issue of the regulation and oversight of self-exclusion programs. One group member made the point that, in the Canadian context, it is the government that sets the policy directions for responsible gaming practices. However, the consensus of this group was that a third party should regulate self-exclusion while the daily management and operation of the program should remain with the casino.

While the breakout group supported third party regulation, group members felt that self-exclusion did not warrant the creation of a new regulatory body, since self-exclusions are not necessarily a daily occurrence. Instead, it was suggested that this role could be given to an existing and credible arms-length third party.

A member of the non-casino gaming-focused group felt that a third party regulator might better serve the interests of both the casino and problem gamblers by reducing the casino's liability and facilitating access to problem gambling treatment. Another group member added that third party oversight creates a "healthy paranoia" for providers. Other group members expressed concern that there is little to motivate providers to enforce self-exclusion other than fear of liability. It was noted that while some providers have strong corporate cultures with respect to responsible gaming, this is not the case for all jurisdictions. Furthermore, group members felt that no matter how scrupulous a provider's practices are, the optics of provider self-regulation are negative.

While there was consensus regarding the need for third party regulation, group members also felt that the administration of self-exclusion needs to be specific to each jurisdiction. The point was also raised that an independent body might complicate self-exclusion with an extra layer of bureaucracy. Regardless of the approach, the group felt that proper administration of self-exclusion requires that providers have a vested interest and a willingness to follow regulations or appropriate program administration.

The idea of fining providers who do not adequately enforce self-exclusion agreements was also discussed in the breakout groups and some members of the enforcement-focused group noted that this is already a policy in certain jurisdictions. In terms of examples, one enforcement-focused group member said that in British Columbia, the

Gaming Control Act allows investigators to write tickets (to a maximum of \$500) to venues that do not meet the standards set out in gaming legislation. Another member of the enforcement-focused breakout group mentioned that venues in Iowa face fines of up to \$40,000 if they are found to admit people who have self-excluded. While there was some support for this idea, the enforcement-focused group generally felt that fining venues should be reserved for situations where there is a blatant disregard for the enforcement of self-exclusion. Some group members in the enforcement-focused group thought that the threat of fines would make providers work harder to detect people breaching their self-exclusion agreements. However, one member of this group raised a concern that providers might not comply if the cost of the fines were less than the cost of upgrading security and surveillance.

### Summary

In summary, the following themes emerged from the Expert Forum:

- The success of self-exclusion should be measured by the degree to which it reduces the frequency, intensity and length of an individual's gambling.
- There should be the option to register for self-exclusion somewhere other than at the venue.
- People should be able to self-exclude from all casinos/racinos in a jurisdiction simultaneously.
- There should be an information package given during registration that includes: i) the respective role (e.g., expectations) of the person who is self-excluding and the venue; ii) program details (e.g., if a jackpot is won during the ban it will be forfeited, what happens to loyalty points, etc.); iii) problem gambling helpline information; and iv) information on treatment and support options.
- Onsite registration should occur in a private and comfortable setting and should not take place in the venue's security offices.
- While links to counselling and treatment are important, it should not be assumed that all people who self-exclude need treatment.
- Staff who handle self-exclusion registration should be trained for this purpose and be able to deal with sensitive issues. Security staff should not necessarily be the primary administrators of self-exclusion.
- There should be a choice of ban lengths, including lifetime bans, to suit the diverse needs and objectives of people who self-exclude.
- There should be progressive penalties for people who are caught breaching self-exclusion, including community service, and, ultimately, criminal charges.

- Jackpots won by players who have self-excluded should be forfeited and the money should go to a problem gambling program.
- The only way to effectively detect people who are breaching their bans is through the use of electronic ID cards to gain access to the venue.
- Any mandatory aspect of a self-exclusion program is a potential deterrent.
- Self-exclusion should apply to non-casino gambling sites, such as VLT venues.
- A casino's key responsibility with respect to promoting self-exclusion is to educate its employees about the program.
- Information on responsible gaming (including self-exclusion) should be integrated into all the promotional material of gaming providers.
- A third party should regulate self-exclusion but daily management and operation of the program should remain with the gaming provider.
- Gaming providers should face penalties in situations in which there has been a blatant disregard for the enforcement of self-exclusion.
- Self-exclusion programs should be periodically evaluated and audited.



## CHAPTER SIX: RGC'S ANALYSIS OF BEST PRACTICES IN SELF-EXCLUSION

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### Overview

In 2007, RGC initiated a thorough review of best practices in self-exclusion.<sup>6</sup> The Review assembled and examined information from five sources: the literature on self-exclusion, current practices in Canadian jurisdictions, focus groups with people who have signed up for self-exclusion, interviews with administrators of self-exclusion programs and an Expert Forum.

The framework for the Review was constructed around nine topics that were identified from the literature and practice. These are:

- Expectations
- Registration
- Counselling and Supports
- Ban Length
- Detection and Management of Breaches
- Ban Scope
- Renewal and Reinstatement
- Promotion
- Regulatory Oversight and Penalties

### From Enforcement to Individual Assistance

There is no doubt that self-exclusion is an important tool for gaming venues to offer and for patrons to consider when dealing with problem gambling. Many of the focus group participants indicated that self-exclusion played a very significant role in helping them to stop gambling. They also spoke about how good it felt to take control over their gambling. Even those who did not succeed in quitting entirely often reported a reduction in amount of time and money spent and in the frequency of gambling (see also Ladouceur, 2000) after they had self-excluded.

That said, the Review discovered many ways in which the process of self-exclusion can be improved. From a broad perspective these improvements would move self-exclusion from the currently predominant enforcement orientation to an individual assistance orientation. The latter model would place greater emphasis on assisting self-excluding individuals to get the help they need to address their problems and achieve their goals.

### Current Context

When people are considering self-exclusion they are looking for help. They are often experiencing a complex set of emotions, including distress, frustration and fear. To seek help, they have to approach venue staff that are not, in most cases, prepared or trained to handle this range of emotions. As one participant at the Expert Forum put it, “we think of the self-excluder as the person in crisis but we underestimate the crisis caused for the staff member having to respond to this very difficult situation.” Casino employees are not social workers and are often reticent to deal with an unpredictable personal issue. As a result, the problem is typically left to security staff and thereby becomes a “security issue”.

In recent years there have been calls for a shift in perspective on self-exclusion from a “punitive”, enforcement oriented process to a model that is more focused on helping individuals, connecting them with counselling and other supports. While there is a widespread consensus, including among gaming providers, regarding such a direction, the predominant model today continues to be based primarily on enforcement. This is not to say that the detection of breaches and enforcement is perceived to be any less important. Virtually every source consulted in this Review indicated that self-exclusion programs need to have more teeth. However, it is important to put the role of enforcement in proper perspective as a component, not the only component, of a program designed to help those individuals interested in self-exclusion to achieve their goals.

### Replacing the One-Size-Fits-All Approach

Many times throughout the Review, participants noted that there is no single type of gambler, and therefore no one set of motivations or expectations underlying self-exclusion. Yet the process of self-exclusion is remarkably similar across most organizations and jurisdictions. The process builds in

*There is no single type of gambler, and thus no one set of expectations.*

<sup>6</sup> The Review's focus is on emerging policies and practices that will best support the individual who has chosen to self-exclude. While every effort is made to take into consideration all implications, it is beyond the Review's scope to anticipate how these best practices would be implemented in individual jurisdictions given that each has its own unique set of regulations, service mixes, financial circumstances, human resource models, etc. to consider.

unnecessary rigidities and systems that act as deterrents and roadblocks rather than supports. The lengths of some bans, for instance, have become problematic even though they are often created for the best of reasons. The compulsory lifetime ban, for example, was created many years ago at the request of some compulsive gamblers who believed that for them gambling is an addiction and complete abstinence was the only alternative. This is undoubtedly true for many, but not for all. There is continuing debate even among gamblers themselves about ban lengths—though most participants in the Review support a variation in ban lengths tailored to the needs of the individual and his or her circumstances.

### **Evolving the Individual Assistance Model**

In practice, the evolution from an enforcement model to an individual assistance model is already underway in gaming venues and corporations across Canada and beyond. The Review discovered many changes in policy and practice (e.g., broadening the registration process beyond security; having specially trained staff to discuss counselling options with individuals asking for self-exclusion; including Responsible Gaming Information Centre staff in the self-exclusion process; etc.).

*The evolution from enforcement to individual assistance is already underway in Canada.*

Thus the self-exclusion process is already moving out of isolated security offices and into a more integrated, individual assistance effort involving more active participation of onsite casino staff and external organizations.

But these changes are just a

start. The individual assistance approach to self-exclusion implies changes to many aspects of the process, from registration (including the registration environment and procedure), communications, detection, management of breaches, renewal, reinstatement, promotions, etc.

### **What the Individual Assistance Model Is**

It is important to be clear that individual assistance, in this context, means responding in a helpful way to individuals' concerns; working through the registration process in a respectful, timely manner; providing information about counselling options (e.g., financial, self-help and treatment referrals) so that individuals may decide what is best for them, according to their own timeframes (i.e., readiness to address their problem); and encouraging these individuals to take advantage of the assistance available.

### **What the Individual Assistance Model Is Not**

While the Review found widespread consensus for changing the self-exclusion process, there is concern on the part of gaming operators and problem gambling professionals that casino employees not become drawn into inappropriate "social work" roles and that the detection and enforcement roles are improved, not abandoned. The individual assistance model is meant to be just that: a method of providing support to people with gambling problems, not a replacement for treatment.

The individual assistance model identifies many ways the process of self-exclusion can be implemented in a manner that is much more flexible and responsive. A more detailed description of this model, provided within the context of the nine framework themes, follows.

## **Expectations**

### **Clarifying Roles**

It is not possible to read the literature and media reports or listen to conversations about self-exclusion without hearing the differing expectations regarding roles and responsibilities. Gamblers who sign self-exclusion agreements often see it as a promise to themselves and to the gaming provider not to return and gamble at that venue. Some use self-exclusion as an aid in recovery that is part of a larger process of support and counselling. Some believe that a self-exclusion agreement places primary responsibility on the gaming provider to keep them out even if they breach the agreement they have made.

Gaming providers typically see their roles and responsibilities as a service commitment that they often have limited capability to meet. Over the years, gaming companies have tried to be clear about their responsibilities through carefully worded self-exclusion agreements and communications, placing responsibility fully on the shoulders of the individual. Though this has probably had some legal benefit, it has not alleviated the problem of expectations among the individuals signing the agreements. This should not be surprising, perhaps, since many of the people who sign self-exclusion agreements do so in times of great pressure or distress.

While some differences in expectations may be unavoidable, it is quite possible to create greater clarity around the self-exclusion process through changes in the way the agreements are established and managed as well as through improvements in communication between the gaming providers and those who self-exclude.

## Registration

The registration process is the primary, and often, the only interaction most people who self-exclude have with venue staff or problem gambling specialists. In the past, people seeking self-exclusion were typically ushered by security staff to a small, isolated room and asked to sign several documents. Their pictures were taken and they were then escorted from the premises. The process could take less than 5 minutes. Many people who had chosen to self-exclude saw this as a demeaning process that made them feel like criminals. Today, however, there are many innovations in practice that show great potential to make the registration process much more helpful and respectful.

### Expanding Registration Access Points

Repeatedly throughout the Review, individuals who had chosen to self-exclude, treatment providers, gaming officials and problem gambling specialists indicated that registration should be available via multiple access points. They suggested registration at the Responsible Gaming Information Centres, at sites outside of the venue, such as treatment providers' offices, regulator or operators' corporate offices or even by mail or online. A number of Canadian jurisdictions now offer registration via multiple access points though this is not the norm across Canada. (Please see Chapter Two: Self-Exclusion Program Features for a thorough listing).

*The considerable benefits of multiple access points outweigh the limitations.*

There is no doubt that a move to multiple access points for registration presents an expanded set of logistic and administrative complexities. For example, if paperwork is completed offsite, checks have to be in place to ensure that the proper documentation is received, verified and entered into the gaming provider's system.

Where registration is expanded to multiple access points it would be essential to ensure that:

- Uniform protocols are established (e.g., all access points must complete the same forms and take the same type and size of pictures)
- Consistent and accurate information is presented to the patron who is self-excluding
- Confidentiality arrangements are clear
- Protocols for the information exchange between the venue and the third party registrant are well delineated

- Methods for processing documents are sound
- Safeguards and checks for each stage of the process are in place

Another potential impediment to multiple access points is the issue of liability in the event of a lawsuit. Currently, the typical complaint of gamblers who sue casinos is the allegation that the casinos have failed to live up to their obligations under self-exclusion agreements. If the registration process occurs in settings other than the casino, the agency or organization that administers registration could potentially be named in any future lawsuit (e.g. alleging failure to prevent a patron who has self-excluded from entering the premises), even if they have nothing to do with detection or enforcement. This risk, while remote, is real and would have to be managed at the time of registration through some form of indemnification process, insurance and/or waivers signed by the individual. On balance, however, the considerable benefits of multiple access points outweigh the limitations, assuming the liability issue can be resolved or at least substantially mitigated.

