



CENTRE FOR THE  
ADVANCEMENT OF  
BEST PRACTICES

# INSIGHT

Best Practices for Self-Exclusion  
Reinstatement and Renewal



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## PREAMBLE

The Responsible Gambling Council's (RGC) Centre for the Advancement of Best Practices is pleased to present its findings from *Insight*—a research project designed to investigate and identify best practices for self-exclusion reinstatement and renewal. **The specific objectives of this project are threefold:**

1. Compile an inventory of reinstatement and renewal options applicable to both land-based and online gaming environments
2. Provide an assessment of pros and cons related to various reinstatement and renewal options
3. Synthesize best available evidence and knowledge on promising reinstatement and renewal options

Towards the achievement of these objectives, several research activities have been carried out:

- A literature review of available research, policy and evaluation documents related to self-exclusion, reinstatement and renewal
- A review of training and procedures for self-exclusion programs across Canada, with a particular focus on reinstatement and renewal
- Interviews with corporate and gaming venue employees
- Focus group discussions with former gamblers experienced in self-exclusion
- A reinstatement panel discussion (*After Reinstatement: What Happens Next?*) and an *Insight* roundtable held during the *Discovery 2015* conference with researchers, treatment providers, gaming operators, and individuals with first-hand experience with gambling problems to discuss the strengths and limitations of various reinstatement and renewal options

This RGC project was made possible through financial support provided by the Atlantic Lottery Corporation, the British Columbia Lottery Corporation, Loto-Quebec, Manitoba Lotteries & Lotteries, the Nova Scotia Provincial Lotteries & Casino Corporation, the Ontario Lottery and Gaming Corporation, and the Saskatchewan Liquor and Gaming Authority.

RGC also wishes to thank the many individuals who have contributed to this project. These include researchers, treatment specialists, gaming operators and employees, and On-Site Responsible Gambling Information Centre staff from across Canada and around the world. Special thanks are also due to the self-excluded individuals who participated in focus group discussions.

*Insight* reflects the input from these numerous partners and participants, but represents the views and analysis of RGC, for which the organization assumes responsibility.

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# EXECUTIVE SUMMARY

*Insight* has set out to examine the topics of voluntary self-exclusion reinstatement and renewal in an effort to develop evidence-informed best-practices for both land-based and online gambling operations.

*Reinstatement* refers to a player's removal from the self-exclusion program upon completion of the agreed term, or a minimum exclusion period, and the ability to gain access to the gaming venue. *Renewal* involves the re-establishment or extension of self-exclusion. While these two processes are common in many jurisdictions that offer gambling opportunities, they can often take a variety of forms. Both reinstatement and renewal address what may occur at the end of a self-exclusion ban, but they are two distinct processes. To build towards best practices for reinstatement and renewal processes, the Responsible Gambling Council's (RGC) Centre for the Advancement of Best Practices has carried out several research activities and synthesized their findings.

Key activities included 1) a literature review; 2) a review of self-exclusion training and procedural documents; 3) key-informant interviews with corporate and gaming venue employees; 4) two focus group discussions with players experienced with self-exclusion; and 5) a panel discussion and a special *Insight* roundtable session at the *Discovery 2015* conference with experts and stakeholders.

## Active Reinstatement

The findings of this report favour an *active reinstatement* process that offers two streams based on the presence or absence of risk warning signs at the end of a self-exclusion term. Following the completion of a self-exclusion term, an operator would assess markers that may represent risks of future problems. The risk assessment process would take into account such things as history of multiple breaches, as well as their risk signs including family concerns, records of unstable or threatening behaviour and other red flag indicators. This risk assessment process would not impose additional mandatory requirements on those who present a low risk and who had successfully completed their self-exclusion term without incident. For higher risk individuals, the strategy proposes additional safeguards to support those who may require further assistance in making a safe return to the gambling venue. With this context in mind, RGC proposes a 3-step strategy to reinstatement of self-excluded gamblers.

### Step 1: Positive Action

*Active* reinstatement begins with an initial positive action to be taken by all self-excluded participants. Commonly, a standardized letter or form is used to indicate a person's interest and intent to return to the gambling venue (Parke & Rigby, 2014; Responsible Gambling Council, 2011). This step would be mandatory for all gamblers returning from self-exclusion. This is in fact a procedure that is currently in place in several jurisdictions and was generally accepted by participants at the *Insight* roundtable event.

### Step 2: Reinstatement Service Options

The second step in the reinstatement strategy depends on evidence of multiple breaching during self-exclusion and/or other red flags. Those who have fulfilled the terms of their self-exclusion agreement and have not presented with significant markers of gambling risk will be offered the voluntary options of: 1) meeting with a trained responsible gambling (RG) staff member (such as a casino staff person with an RG role, or On-Site Responsible Gambling Centre staff person) in order to devise a safe

gambling plan; 2) completing a brief online or in-person educational session to enhance responsible gambling knowledge (also with a trained RG staff member); and/or 3) participating in professional counselling. However, for those who have presented with high risk warning signs, reinstatement would require them to choose and complete at least one of the preceding three options.

### **Step 3: After Reinstatement**

Following the approval of reinstatement for the gamblers who fulfilled the terms of their self-exclusion agreement and did not present with significant markers of gambling risk, returning to the gambling venue would include some conditions, such as 1) ineligibility of credit, 2) passive exclusion from marketing, and 3) passive exclusion from loyalty programs. Passive exclusion from marketing and loyalty programs means that players continue to be excluded from these services but would have the option of registering for them again. For those players considered to be of higher risk of problematic gambling, two of the conditions, ineligibility of credit and passive exclusion from loyalty programs, would apply in the same manner as the group that did not present risk signs. However, marketing restrictions would remain in place. Research has shown that restrictions on marketing for reinstated players is widely supported as best practice as it aims to reduce the triggers that may lead to risky gambling behaviour. Because loyalty programs monitor gambling patterns, they can serve as an important source for identifying risky gambling behaviour (e.g., increasing intensity and frequency of betting, increasing monetary loss, and significant involvement in time spent gambling, etc.).

Some have suggested that gaming providers should actively monitor all individuals who return to gambling after self-exclusion. This may not be feasible, especially in those cases where the patron is not enrolled in the loyalty program. It is possible, however, to designate 'returning from self-exclusion' as a 'red flag' in whatever RG information system the venue or site is using.

### **Renewal**

Active reinstatement implies an indefinite term of self-exclusion, even if an individual is eligible to apply for re-entry after a specified term. In other words, a self-excluded patron can only return to the gambling venue by making a positive action to apply for reinstatement. In the absence of such an application he/she would remain excluded. If this is the case, some have argued that an active renewal process is not necessary.

However, informants participating in the *Insight* roundtable believed that there was merit in providing an active renewal mechanism since it provides a self-excluded individual with the opportunity to reinforce or remake their commitment to self-exclusion. On balance, the RGC believes that best practice should include some form of active renewal process for those who wish to take this route. This renewal process might be conducted through telephone, mail, or in-person in some location other than a gaming venue.

### **Revocation**

Revocation is a feature of some self-exclusion programs. It represents a form of premature reinstatement whereby an individual can revoke their self-exclusion agreement before the end of the term. In some jurisdictions, a minimum non-revocation period (e.g. 6 months or years) is put in place after which an individual is eligible to reinstate, with some of these jurisdictions including a mandatory waiting period as well, following the application for revoking their self-exclusion. In other jurisdictions, a policy of non-revocation is enforced and players must honour the agreed term of their self-exclusion contracts.



Revocation is notable as it calls into question the integrity of initially established terms of self-exclusion—especially those choosing longer or indefinite bans. While it has been argued that revocation supports those who may feel that they have regained control of their gambling in advance of their full self-exclusion term, no evidence or clear information was found to support this premise. On the other hand, testimony from the *Insight* roundtable did clarify the potential risks associated with having a revocation option available, as it provides a relatively easy route back to the gaming venue in moments of vulnerability. On balance, RGC believes that revocation cannot be supported as a best practice in the management of self-exclusion programs.