### Modifying the Process Within Gaming Venues

Whether or not self-exclusion agreements are established offsite, gaming venues are likely to continue to be the place where the majority of agreements are initiated. The individual assistance model implies a shift in the way self-exclusion is initiated internally. Whether delivered by security staff or other casino staff, the process could be improved in several ways.

First and foremost, there was consensus in the Review that staff should be specially selected and trained to provide a responsive, respectful and professional process. Staff responsible for self-exclusion might come from any number of positions including security personnel, shift managers, be from the RGIC or be treatment providers from offsite. The key determining factor is that, at the end of the training, designated staff be able to actively listen to patrons and explain the self-exclusion process to them.

Furthermore, all information sources in the Review supported a registration process that is:

- Carried out in a respectful, discrete way
- Takes place in a comfortable setting
- Executed in a timely manner

Registration may be the only opportunity to provide patrons with information on how self-exclusion works, how they can benefit from it, what supports are available, what is expected from the individual who is choosing to self-exclude, what is expected from the venue, etc. Topics covered during the discussion between staff and the patron should include:

- Roles and expectations of gaming provider and the person who has chosen to self-exclude
- Ban length options that best meet the individual's needs
- How breaches will be managed
- What happens to player cards and loyalty points (please see the explanation that follows)
- Whether the person who has self-excluded has more than one player card or is registered under more than one name
- Support options (e.g., local gambling counselling, helpline number, financial counselling, online resources, and self-help resources)
- Processes for renewal and/or reinstatement
- Confidentiality and privacy arrangements
- The cessation of promotional materials

### Provision of Take-Home Material

It must be acknowledged that given the tense, often emotional nature of the self-exclusion registration process, it may be very challenging to convey the information required in a meaningful way. The conversation may be more than the patron is willing or able to absorb. Yet much of the information available will be important to the individual and their future decision-making. Therefore, many participants in the focus groups and the Expert Forum highlighted the importance of providing those who self-exclude with written material that they could view in less pressured circumstances.

### The Benefits of Follow-Up Contact

Program administrators suggested that registration may not be the best time to convey all of the suggested information. Once the specific incident or crisis is over, there may be another opportunity to provide information. It is proposed that a follow up call be initiated by a designated contact person (preferably the same staff member involved in the initial registration). This approach was recommended by members of the focus groups who suggested that a contact person should touch base and “check-in” with the person who has self-excluded sometime after registration. The contact person would ensure that the patron understood what was discussed during registration and offer information and/or referral to a treatment agency. The contact person could be RGIC staff, a treatment provider or casino

staff trained to deal with self-exclusion. Any permission for follow-up would need to be explained and consented to in writing by the individual at registration.

### Loyalty Points and Other Comps

Loyalty points are a large incentive for people to return to the casino and a large disincentive to self-exclusion. They may be very important to patrons, having symbolic value beyond their nominal value. There is an obvious expectation that the loyalty and “comping” process will end when a self-exclusion agreement is signed. But the way in which this process is managed can be an important factor in supporting successful self-exclusion. At registration, the patron needs to understand clearly what will happen to their points, comps, etc. Though there is no single approach to this process that appears superior, it does seem preferable to offer the patron some options, such as various forms of non-cash payouts or an alternative to cash (i.e. cheque to spouse, offer to put the dollar value of points toward debt, or pay out points in the form of coupons to local store). If substitution of points for non-monetary equivalents is not permitted in some jurisdictions, then, at a minimum, payment should be given in the form of a cheque that is not cashable on site and/or is paid out off-site.

### Counselling and Other Supports

Self-exclusion on its own is not likely to be as successful as self-exclusion in the context of counselling, family support and other assistance. In fact, counselling was considered so crucial by some study participants that they would recommend compulsory counselling as part of the self-exclusion program. This, however, has several limitations. There are many questions about the effectiveness of mandated counselling. It also raises many ethical and legal issues especially in the context of a voluntary program. That said, the pilot project in place in the Casino de Montreal makes it clear that staff can have an important influence on the actions of the patron who is self-excluding and should encourage these individuals to seek additional assistance such as problem gambling counselling, debt counselling and other supports. What this means in practice is that staff can present people who have self-excluded with a current list of local resources (e.g., helpline, treatment providers) and online resources, as well as the best research available on methods for successful behavioural change.

*Staff can have an important influence on the patron's actions and should encourage counselling.*



## Ban Length

Ban length was the subject of much discussion during the Review—particularly at the Expert Forum. While some believe that a lifetime ban is best, the vast majority favoured a continuum of options to suit the unique needs and circumstances of the individuals involved. Virtually every source consulted in this Review called for optional ban length terms. Indeed, 82% of the participants in the Expert Forum preferred optional ban lengths as indicated in the end survey.

This is not to say that a lifetime ban should not be available, only that it should not be the sole option. Included in the menu of ban lengths might be bans of a variety of lengths starting at 6 months. In order to determine an appropriate ban length, staff and individuals seeking self-exclusion would have a discussion; the objective of which would be to engage the patron in choosing the ban length they want with the assistance and information they need.<sup>7</sup> In practice, staff may provide information and advice combining their experience with other registrants and their knowledge of the particulars of the individual seeking self-exclusion.

Some program administrators indicated that patrons may impetuously choose to ban themselves for life, out of anger or on impulse, leading them to later regret their decisions, which may lead to multiple breaches. There was also some suggestion in the Review of a 24-hour post-registration cooling-off period. There are two perspectives on this issue. On the one hand, a patron making an impetuous decision would have more opportunity to think through the decision if they had a 24-hour grace period. On the other hand, most focus group participants, Forum attendees and program administrators were concerned that a cooling-off period would offer a person with very real problems an easy way to opt out and avoid addressing those issues. In such circumstances, a 6 month ban may be more judicious. The patron can still experience the benefits of a self-exclusion ban would but have the option to renew or reinstate after a relatively short period of time.

## Detection and Management of Breaches

As noted earlier, the current self-exclusion model that predominates in Canada focuses primarily on detection/enforcement. There is no doubt that these elements continue to be very important. Though they may need to change, they should not be lost.

More specifically, detection needs to be seen in its proper context. Most who sign self-exclusion agreements will likely gamble during their ban. Most people have setbacks on the road to recovery (Blaszczynski, et al, 2007). Breaching, though it is frequently viewed as a sign of failure by both the individual and the venue, is a typical part of the recovery process. Indeed, recall that 70% of the participants in the focus group survey reported gambling during their bans. At the same time, there is a widespread view among individuals who exclude that gaming providers make little effort to detect breaches and keep them out.

*For some, breaching is a typical part of the recovery process.*

On the casinos' side, there are often considerable challenges in detection and enforcement (particularly in larger venues admitting thousands of patrons each day). In fact, even the focus group participants acknowledged the difficulties facing casinos when it comes to detection. Security staff, and in some cases other staff on the casino floor, are asked to memorize thousands of pictures and identify potential self-excluders as a part of their responsibilities. What's more, most self-exclusion detection processes still depend on paper-based communication systems with photocopied pictures. Where there is a province-wide self-exclusion program in place, it is difficult, if not impossible, for staff in one venue to detect breaches among patrons who are not local. For example, the Ontario-wide self-exclusion list includes over 11,600 individuals. This means that staff at Thousand Islands Charity Casino, for example, are expected to detect patrons from Thunder Bay, Windsor, Orillia or any other part of the province who are in breach of their bans.

<sup>7</sup> If at times the patron wishes to choose a ban length that is less than the 6 months that has been offered, the wish of the individual needs to be respected in so far as it is actually feasible for the venue.

## Enhancing Detection

In recent years, there have been many examples of detection enhancements, including facial recognition software<sup>8</sup>, Saskatchewan's iCare system<sup>9</sup>, and other, lower tech, methods. Some venues, for example, broaden the circle of casino employees who are responsible for detection (e.g., pit bosses, floor staff, dealers, cashiers), rather than rely exclusively on security staff to identify self-excluders. Given privacy concerns and the potential for error, it seems unlikely that detection responsibilities could be distributed amongst all staff. But, at the least, the involvement of all key Level 2 and 3 staff would likely be feasible and useful.

## Priority-Setting

Another enhancement used in some places involves priority setting to classify patrons who are most likely to breach their agreements (e.g., based on geographical proximity, history of breaches, and/or reports from family members, etc.). In such a system, security and surveillance are still responsible for the wider list of people who have self-excluded, but the non-security staff are able to concentrate on those most likely to appear in their venue (i.e., a subset of higher risk and/or local persons).

## Information Management

Priority setting raises the question of what sort of information management system should be in place to support such enhancements to self-exclusion programs. Many of the experts consulted as part of the Review recommended replacing paper-based identification systems with electronic systems. What is proposed is an information management system that begins with the registration process. Staff involved with registration could enter patron information into the database (i.e., name, address, gender, age, aliases, etc.). Such entries could include all the information currently collected as well as additional information. For example, staff involved in the registration process could complete a simple assessment of the patron's risk for breaching (based on information gathered during registration or what is previously known about the

individual). In this way, the database could be accessed by designated people, sorted by risk-level or neighbourhood, and updated over time with additional information relevant to the management of self-exclusion (e.g., key contacts, record of breaches, third party reports, etc.). Such a system need not be onerous. What's more, it would facilitate sharing of information between access points and between venues within a jurisdiction.

For this system to be effective, those charged with detection responsibility would need to have access to pictures that they regularly check. Given potential privacy issues, data and pictures would need to be kept in a secure environment with tight circulation controls. Moreover, extending detection responsibilities to staff beyond security and surveillance personnel would mean that appropriate training would have to be provided and that staff would need to know their responsibilities and what they were expected to do.

## Card-Based Play

Another topic discussed a number of times during the Review was the use of "smart cards" or some form of personalized card to initiate play. Such cards could assist with detection by allowing the gaming provider to control access to play. Additionally, the cards could also give players an additional tool to help them manage their play and/or receive feedback and personal play information. Several types of smart cards are now being introduced in Canada (with a variety of features and purposes). There is some optimism about the potential for such tools to reduce problem gambling. However, the topic warrants more investigation and is well beyond the scope of this Review.<sup>10</sup>

## The Question of Enforcement

As difficult as detection may be, the enforcement question is at least equally difficult and important. What should staff do once a breach is detected? Within a self-exclusion model based on individual assistance, the primary question around enforcement would ideally be "what is the best option to help the individual deal with his or her

<sup>8</sup> Facial recognition technologies have emerged in recent years as a tool to better detect breaches. Facial recognition has the potential to be a valuable tool. There is, however, much current concern and debate about the capability and usefulness of this technology. While facial recognition software appears to be changing and the limitations in previous versions are being addressed (Williams, 2007), the jury is still out about whether or not this technology should be regarded as an element of best practice in the management of self-exclusion agreements. Successful detection using facial recognition software is reliant on picture quality, lighting, angle, etc. (Williams, 2007). This could mean that the requirements of the technology, i.e. the picture, could make it difficult to operate the self-exclusion program with multiple registrations sites. It will be important then that those who are considering the introduction of this technology take into account the demands of the multi-site registration process. If facial recognition is shown to significantly increase detection rates within a gaming environment, it will still be a tool that needs to work in tandem with human observation and judgment. In the end, a staff member will always have to verify the identity of a patron and decide appropriate action.

<sup>9</sup> The iCare system was developed and implemented by the Saskatchewan Gaming Corporation (SGC). It integrates self-exclusion within a broader process that proactively tracks gambling patterns and assesses them within a preventative framework. iCare is intended to identify potentially problematic patterns of play before self-exclusion becomes necessary.

<sup>10</sup> It is important to recognize that in many jurisdictions, there may be technological challenges (i.e., compatibility, integrity, and security) involved in integrating current systems with those required for card-based play.

problems?” However, there are counterbalancing views. Many of those consulted in this Review strongly advocate for enforcement measures “with teeth”. In fact, the participants with first hand experience of gambling problems were often those most critical of the apparent lack of strong enforcement measures. This is a significant dilemma and poses a real set of contradictions. How do you design an approach that responds to individual needs and has teeth?

***Enforcement should be progressive, reinforce availability of help services, and provide consequences of further breaches.***

In the Expert Forum there was clear support for diligent enforcement measures. Such measures would be progressive, offer reinforcement of available help

services, and provide individuals with information about the consequence of further breaches of the self-exclusion agreement. In terms of managing breaches, protocols would include:

- Persons who breach should be discretely approached to verify their identification
- If they are in breach of their agreement, they would be asked to leave the gaming floor, preferably for a private discussion with an internal contact person or RGIC staff. (These discussions should occur after each breach, as should the offer of support and information.)
- Persons who breach should be flagged in the database as higher risk.
- Consequences should escalate for each breach with the end point having teeth (e.g., a trespass charge, with or without fines).

### **Withdrawal of Winnings**

In some jurisdictions individuals who self-exclude are precluded from collecting large wins. There was a reasonable consensus among the Forum experts that jackpot winnings should not be given to a person who is breaching their ban, but nor should such winnings be retained by the gaming provider. Rather, winnings would be kept in trust funds and used for problem gambling treatment or prevention. It is important to note, however, that the legal status of withholding winnings has not been adequately explored in Canada. Any move in this direction would need close legal scrutiny. What’s more, individuals who have self-excluded would need to be advised of this policy when they register for self-exclusion.

## **Ban Scope**

Virtually all sources of information in the Review agreed that self-exclusion bans should cover similar types of gambling in a jurisdiction (i.e., cover all casino/racino gambling). This is common practice in Canada. However, at present there are a number of logistic and pragmatic challenges to this approach. As noted earlier, bans may extend across a broad jurisdiction. Therefore, individuals who self-exclude might gamble in remote places still covered by their bans, but venue staff there are unlikely to recognize or detect them. The introduction of facial recognition technology has the potential to be an important tool to support broad based bans. Similarly, provincial bans may or may not cover gambling on reserves. In the latter case, it would be ideal if provincial governments and aboriginal gaming authorities harmonized their policies.

### **Coverage of Non-Casino Gaming Opportunities**

There was much agreement in the Review that bans should be broadened to cover non-casino gambling opportunities (e.g., VLTs, lotteries, bingo, Internet). The difficulties in achieving this goal were also identified. For example, given that in some jurisdictions there are thousands of bars, bingo halls etc. with VLTs, detection and management of breaches across a broad gambling network would be very difficult. In addition, an experiment in Nova Scotia involving VLT self-exclusions has uncovered considerable obstacles and limitations. For the present, it appears that the implementation of similar venue self-exclusion programs presents an adequate challenge and that broader, all-site bans remain a positive, but longer term, concept. However, the introduction of facial recognition technologies and electronic self-exclusion databases would go a long way to assist venues in identifying self-excluders unknown in local areas.

## Renewal and Reinstatement

The end of a ban can be an unsettling time for individuals who have self-excluded. This period is a time for decision-making—whether to resume gambling in the venues or to renew the ban. From a support point of view, this time can also be an opportunity to provide information to help individuals make informed choices about what decision is right for them.

Currently, bans come to an end in a variety of ways. In most cases the ban simply expires: the individual's name and picture are removed from the self-exclusion list and the person can enter without concern the venues formerly covered by the ban. However, there are many ways to manage the ends of bans. In Manitoba, a person who has self-excluded is required to attend a mandatory education session prior to re-entry. In several jurisdictions, the ban remains in place until the patron initiates a reinstatement process. In Nova Scotia, reinstatement requires application to the regulator who then considers the risk to the individual and also to the gaming operator. There are undoubtedly other models that did not surface during this Review.

### Ban Renewal

Ban renewal is an easier process to manage than reinstatement. As with the registration process, there is considerable support for a renewal process with multiple access points. The individual could simply ask for ban renewal, have their picture taken to ensure it is current and select a new timeframe. This process could be triggered by the gaming operator or a designated agent such as an RGIC. The individual would receive a call or letter to inform him or her that the ban is near completion and asks about the individual's intentions. The contact, by whatever means, should not be promotional or allude to any gambling invitation.

### Active Reinstatement Process

There could be considerable benefit for the individual and the gaming provider if reinstatement was an active reinstatement process rather than a default process. In this regard, the individual would initiate reinstatement by indicating his or her intentions. If the individual does not initiate reinstatement then the ban would continue.

The active reinstatement process could take a number of different forms (e.g., face-to-face, online, or a written process administered through the mail) and represents another opportunity to provide support and information, thereby assisting the individual in making an informed personal choice.

The following content could be conveyed during the active reinstatement process:

- The option to renew the ban
- Support and information regarding community resources, tips and information (about responsible gambling, odds of winning, risks, etc.)
- The progress and support the individual received during the self-exclusion period
- Documentation (to be signed by the individual) indicating that he or she wishes to return to gambling at the venues, and that the individual is making an informed choice to reinstate

## Promotion

There was strong sentiment expressed in the Review that self-exclusion is not adequately promoted and communicated to casino patrons. At minimum, patrons should know that if they are having problems with gambling, help is available and self-exclusion is one option. There are two ways that casinos can better inform patrons about the option to self-exclude.

### Active Promotion

The first way is to promote self-exclusion actively, rather than passively. Casinos and gaming companies invariably have formidable communications capabilities. They already employ many effective strategies to communicate with their patrons (e.g., patron newsletters, promotional materials, RGIC, onsite posters, kiosks, etc.). Any and all of these methods could be used to promote understanding of the company's self-exclusion program.

*Casinos have formidable communications capabilities which could be used to promote self-exclusion.*

### Staff Training

The second way that casinos can inform patrons about self-exclusion is through their staff. That is, primarily as a result of training (but also reinforced through other means) all staff should know four simple pieces of information:

- That self-exclusion is available
- What self-exclusion involves
- What to say to patrons about self-exclusion
- To whom a patron should be referred for further information or registration

## Regulatory Oversight and Penalties

While the mandate of this Review is the best practices in self-exclusion programs, third party regulation, administration and sanctions arose as topics of discussion. The essence of the argument is that there is a conflict of interest if casinos manage their own self-exclusion programs. Because casinos make money from gamblers, they are thought to have less incentive to detect breaches. Even if a conflict of interest does not, in fact, occur, there is no doubt that the perception will continue. Discussion of this issue at the Expert Forum resulted in a number of perspectives.

### Third Party Administration

One perspective is that self-exclusion should be administered by a third party. That is, some experts who have studied self-exclusion, particularly researchers, suggest that there be specific regulations and designated oversight of the self-exclusion process. Presumably, regulatory oversight would also include fines for operators who fail to detect and enforce breaches of self-exclusion agreements.

### Take Proactive Steps First

A second perspective, supported by some gaming operators, is to focus on developing an individual support model rather than further regulation, because the latter could have a negative effect on changes in the self-exclusion process. There is concern that regulatory intervention at this time might introduce requirements that would make self-exclusion more legalistic and enforcement driven. This would be counter to the recommended individual assistance model which is gaining considerable momentum.

Most jurisdictions examined as part of this Review are currently reassessing their self-exclusion policy frameworks. Therefore it would be very useful to establish such frameworks and to evaluate their impact before moving to the regulatory level. This would also provide a stronger base in experience with the individual assistance model prior to determining the necessity of stronger, more centralized regulations.

## Conclusion

The self-exclusion process is quite rightly in transition from an enforcement model to an individual assistance model. This shift is widely supported by those with gambling problems, gaming operators and specialists in problem gambling. Improvements to the current self-exclusion model involve adjustments to most elements of the process: from the way self-exclusion is promoted, to the way it is administered, to ban renewal and reinstatement. These changes will advance a more helpful, self-exclusion process with the needs of the individual at its centre.

Ultimately, self-exclusion is a tool to help people in their efforts to overcome gambling problems. This tool requires delicate balancing so that it supports individual initiative but does not replace it. It needs to balance enforcement against disincentives created if there is too much focus on enforcement. It needs to fit each individual's unique circumstance, giving the individual as many options as possible. The more closely self-exclusion is linked with community counselling and other supports, the more likely it is that the person who has chosen to self-exclude will be successful.



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## WEBSITES

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The following websites were consulted during this Review.

### Canadian

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[www.afm.mb.ca](http://www.afm.mb.ca)  
[www.bclc.com](http://www.bclc.com)  
[www.loto-quebec.com](http://www.loto-quebec.com)  
[www.casino-quebec.com](http://www.casino-quebec.com)  
[www.aglc.gov.ab.ca](http://www.aglc.gov.ab.ca)  
[www.bcreponsiblegambling.ca](http://www.bcreponsiblegambling.ca)  
[www.casinowindsor.com](http://www.casinowindsor.com)  
[www.mlc.mb.ca](http://www.mlc.mb.ca)  
[www.gov.ns.ca/enla/agd](http://www.gov.ns.ca/enla/agd)  
[www.olg.ca/](http://www.olg.ca/)  
[www.responsiblegambling.org](http://www.responsiblegambling.org)  
[www.gov.sk.ca/SGC/](http://www.gov.sk.ca/SGC/)  
[www.slga.gov.sk.ca/](http://www.slga.gov.sk.ca/)

### American

[www.americangaming.org](http://www.americangaming.org)  
[www.ncpgambling.org](http://www.ncpgambling.org)  
[www.igb.state.il.us](http://www.igb.state.il.us)  
[www.gm.state.az.us](http://www.gm.state.az.us)  
[www.calproblemgambling.org](http://www.calproblemgambling.org)  
[www.coloradogaming.com](http://www.coloradogaming.com)  
[www.harrahs.com](http://www.harrahs.com)  
[www.state.in.us/gaming](http://www.state.in.us/gaming)  
[www.1800betsoff.org](http://www.1800betsoff.org)  
[www.michigan.gov/mgcb](http://www.michigan.gov/mgcb)  
[www.mgc.dps.mo.gov](http://www.mgc.dps.mo.gov)  
[www.nj.gov/oag/ge/index.html](http://www.nj.gov/oag/ge/index.html)  
[www.olgr.nsw.gov.au/olgr\\_default.asp](http://www.olgr.nsw.gov.au/olgr_default.asp)  
[www.pgcb.state.pa.us](http://www.pgcb.state.pa.us)  
[www.mrga.org](http://www.mrga.org)  
[www.casinogamblingweb.com](http://www.casinogamblingweb.com)  
[www.iowagambling.org](http://www.iowagambling.org)  
[www.pgcb.state.pa.us/](http://www.pgcb.state.pa.us/)

### International

[www.countmeout.org.uk](http://www.countmeout.org.uk)  
[www.gamblingandracetracing.act.gov.au](http://www.gamblingandracetracing.act.gov.au)  
[www.dia.govt.nz](http://www.dia.govt.nz)  
[www.hollandcasino.com](http://www.hollandcasino.com)  
[www.olg.sa.gov.au](http://www.olg.sa.gov.au)  
[www.responsiblegambling.qld.gov.au](http://www.responsiblegambling.qld.gov.au)  
[www.iga.sa.gov.au](http://www.iga.sa.gov.au)  
[www.ngb.org.za](http://www.ngb.org.za)



# APPENDIX I: PRE-FOCUS GROUP SURVEY (A)

Please complete this short survey. There are questions here that are about your personal history and your gambling history. Answer the questions to the best of your ability.

Do not hesitate to ask if you have any questions.

ID Code: \_\_\_\_\_

1. **Age**  
\_\_\_\_\_ Years
2. **Gender**  
 Male  
 Female
3. **What is the highest level of education that you have reached?**  
 No high school  
 Some high school  
 Completed high school  
 Some post-secondary  
 Completed post-secondary  
 Some post-graduate  
 Completed post-graduate
4. **What is your current annual household income?**  
 No income  
 < \$20,000  
 \$20,001 - \$40,000  
 \$40,001 - \$60,000  
 \$60,001 - \$100,000  
 \$100,001 - \$150,000  
 > \$150,001
5. **What is the total amount of time you have gambled in your lifetime?**  
\_\_\_\_\_ Months / Years (Circle the right time unit)

Questions 6 through 10 are about your gambling during the YEAR BEFORE self-excluding.

6. **Estimate how often you gambled:**  
 Daily  
 2-4 times per week  
 At least once per week  
 At least once per month  
 At least once every 3 months  
 Less than 4 times per year
7. **During a typical visit, what is the average amount of MONEY you spent gambling? (Not including winnings)**  
\_\_\_\_\_ Dollars
8. **During a typical visit, what is the average amount of TIME you spent gambling?**  
\_\_\_\_\_ Minutes / Hours (Circle the right time unit)
9. **What types of gambling did you participate in? (Check all that apply)**  
 Casino table games (e.g., blackjack, roulette, poker)  
 Non-casino card games (e.g., poker)  
 Sports betting (non-horse-racing)  
 Electronic gaming machines (e.g., slots, video poker)  
 Horse racing  
 Lottery, scratch tickets  
 Internet  
 Other (specify): \_\_\_\_\_
10. **Check the box that best applies to each question.**

<i>In the year BEFORE you self-excluded, would you say you</i>	<i>Never</i>	<i>Some-times</i>	<i>Most of the time</i>	<i>Almost always</i>	<i>Don't Know</i>
a. Bet more than you could really afford to lose?					
b. Needed to gamble with larger amounts of money to get the same feeling of excitement?					
c. Went back another day to try to win back the money you lost?					
d. Borrowed money or sold anything to get money to gamble?					
e. Felt that you might have a problem with gambling?					
f. Felt gambling had caused you any health problems, including stress or anxiety?					
g. Had people criticizing your betting or telling you that you had a gambling problem, regardless of whether or not you thought it was true?					
h. Felt your gambling had caused financial problems for you or your household?					
i. Felt guilty about the way you gambled or what happened when you gambled?					