## INTRODUCTION

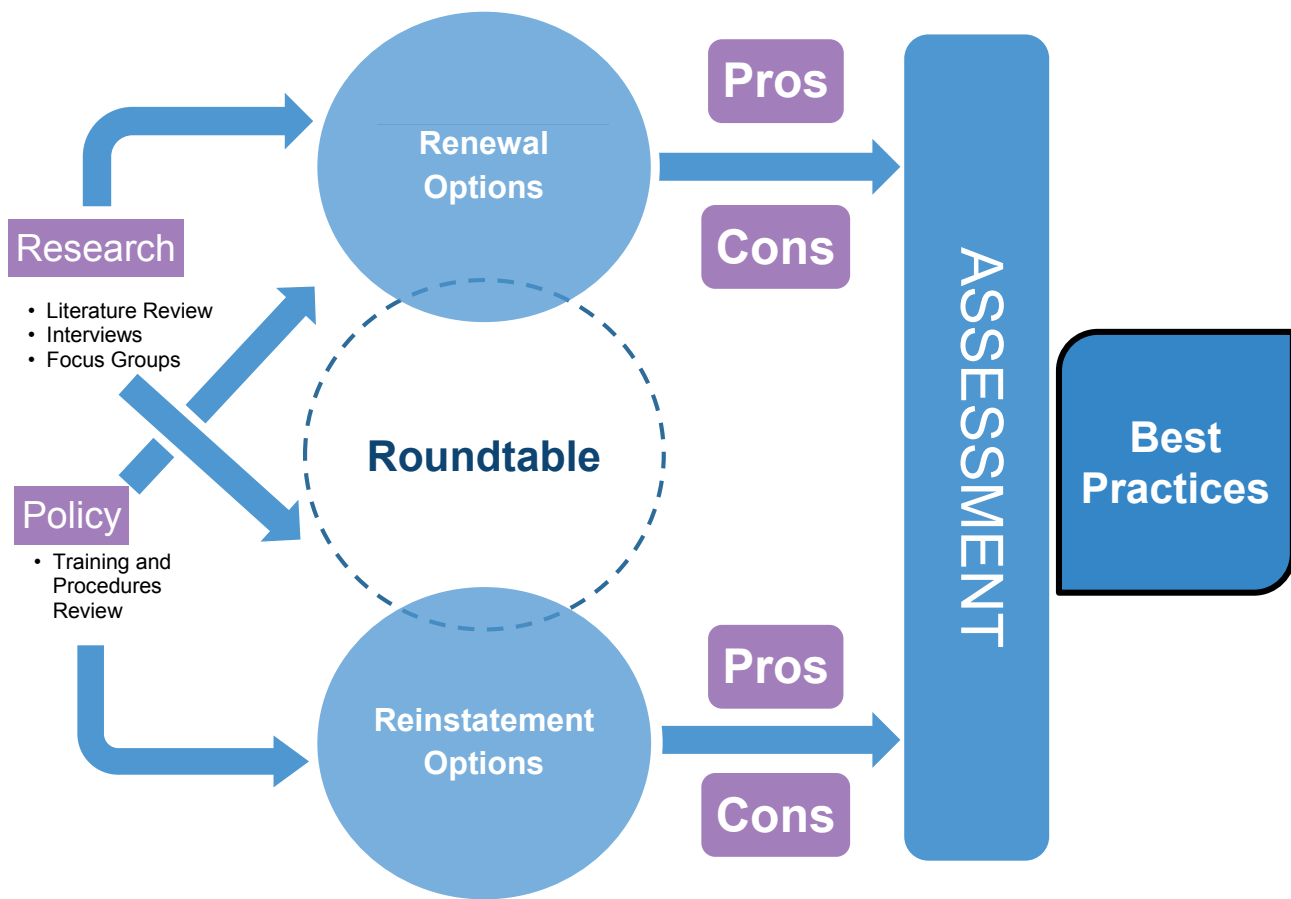
In 2007, the Responsible Gambling Council (RGC) initiated a thorough review of self-exclusion to develop a set of best practices that could help facilitate successful outcomes for people who choose to ban themselves from gaming venues. Entitled “From Enforcement to Assistance: Evolving Best Practices in Self-Exclusion,” the review found the self-exclusion process to be quite rightly in transition from an enforcement model to an individual assistance model. Still, there were a number of areas for improvement in most elements of the process relating to: *registration, communication, detection, breaches, renewal, reinstatement, and promotions*.

For this *Insight* project, the RGC Centre for the Advancement of Best Practices has set out to examine and further define best practices related to the *renewal* and *reinstatement* aspects of self-exclusion.

*Reinstatement* refers to a player’s removal from the self-exclusion program upon completion of the agreed term, or a minimum exclusion period and the ability to gain access to the gaming venue. Reinstatement provides a key opportunity to further support players in making informed gambling decisions. In contrast, *renewal* refers to a player’s desire to extend their current self-exclusion term for a longer period of time. Reinstatement and renewal both address what may occur at the end of a self-exclusion ban, but they are two distinct processes. Currently there has been limited research or investigation into how best to offer reinstatement and renewal.

Due to the current absence of best practices for reinstatement and renewal, this project marshalled the evidence available as well as developed new knowledge from multiple perspectives across Canada and around the world. The description and synthesis of this information is presented in six chapters. Chapter 1 consists of a literature review covering research, policy and evaluation documents related to self-exclusion, reinstatement, renewal and other related topic areas. Chapter 2 includes a review of self-exclusion policy and procedural documents, with a particular focus on reinstatement and renewal approaches. Chapter 3 describes the findings from key-informant interviews with corporate and gaming venue employees. In Chapter 4, findings from two focus group discussion sessions with players who have experience with self-exclusion programs and familiarity with reinstatement and renewal processes are presented. Chapter 5 details the results of work-group activities and discussions with Canadian and international experts on self-exclusion at a panel discussion and an *Insight* roundtable, held at the *Discovery 2015* conference. Finally, Chapter 6 provides a synthesis of knowledge from the preceding chapters and outlines promising practices for reinstatement and renewal. Figure 1 depicts the *Insight* research development process.

Figure 1: *Insight* Research Development Process



# CHAPTER 1: LITERATURE REVIEW

This review of literature presents the evidence and expert opinion that exists on the topics of reinstatement and renewal. It should be noted that the evidence-base is quite weak, with the vast majority of reinstatement and renewal findings coming from documents in which these topics were secondary considerations. Methodologically, most reviewed documents can be described as peer-reviewed discussions or commentaries, with only a handful providing analyses of primary data—even fewer were examples of peer-reviewed empirical research.

With this clarification made, some key issues that will be covered include:

- Reinstatement eligibility and process requirements
- Implications for reinstatement and renewal depending on fixed and indefinite self-exclusion term lengths
- Revocation of self-exclusion and reinstatement before the end of an agreed term
- Location of and access to reinstatement and renewal services
- Post-reinstatement options and requirements
- Considerations for renewal processes

Before the topics of reinstatement and renewal are explored, it is helpful to place them within the broader context of self-exclusion.

## Overview of Self-Exclusion

Self-exclusion is a protective measure that allows people to voluntarily ban themselves from accessing gambling facilities. It has become a primary strategy used by the gaming industry and players to minimize the harms of problematic gambling (Nower & Blaszczynski, 2006). Gainsbury (2014) refers to it as an extreme form of pre-commitment—an arrangement initiated by the player requesting to be banned from the gaming venue(s) for an agreed upon period of time. The agreement permits staff to prevent individuals from entering the venue and/or gaming area, and to escort them out if they are found on-site. Depending on the jurisdiction, the individual may face penalties if they are found breaching their agreement (Napolitano, 2003). The durations offered for self-exclusion are usually 6 months, 1-5 years, or lifetime bans (Gainsbury, 2014).

The main purpose of self-exclusion is to help at-risk or players with problems regain control of their gambling behaviour by supporting their efforts to abstain from at least one specific form of gambling for a particular amount of time. An evaluation of self-exclusion programs in Europe, which gathered data from casinos in Austria, Germany, Switzerland and two Internet gambling sites, found the most common reasons for choosing to enroll were: having lost too much money (76%), as a preventive measure (60%), and a loss of control (54%) (Hayer & Meyer, 2011a, 2011b). Nower and Blaszczynski (2006) examined the characteristics of gamblers enrolled in the Missouri Voluntary Exclusion Program (MVEP) between 2001 and 2003. When asked to indicate their reasons for enrolling in self-exclusion, some of the top reasons selected were: to gain control, needing help, and hitting rock

bottom. In a follow-up study, Nelson et al. (2010) asked participants why they enrolled in the MVEP as an open-ended question, and found that the majority of participants (77%) provided reasons such as financial worries, the inability to control their gambling, and the recognition that they had a problem.

Overall, the structure of self-exclusion programs have evolved from an 'enforcement model' into an 'individual assistance model' whereby the emphasis is now on helping those who self-exclude to address their problems and achieve their goals (Responsible Gambling Council, 2008). The individual assistance model focuses on helping the person and connecting them with help services such as counselling. Most self-exclusion programs usually fall between the enforcement and individual assistance approaches (Hing & Nuske, 2011).

Practically, the process begins with those wishing to self-exclude requesting to do so by informing venue staff. The individual is usually escorted off of the gaming floor to meet with staff who explain the program, provide the agreement to be reviewed and signed, and take the individual's photograph (Blaszczynski et al., 2007; Ladouceur, Jacques, Giroux, Ferland, & Leblond, 2000; Nowatzki & Williams, 2002). 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 (Blaszczynski et al., 2007; Nowatzki & Williams, 2002). Typically, the venue will provide the photos of the self-excluded person to security and/or gaming floor staff so that self-excluders can be identified, should they attempt to gamble while excluded. It is also a common practice for the gaming operator to bar self-excluded individual's from receiving marketing materials (Napolitano, 2003; Nowatzki & Williams, 2002).

The effectiveness of self-exclusion sometimes shares a dependency with other measures that address problematic gambling behaviour. For instance, some researchers assert that self-exclusion is most effective for those who recognize that they have a problem with gambling and take steps to address it, such as seeking counselling or other support (Nowatzki & Williams, 2002; Blaszczynski et al., 2007). However, not all people who seek self-exclusion are receptive to professional help (Ladouceur et al., 2000; Ladouceur et al., 2007). Ladouceur and colleagues (2007) found that 49% of those enrolled in self-exclusion considered seeking therapy, however only 10% actually did so. Research on treatment suggests that only those receptive to it may receive its benefits (Griffiths & Macdonald, 1999). Thus, making counselling a mandatory requirement may not be effective and for some, it may even be a deterrent to enrolling in self-exclusion (Ladouceur et al., 2000; Nowatzki & Williams, 2002).

On its own, self-exclusion has been shown to be effective in reducing harms from gambling, urges to gamble, and gambling behaviour, overall (Hing, Tolchard, Nuske, Holdsworth, & Tiyce, 2014; Ladouceur, Sylvain, & Gosselin, 2007; Nelson et al., 2010; Responsible Gambling Council, 2008). However, self-exclusion cannot be construed as a substitute for treatment; it provides a barrier, limiting an individual's gambling and encourages them to seek professional assistance.

## **Reinstatement**

Reinstatement refers to an individual's removal from the self-exclusion program upon completion of the agreed term, or a minimum exclusion period, and the ability to gain access to the gaming venue(s) from which they were barred. In general, there are two pathways to reinstatement:

1. The *active* process whereby excluded players must apply to be reinstated, else the ban continues
2. The *passive* process in which reinstatement is automatic once the exclusion period ends

Within each of these reinstatement pathways are numerous options. Many of these options are detailed in the summarized literature below (also see Table 1).

Table 1. Reinstatement Options and Conditions Reflected in Literature Review

Options or Conditions	Sources
Letter from player requesting reinstatement	(Parke & Rigbye, 2014; Responsible Gambling Council, 2011)
Provision of responsible gambling support and information	(Gainsbury, 2014; Responsible Gambling Council, 2011)
Review of reinstatement requirements by operator	(Bellringer et al., 2010; Blaszczynski et al., 2007; Gainsbury, 2014)
Discussion of breaches	(Responsible Gambling Council, 2011)
Mandatory pre-reinstatement meeting with professional	(Bellringer et al., 2010; Gainsbury, 2014; Leitzel, 2011; Murray & Savage, 2010; Tremblay et al., 2008)
Mandatory meeting with operator staff	(Parke & Rigbye, 2014)
Optional pre-reinstatement counselling	(Blaszczynski et al., 2007; Nowatzki & Williams, 2002)
Mandatory education session	(Nowatzki & Williams, 2002; Tremblay et al., 2008; Verlik, 2008)
Off-site reinstatement option	(Gainsbury, 2014; Parke & Rigbye, 2014)
Creation of gambler safety plan	(Murray & Savage, 2010; Nowatzki & Williams, 2002)
Continued exclusion from direct marketing, unless requested by player	(Gainsbury, 2014; Parke & Rigbye, 2014)
Post-reinstatement risk-monitoring	(Parke & Rigbye, 2014)

Table 2. Revocation Conditions Affecting Reinstatement

Revocation Conditions	Sources
Minimum non-revocation period	(GamblingCompliance, 2009; Nowatzki & Williams, 2002; Verlik, 2008)
Revocation requires meeting and possible assessment	(Blaszczynski et al., 2007; Croucher & Croucher, 2005; Leitzel, 2011; Napolitano, 2003; Verlik, 2008)
No revocation during self-exclusion period	(Robert Ladouceur et al., 2007; National Center for Responsible Gaming, 2011; Parke & Rigbye, 2014)

Requiring a self-excluded gambler to write a letter requesting to be reinstated after or approaching the end of the exclusion term is a feature of an *active* reinstatement process. In a recent evaluation report of self-exclusion in the United Kingdom (UK), Parke and Rigbye (2014) noted that the majority of responses by land-based and online gambling operators (62%) supported the requirement of a “positive action” made by an excluded player, such as a letter confirming their interest in reinstating and affirming their readiness to gamble responsibly. In the 2011 review of the British Columbia Lottery Corporation (BCLC) Voluntary Self-Exclusion (VSE) program, the Responsible Gambling Council (2011) found a need and local interest in the future development of an active reinstatement process, which would include documentation of a player’s wishes to return and evidence to show his or her decision is informed and appropriate. While letters of intent do encourage players to take an active role in reinstatement and provide a potential mechanism to reflect on their decision, it is one of the least onerous options in a reinstatement process and may be viewed as an initial step rather than a singular one.

Another option presented in the literature includes the provision of responsible gambling information and support by operators or third-parties at the conclusion of a self-exclusion term and upon a player’s request to reinstate. In addition to a reinstatement letter, the BCLC VSE program review report (2011) recommended gamblers requesting reinstatement also receive support and information regarding community resources—including tips and information about responsible gambling. Following Gainsbury’s (2014) review of evidence surrounding self-exclusion strategies, the author recommended resources, such as educational information and referrals to formal counselling services, treatment and/or self-help programs be communicated to self-excluded persons. While this option is presented in the context of those entering into self-exclusion programs, opportunities to pair information on responsible gambling and support services at the latter stages of a program may also exist and be beneficial.

One such opportunity includes notifying self-excluded gamblers of reinstatement requirements. Typically, this would be carried out by gambling operators or third-parties. For instance, Gainsbury’s (2014) review of self-exclusion strategies also indicates that operators need to provide information on reinstatement, as the exclusion term nears an end. The Gambling and Addictions Research Centre’s (Bellringer et al., 2010) evaluation of self-exclusion programs in New Zealand highlighted the apparent lack of information and communication between operators and gamblers as self-exclusion periods reached a conclusion. In a survey of gamblers reflecting on their self-exclusion experience, less than half knew what happened after the agreed self-exclusion period; over 60% of these individuals expressed a desire to know about options for renewal at the end of the contract as well as information on reinstatement requirements (Bellringer et al., 2010). In contrast, nearly 40% of survey respondents stated that they did not want to receive any notifications at the end of the self-exclusion term, as most did not intend on reinstating and perceived it as irrelevant (Ibid.).

A discussion of breaches with a self-excluded player upon initiation of a reinstatement process has been identified as another possible option to consider. In an effort to move away from an enforcement model of self-exclusion towards one of assistance, such a discussion could bring attention to unresolved issues of self-control and help gamblers confront the question of whether he or she is indeed ready to return to the venue (Responsible Gambling Council, 2008, 2011). While evidence to support the positive effect of discussing breaches on future responsible gambling choices and behaviours is not fully formed, the aim of this option is to help prevent a repeating cycle of self-exclusion and reinstatement.

A mandatory interaction (i.e. meeting) between a self-excluded gambler and either a treatment specialist or venue staff member was identified as a key component of an active reinstatement process (Gainsbury, 2014). Evaluation findings have found mandatory counselling sessions before reinstatement to be helpful in promoting responsible gambling, as perceived by gamblers who were currently or recently excluded (Bellringer et al., 2010; Leitzel, 2011; Murray & Savage, 2010; Tremblay et al., 2008). As opposed to voluntary counselling sessions, which have been shown to feature lower uptake among gamblers, mandatory meetings with counsellors represent an opportunity to improve a range of responsible gambling knowledge and behaviours (Tremblay et al., 2008). It should also be noted that in Tremblay et al.'s (2008) study of an improved self-exclusion program, the vast majority (97.8%) of gamblers were either "quite satisfied" or "very satisfied" with their mandatory meeting experiences. Similar to the option of a discussion of breaches, a mandatory meeting could also provide the context for addressing ongoing behavioural issues that influenced a decision to voluntarily enter into a self-exclusion program in the first place or confirm a gambler's readiness (i.e. knowledge and plan for gambling responsibly) to return to the venue(s).

There are some, however, that argue that mandatory counselling may only benefit those that are receptive and motivated as well as deter gamblers from entering into a self-exclusion program to begin with (Nowatzki & Williams, 2002). In a paper discussing a unifying structure for self-exclusion programs, Blaszczynski, Ladouceur and Nower (2007) recommend an *optional* meeting with a trained educator to determine whether a gambler wishes to renew—such meetings would include further assessment and counselling, if so desired. Failure to respond to meeting requests or attend would not affect the termination of the self-exclusion contract at the end of the term. The authors point out that this *passive* reinstatement approach featuring an optional meeting would place primary responsibility for developing personal coping skills to control behaviour on the gambler. Blaszczynski and colleagues (2007) also argue that this approach may be more effective than relying on operators and treatment professionals to provide oversight and prevention of harmful gambling behaviour, which may not be desired or warranted.

In appreciation of the potential negative effects of mandatory counselling, specialists or staff may want to scale the intensity of these interactions to the needs and interests of gamblers. Nowatzki and Williams (2002) agree that mandatory counselling may be too invasive for some gamblers returning from self-exclusion, but that a brief educational seminar should be compulsory for reinstatement. In a comprehensive evaluation of Casino VSE in Alberta, which included a representative random sample (n=300) of surveyed program clients, Verlik (2008) found general agreement (68%) on the perceived effectiveness of a mandatory gambling education and awareness seminar prior to reinstatement. A final educational meeting may also be useful to both affirm knowledge and skills developed during self-exclusion as well as detect gaps that can be addressed before re-entry into a gambling venue (Tremblay et al., 2008).

The issue of location where gamblers meet with staff or other third-party specialists to initiate and carry out the reinstatement process has prompted some to advocate for off-site administration (i.e. away from the gambling venue) (Gainsbury, 2014). In part, the reasoning behind this option pertains to the possible embarrassment, particularly in smaller communities where privacy is more difficult to maintain (Ibid.). As with self-exclusion registration, reviews of evidence contend that reinstatement processes should be simple, convenient, and remotely accessible in order to minimize the barriers (both real and perceived) to accessing self-exclusion services and future program uptake (Parke & Rigbye, 2014).