*Questions 11 and 12 are about ANY gambling you may have done SINCE self-excluding.*

11. Since self-excluding, have you gambled **OUTSIDE** of the gaming venue/s you self-excluded from? (e.g., this may include lottery purchases, gambling out-of-province, or gambling in the U.S./Internationally)
- Yes (Please go to Q 11.a)  
 No (Please go to Q 12.)
11. a) **What types of gambling have you participated in? (Check all that apply)**
- Casino table games (e.g., blackjack, roulette, poker)  
 Non-casino card games (e.g., poker)  
 Sports betting (non-horse-racing)  
 Electronic gaming machines (e.g., slots, VLT)  
 Horse racing  
 Lottery, scratch tickets  
 Internet  
 Other (specify):\_\_\_\_\_
11. b) **Roughly, how often have you gambled?**
- Daily  
 2-4 times per week  
 At least once per week  
 At least once per month  
 At least once every 3 months  
 Less than 4 times per year
11. c) **During a typical visit/occasion, what is the average amount of MONEY you spent gambling? (Not including winnings)**
- \_\_\_\_\_ Dollars
11. d) **During a typical visit/occasion, what is the average amount of TIME you spent gambling?**
- \_\_\_\_\_Minutes / Hours (Circle the right time unit)
12. **SINCE self-excluding, have you gambled at the gaming venue/s you self-excluded from? (e.g., this includes ALL of the venues that are covered in your self-exclusion)**
- Yes (Please go to Q 12.a)  
 No (You are done! Thank-you for filling out this survey!)
12. a) **Were you discovered gambling at the gaming venue/s that you self-excluded from?**
- No (Please go to Q 12.b)  
 Yes (Please explain what happened in the space below and then go to Q 12.a)i.)

12. a)i. **Since being discovered gambling, have you gone back to gamble at the gaming venue/s you self-excluded from?**
- Yes  
 No
12. b) **How often have you gambled at the gaming venue/s that you self-excluded from?**
- Daily  
 2-4 times per week  
 At least once per week  
 At least once per month  
 At least once every 3 months  
 Less than 4 times per year
12. c) **During a typical visit, what is the average amount of MONEY you spent gambling at the gaming venue/s you self-excluded from? (Not including winnings)**
- \_\_\_\_\_ Dollars
12. d) **During a typical visit, what is the average amount of TIME you spent gambling at the gaming venue/s you self-excluded from?**
- \_\_\_\_\_Minutes / Hours (Circle the right time unit)
12. e) **What types of gambling have you participated in?**
- Casino table games (e.g., blackjack, roulette, poker)  
 Sports betting (non-horse-racing)  
 Electronic gaming machines (e.g., slots, video poker)  
 Horse racing  
 Other (specify):\_\_\_\_\_

## APPENDIX II: PRE-FOCUS GROUP SURVEY (B)

Please complete this short survey. There are questions here that are about your personal history and your gambling history. Answer the questions to the best of your ability.

Do not hesitate to ask if you have any questions.

ID Code: \_\_\_\_\_

1. **Age**  
\_\_\_\_\_ Years
2. **Gender**  
 Male  
 Female
3. **What is the highest level of education that you have reached?**  
 No high school  
 Some high school  
 Completed high school  
 Some post-secondary  
 Completed post-secondary  
 Some post-graduate  
 Completed post-graduate
4. **What is your current annual household income?**  
 No income  
 < \$20,000  
 \$20,001 - \$40,000  
 \$40,001 - \$60,000  
 \$60,001 - \$100,000  
 \$100,001 - \$150,000  
 > \$150,001
5. **What is the total amount of time you have gambled in your lifetime?**  
\_\_\_\_\_ Minutes / Hours (Circle the right time unit)
6. **Did you gamble during your LAST self-exclusion (not including current)?**  
 Yes  
 No

*Questions 7-12 are about the period of time BETWEEN your last reinstatement from self-exclusion AND your most recent self-exclusion.*

7. **How long was the period of time between your last reinstatement from self-exclusion AND your most recent self-exclusion?**  
\_\_\_\_\_ Days / Weeks / Months / Years  
(Circle the right time unit)
8. **How much did you gamble during this period of time?**  
 Always  
 Almost always  
 Most of the time  
 Some of the time  
 Never
9. **During a typical visit, what is the average amount of MONEY you spent gambling? (Not including winnings)**  
\_\_\_\_\_ Dollars
10. **During a typical visit, what is the average amount of TIME you spent gambling?**  
\_\_\_\_\_ Minutes / Hours (Circle the right time unit)
11. **What types of gambling did you participate in? (Check all that apply)**  
 Casino table games (e.g., blackjack, roulette, poker)  
 Non-casino card games (e.g., poker)  
 Sports betting (non-horse-racing)  
 Electronic gaming machines (e.g., slots, video poker)  
 Horse racing  
 Lottery, scratch tickets  
 Internet  
 Other (specify): \_\_\_\_\_

**12. Check the box that best applies to each question.**

<i>In the year BEFORE your most recent self-exclusion, would you say you</i>	<i>Never</i>	<i>Some-times</i>	<i>Most of the time</i>	<i>Almost always</i>	<i>Don't Know</i>
a. Bet more than you could really afford to lose?					
b. Needed to gamble with larger amounts of money to get the same feeling of excitement?					
c. Went back another day to try to win back the money you lost?					
d. Borrowed money or sold anything to get money to gamble?					
e. Felt that you might have a problem with gambling?					
f. Felt gambling had caused you any health problems, including stress or anxiety?					
g. Had people criticizing your betting or telling you that you had a gambling problem, regardless of whether or not you thought it was true?					
h. Felt your gambling had caused financial problems for you or your household?					
i. Felt guilty about the way you gambled or what happened when you gambled?					

*Questions 13 & 14 are about ANY gambling you may have done SINCE your most recent self-exclusion.*

**13. Since your most recent self-exclusion, have you gambled OUTSIDE of the gaming venue/s you self-excluded from? (e.g., this may include lottery purchases, gambling out-of-province, or gambling in the U.S./Internationally)**

- Yes (Please go to Q 13.a)
- No (Please go to Q 14)

**13. a) How often have you gambled?**

- Daily
- 2-4 times per week
- At least once per week
- At least once per month
- At least once every 3 months
- Less than 4 times per year

**13. b) During a typical visit/occasion, what is the average amount of MONEY you spent gambling? (Not including winnings)**

\_\_\_\_\_ Dollars

**13. c) During a typical visit/occasion, what is the average amount of TIME you spent gambling?**

\_\_\_\_\_ Minutes / Hours (Circle the right time unit)

**13. d) What types of gambling did you participate in? (Check all that apply)**

- Casino table games (e.g., blackjack, roulette, poker)
- Non-casino card games (e.g., poker)
- Sports betting (non-horse-racing)
- Electronic gaming machines (e.g., slots, VLT)
- Horse racing
- Lottery, scratch tickets
- Internet
- Other (specify): \_\_\_\_\_

**14. SINCE your most recent self-exclusion, have you gambled at the gaming venue/s you self-excluded from? (e.g., this includes ALL of the venues that are covered by your self-exclusion)**

- Yes (Please go to Q 14.a)
- No (You are done! Thank you for filling out this survey)

**14. a) Were you discovered gambling at the gaming venue/s that you self-excluded from?**

- No (Please go to Q 14.b)
- Yes (Please explain what happened in the space below and then go to Q 14.a)i)

**14. a)i. Since being discovered gambling, have you gone back to gamble at the gaming venue/s you self-excluded from?**

- Yes
- No

**14. b) How often have you gambled at the gaming venue/s that you self-excluded from?**

- Daily
- 2-4 times per week
- At least once per week
- At least once per month
- At least once every 3 months
- Less than 4 times per year

**14. c) During a typical visit, what is the average amount of MONEY you spent gambling at the gaming venue/s you self-excluded from? (Not including winnings)**

\_\_\_\_\_ Dollars

**14. d) During a typical visit, what is the average amount of TIME you spent gambling at the gaming venue/s you self-excluded from?**

\_\_\_\_\_ Minutes / Hours (Circle the right time unit)

**14. e) What types of gambling did you participate in?**

- Casino table games (e.g., blackjack, roulette, poker)
- Sports betting (non-horse-racing)
- Electronic gaming machines (e.g., slots, video poker)
- Horse racing
- Other (specify): \_\_\_\_\_

## APPENDIX III: FOCUS GROUP DISCUSSION QUESTIONS

Thank-you very much for agreeing to participate in this study, your input will be of great value.

For those of you wondering about what the Responsible Gambling Council does, I will give you a short explanation. We are a non-profit and independent organization whose main goal is the prevention of problem gambling. We try to achieve this by educating people about the risks of gambling and by conducting research, like this, to inform policy makers about best practices.

The purpose of today's focus group is to learn about your experiences with self-exclusion programs and to get your opinions about how to make it better. We will also suggest some possible changes to self-exclusion programs and ask whether you believe these would be helpful. What we learn from your input will help us to inform those in charge of designing self-exclusion about ways to make it more effective.

The focus group is just one part of a larger study that will also involve speaking to self-exclusion program administrators, such as casino staff, and other experts in the field, such as counsellors and researchers.

We welcome your open and honest point of view and want you to be as detailed as possible in your answers.

The focus group part of this session should take no more than an hour and a half of your time.

Before we begin, I will go over the ground rules that I would like everyone to keep in mind during the meeting:

- Please feel free to use your first name only
- The focus group will be in a discussion format, where people can add their thoughts and opinions at any time. The only rule with this is that I would like only one person to speak at any given time and that every person gets a chance to speak
- What is said in this room, stays in this room
- There is no right or wrong answer
- There will inevitably be differing opinions, so I ask you to have respect for one another and allow each person to finish their thoughts.

- I want to remind you that the focus group will be recorded but rest assured that your responses will be kept confidential and that you will remain anonymous. For example, the casino will never know about your participation in this study and your enrolment in self-exclusion will NOT be affected whatsoever.

### Does anyone have any questions for me?

I would like everyone to share a little something about themselves with the group. Tell us your first name and one of your favourite activities. I will start.

1. **How did you first learn about SE?**
2. **Can you describe how the casino registered you in the self-exclusion program? Please also include how you were feeling.**
  - a. Did you receive any documentation that gave you information about how to get help for your gambling (i.e., counselling or helpline etc...)?
3. **What was it that motivated you to self-exclude?**  
*<<prompt: how were you feeling?>>*
4. **What types of support, aside from self-exclusion have you used to help you with your gambling?**  
*<<prompt: For example, have you gone to counselling?>>*
5. **Can you identify any features of self-exclusion that are especially helpful?**
6. **If you could change any feature of self-exclusion to make it work better for you what would that be?**  
*<<prompt: What makes you think this?>> (they are not limited to only one answer) <<Prompt with topics if necessary>>*
  - Advertising for SE
  - Registration process
  - Information given during registration
  - Support services offered during registration
  - Methods of detection, what they do when they find a person at the casino
  - Reinstatement process

Some think that certain changes would make self-exclusion programs more successful. I am going to list some of these changes and I would like to hear your thoughts about them. For example, do you think they would work, and what makes you think this. *<<May not be necessary to ask these given the answers to the prior question.>>*

**7. What do you think about making counselling a mandatory part of SE? (e.g., once you self-exclude you would have to see a counsellor, or attend GA groups.)**

- a) If so, how many sessions do you think should be made mandatory?
- b) Do you think that this would be a deterrent?

**8. What do you think about having a mandatory assessment by a problem gambling counsellor before being allowed back into the casino? (e.g., the process would involve you seeing a counsellor who would assess whether or not you are prepared to return to gambling. Depending on the outcome of the assessment, the counsellor could decide not to let you back in.)**

- a) Do you think that this would be a deterrent?
- b) Do you think something more benign like an educational session or a lecture would be better? Or less of a deterrent?

**9. What do you think about the casinos being more diligent with identifying self-excluded individuals when they enter? (e.g., card-only entry into facility). How do you think the gaming facility can enforce this?**

**10. What do you think about instituting a system to monitor people who have self-excluded playing patterns (i.e. The Saskatchewan I-care system)? Part of this would involve approaching people who have self-excluded based on changes in behaviour – What do you see as the pros and cons to this suggestion?**

**11. What do you think about shifting emphasis of the program from enforcement to education and rehabilitation (e.g., if found on-site during a ban being provided with information and counselling opportunities instead of being charged with trespassing).**

- a) What is the issue surrounding the bite of a program vs. an educational approach?

**12. Thoughts on the length of the ban.**

- a) Do you think the duration of self-exclusion can make a difference? If so/not, what makes you think this? Do you think shorter bans (6 months) are better or worse than longer bans (2 years plus)?
- b) Do you think that having the option of selecting the length of your ban is good or bad idea?
- c) What do you think about lifetime bans? (Do you think that this would be a deterrent?)

**13. How likely do you think people will be to visit a non-casino VLT facility after choosing to ban or self-exclude at the casino?**

- a) Do you think that self-exclusion should be offered at these locations as well?
- b) Is SE at VLT sites logistically possible?

**14. What do you see as the pros and cons of having casino staff wear buttons that advertise self-exclusion, for example, “ask me about self-exclusion”.**

**15. Do you think that people who have self-excluded who have self-excluded should be fined if they are found violating their ban? For example, Australia has a \$3,000 fine for violations.**

- a) If so, how much money do you think is enough of a deterrent?
- b) Can problem gamblers afford to pay such a fine?
- c) What do you think of the casino or casino staff members being issued a fine if a patron is caught violating their ban on the staff’s watch? Do you think that this would go over well in Canada?

**16. How would you feel about the people who have self-excluded having the option of restricting their play (partial-ban) rather than a full exclusion? For example, a person could request not to receive direct marketing by the casino, and/or be denied credit and check cashing privileges, and/or be able to see a show but not enter the gaming floor).**

**17. What are the pros and cons of denying self-excluders access to any jackpot winnings gained during their ban? An example would be to donate the money to charity.**

*<< Is there anything anyone would like to add? Summarize the findings...>>*

I would like to thank you all for your participation and would like to remind you that your participation in this focus group is very much valued and is an asset to this study.

I would also like to remind everyone that we (the Responsible Gambling Council) mean to do absolutely no harm as a result of conducting this focus group. So, if at any point you develop any unease or concern regarding your gambling or any other issue, I strongly encourage you to speak with me following this session, call the problem gambling helpline, or consult with your counsellors. We have provided you with gambling help resources and phone numbers on your copy of the consent form in case you feel the need to speak with someone.



## APPENDIX IV: PROGRAM ADMINISTRATOR INTERVIEW SCRIPT

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### *I. Background Information:*

1. Province:
2. What is your role related to the SE program:
3. How long have you been working with the SE program?
4. How many people SE per year at your venue?
  - a) How many reinstate?
  - b) How many people do you catch?
  - c) How many reinstate and then need to self-exclude again?

### *II. Now I would like to ask you some questions about how the SE program is designed to run at your venue as well as whether you see any room for improvement?*

1. **What is the general purpose of the SE program?**
2. **What are the general procedures governing the SE program? If there are too many to list, is there written documentation outlining this information?**
3. **How does the registration work?**
  - Which employees are involved in the process of overseeing the program registration (i.e., security staff, RGIC staff), please explain their roles. Do you think this is working? Can you suggest any changes?
  - What information is given to people who have self-excluded during the registration process? Do you think what is given is sufficient? If not, can you suggest any changes?
  - How long does a typical registration take? Can you see any need for improvements with this? If so, what would you suggest?
  - Are there any counselling, educational, or referral services provided directly or indirectly to people who have self-excluded at registration? Do you think this is sufficient? If not, can you suggest any changes?

### **4. Security and Program Management:**

- Which employees are involved in the security and tracking of the SE program? What are their roles?
- What is the length of the ban at your venue? Is there more than one option? If so, how is the length of the ban decided? Can you see any need for improvements? If so, what would you suggest?
- What are the steps that the venue takes to keep people who have self-excluded? Do you think that these steps are working? If not, what would you suggest to remedy this?
- How many security staff do you have in total? How much staff do you have working at any given time? How many entrances are there?
- Are any special technological features used to monitor the program e.g., facial recognition software? If there are technological features: Do you think that this is enough to keep self-excluders out? If not, what would you suggest doing?
- What is supposed to happen when a patron breaches their self-exclusion? Do you think that this process is effective? If not, what would you suggest doing?
- What is the protocol for how data collected from the program is managed? Do you think that this protocol works? If not, how would you remedy this?

### **5. Reinstatement:**

- If a self-excluded individual wanted to return to gambling at the venue, what steps are required to make this possible?
- Are there any counselling, educational, or referral services provided directly or indirectly to people who have self-excluded during reinstatement? If so, is attendance a mandatory requirement for reinstatement? How is this verified? Do you think that this is effective? If not, how would you change it?

### *III. Additional questions:*

1. **What efforts are undertaken to promote or advertise the SE program? Do you think these are effective?**
2. **Overall, how flexible is the SE program at your venue? Why do you say this?**
3. **In your opinion, what do you think people who have self-excluded expect when they sign up for SE programs?**
4. **In your opinion, do you think the SE program in your venue is effective? Why or why not?**

5. To your knowledge, has the SE program ever been evaluated? If so, what were the findings? Can you summarize the findings? Is it possible to get a copy of the findings?
6. How much training does the casino staff (security, table and slot attendants) get, in regards to SE?
7. Given that the main responsibility of security is to enforce the casino's rules and regulations, how well suited are security in dealing with the emotional side of self-exclusion? Is there anything you can suggest be done to assist security in this role?
8. Does the RGIC play a role in the SE? If not, do you think the RGIC could play a role in the SE? If so, in what capacity?
9. How do you handle a situation when a person is having second thoughts half-way through the process of enrolling in SE?

Some think that certain changes would make self-exclusion programs more successful. I am going to list some of these changes and I would like to hear your thoughts about them. For example, do you think they would work, and what makes you think this.

May not be necessary to ask these given the answers to the prior question.

10. What do you think about making counselling a mandatory part of SE? (e.g., once you self-exclude you would have to see a counsellor, or attend GA groups.)
  - a) If so, how many sessions do you think should be made mandatory?
  - b) Do you think that this would be a deterrent?
11. What do you think about having a mandatory assessment by a problem gambling counsellor before being allowed back into the casino? (e.g., the process would involve you seeing a counsellor who would assess whether or not you are prepared to return to gambling. Depending on the outcome of the assessment, the counsellor could decide not to let you back in.)
  - a) Do you think that this would be a deterrent?

12. What do you think about the casinos being more diligent with identifying self-excluded individuals when they enter? (e.g., card-only entry into facility). How do you think the gaming facility can enforce this?
13. What do you think about instituting a system to monitor people who have self-excluded playing patterns (i.e. The Saskatchewan I-care system)? Part of this would involve approaching people who have self-excluded based on changes in behaviour – What do you see as the pros and cons to this suggestion?
14. What do you think about shifting emphasis of the program from enforcement to education and rehabilitation (e.g., if found on-site during a ban being provided with information and counselling opportunities instead of being charged with trespassing).
15. Thoughts on the length of the ban.
  - a) Do you think the duration of self-exclusion can make a difference? If so/not, what makes you think this? Do you think shorter bans (6 months) are better or worse than longer bans (2 years plus)?
  - b) Do you think that having the option of selecting the length of your ban is good or bad idea?
  - c) What do you think about lifetime bans? (Do you think that this would be a deterrent?)
16. How likely do you think people will be to visit a non-casino VLT facility after choosing to ban or self-exclude at the casino?
  - a) Do you think that self-exclusion should be offered at these locations as well?
  - b) Is SE at VLT sites logistically possible?
17. What do you think about pairing a person who has JUST self-excluded with another person who has had success at self-exclusion (i.e. a buddy system or mentorship program)?
  - a) Do you think this would work/be helpful?
  - b) Who do you think is best suited to arrange this (security staff/RGIC/local counsellors)??
18. What do you see as the pros and cons of having casino staff wear buttons that advertise self-exclusion, for example, "ask me about self-exclusion".

**19. Do you think that people who have self-excluded who have self-excluded should be fined if they are found violating their ban? For example, Australia has a \$3,000 fine for violations.**

- a) If so, how much money do you think is enough of a deterrent?
- b) Can problem gamblers afford to pay such a fine?
- c) What do you think of the casino or casino staff members being issued a fine if a patron is caught violating their ban on the staff's watch? Do you think that this would go over well in Canada?

**20. How would you feel about the people who have self-excluded having the option of restricting their play (partial-ban) rather than a full exclusion? For example, a person could request not to receive direct marketing by the casino, and/or be denied credit and check cashing privileges, and/or be able to see a show but not enter the gaming floor).**

**21. What are the pros and cons of denying self-excluders access to any jackpot winnings gained during their ban?**



## APPENDIX V: EXPERT FORUM SURVEY QUESTIONS

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1. **What does self-exclusion mean to you?**
  - a) An agreement between an individual and a gaming provider to prevent the individual from gambling for a set period of time?
  - b.) An expression of commitment by the individual to stop gambling?
  - c) Both
  - d) Neither
2. **How long should self-exclusion agreements last?**
  - a) 6 months
  - b) 1 or 2 years
  - c) 5 years
  - d) Lifetime ban with possibility of reinstatement
  - e) Don't know
3. **What punishments should be in place for individuals who breach their bans?**
  - a) Ejection without consequences
  - b) Fine (> \$500.00)
  - c) Fine (< \$500.00)
  - d) Criminal trespass charge
  - e) Forfeit large winnings/jackpots
  - f) Consequences escalate with each breach
  - g) None of the above
4. **Should gaming providers that fail to detect individuals who have breached their bans be fined?**
  - a) No
  - b) Yes
  - c) Don't know
5. **What more should be done to detect individuals who breach their bans?**
  - a) Facial recognition software
  - b) Pictures circulated among floor staff and at back of the house
  - c) Player card required for entry
  - d) Picture ID required for entry
  - e) All of the above
  - f) None of the above
6. **Should separate independent bodies (like Responsible Gaming Information/Resources Centres) manage:**
  - a) Registration
  - b) Reinstatement
  - c) Both
  - d) Neither
7. **Should separate, independent bodies regulate and enforce self-exclusion (e.g., the provincial regulator)?**
  - a) No
  - b) Yes
  - c) Don't know
8. **How much of a role should treatment/counselling play within the self-exclusion program?**
  - a) No role
  - b) Optional participation
  - c) Mandatory participation
  - d) Don't know
9. **Should counselling/assessment be a mandatory condition for reinstatement?**
  - a) No
  - b) Yes
  - c) Don't know



## APPENDIX VI: EXPERT FORUM BREAKOUT DISCUSSION QUESTIONS

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### 1. What are the objectives of self-exclusion?

Is it an agreement between an individual and a gaming provider to prevent the individual from gambling for a set period of time?

Is it an expression of commitment by the individual to stop gambling?

Is it a means for an individual to a “take a time out” from gambling?

Is it a gateway to treatment (i.e., a process to assist problem gamblers to access external counselling)?

### 2. Length of self-exclusion bans:

How long should they last?

6-month (to allow for a cooling off period)?

1, 2, 5 years?

For a lifetime with the possibility of self-initiated reinstatement?

Do longer bans deter people from self-excluding in the first place?

How do you manage the administrative side of lifetime bans with reinstatement (especially since you end up with huge numbers of people on SE with outdated pictures)?

Should people who have self-excluded be offered choice in the length of their bans?

Would this be difficult to oversee?

### 3. Currently, the view among users is that self-exclusion programs have no teeth.

What options can be put in place to change this?

Should there be fines for individual who break their ban? If so should the fine be less than \$500 or more than \$500?

Should those who breach be charged with criminal trespassing?

Should individuals who sign agreements forfeit any right to a jackpot or winnings if won while breaching their ban? (FG participants say that there are ways around this)?

If so, what becomes of this money?

Should there be graduated penalties? (i.e., if you break the ban once you get a warning; twice you receive a fine etc.)

Should venues who fail to exclude someone who has signed a ban be fined?

How do you regulate and enforce fines to the individual and venue?

### 4. Focus group participants had a lot of complaints about registration and renewal of self-exclusion. They also complained about treatment by security staff. Should independent bodies (like responsible gambling information/resources centres) manage registration and reinstatement of self-exclusion agreements?

Should self-exclusion registration be available offsite?

What about renewal of expiring self-exclusion bans, should this be available offsite?

Participants also mentioned that they would like to be informed about the possibility of renewal in advance. But is this problematic given that this might raise issues surrounding confidentiality and the promise of “no contact” from the casino?

Would having an independent body that manages self-exclusion registration and renewal make this easier?

**5. Promoting self-exclusion:**

What is enough?

What more can be done?

**6. What is considered reasonable effort on part of the casino when it comes to self-exclusion?**

If the Casino can demonstrate that they have shown reasonable effort, should they be held liable for failing to detect individuals who breach their bans?

**7. What resources can be made available to the patron at the point of self-exclusion?**

What resources should be a mandatory part of every self-exclusion program?

What more can venues do? What role, if any, should counselling and assessment play in self-exclusion?

Should counselling and assessment be mandatory during the course of the self-exclusion program?

Should counselling and assessment be a mandatory part of reinstatement?

**8. Is there any way to effectively catch individuals who breach their ban (i.e., facial recognition software, players' club access cards, and mandatory use of personal ID)?**

What would it take to make this work?

What are the privacy implications?

Does an effective self-exclusion program outweigh such privacy issues?

How do you measure the success of self-exclusion and what is realistic in terms of enforcement?

For example, what is an acceptable level for approaching people who have self-excluded and should an industry-wide level be established?

**9. Should separate, independent bodies regulate/enforce the daily operations of self-exclusion programs?**

Casinos and their operators make money from problem gamblers. Therefore, it is perceived (by those who sign self-exclusion agreements) that casinos have no real interest in making self-exclusion work. Should the functions of regulation and enforcement be kept separate from the management of the program?

**10. Is it possible to have a self-exclusion program that covers all gaming products and venues (bingo halls, VLTs, race-tracks, casinos)?**

Are effective self-exclusion programs realistic in jurisdictions that have widely accessible VLTs (e.g., in hotels and bars) that are exempt from such bans?

What measures can be taken to implement effective self-exclusion across all gaming products?



## APPENDIX VII: EXPERT FORUM BREAKOUT DISCUSSION FINDINGS

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The content of the discussions are organized under the headings of the questions that were asked. Since the group discussions were dynamic and did not necessarily follow the proscribed sequence of the questions, the question headings act as themes that organize the content of the discussions. In some cases, questions have been combined when responses have run together.