The development of gambler safety plans as part of the reinstatement process have been forwarded as a way of mitigating risk of future harm to returning gamblers by providing a structure for informing responsible gambling behaviour (Murray & Savage, 2010; Nowatzki & Williams, 2002). Plans could be tailored to the needs and comfort of reinstating players and developed in collaboration with responsible gambling educators, treatment specialists, or trained venue staff. Included in these plans could be self-imposed limits on losses, time spent, as well as tips and guidelines for managing finances and de-stabilizing emotions stemming from gambling (National Center for Responsible Gaming, 2011; Parke & Rigbye, 2014).

In many instances, when a player enters into a self-exclusion program he or she is removed from mailing lists and are no longer targets for direct marketing. Maintaining exclusion from direct marketing even after reinstatement is another option to consider. This provision ensures that returning players are not subjected to additional pressure or incentives to engage in risky gambling, which may have led to their initial enrollment in a self-exclusion program (Gainsbury, 2014; Parke & Rigbye, 2014). However, it has been suggested that reinstated gamblers have the option to be included in mailing lists and loyalty programs again, if they request it (Gainsbury, 2014; Parke & Rigbye, 2014).

Another recommended option following a gambler's reinstatement is risk-monitoring (Parke & Rigbye, 2014). Risk-monitoring could provide operators and treatment specialists with valuable information to identify potentially problematic gambling behaviour. Issues of privacy and feasibility, especially amongst land-based operations, in instituting this option may require further deliberation. However, in principle, operators in certain jurisdictions have been open to the idea and, given informed consent by reinstated players, may become a valuable preventative measure (Parke & Rigbye, 2014).

## Renewal

If evidence and research attention pertaining to reinstatement is considered limited, the area of renewal is weaker still. Renewal refers to the active process in which the self-excluded individual formally agrees to renew or extend his/her period of exclusion. Like reinstatement, the renewal process is informed by two pathways: *passive* and *active*. The passive renewal process requires no further action once the term of self-exclusion has expired, as players are indefinitely excluded until a reinstatement request is made—some have even argued that renewal is irrelevant as a consideration if terms of exclusion are indefinite (Tremblay et al., 2008). In an active renewal process, players must make a formal request to extend their exclusion and in some cases enter into a new agreement. This may also involve having renewal applicants meet with venue staff to sign a new agreement and provide updated photo identification.

Clear communication, which may include notification of renewal requirements or conditions for passive and active processes, respectively, has been highlighted as an area for strengthened policy and program development. In a process evaluation of self-exclusion in Queensland, Australia, Hing and colleagues (2014) interviewed over fifty gamblers who had self-excluded, many of whom noted that the renewal process was unclear to them and had not been adequately explained. This phenomenon mirrored findings from the Gambling and Addictions Research Centre's evaluation of self-exclusion processes in New Zealand (Bellringer et al., 2010). In it, investigators found that two-thirds of surveyed gamblers who were unaware what happens at the end of the exclusion term (58%) indicated their desire to know more about conditions for automatic renewal (Ibid.). These findings support clearly explaining the passive renewal processes not only at the time of enrolling in self-

exclusion, but also as the exclusion term nears expiration, as a reminder that the individual will remain excluded unless they actively reinstate.

For active renewal processes, the location or setting for administration is an important consideration (Responsible Gambling Council, 2011). As with the argument for off-site reinstatement summarized above, there are benefits to conducting renewal administration away from gambling venues, as players indicate by their intentions to renew self-exclusion that they are not ready to be exposed to or take part in gambling (Gainsbury, 2014; Parke & Rigbye, 2014). Parke and Rigbye (2014) contend that excluded individuals may benefit from customer care telephone services for renewing the terms of their self-exclusion, which could be even more convenient than having to visit an off-site location. This, however, raises the issue of how to obtain updated photo identification from the client.

Other conditions for both passive and active renewal include continued restrictions on direct marketing that have been imposed at the initiation of the self-exclusion contract. Arguments for this provision also mirror those made for reinstated players returning from self-exclusion (Gainsbury, 2014; Parke & Rigbye, 2014).

## Revocation

Several options relating to the revocation of a self-exclusion agreement (i.e. premature reinstatement) have emerged from the literature. Some have argued that a minimum non-revocation period should be maintained (GamblingCompliance, 2009; Ly, 2010; Nowatzki & Williams, 2002; Verlik, 2008). Evidence of the ideal length of time to prevent a potential relapse into problem gambling is not yet available, but some researchers point out that easily revocable self-exclusion contracts defeat the purpose of this intervention (Nowatzki & Williams, 2002). Others have suggested that if revocation is to be considered, certain conditions should be put in place to dissuade impulsive decisions (Blaszczynski et al., 2007; Croucher & Croucher, 2005; Hing & Nuske, 2011; Leitzel, 2011; Napolitano, 2003; Verlik, 2008). For instance, Verlik (2008) presents several conditions in addition to minimum exclusion terms, such as the provision of evidence showing individuals have regained (or maintained) control over gambling behaviour and perhaps even include a panel review before reinstatement is granted. Other conditions for a revocation option include a waiting period to allow self-excluded individuals time to reconsider their decision (Leitzel, 2011); an assessment of a revocation request by a third-party (Blaszczynski et al., 2007); or having applicants secure the approval of at least one counsellor by demonstrating their capacity and intent to gamble responsibly (Croucher & Croucher, 2005).

There are, however, others who believe a self-exclusion term should be irrevocable, based on the conjecture that longer durations in programs could help reduce the risk of relapse (Ladouceur et al., 2007; National Center for Responsible Gaming, 2011). Approval of this condition by gambling operators has also been demonstrated in a UK survey, which found 72% of respondents agreeing that self-exclusion contracts should be irrevocable over the agreed time frame, without exceptions (Parke & Rigbye, 2014).

## CHAPTER 2: POLICIES AND PROCEDURES REVIEW

At the beginning of 2015, seven Canadian gambling operators were asked to provide documentation on self-exclusion, reinstatement and renewal. This process was initiated through a standardized email request for information and included:

- Policies for self-exclusion programs, reinstatement, and/or renewal
- Procedures for staff on self-exclusion, reinstatement, and/or renewal as well as any responsible gambling related documentation
- Designated staff training (i.e. presentations, booklets, etc.)
- Any other documents pertaining to self-exclusion, reinstatement or renewal

Collected information was synthesized in two review cycles to capture themes related to the conditions, procedures and requirements of current reinstatement and renewal processes in Canada. Below is a summary of this synthesis, preceded by a brief overview of reinstatement and renewal processes from around the world.

### International Perspective

Self-exclusion is a method that has been implemented around the world, in numerous gambling jurisdictions. These programs, as well as the processes of reinstatement and renewal, have similar characteristics as well as unique variations. Below is a selected overview of some of these arrangements from numerous jurisdictions including the United States, Australia, Singapore, South Africa, and the United Kingdom (Table 3).

Table 3. Selected Overview of International Self-Exclusion, Reinstatement and Renewal Policies

Jurisdiction	Self-Exclusion	Reinstatement	Renewal
Kansas (USA)	<ul style="list-style-type: none"> <li>• Must apply in person</li> <li>• Life-time or two-year bans</li> </ul>	<p>Can revoke at any time, but must meet requirements; else, re-evaluated after two-years</p> <p>Requirements: Complete PG assessment with certified counsellor; complete educational courses</p>	Exclusion is indefinite, unless request to reinstate is made
Illinois (USA)	<ul style="list-style-type: none"> <li>• Must apply in person or over phone</li> <li>• Life-time ban</li> </ul>	<p>Can apply for reinstatement after five years</p> <p>Requirements: Provide affidavit from licensed gambling addictions counsellor</p>	Exclusion is indefinite, unless request to reinstate is made
Louisiana (USA)	<ul style="list-style-type: none"> <li>• Must apply in person</li> <li>• Life-time ban</li> </ul>	<p>Can apply for reinstatement after five years</p> <p>Requirements: Board hearing determination</p>	Exclusion is indefinite, unless request to reinstate is made

Jurisdiction	Self-Exclusion	Reinstatement	Renewal
Mississippi (USA)	<ul style="list-style-type: none"> <li>• Must apply in person</li> <li>• Five, ten, life-time or custom ban lengths of at least 5 years</li> </ul>	Reinstatement is automatic at the end of the exclusion period	No process indicated; assume re-application of self-exclusion at end of term
New Jersey (USA)	<ul style="list-style-type: none"> <li>• Must apply in person</li> <li>• One year, five years, or life-time ban lengths</li> </ul>	One and five year: Can only apply after period has expired	No process indicated
Pennsylvania (USA)		Life-time ban: Cannot reinstate  Requirements: Submit reinstatement form	
Australia (general)	<ul style="list-style-type: none"> <li>• Telephone or in person</li> <li>• Six months to indefinite (life-time) ban</li> </ul>	May apply to reinstate after 6-12 months  Requirements (may include): Attendance at a meeting and counselling; spending and visitation limits; submit reinstatement form	Process indicated; details not found
Singapore	<ul style="list-style-type: none"> <li>• Must apply in person</li> <li>• Indefinite (life-time) ban</li> </ul>	May apply to reinstate after twelve months  Requirements: Participate in counselling, rehabilitation or special education; undergo assessment of harm by trained professional	Exclusion is indefinite
South Africa	<ul style="list-style-type: none"> <li>• Must apply in writing</li> <li>• Six months, one year, five years, life-time ban lengths</li> </ul>	May apply to reinstate after six months  Requirements: Proof of attendance in counselling	No process indicated
United Kingdom	<ul style="list-style-type: none"> <li>• Apply in person</li> <li>• Six months and five years</li> </ul>	After six months a reinstatement request can be made  Requirements: Submit reinstatement form; wait 24 hours before full reinstatement	Process indicated; details not found

**Note:** Information sourced from National Center for Responsible Gaming (2011) evaluation of self-exclusion (vol. 5) and cross-checked with official online information from gambling commissions and regulators for each jurisdiction.

Self-exclusion programs from around the world share several characteristics. For instance, most programs support *active* reinstatement. It was also rare that self-exclusion terms were offered for less than six months. In many cases, a minimum non-revocation period was established after the initiation of the self-exclusion contract or agreement. In some jurisdictions, such as New Jersey and Pennsylvania, self-excluded gamblers are ineligible to apply for reinstatement until the conclusion of their agreed term and are prohibited from ever applying if they had chosen a life-time ban. Other common reinstatements requirements included the need for some sort of interaction prior to approval of re-entry into gambling venues, such as counselling, completion of responsible gambling education, and/or formal assessment by a review board or trained addictions specialist. Moreover, the general

absence of a clearly articulated self-exclusion renewal process was noted throughout many jurisdictions.

It may be argued that in cases where active reinstatement was adopted, the need for renewal options was perceived to be less relevant. However, in jurisdictions where reinstatement is automatic at the end of the exclusion period (i.e. Mississippi), the lack of communication and apparent guidelines for renewal of fixed-term self-exclusion bans stood out.

Variations in self-exclusion programs focused primarily on the requirements of reinstatement. In some jurisdictions such as the UK, Pennsylvania and New Jersey, the submission of a reinstatement form was the only major requirement. In other jurisdictions, formal assessments by certified and licensed counsellors were necessary to confirm readiness to return to gambling. Interestingly, the UK was the only jurisdiction *not* to offer a life-time self-exclusion option.

## Reinstatement in Canada

Table 4 provides an overview of the reinstatement and renewal policies in some Canadian jurisdictions. In Canada, several provinces have an *active* reinstatement process in place. Usually, the process is initiated when the self-excluded player makes a formal request through a letter to be reinstated. In some jurisdictions, when the venue receives such requests they search their databases to confirm the applicant’s registration in the self-exclusion program, the length of the ban agreed upon, and whether or not infractions (i.e. breaching) occurred during the term of the contract. If the player is found to be eligible for reinstatement, operators and staff may attempt to schedule a meeting to go over further requirements and to sign and submit re-entry forms. When this process is completed, the name of the previously excluded player and his/her photograph are removed from the exclusion list and facial recognition system, respectively. Reinstated players are then allowed back onto the gaming floor. In some cases, the reinstated player is placed back on the venue’s marketing distribution list.

This general process of reinstatement may vary from province to province depending on differences in the location of reinstatement; eligibility; personnel involvement; reinstatement requirements, including meetings and interactions; and any additional conditions or steps following reinstatement. Figure Two depicts the various pathways that self-exclusion, reinstatement as well as renewal may take in Canada.

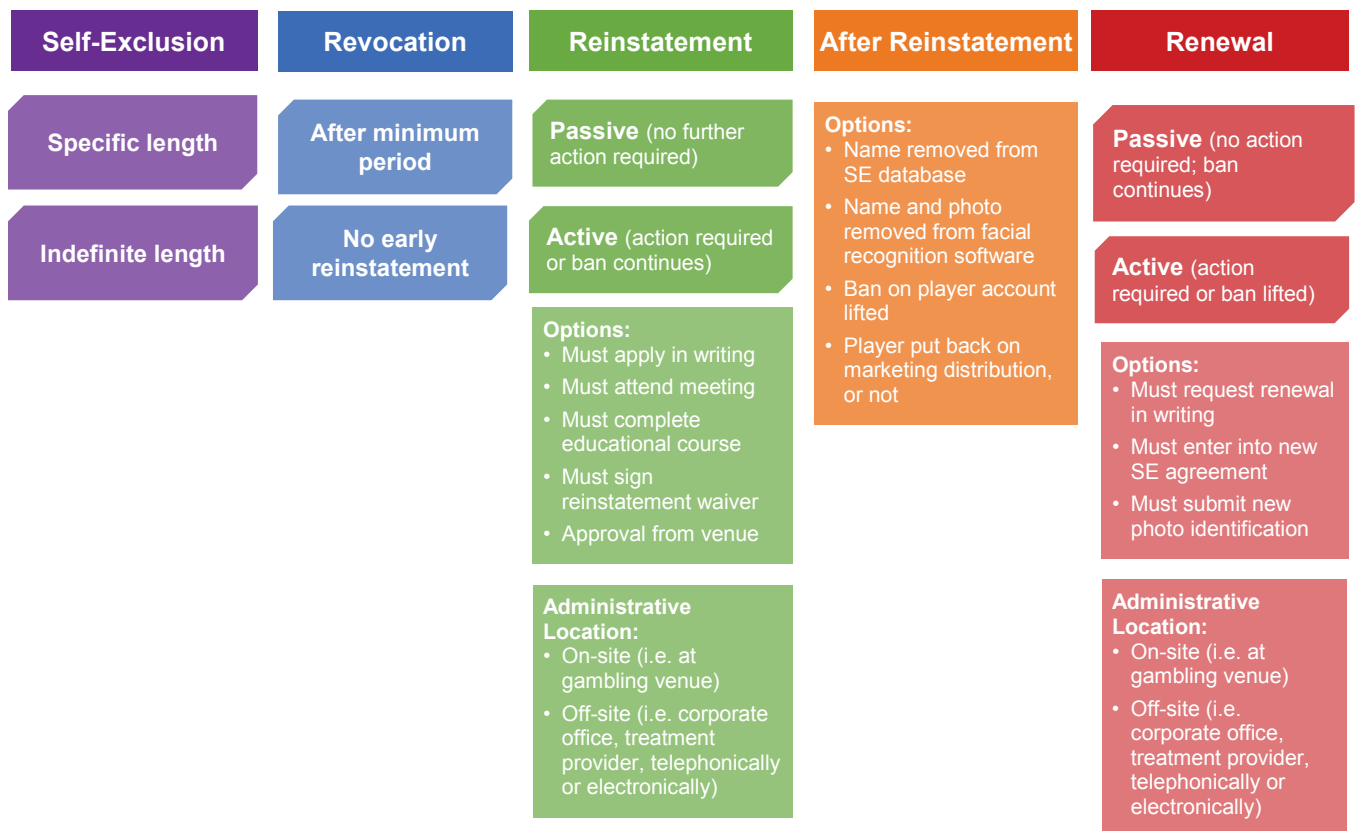
Table 4. Overview of Canadian Self-Exclusion, Reinstatement and Renewal Policies

Operator	Self-Exclusion Terms	Reinstatement	Renewal
British Columbia Lottery Corporation	Six months, one year, two years, or three years	Cannot be revoked prior to completion of the term.  <b>Requirements:</b> No additional requirements once term is completed.	Can re-enrol or extend the period of SE prior to the expiry date by attending a BCLC office or contacting BCLC Customer Support to arrange to be contacted by a designated BCLC Employee to complete the required documentation for the exclusion. If the expiry date of the SE has been reached, the person can attend a British Columbia gaming facility to re-enrol.

Operator	Self-Exclusion Terms	Reinstatement	Renewal
SaskGaming	Minimum three months, up to five years. Agreements made in monthly increments.	Can request to have SE agreement revoked prior to expiry date, by email or letter, after a minimum of six months have passed. Must complete a Gambling & Risk Information session delivered by a trained regional health authority problem gambling counsellor, and sign a waiver indicating that they understand the risks associated with gambling and problem gambling. Request must be approved by the Manager of RG or Executive Director of Risk & Compliance. <b>Requirements:</b> No additional requirements once term is completed.	Can extend their VSE by entering a new agreement.
Manitoba Liquor & Lotteries	Six months, one year, two years, or three years	Cannot be revoked prior to completion of the term. <b>Requirements:</b> Must complete an information course (online or in-person), and write a letter to Manitoba Liquor & Lotteries requesting to reinstate.	Exclusion is indefinite, unless request to reinstate is made once the self-selected time frame is complete.
Ontario Lottery and Gaming Corporation	Six months, one year, or indefinite	If fixed term, cannot apply to reinstate prior to completion of the term. If indefinite, cannot apply to reinstate prior to six months. <b>Requirements:</b> Submit request for reinstatement in writing. Request and individual's history are reviewed to consider the individual's breach history, with final determination made by Gaming Site management. If eligible for reinstatement, the individual must complete a mandatory responsible gambling reinstatement tutorial, complete a minimum 30 day waiting period, then attend an appointment to sign reinstatement form at a Gaming Site.	Exclusion is indefinite, unless request to reinstate is approved.
Loto-Quebec	Minimum three months, up to five years.	Cannot be revoked prior to completion of the term. <b>Requirements:</b> No additional requirements once term is completed.	Can renew at any of the six gaming venues, head offices, or specified addictions centres. Can renew at any time as long as when combined with the existing contract, it does not exceed a 5 year period. The 'new' contract starts the day the previous one ends.
Nova Scotia Provincial Lotteries and Casino Corporation	Indefinite	<b>Requirements:</b> Complete an application to <i>Alcohol, Gaming, Fuel and Tobacco Division of Service Nova Scotia</i> , complete a psychological assessment, potentially a financial assessment, and a hearing before the <i>Nova Scotia Utility and Review Board</i> .	Exclusion is indefinite.