### Breakout Group One (Counselling-focused)

#### What resources can be made available to the patron at the point of self-exclusion?

#### What resources do you make available? Do you make print resources available?

Group members discussed a range of resources that they made available. These included:

- Providing information about what to expect from counselling (The Addictions Foundation in Manitoba)
- Websites with information on problem gambling and treatment
- Referrals to credit and financial counselling
- Pamphlets on where to seek treatment
- Responsible gaming representatives onsite at casinos
- Helpline information

In terms of onsite support, one group member said that most people seeking self-exclusion do not want to sit and talk, they just want to get it over with. This is a point that some other group members agreed with. In relation to this, one group member made the point that there is no “one size fits all” approach to self-exclusion. This group member also felt that too much emphasis was put on counselling as part of self-exclusion and there is a risk of stigmatizing people who self-exclude by making them think that they need to see a “shrink”. In response, another member of the group suggested that information

can be made available, but it should be presented in a way that does not make people who want to self-exclude feel worse than they already do. Following on this, another group member described the approach used by Manitoba Lotteries Corporation with respect to self-exclusion, which is called “engage, connect, refer.” This is a supportive approach used by casino shift managers and responsible gaming staff that aims to engage people and determine their needs so that they can be given appropriate information about the resources that are available.

In terms of the information that is provided to self-excluders, a member of the group who had self-excluded stated that she preferred information about local treatment options over an anonymous helpline. This individual also said that she was not ready to seek treatment at the point of self-exclusion, but being given information she could look at later was important.

The group agreed that there should be a package of print materials available as part of self-exclusion that includes information on the self-exclusion program, problem gambling helplines, as well as locally relevant information on problem gambling counselling and financial counselling.

#### What resources should be a mandatory part of every self-exclusion program?

One group member stated that it is difficult to say what should be the mandatory parts of all self-exclusion programs because different provinces have different needs. Another group member recalled a point raised earlier that one size does not fit all. This individual went on to suggest that there should be a range of information that is made available to people, but nothing should be mandatory.

The point that mandatory program requirements might be a deterrent to people going through with self-exclusion also came up in the discussion. On this matter, the group member who had self-excluded felt that anything that is mandatory will be a deterrent for people who might otherwise self-exclude, adding that she would not have self-excluded if counselling was mandatory or if the only ban option was for life.

There was a general consensus in the group that it is a concern that making aspects of self-exclusion mandatory for all programs would be a deterrent for entering self-exclusion. However, group members agreed that they did not know the extent to which mandatory requirements are actually a deterrent in practice.

**What more can venues do? What role, if any, should counselling and assessment play in self-exclusion? Should counselling and assessment be mandatory during the course of the self-exclusion program? Should counselling and assessment be a mandatory part of reinstatement?**

One group member stated that many problem gamblers will not seek treatment, even though they understand that problem gambling is an illness and know that treatment is available. Another group member felt that counselling and assessment are very important and should be offered as an option. Some other members of the group agreed with this approach. However, the concern was raised that if too much information is provided when people self-exclude, it might create the impression that self-exclusion programs are lacking. The individual who raised this point also felt that it cannot be assumed that everyone who seeks self-exclusion needs counselling and that self-exclusion alone might be enough for some people. This group member went on to suggest that self-exclusion programs should have pamphlets that explain how self-exclusion works and what to do if additional help is needed.

The discussion turned to the education program that is a feature of self-exclusion in Manitoba. One group member said that he initially thought this was a good idea but, upon reflection, he felt that since self-exclusion is voluntary, people who self-exclude should not have anything imposed on them as part of the program. A group member from Manitoba clarified that the course is not counselling, but an education that addresses mistaken beliefs about gambling and helps people who have chosen to end their self-exclusion make a plan to safely return to the casino.

However, there was a concern in the group that a mandatory education program, such as Manitoba's, is still a potential barrier to people choosing self-exclusion. In response, the group member from Manitoba stated that the education course has the potential to instill knowledge that might help people recognize the warning signs that they are relapsing after they return to gambling.

**Is there any way to effectively catch individuals who breach their bans (i.e., facial recognition software, players' club access cards, and mandatory use of personal ID)?**

**What would it take to make this work? What are the privacy implications? Does an effective self-exclusion program outweigh such privacy issues?**

One group member stated that the only effective way to catch people who are breaching their bans is through the use of electronic ID cards to gain access to the venue. However, this individual also thought this would be

impractical and would likely violate the Charter of Rights and Freedoms.

One group member suggested that players could have cards that activate the machines, but this was countered with the assertion that a self-excluded player could just borrow a friend's card to play. Another group member brought up the use of facial recognition. This person said that facial recognition is only effective 25% of the time and that the only way to improve detection is to make venues smaller. However, this approach would result in multiple smaller venues and people who were self-excluded from one could go to another where they were not known.

While group members suggested that there needs to be some sort of detection process that demonstrates a venue's diligence and responsibility with respect to self-exclusion, the group was unable to come up with any surefire suggestion for effectively detecting people who breach their bans.

There was a general consensus in the group that no detection system is perfect. It was suggested that emphasis should not be on detection, but on providing support to self-excluded individuals and encouraging them to be responsible for their actions.

**Consider this quote from a focus group participant: "If they know who the trouble makers are and are successful at keeping them out, why can't they place the same focus on self-excluders?"**

In response to the quote, one group member said that there are significantly fewer people who have been expelled for behavioural issues than there are people who have self-excluded and that people who cause trouble tend to be remembered by venue staff. Other group members agreed with this assessment.

**How do you measure the success of self-exclusion and what is realistic in terms of enforcement? For example, what is an acceptable level for approaching people who have self-excluded and should an industry-wide level be established?**

The members of the group thought that this was the most important question asked. One member of the group stated that the ultimate measure of self-exclusion is the degree to which it reduces the frequency, intensity and length of an individual's gambling. Thus, even if people breach their bans, they may still be gambling less than they did before self-exclusion. This group member also felt that breaching was part of a normal process of behaviour change and while some people are able to get it right the first time, for most it is trial and error.

Another group member made the point that people feel alienated from the self-exclusion process and there should be a way for the operator to better understand the experience of people who have self-excluded. The suggestion was made that there could be research and follow-up with self-excluded people to gain insight into their experiences that could be used to improve the program. The point was also made that follow-up would shed light on the degree to which self-excluded people access treatment services and the kinds of treatment they seek out.

During the discussion, two schools of thought were identified for dealing with people who repeatedly breach their bans. The first is to mete out harsh punishment to deter people from coming back, while the second is to use the breaches as an opportunity to see if the person needs some additional support and resources.

In terms of finding ways to measure the success of self-exclusion, it was suggested that if enrollment is climbing, then that signals an awareness of the program, which should be seen as mark of its effectiveness. Members of the group also suggested that assessing the effectiveness of self-exclusion could be done by surveying people who had self-excluded. Additionally, it was suggested that the public at large could be polled to gauge the general awareness and perception of self-exclusion.

### **Additional Points Discussed in the Group's Presentation to the Forum**

In the presentation of the breakout group's discussion to the rest of Forum attendees, the group leader stated that one of the key areas of consensus was the concern about too much emphasis being placed on combining self-exclusion with counselling. Some Forum attendees disagreed with this. In response, the group leader clarified that the group was wary of self-exclusion being perceived as forcing people into treatment, as opposed to presenting treatment as an option.

### **Breakout Group Two (Non-casino gaming-focused)**

The content of the discussions are organized under the headings of the questions that were asked. Since the group discussions were dynamic and did not necessarily follow the proscribed sequence of the questions, the question headings act as themes that organize the content of the discussions. In some cases, questions have been combined when responses have run together.

### **Should separate, independent bodies regulate/enforce the daily operations of self-exclusion programs?**

**Casinos and their operators make money from problem gamblers. Therefore, there is a perception that casinos have no real interest in making self-exclusion work. Should the functions of regulation and enforcement be kept separate from the management of the program?**

One group member said that there are more problems when gaming is privately regulated because a provincial government will run gaming establishments more responsibly than private enterprises because it would face negative public opinion otherwise. Another group member noted that in Alberta, the regulator works collaboratively with casinos. This group member felt that it did not matter who the regulator was, as long as it is a credible arms-length third party. This group member went on to express concern that there is little to motivate operators to enforce self-exclusion other than fear of liability. This person also felt that, if nothing else, it is good optics to have a third party overseeing self-exclusion, a point that others in the group agreed with.

One group member felt that a third party regulator might better serve the interests of both the casino and problem gamblers by reducing the casino's liability and facilitating access to problem gambling treatment. Another member of the group agreed, adding that third party oversight creates a "healthy paranoia" for operators.

One group member noted that in Quebec, Loto-Québec oversees all venues, creating one system for administration and enforcement. The question was raised as to what motivates operators to be diligent, and this group member stated that for Loto-Québec, it is its corporate philosophy, since there are no laws governing self-exclusion in Quebec. Another group member agreed that Loto-Québec's corporate culture is excellent, but added that this is not the case in all jurisdictions. The point was reiterated that no matter how scrupulous an operator's practices, there is still a concern about optics with respect to operators self-regulating. However, one group member noted that regardless of whether or not operators and regulators are separate, both ultimately report to the government and it is the government that sets the general directions for administering responsible gaming practices.

The general consensus of the group is that a third party should regulate and oversee self-exclusion but daily management and operation of self-exclusion should remain with the casino operator. Regardless of the approach, the group felt that proper administration of self-exclusion requires that operators have a vested interest and a willingness to follow regulations or appropriate program administration.

**Is it possible to have a self-exclusion program that covers all gaming products and venues (bingo halls, VLTs, race-tracks, casinos)?**

**Are effective self-exclusion programs realistic in jurisdictions that have widely accessible VLTs (e.g., in hotels and bars) that are exempt from such bans? What measures can be taken to implement effective self-exclusion across all gaming products?**

One group member felt that if self-exclusion is seen as a positive initiative for casinos, then it should apply to all gaming products. Another member of the group member felt that self-exclusion for non-casino venues like VLT sites was not possible. Some in the group responded to this, saying that it is possible but it would be difficult and expensive, while others in the group felt that the cost and difficulty of instituting self-exclusion in non-casino gaming sites is not as high as often assumed. One group member raised the question of whether self-exclusion was possible for instant scratch lottery tickets. While another member of the group responded by saying this might be overkill, it was noted that self-exclusion programs for lotteries do exist in some jurisdictions.

One group member noted that there is little empirical evidence in terms of effective practices for self-exclusion, and it is therefore important to look to other jurisdictions to see what works and what does not. It was also noted that while self-exclusion for non-casino gaming products is technologically possible, there has to be the political will to implement them. This opinion was shared by most in the group, and it was felt that a lack of political will might be the biggest barrier to having introducing an all-encompassing self-exclusion program.

One group member raised concerns about the Charter of Rights and Freedoms with respect to asking for mandatory identification checks to enter a gambling venue. In response, others in the group noted that gambling is not a right and that people often have to show ID to do things like buy alcohol or board an airplane. Some concerns were also raised that people could cheat a self-exclusion system that required identification checks or card-only access by using fake ID or borrowing a non-excluded person's player's card. One group member acknowledged this was likely, but felt that it would constitute a minority of self-excluded players. Furthermore, this group member noted that if an operator exercised due diligence by instituting mandatory ID checks or card-only access, it would be protected from liability if people tried to cheat the system.

Other concerns that were raised about introducing a self-exclusion program for all gaming products included the expense and logistics of monitoring the program as well as the thought that implementing a universal self-exclusion may not be justified since a relatively small percentage of the population are problem gamblers.

Most members of the group thought that self-exclusion for non-casino gaming sites was a good idea. While there were several obstacles, such as cost and garnering political will, the group did not feel these were insurmountable.

### **Additional Points Discussed in the Group's Presentation to the Forum**

The group leader reported that there was a consensus that a separate agency should regulate self-exclusion and ensure compliance but that daily management of self-exclusion should stay with the operator. In terms of implementing a self-exclusion program that covers all gaming products and venues, there was a consensus that this is possible, although there are lots of obstacles to doing so. In particular, the group questioned the degree to which the political will exists to implement such a program.

A Forum attendee asked if there was any discussion about regulating self-exclusion for First Nations casinos. The group leader responded that they had not. Another Forum attendee asked if there was any discussion of in terms of whistle blower protection in the context of third party regulators. The group leader felt this was an issue that should be addressed, but it had not come up during the discussion.

### **Breakout Group Three (Promotion-focused)**

The content of the discussions are organized under the headings of the questions that were asked. Since the group discussions were dynamic and did not necessarily follow the proscribed sequence of the questions, the question headings act as themes that organize the content of the discussions. In some cases, questions have been combined when responses have run together.

#### **Promoting Self-Exclusion**

##### **What is enough? What more can be done?**

One group member felt that any casino staff that interacted with people who have self-excluded should know about self-exclusion. In response, another member of the group referred to Holland Casino's practice of training all employees on the company's responsible gaming policies, not just the staff that work with customers. This group

member suggested that this should be a standard practice for all casinos. Other members of the group agreed.

Continuing the discussion on staff training, one group member talked about the practices in Manitoba, where there are different levels of training for different staff. This group member also felt there had to be clear responsible gaming policies that were supported by the venue's management. Another group member agreed and said that it is important for operators to create a "culture of responsible gaming" among their staff. There was a consensus in the group on this point and it was noted that a culture of responsible gaming would be good for staff morale.

In terms of strategies to promote self-exclusion, one group member discussed Holland Casino's policy in which frequent customers are given responsible gaming brochures that include self-exclusion forms. Another member of the group suggested that if card-only access for venues was standard across Canada, brochures on responsible gaming and self-exclusion could be given to players when they signed up for their cards. Others agreed and it was noted that if responsible gaming and self-exclusion information was integrated into a venue's promotional material, it would make the provision of this information less stigmatizing.

In order to assess how well self-exclusion is promoted in a venue, the group agreed that evaluations could be conducted to determine the awareness of self-exclusion among both staff and people who have self-excluded.

**What is considered a reasonable effort on the part of the casino when it comes to self-exclusion? If the casino can demonstrate that they have shown reasonable effort, should they be held liable for failing to detect individuals who breach their bans?**

One group member felt that given the current practices of most casinos, defining a reasonable effort to enforce self-exclusion is meaningless since the process consists of little more than taking applicants' pictures and hoping they will be spotted by venue staff if they return. Also, this group member raised the concern that most venues have a waiver in their self-exclusion agreements protecting them from liability. Thus, this group member asked, what should a venue's minimum standards be with respect to enforcing self-exclusion? The same group member suggested that controlled access was the best solution, since self-exclusion is an "oxymoron" without it. Another member of the group agreed that all casinos should have mandatory player registration. It was noted by another member that in Missouri all players need a player's card to access the venue. Some in the group felt that if card-only access works in Missouri, it should be feasible in other North American jurisdictions.

One group member raised the question of what is an individual employee's obligation with respect to self-exclusion. This group member wondered if a venue would be liable if a dealer knew someone was self-excluded but didn't tell anyone. This group member felt that while it is a clear cut case of negligence if management knows a self-excluded customer is on the premises and does nothing, it is not clear what the situation is with respect to liability for front-line staff. In terms of liability, other members of the group felt that venues should not be liable for human error. On this point, it was noted by one group member that operators need to educate and supervise their employees with respect to their responsible gaming policies. In terms of enforcement, another group member said that it is very difficult for venue security to enforce self-exclusion using only photographs and others agreed. While the group did not produce a definitive answer with respect to negligence, many in the group felt that venues should be liable and subject to fines if they are found to have been negligent with respect to the administration of self-exclusion.

The topic was raised as to whether there should be the option for people to exclude somewhere other than the venue. One group member wanted to see Responsible Gaming Information Centres partnering with casinos to administer self-exclusion. This group member also felt that offsite applications might not be the best idea, but that there should be a place in the casino other than the security office where people can self-exclude. Another group member also disliked the idea of offsite self-exclusion because it would involve a third party. However, this group member said that self-exclusion applications could be mailed or emailed to the venue or operator.

One group member asked what a venue should do when contacted by a patron's family who had concerns about the patron's gambling. Another member of the group responded to this by discussing Holland Casino's protocol for this situation, which involves asking about the customer's personal and financial situation. However, at Holland Casino staff will only approach the patron in question if the family member allows his or her name to be disclosed. If this is not the case, staff do not confront the patron at that point but they will monitor his or her gambling. On this topic, another group member felt that if a third party approaches venue staff, then the venue has been made aware that the person has a problem and should be responsible for addressing it.

One member of the group asked what is a reasonable standard for "red flag" behaviour, other than a player self-reporting? In response, another group member said that there are a number of behaviours that, when observed in combination with each other, might indicate that a person has a problem. This group member described the practice at Holland Casino where frequent guests are approached

by floor managers for a conversation. These conversations have a customer-service orientation where the manager asks the patron how they like the facilities and as part of the discussion, the manager mentions the casino's responsible gaming programs. If the manager suspects that the patron may have a gambling problem, the next time the patron comes in, they will be interviewed about their gambling activities. This type of customer-service approach was supported by other members of the group. However, the group was undecided on what constitutes unreasonable or irresponsible play and the extent to which a casino is responsible for acting on warning signs. A key concern of the group is that expectations in terms of a venue's reasonable efforts with respect to self-exclusion need to be tempered by the fact that there is a lack of access control and tracking in most venues.

While the group did not reach a full consensus on what constitutes a reasonable effort, it was able to identify some minimum standards. In summary, the group suggested the following ten policies to constitute the minimum standards for a venue's reasonable effort with respect to self-exclusion:

1. Simply having a self-exclusion program
2. An electronic list that allows for tracking of self-excluded players.
3. Controlled access to the venue, such as card-only access.
4. Responsible gaming training for all employees that outline self-exclusion policies and what an employee should do when asked about self-exclusion.
5. Regular promotion of self-exclusion.
6. Instant access to self-exclusion on demand with no waiting periods.
7. Access to self-exclusion outside of the casino, such through an outside agency or somewhere in the casino other than the security office.
8. Taking information from a third party (family, loved ones, employers, etc.) that could lead to an intervention. However, self-exclusion would still be an individual's choice.
9. Multiple ways to apply for self-exclusion, such as offsite, by mail or online.
10. The capacity to spot red flag behaviours, such as suicidal ideation or other behaviours that would require intervention.

### **Additional Points Discussed in the Group's Presentation to the Forum**

The group leader reported that the group felt that casinos had a responsibility to promote responsible gaming initiatives to the general public, but that self-exclusion was just one part of this. Thus, the group felt that the self-exclusion did not need to be promoted to the public at large. However, there was agreement in the group that it is essential for casino staff to be educated about self-exclusion and that information on self-exclusion should also be available to customers.

The group leader reported that the group felt that responsible gaming messages could be reinforced through corporate communications and that employees' knowledge of responsible gaming policies, including self-exclusion, should be assessed during performance reviews.

One Forum attendee asked if the group discussed any of the limitations of offsite self-exclusion applications that might affect the integrity of the process. The group leader responded that this had not come up, but he felt that there were ways to ensure that the integrity of the self-exclusion process is consistent.

Another Forum attendee raised the issue of third party exclusion and asked the group leader to clarify whether a third party should be able to report that an individual had breached their self-exclusion agreement or if a third party should simply be able to inform a venue that someone has a potential gambling problem. In response, the group leader stated that while self-exclusion is an individual's choice, there is room for a casino to collect information on a patron through a third party and approach the patron to talk to them about self-exclusion if this is felt to be appropriate in the context of the situation.

### **Breakout Group Four (Enforcement-focused)**

The content of the discussion is organized under the headings of the questions that were asked. Since the group discussion was dynamic and did not necessarily follow the proscribed sequence of the questions, the question headings act as themes that organize the content of the discussion. In some cases, questions have been combined where their responses have run together.

## **Currently, the view among users is that self-exclusion programs have no teeth.**

### **What options can be put in place to change this?**

The breakout group agreed with the assertion that self-exclusion programs have no teeth. One group members noted that in most jurisdictions, operators “bluff” to make the penalties seem worse than they actually are.

The group members felt that enforcement needs to be system-wide in order to be effective. Currently, most people who self-exclude are only recognized in their local casinos. There is concern that the volume of customers is too high in large venues to effectively identify people who are breaching self-exclusion. Also, not all venue employees have access to information on people who have self-excluded because of privacy issues.

In terms of current practices, one group member stated that venues run by Harrah’s Entertainment create user accounts for all people who have self-excluded at each of their properties and all self-exclusion data is uploaded to Harrah’s computer network so that all Harrah’s venues have access to it. It was noted in the discussion that not all venues have the IT capability to enable them to share and manage self-exclusion data with other venues.

One group member suggested the idea that people who have self-excluded could be used to “secret shop” casinos to test their detection and enforcement. Other group members expressed concerns about the ethics of using self-excluded gamblers to do this. Furthermore, if secret shopping was to yield negative results that became public, it could undermine the self-exclusion program because participants would know they could breach system. However, there was a general consensus that venues should audit their self-exclusion programs to assess effectiveness.

One group member suggested that there could be incentives or bonuses for casino staff that identify self-excluders. Another group member noted that this is already the practice at Crown Casino in Australia. Group members felt this might be a good idea. However, some also expressed concern that since only certain employees have access to self-exclusion info, not all staff would be eligible. Thus such a policy may be considered unfair by venue staff.

## **Should there be fines for individuals who break their bans? If so, should the fine be less than \$500 or more than \$500?**

The group members discussed the fact that, in practice, people caught violating their self-exclusion agreements are not usually fined. While punishment by fine is an option in most jurisdictions, venues and operators have concerns about the negative optics of fining problem gamblers. Members of the group felt that fining people for violating self-exclusion is like punishing the victim, since self-exclusion participants already tend to have personal troubles as a result of their gambling. It was also noted that the fines for trespassing (the common charge for self-exclusion violators) are typically small and are not an adequate deterrent.

The point was also raised by one group member that other public health interventions do not involve fining people. For example, alcoholics or drug addicts are not fined as a result of their addictions. Instead of fining, it was suggested that people caught in breach of their bans should have the option of alternative punishments, such as going to counselling.

## **Should those who breach be charged with criminal trespassing?**

As with fining, the group felt that the optics of criminally charging people for breaching self-exclusion is problematic and that people in that situation have enough problems already.

## **Should individuals who sign agreements forfeit any right to a jackpot or winnings if won while breaching their ban? If so, what becomes of this money?**

While there were concerns about the optics of taking self-excluded players’ money if they won a jackpot, the group consensus was that withholding jackpots is a strong disincentive for self-excluded players to re-enter the venue. However, some counterpoints were raised. For one, it was noted that some self-excluded players get excitement from the risk of getting caught, thus winning a jackpot isn’t their sole motive for returning to the venue. Some group members expressed concern that confiscating jackpots is legally ambiguous and therefore might not be feasible in all jurisdictions.

In addition to confiscating jackpots, the idea was also raised that self-excluded players who are caught should have all the money they have in play confiscated and given to charity. However, others in the group raised the concern that it might be challenging to determine what constitutes money in play. As with confiscating jackpots, concerns were also raised about the legality of doing this.

In terms of what happens to confiscated jackpots, group members felt that the money should be given to charity or to treatment programs; otherwise it is just another source of revenue for the operator.

**Should there be graduated penalties? (i.e., if you break the ban once, you get a warning; twice, you receive a fine etc.)**

There was a general consensus in the group that there should be progressive penalties for people who are caught violating their self-exclusion agreement. However, members of the group raised concerns that harsh punishments could be a deterrent to self-exclusion. Regardless, group members felt that the escalation of penalties had to include the possibility of going to court, as fear of having a public record of their offense is a powerful motivation for self-excluded players to honour their agreements.

**Should venues who fail to exclude someone who has signed a ban be fined?**

Some group members noted that fining venues is already a policy in certain jurisdictions. One participant said that in British Columbia, the Gaming Control Act allows investigators to write tickets (to a maximum of \$500) to venues that do not meet the standards set out in gaming legislation. Another participant mentioned that venues in Iowa face fines of up to \$40,000 if they are found to have let people who have self-excluded return.

Some group members thought that the threat of fines would make operators work harder to detect self-excluded players. However, one group member raised the concern that operators might not comply if the cost of the fines are less than the cost of upgrading security and surveillance.

One group member raised the point that instituting fines requires a legally mandated self-exclusion system for all venues because venues would not voluntarily offer self-exclusion if doing so opened them up to the possibility of fines. On this point, one group member suggested that the mandatory use of smart cards is the best way for casinos to protect themselves from liability where self-exclusion programs are mandatory.

One group member asked if venue fines helped self-exclusion participants. This point led to the suggestion that the money generated by venue fines should go towards funding problem gambling treatment, although most in the group felt that this would be unlikely.

Overall, while there was some support for the idea of venue fines, the group generally felt that fining venues should be reserved for situations in which there was blatant disregard to the enforcement of self-exclusion.

**How do you regulate and enforce fines to the individual and venue?**

The group felt that the regulator was the logical choice to regulate and enforce punishments and fines for self-exclusion programs.

**Should separate independent bodies (like responsible gambling information/resources centres) manage registration and reinstatement of self-exclusion agreements?**

**Should self-exclusion registration be available offsite? What about renewal of expiring self-exclusion bans, should this be available offsite?**

Group members felt that there should be more flexibility about where people could sign up for self-exclusion. In terms of current practices, one group member noted that in Manitoba, people can sign up for self-exclusion at the Addictions Foundation as well as at the Manitoba Lotteries Corporation's head office. Self-exclusion renewals in Manitoba can also be done offsite. Another participant stated that in Iowa, notarized self-exclusion forms can be submitted by mail with a picture. Problem gambling counsellors in Iowa can also fill them out on behalf of their clients.

**Participants also mentioned that they would like to be informed about the possibility of renewal in advance. But, is this problematic given that this might raise issues surrounding confidentiality and the promise of 'no contact' from the casino?**

This point was not specifically discussed.