Operator	Self-Exclusion Terms	Reinstatement	Renewal
Atlantic Lottery	Six months, one year, two years, or three years.	Cannot be revoked prior to completion of the term. <b>Requirements:</b> Written request and attend meeting with PlayWise (RG) Information Centre staff. 30 day waiting period following completion of reinstatement form.	Exclusion is indefinite, unless request to reinstate is made.

Figure 2: Reinstatement and Renewal in Canada



## Location of Reinstatement Request

Requesting reinstatement in Canada can vary by location. For submitting on-site reinstatement requests, applicants may be required to visit gaming venues (e.g. at security office) from which they had initially registered for self-exclusion. Options for submitting reinstatement requests away from gambling venues can include email, regular posted mail, and by fax. Off-site locations for face-to-face submissions may also be available and typically take the form of corporate offices of gambling operators and treatment provider offices or clinics.

## Reinstatement Eligibility

Eligibility for reinstatement can depend on the term of the ban. Fixed-term self-exclusion (e.g. six months, one year, five years, etc.) may stipulate that reinstatement can only be requested when the contracted period of exclusion has expired. In some jurisdictions, a player can revoke their ban before the end of the originally established exclusion period, but must wait a minimum length of time (e.g. six months or longer) and may be dependent on the contracted ban term. Indefinite-term self-exclusion may be viewed as life-time bans or fixed-term bans that require an active reinstatement process, else exclusion continues. As with some fixed-term self-exclusion agreements, a player may only be eligible for reinstatement after a minimum period of time has passed, either established by operators' policies or in cases where the individual has specifically selected a period of non-revocation.

Reinstatement eligibility may also depend on a host of other factors. In some jurisdiction, a factor that may potentially affect a player's reinstatement eligibility at the end or during the course a self-exclusion ban is a history of breaching (i.e. returning to a gambling venue in contravention of the self-exclusion contract). Breaching, whether it be a recent occurrence or repeated offense, may affect reinstatement eligibility. Evidence of problematic gambling behaviour, either self-admitted or professionally diagnosed, may also be considered grounds for the withdrawal of a player's eligibility to reinstate. Other issues that may cause a player to become ineligible for reinstatement can include a documented history of causing harm, uttering threats to themselves or others, or admissions of financial instability.

## Personnel Involvement

The process of reinstatement may involve a multi-linked decision-chain of personnel. Sometimes the initial approval of a reinstatement request is administered by staff who verify that a player has been enrolled in a self-exclusion program; the length of their ban; and any history of breaching. In some jurisdictions, once this basic information has been checked, the reinstatement application is forwarded to more senior staff for review and administration. Personnel involved in the reinstatement process may include:

- Corporate staff
- Designated lead supervisors
- Executive directors of risk and compliance
- General managers
- Head office investigators
- On-Site Responsible Gambling Centre staff (e.g. Game Sense Advisor)
- Responsible gambling managers
- Security employees
- Security shift managers or supervisors
- Security/compliance managers
- Senior managers



## Reinstatement Requirements

The requirements that a self-excluded player may need to satisfy in order to become reinstated generally depend on the active or passive nature of the re-entry process. Passive reinstatement processes do not often involve any further action on the part of the player, once his or her exclusion term has expired—players are automatically granted access to the gambling venue once the ban has ended.

On the other hand, active reinstatement processes usually do involve requirements to be fulfilled by the player before being approved for re-entry into the gambling venue. For instance, depending on the jurisdiction, a player may need to complete an informational or educational course. The course may be held either on-site (e.g. security office, support centre), at an off-site location (e.g. corporate office, third-party counselling office), or offered online. It is often administered by a trained professional, such as a problem gambling counsellor. Informational and educational interactions are intended to help players make informed decisions about their return to gambling; raise awareness of the risks associated with gambling and problem gambling; help the person develop a plan for returning to gambling; teach the player how gambling works; and encourage the player to consider their experiences and learnings while gambling. In some jurisdictions these interactions are voluntary, while in others they are mandatory. Finally, players may be required to sign a waiver indicating their understanding of the risks associated with gambling and problem gambling, acknowledging that the self-exclusion ban has been or will be effectively lifted. In some jurisdictions, an appointment is made for the player to come in, whereby the form is read aloud and explained in further detail, and the player may also be required to initial each paragraph to indicate understanding of the reinstatement terms and conditions. Some jurisdictions also impose a waiting period between the time of application and this appointment. Other jurisdictions may not require the signing of a waiver, but rather, require the individual to send a letter indicating their desire to re-instate.

## After Reinstatement

Once all the requirements of the reinstatement process are fulfilled, there may or may not be a delay before a player can officially return to the gambling venue. Instances where there is a delay can range from a day up to a month in which the player is encouraged to consider their decision in order to avoid the potential harms of an impulsive decision to return. If no delay is imposed, the player is immediately allowed to re-enter the gambling venue.

Upon full reinstatement of a player, operators remove their names from the self-exclusion database as well as their photographic identification from facial recognition systems. Player accounts are then unfrozen or recreated and, in some instances, players are placed back on marketing distribution lists—although requests to not be subjected to direct marketing can be made by reinstated players.

## Renewal in Canada

Like reinstatement, renewal of self-exclusion involved either an active or passive process. Active renewal often implies a passive reinstatement process and requires a player to take action in order to request and apply for renewal. This request is usually submitted in writing or may require signing an entirely new self-exclusion agreement. If a player is required to submit a request for renewal in-person, the location is either on-site (e.g. security office, support centre) or off-site (e.g. treatment provider office or gaming operator head office). These active renewal requests are usually accepted before the end of a self-exclusion ban. In some jurisdictions, if the total combined ban length exceeds

several years, applicants may not be able to renew due to the obsolescence of photographic identification. In other instances, players may only be able to renew their self-exclusion once their original contract period has ended. When renewal is passive, a player need not take any action as they are self-excluded indefinitely, until/unless they take steps to actively reinstate.

## CHAPTER 3: STAFF INTERVIEWS

As part of the *Insight* project, the Responsible Gambling Council (RGC) conducted interviews with corporate and gaming venue staff to capture their perspectives of current self-exclusion programs and procedures. A special focus on the topics of reinstatement and renewal were central to these discussions. For instance, informants were asked to discuss any opportunities they could identify for enhancing self-exclusion reinstatement and renewal options.

Lists of potential informants were provided by provincial gaming operators. RGC received this list and distributed recruitment emails and made telephone calls requesting participation and scheduling interviews. In total, eleven staff were interviewed from British Columbia, Manitoba, Ontario, Quebec, Nova Scotia, and Prince Edward Island. Telephone interviews were approximately one hour in length and were carried out between March 9 and March 27, 2015. Informants included executives, managers and specialists in the areas of gaming security, responsible gambling, surveillance, self-exclusion, and counselling.

Findings from the content analysis are organized as follows: reasons for self-exclusion and reinstatement; the objectives of reinstatement and renewal; perceived sentiment of gamblers towards these processes; characteristics of self-exclusion; gambler awareness of reinstatement and renewal processes; benefits and challenges of reinstatement and renewal; and perspectives on additional reinstatement options. Findings are presented according to common and recurring points and themes as well as differences that emerged from the interview data.

### Reasons for Self-Exclusion and Reinstatement

Interviewees were asked to discuss their thoughts on why patrons enroll in self-exclusion programs. The most common reasons reported were:

- Financial problems
- Family problems or encouraged by family
- Self-admission or recognition of problem severity
- Court ordered (i.e. bankruptcy)

Interviewees also identified the following reasons patrons may have for requesting reinstatement:

- Belief that they are more in control of their play
- Belief that it will no longer be harmful to their family
- Have sought help and have a better understanding of gambling
- Desire access the entertainment portion of gaming venue (i.e. concert theatre, restaurant, etc.)<sup>1</sup>

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<sup>1</sup> Self-exclusion typically includes bans from all facilities at a gambling venue

## Objectives of Reinstatement

Many interviewees stated that, in their opinion, the objective of having an active process for reinstatement was to create an opportunity for a conversation with the patron. These discussions were thought to help patrons make an informed choice regarding whether returning to the gambling venue is the right thing for them. The discussion also facilitates the provision of information on responsible gambling and support services.

## Perceptions of Gambler Sentiments

The majority of interviewees reported that patrons feel that the requirements of the reinstatement process are fair (i.e. writing a letter, having a meeting with gaming staff prior to entry, etc.). Of those interviewed, few received complaints about the process. Of the common complaints that were received, many pertained to:

- The time it took to gain entry into the casino after reinstatement
- Having security staff who were not sympathetic
- The invasiveness of having to provide financial information
- Having to attend meetings/interviews

## Awareness of Reinstatement or Renewal Process

All interviewees mentioned that, generally, patrons find out about the reinstatement or renewal process as part of self-exclusion enrollment. Security staff review the requirements and information with the patron with additional details found in take-home packages. Information on reinstatement or renewal could also be found in self-exclusion brochures; on the gaming venue's website; by speaking with a gaming venue employee or On-Site Responsible Gambling Information Centre staff; or by calling the customer service line. In some cases, patrons could find out about the process through their counsellor, treatment provider, or a helpline.

## Benefits and Challenges of Reinstatement and Renewal

Some of the features of the reinstatement and renewal processes that the interviewees perceived to be beneficial included:

- Offering locations outside of the gaming venue
- Having a face-to-face meeting with the patron
- Having an On-Site Responsible Gambling Information Centre staff member present to provide support and education
- Having the process take place at the On-Site Responsible Gambling Information Centre offices and not security
- Enabling patrons to remain self-excluded after the term has ended by requiring them to request reinstatement

Challenges included:

- Patrons not being comfortable having security be the ones who administer the reinstatement/renewal process
- Finding meaningful consequences for those found breaching
- Resource limitations for reinstatement or renewal in remote locations (i.e. outside of the gaming venue)
- Having only one option for ban length, which may be a deterrent to enrollment

## **Additional Reinstatement Options**

The following summarizes the responses provided when interviewees were asked, "What do you think of requiring patrons to complete any of the following as part of the reinstatement process?"

### **Educational Course**

For the most part, interviewees thought that an educational course was a good idea. When asked about how the course could be delivered (i.e. online, in-class), all interviewees mentioned that the course could be offered in a variety of ways. This would make it easier for the patron to complete, as not all patrons learn the same way.

Interviewees did not have a sense for the appropriate length of an educational course, but were more open to a shorter (i.e. 20-30 minutes) rather than longer (half/full day) courses. Some interviewees mentioned that the course should be completed at the convenience of the patron. Others noted that the course should also remain available to the patron for longer than a 24 hour period, so that they may complete the assignment at their convenience without feeling rushed.

In terms of the content, interviewees felt that it should include:

- How the games work
- Gambling myths and facts
- Signs of a gambling problem
- Responsible gambling tools/tips (e.g. setting limits, money management)
- Help resources

One interviewee was concerned about the verification of patrons' identity (especially for online courses) since it is possible to have someone else complete the course on their behalf. Courses were also seen to be challenged by potential language barriers.

Some interviewees who currently implement such a requirement as part of the reinstatement process, stressed that the idea of educational courses is to have the patron reflect on what they have learned and determine if they want to return to gambling.

### **Counselling Session**

Some interviewees felt that this could be a good option if it was local, but noted that it would be dependent on the availability of treatment providers in the area.

Many felt that a face-to-face session with a treatment provider would be best, but other avenues such as online or by phone could also be offered to make it easier for the patron.

Many interviewees raised the concern that not all patrons would want treatment. They added that a patron may not benefit from a counselling session if they are doing it to "check it off [his/her] requirements list". Other informants mentioned that some would prefer to seek out self-help first and may not feel they need a counselling session. A few questioned what the purpose of the session would be.

### **1. Assessment by PG counsellor**

All interviewees questioned the objective of a patron having to submit to a problem gambling assessment as part of the reinstatement process. Many wondered if the gaming venue would be able to deny re-entry based on this and, if so, on what grounds? Others wondered what the value would be for the patron.

### **2. Affidavit by PG counsellor**

All interviewees felt that requiring a patron to obtain an affidavit stating that they no longer have a gambling problem is not a viable option. The main concern raised by interviewees was how the patron is going to prove they no longer have a problem and are able to gamble responsibly.

All interviewees felt that there is value in offering these options, but noted that they cannot be mandatory. Doing so may deter the patron from enrolling in self-exclusion which is not the objective. Rather, the self-exclusion program should be a flexible tool that can be used by patrons in a way that suits their individual needs. Many interviewees mentioned that the self-exclusion program is voluntary and that there needs to be a balance between having components that are not deterrents but have enough weight to make the patron think about their decision to return to gambling.

## **Multiple Self-Exclusions**

Interviewees were asked if there should be a different reinstatement process for patrons who have self-excluded multiple times. For the most part, interviewees did not see a reason to have a different reinstatement process.

A few interviewees mentioned that perhaps an escalated process could be implemented, but they were unable to identify what this process could look like. One example that was mentioned involved having a different educational course that focused on help resources more so than how the games work.

## **Multiple Breaches**

Interviewees were also asked if there should be a different reinstatement process for patrons who have breached multiple times during their self-exclusion. Some interviewees mentioned that the current process in their jurisdiction adds time to the self-exclusion period each time a patron is caught breaching, thus delaying the date they are eligible to apply for reinstatement. Other interviewees mentioned that the process should not change.

## CHAPTER 4: CLIENT FOCUS GROUP DISCUSSIONS

A focus group with individuals who had sought help for their gambling-related problems was conducted to explore their experiences with the self-exclusion program and to identify strengths and weaknesses of self-exclusion reinstatement and renewal options at gaming venues.

All focus group participants were recruited from one province. Gamblers in treatment were screened to meet the following criteria: over 19 years of age and currently in a self-exclusion program. The focus groups were conducted in March 2015 with the first focus group being a pilot test of the discussion guide questions. In total, two focus groups were held, consisting of 17 gamblers overall (9 women and 8 men). All participants signed consent forms prior to discussions. The focus group was recorded and transcribed. Transcripts and recordings have been stored on the RGC secure computer network.

The findings are organized according to the general topics of self-exclusion, reinstatement and renewal. Key themes and points emerging from the content analysis provide the basis for the findings described below. Note that as participants were recruited from one jurisdiction only, results may not be representative of experiences with self-exclusion in all provinces.

### Self-Exclusion

#### Awareness

The focus group began by asking participants, in a general way, "*How did you become aware of the self-exclusion program?*" Across both groups, the majority of participants found out about the program through their treatment provider. Others mentioned getting information from: the On-Site Responsible Gambling Information Centre, family/friends, and gaming venue staff.

"I heard about through group [here at the treatment centre]."

"I had a friend who told me about it."

Participants noted that despite knowing about the program, it took time to self-exclude because when they became aware of the program they had not hit their "*lowest point*" and were not "*serious about it*." Participants reported waiting a couple of weeks, several months, even years, before enrolling. For a few, enrollment was within a couple of days of becoming aware the program existed.

"For me, it was 6 years before I actually did it [enrolled in the self-exclusion program]."

"I asked about it and 5 minutes later I enrolled on my way out."

"For me, it was a few months after coming to group here. Someone [from the gaming venue] came here to do it and that was wonderful."

"After having attended counselling and becoming more informed about gambling problems, I knew this is what I had to do and just did it."

## Motivations

When asked, "What were your motivations for joining the self-exclusion program?" participants responded with "family." As one participant said, "I was tired of hurting myself and my loved ones" and another said, "My husband told me that I had to go self-exclude." Other reasons cited included:

- Financial losses
- Requirement as part of bankruptcy process
- Mental health (sanity)
- Hitting rock bottom - realizing you have a problem
- Commitment to the program

## Ban Length

Ban lengths that were selected at enrollment, varied from six months to indefinitely. For those who had self-excluded more than once, their original ban was the shortest available time period; the next time they chose the longest length possible. For many informants, an indefinite ban was the preference based on the options available in their jurisdiction. There were a few participants who had chosen a one year ban and had no intentions of returning to gambling.

There was confusion surrounding the meaning of an indefinite ban. Many participants were not aware that in this particular jurisdiction, an indefinite ban allowed them to apply for revocation after six months into their ban. In fact, almost all participants who had chosen this ban length thought *"it's for life" or "you can't ever come back."* One participant stated:

"I had chosen indefinite and was told that I could come back in six months. This made so angry. At that point I was at my lowest and broken. I chose indefinite because I never wanted to come back."

Many participants felt that the term indefinite needed to be better explained to the individual as to what it meant and what it entails because of current ambiguities experienced.

Across both groups, participants reported that they would have liked to have been able to choose a ban length that was outside of those presented to them at the time of enrollment. A few participants felt that being able to choose something other than a year or an indefinite term would help serve as a deterrent because *"having a definite term (e.g. two, three, and five years) will keep you from returning until that time passes."* A few participants noted, that at the time they enrolled there was only one option - *"When I self-excluded, I could only choose lifetime."*

## Experience

In general, participants have had a positive experience with the self-exclusion program. It has served their intended purpose of keeping them from gambling. Participants said:

"Definitely found it to be beneficial - the longer I'm away from it the easier it gets."

"Quite honestly it's the only thing that keeps me from going back."

"It made it so much easier to know that I just can't go and that's all there is to it."



"I felt like it was a lifeline—that I'm not fooling around with this. This is what I really want to do. I'm not going to go in there."

"It took away that decision-making every day, that agonizing as to whether or not I'm going to go gamble."

Other participants noted that the self-exclusion program is one of many tools that they use to refrain from gambling. As one participant said, *"For me, it was the fourth thing in a series of tools that I was able to use."* Other tools included seeking individual or group counselling, support from family and friends, and their own will.

When asked, *"What areas of the self-exclusion program could be improved?"* almost all participants said enforcement. Many participants had breached multiple times during their ban and were not caught at the gaming venue. Some participants even managed to play and even win. It was not until they had won a significant amount that they were caught since they had to provide identification to receive the winnings. One participant was relieved when caught and asked gaming staff, *"How come it took you so long?"* This participant felt that *"If [the gaming venue] had stricter and more consistent checks it would've made a difference and I would not have returned so many times."* Some participants suggested lowering the threshold of requiring identification for claiming winnings.