### **Would having an independent body that manages self-exclusion registration and renewal make this easier?**

Group members felt that the administration of self-exclusion needs to be different for each jurisdiction. While the idea of an independent regulatory body for self-exclusion was not dismissed, there were questions raised about what its actual function would be, since self-exclusions do not necessarily happen everyday. It was suggested by one participant that the self-exclusion regulatory role should be given to an existing body, since the administration of self-exclusion is not substantial enough to warrant creating a dedicated regulatory body. The point was also raised that an independent body might complicate the self-exclusion with an extra layer of bureaucracy.

### **Additional Discussion**

The point was made that people should be able to self-exclude from all venues in a jurisdiction at once.

In terms of ban length, one group member raised the point that there is no research in this area and no rationale for a variation in ban length. However, the general opinion of the group was that there should always be the option of lifetime self-exclusion.

In terms of the role of security staff, the point was made that security should not be the primary administrators of self-exclusion. The staff administering self-exclusion in the venue should be sensitive and well-trained. The protocols for Manitoba Lotteries Corporation and Harrah's Entertainment were cited as good models. In both cases, shift managers handle self-exclusion and security only comes in towards the end of the application process.

### **Additional Points Discussed in the Group's Presentation to the Forum**

A number of further points were discussed when the group leader presented the contents of the group's discussion to the attendees of the Forum.

When asked which areas of discussion had significant consensus, the group leader indicated the ability to self-exclude somewhere other than casinos, confiscating jackpots won by self-excluded gamblers, and the availability of lifetime bans for all self-exclusion programs.

One Forum attendee asked if the group had discussed the idea of cashing-out loyalty program points when people self-exclude. While this did not come up in the breakout group discussion, Forum attendees debated the idea. One attendee suggested that it would be good to use the reward points to give vouchers for necessities and practical goods. Another attendee raised the point that venues have a legal responsibility to redeem the reward points, since they belong to the individual.

One Forum attendee expressed surprise that the breakout group had consensus on the issue of confiscating jackpots, saying that it is harsh to take money away from people who already have financial hardships. However, other attendees felt that if someone breaches their ban and wins a jackpot, they should not be allowed to keep the money.

There was a quick vote regarding what should happen to confiscated jackpots and player reward points to gauge the general opinion of Forum attendees on these topics. The majority of attendees indicated that that jackpots should not go back to the operator and that operators should not keep the reward points of self-excluded players.

## **Breakout Group Five**

### *(Ban length-focused)*

The content of the discussion is organized under the headings of the questions that were asked. Since the group discussion was dynamic and did not necessarily follow the proscribed sequence of the questions, the question headings act as themes that organize the content of the discussion. In some cases, questions have been combined where their responses have run together.

### **What are the objectives of self-exclusion?**

#### **Is it an agreement between an individual and a gaming provider to prevent the individual from gambling for a set period of time?**

One member of the group suggested that this question should be reworded to read: "self-exclusion is an agreement between an individual and a gaming provider to provide a barrier to access." The rationale for this was that it is an individual's choice whether or not they gamble (and they can gamble other places than at the venue from which they have self-excluded). This group member also described self-exclusion as a mutual agreement to limit the individual's access to gambling. Thus, for the casino, self-exclusion means ensuring that a barrier is in place, while for the gambler, the self-exclusion should be thought of as a psychological barrier as well as a physical one.

The conception of self-exclusion as a barrier drew support from other group members.

In terms of a venue's responsibility, another member of the group felt that while venues should remove self-excluded people caught on their premises, it was not a venue's responsibility to ensure that self-excluded gamblers did not re-enter. This viewpoint was well-received by a member of the group who had self-excluded. This group member said that he had no expectation that the venue had any responsibility to keep him out.

**Is it an expression of commitment by the individual to stop gambling? Is it a means for an individual to a "take a time out" from gambling?**

There was much talk in the group about the role of personal responsibility on the part of self-excluded individuals. One member of the group said that in Ontario, the Gaming Control Act requires an operator to keep self-excluded people off their premises. This group member felt that it was important to look at the legislation regarding self-exclusion and consider where personal responsibility fits in. In response to this, another member of the group said that he felt that the way self-exclusion is presented should be changed in order to remove the expectation that self-excluders will be caught if they breach their bans. This group member felt that, regardless of legislation, people who have self-excluded should not assume the casino will keep them out. In response, another group member noted that some jurisdictions have addressed this issue. As an example, this group member cited Missouri, where self-excluded individuals are expected to notify a venue within 24 hours if they breach. Additionally, it was noted that in Missouri, the initial draft of the self-exclusion regulations made it the casino's responsibility to keep self-excluded people out. However, counsellors who reviewed the draft said that this undermined the role of personal responsibility with respect to recovery, so this provision was not included in the regulations. Overall, the group felt personal responsibility on the part of self-excluded people was important.

**Is it a gateway to treatment (i.e., a process to assist problem gamblers access external counselling)?**

The group generally agreed that there should be a relationship between self-exclusion and treatment services, although there was some debate as to the ideal nature of this relationship. One group member thought it should be clarified that self-exclusion should not be a "cure" but a "tool". This view was shared by others. Another member of the group felt that self-exclusion was not a gateway to treatment per se, but a gateway to services. The reason for this distinction was that not everyone who self-excludes

opts for treatment, choosing instead to access other services, like Gamblers Anonymous.

One member of the group challenged the concept of self-exclusion as a gateway to treatment. This group member felt that this definition was too narrow and suggested that self-exclusion should be thought of as a component to successful treatment. Thus, people who seek treatment should be encouraged to self-exclude as part of their overall strategy. This group member went on to say that the objective of self-exclusion is different for different people. While some might use it as a tool for recovery, others might use it as a deterrent or a gateway to treatment.

**Length of self-exclusion bans?**

**How long should they last? 6 months (to allow for a cooling off period)? 1, 2, 5 years? For life with the possibility of self-initiated reinstatement?**

One group member said that if self-exclusion is a barrier, then theoretically someone might only need it for a year or two to reduce problem gambling. This was supported by another member of the group who felt that there are some people who are comfortable self-excluding for a year and then controlling their level of access after that. Another group member said that he liked Ontario's self-exclusion program, where the ban is indefinite, because this puts the responsibility in the hands of the self-excluder. However, unlike Ontario's 6 month minimum, this group member felt that the minimum amount of time an individual should wait before being eligible for reinstatement is a year. The model of an indefinite ban that can be rescinded after a minimum of one year was supported by all members of the group. However, one group member added that if a person asks for self-exclusion for a second time, the ban should be permanent, because they have shown that they cannot gamble safely. This idea received mixed support in the group.

**Do longer bans deter people from self-excluding in the first place?**

There were concerns in the group that longer (specifically indefinite or lifetime) self-exclusion bans may be a deterrent to self-exclusion. One group member suggested downplaying the fact that a ban was indefinite and emphasizing the option to reinstate after a year. Another member of the group did not like the idea that was raised earlier about permanent bans for second-time self-excluders. This group member felt that this practice might discourage a person from re-applying for self-exclusion. Instead, this group member suggested self-exclusion should be permanent after the third time a person applied for it.

**How do you manage the administrative side of lifetime bans with reinstatement (especially since you end up with huge numbers of people on self-exclusion with outdated pictures)?**

This point was not specifically discussed.

**Should people who have self-excluded be offered choice in the length of their bans? Would this be difficult to oversee?**

There was a group consensus that choice of ban length was a good idea, although one group member added that if people can choose their ban lengths, then they should also be better-educated about treatment options. One group member said that from a therapeutic perspective, the more choice given to the client, the better the odds of success. This was echoed by another person in the group who said that different people have different needs. In response, it was suggested that different treatment options could be presented to people when the self-exclude, depending on what they are looking for and how they define their situation. Thus, a person who just wants a break could choose self-exclusion for a year but someone who considered their gambling problem as an illness could choose self-exclusion for life. The pros and cons of different self-exclusion options could be presented to people at sign-up. Another member of the group went on to say that there may be a larger percentage of binge gamblers who use self-exclusion for a break than was previously thought.

### **Additional Discussion**

A recurring point during the discussion was the need for further research that would assess the effectiveness of various aspects of self-exclusion and inform the development of best practices. Another point that was raised more than once was that all jurisdictions around the world are different and that self-exclusion best practices need to be broad enough to be relevant for each jurisdiction.

One member of the group also made the point that if operators do not address problem gambling concerns with initiatives like self-exclusion, the viability of the industry could be threatened by poor public opinion.

### **Additional Points Discussed in the Group's Presentation to the Forum**

When asked which areas of discussion had consensus, the group leader indicated that there was agreement that self-exclusion should provide a barrier to access and a gateway to services, and that ban lengths should be indefinite with reinstatement possible after a minimum of one year. The group leader noted that the group felt

there was a need for more discussion on how many times someone should be able to self-exclude before the ban became permanent.

A Forum attendee asked if the group had discussed the merits of a cooling-off period but the group leader reported that this did not come up.

During the presentation to the Forum, one of the attendees suggested that a year was too long as the minimum duration for self-exclusion. This person also suggested that it may be better to have 3 and 6 month options as a first step. This was followed-up with a comment by another attendee that any self-exclusion program that features a lifetime or indefinite ban would be a deterrent.

However, other attendees expressed support for lifetime bans. One attendee felt that lifetime bans should be an option while another stated that self-exclusion has been effective in jurisdictions where lifetime bans are the only option.

The point was also reiterated during the presentation to the Forum that a one-size-fits-all approach reduces the number of people who will use self-exclusion. One Forum attendee noted that there are lots of differences between people who sign up for self-exclusion in terms of their mental state. Some are simply angry at the casino while others recognize that they have a gambling problem. Thus, the way self-exclusion is presented to people who apply impulsively out of anger might have to be different from how it is presented to a person who has chosen self-exclusion after thinking it through. Other Forum attendees agreed.



## APPENDIX VIII: EXPERT FORUM ATTENDEES

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**Paula Antoniazzi**, Program Director, Responsible Gambling Council

**Jennifer Ashton**, Manager of Social Responsibility, Nova Scotia Gaming Corporation

**Sue Birge**, Deputy General Manager, Gaming Policy and Enforcement Branch, Province of British Columbia

**Wendy Denis**, Focus Group Participant

**Terry Finn**, Chair of Board of Directors, Responsible Gambling Council

**Duane Galbraith**, Focus Group Participant

**Richard Gingras**, Chief of Surveillance and Investigations, Montreal Casino

**Jeff Graber**, Director of Surveillance, Harrah's Horseshoe Casinos

**Terri Graham**, Focus Group Participant

**Jon Kelly**, Chief Executive Officer, Responsible Gambling Council

**Joseph Kelly**, Professor of Business Law, Buffalo State College

**Gerry Kolesar**, Supervisor of Problem Gambling Services, Addictions Foundation of Manitoba

**Robert Ladouceur**, Professor of Psychology, Laval University

**Susan Lucente**, Manager, Responsible Gaming Information Centre, Niagara Fallsview Casino Resort, Responsible Gambling Council

**Brian Lynch**, Past Vice President of Casino Gaming, British Columbia Lottery Corporation

**Jean Major**, Chief Executive Officer, Alcohol and Gaming Commission of Ontario

**Bev Mehmel**, Director of Responsible Gaming Programs & Research, Manitoba Lotteries Corporation

**Jasmina Milanovich**, Director of Corporate Policy and Communications Branch, Alcohol and Gaming Commission of Ontario

**Patricia Mosher**, Security Manager, Casino Nova Scotia

**Phil Mun**, Senior Researcher, Responsible Gambling Council

**Lia Nower**, Associate Professor & Director, Center for Gambling Studies, School of Social Work, Rutgers University

**Michael O'Neil**, Director, South Australian Centre for Economic Studies

**Ronald Oud**, Senior Manager of Security and Risk Control, Holland Casino

**Betty Palantzas**, Manager of Responsible Gambling, Ontario Lottery and Gaming

**Paul Pellizzari**, Senior Manager of Strategic Policy, Ontario Lottery and Gaming

**Michel Rochon**, Investigator, Montreal Casino

**Lisa Root**, Manager, Gambling Support Services, Niagara Alcohol & Drug Assessment Service

**Jennifer Shatley**, Program Vice President Code of Commitment, Harrah's Entertainment Inc.

**Robert Simpson**, Chief Executive Officer, Ontario Problem Gambling Research Center

**Paul Smith**, Director of Public Affairs & Corporate Social Responsibility, British Columbia Lottery Corporation

**Marvin Steinberg**, Executive Director, Connecticut Council on Problem Gambling

**Melissa Stephens**, Problem Gambling Program Administrator, Missouri Gaming Commission

**Kent Verlik**, Director of Social Responsibility Division,  
Alberta Gaming and Liquor Commission

**Larry Wandowich**, Executive General Manager, Manitoba  
Lotteries Corporation

**Monica White**, Director of Research and Information,  
Responsible Gambling Council

**Keith Whyte**, Executive Director, National Council on  
Problem Gambling

**Karen Williams**, Manager, Responsible Gaming  
Information Centre, Casino Windsor, Responsible  
Gambling Council

**Kim Wilson**, Manager of Social Responsibility and  
Responsible Gambling, Atlantic Lottery Corporation

**Harold Wynne**, Wynne Resources Ltd.





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