Participants also mentioned that they would like to have counsellors or others trained at providing support to do the self-exclusion enrollment. As one participant said, *"They are just security guards, and after enrolling he said to me 'see you in six months.'"* Another informant said, *"It just seems like it's a hassle for them - it took them a long time to come and see me, and he didn't say a word; just gave me the forms to enroll."*

Another area targeted for improvement was gaming venue promotional communications. All participants were told that they would be removed from the mailing list once enrolled in the self-exclusion program and were no longer going to receive any marketing communications from the gaming venue. However, this was not the case for all. A few participants continued to receive marketing materials despite having been in the program for a while. As one participant said, *"Make darn sure that the gaming venue is not sending you flyers - it's a trigger."*

## Reinstatement

There were mixed opinions among participants when asked, *"What do you think about some people who self-excluded deciding to return to gambling when their ban is over?"* For the majority of participants, it was hard to understand why someone would want to return to gambling after self-excluding. Many felt that self-exclusion was the last option available to them to help them stay away from gambling all together. Other participants recognized that self-exclusion does not always mean staying away from gambling forever; it serves a different purpose for each individual who enrolls. These participants added that perhaps those who would like to return to gambling just needed a break or did not have significant problems resulting from their gambling.

Despite almost all participants not having direct experience with the reinstatement process, they were aware of what would be required from them. When asked, *"What, if anything, do you know about the reinstatement process?"* many participants reported that they had to contact the gaming venue either by phone or in writing and would have to set up a meeting with the security manager to fill out forms. The few participants who had reinstated in the past added that a letter had to be written requesting that they wanted to return to gambling and it had to be after the self-exclusion term expired. There

was a waiting period after completing the forms before they could return to the gaming venue. A few other participants did not have any idea of what the process entailed.

All participants felt that reinstatement should *not* be an option for someone who is experiencing severe problems with their gambling or who has a goal of never gambling again. Reinstatement should be for someone who just needed a break and can be *in control* of their gambling. Participants accepted the fact that taking reinstatement off the table is not an option—doing so may "*lead to more breaches.*"

Participants identified two issues when asked, "What do you think you would consider in making the decision to reinstate?"

1. Harm done to myself and family
2. Ability to control own gambling (i.e. play in a social manner)

## **Additional Reinstatement Options**

Informants were asked to comment on a series of mandatory options as part of the reinstatement process.

### **1. Educational Course**

Participants were in favour of offering an educational course. They felt that it could be a thirty minute video or presentation that would teach individuals about gambling risks. Some participants felt that the individual should be given a chance to do the course prior to filling out the reinstatement forms, as the individual may have a change of heart after taking part in the course. The objective would be for individuals to have all the information they need to make a better informed decision.

### **2. Counselling Session**

All participants welcomed the idea of having a counselling session as part of the reinstatement process. Participants felt that counselling would have to be provided by a recognized organization with "*a track record of counselling problem gamblers.*" Some participants mentioned that there would need to be a way of providing proof that the individual had attended the counselling session, whether through a certificate or letter from the treatment provider.

Participants felt that, while counselling could be offered by phone or online, it would be most beneficial if done in person. They also added that perhaps a one-on-one session may not be the best choice—group sessions were thought to be a more effective first step in counselling. However, this would be largely dependent on the individual. All participants felt that the individual should have the choice of the format they would like to seek.

All participants agreed that the objective of having a counselling session is for the individual to be more informed about their gambling problems.

### **3. Assessment by a Problem Gambling Counsellor**

All participants questioned the purpose of having a problem gambling counsellor conducting an assessment on the individual's ability to return to gambling.

### **4. Affidavit by a Problem Gambling Counsellor**

All participants were *not* in favour of this option. Responses included:

“This is treading on dangerous water.”

“I don't want a stamp of approval that I can now gamble.”

“We all want some autonomy for making decisions for ourselves.”

## 5. Nothing

All participants *did not* feel that being able to walk into the venue after their self-exclusion period had expired was appropriate. Rather, participants mentioned that they would like to see a more demanding reinstatement process, as the waiting time needed to complete it could lead an individual to rethink and reassess their choice to reinstate.

All participants felt that if anything should be added it would have to be of an educational aspect.

Some participants did not feel comfortable with labelling any additional requirement as "mandatory." As one participant stated: "By doing so, it feels like I've done something criminal/ illegal and I haven't. I've just done something bad to myself."

All informants felt that any requirement that is added to the reinstatement process needs to be clearly explained during self-exclusion enrollment and it also needs to be on the registration forms that are signed.

“I'd like to see on the form: In order to reinstate you need to complete this and this.”

## Multiple Self-Exclusions

Focus group discussants felt that there should be an escalated reinstatement process for individuals who have self-excluded multiple times. But they were not able to identify what the process would be.

## Multiple Breaches

Participants strongly felt that those who breach multiple times during their self-exclusion should have their term extended by more than just a few months. They felt that this would be more of a deterrent than presenting the individual with a fine. All participants felt that the consequences for breaching need to be *"harsher."*

## Renewal

Participants were asked, "What, if anything, do you know about the renewal process?" One participant stated:

“You had to contact the gaming venue and request to re-apply to the self-exclusion program and select your new time period. They will send you a letter confirming that you have extended your self-exclusion.”

Other participants reported that there was no renewal process because you could only go back to the gaming venue if you request to go back. To them, this meant that they were self-excluded until they took such action.

When asked "If a person wanted to renew their self-exclusion, what should be required of them to do, if anything?" participants responded that it should be "a very simple procedure" and "convenient". Another participant added that "it should not be required to go back to the gaming venue to renew."

Participants suggested:

"It could be a phone call with some way of identifying myself."

"It could be done in writing, but definitely not in the casino."

"If it has to be done in person, then at a place that is not the casino."

To conclude the focus group, informants were asked, "If we could develop a checklist that self-excluders could use to start considering whether they are ready to go back or not, what do you think it would include?" Responses addressed the motivating factors and outcomes that had led to self-exclusion, and included:

- What has changed?
- Mental health
- Finances
- Relationships with family/friends

## CHAPTER 5: DISCOVERY 2015 & INSIGHT ROUNDTABLE

On April 23, the Responsible Gambling Council (RGC) hosted a panel discussion entitled *After Reinstatement: What Happens Next?* at the *Discovery 2015* conference. This session featured research and operational experts in self-exclusion from Canada, Australia, Austria and the United Kingdom and set out to explore the arrangements, issues and preferences of reinstatement from self-exclusion. Following the panel discussion, audience members were invited to ask questions and answer live, electronic polls pertaining to conditions placed on reinstated players. Polling was conducted in a room with an attendance of at least eighty people, with questions posed by a facilitator and responses collected via hand-held, wireless remotes.

Following the panel discussion described above, a special *Insight* roundtable was held with members of the RGC, key stakeholders, and special guests. This forum provided an opportunity to update the group on the work carried out, thus far, in the development of the *Insight* report, entitled *Best Practices for Self-Exclusion Reinstatement and Renewal*. In addition, brief presentations by guest speakers on reinstatement and renewal processes in Canada and from around the world were carried out prior to a series of small group activities. Activities included brainstorming and outlining of reinstatement options for three scenarios:

1. First time self-excluder, no breaches
2. Multiple self-excluder, no breaches
3. Self-excluder, one or more breaches

Perspectives were then compiled and given to other working groups to review on a basis of perceived advantages, impediments and other key considerations. Upon completion of these activities, the ideas were consolidated and presented to the entire room. Following this exercise, groups were asked to consider the questions:

If a gambling venue has an active reinstatement process, is there a need for a self-exclusion renewal process?

**If YES:** What should the renewal process consist of?

**If NO:** What does a gaming venue need to make clear to self-excluded players regarding such things as: the difficulty the venue has enforcing self-exclusion without up-to-date visual identification, withholding of winnings, venue liability, etc.?

Below you will find a summary of the key points of discussion for these two sessional events.

### After Reinstatement: What Happens Next?

The panel session began with an overview of self-exclusion and reinstatement in Austria, Adelaide (Australia), Quebec, and the United Kingdom. In Austria, a key regulatory distinction is the institutionalization of mandatory carded entry (identification) at all land-based venues. This policy has provided a strong barrier to potential breaching by self-excluded gamblers. Another feature of reinstatement in Austria is the ability of gambling regulators to conduct financial checks to determine if applicants are fundamentally unable to bear the risk of gambling-related financial loss (based on

bankruptcy status or income and savings below the line of subsistence). For both land-based and online reinstatement in Austria, active reinstatement is the adopted process.

Self-exclusion and reinstatement in Adelaide, Australia have undergone recent changes, which have had an apparent impact on these related processes. Following July 1, 2014, oversight and administration of self-exclusion and reinstatement were taken over by the government regulator, whereas before it had been the responsibility of the operator. An effect that this change has had on some players is a reduction in personal contact with the operator and responsible gambling staff, regarding self-exclusion issues. Now interactions between individuals seeking self-exclusion and providers of such programs are conducted through formal government correspondence. Like Austria, reinstatement in Adelaide is an active process. The process includes a meeting with a counsellor; a gambling assessment; a financial assessment; and a meeting with the operator's responsible gambling coordinator. Following reinstatement, players must set limits for their gambling and are actively managed for three months and then passively for another three months.

In Quebec, there is no formal reinstatement process, implying a passive approach whereby the player is free to re-enter gaming venues and gamble immediately after the end of the self-exclusion period. In part, the rationale for this approach is that some players will not be interested in mandatory requirements and may be discouraged from participating in the self-exclusion program. The foundation of this argument rests on the assertion that self-exclusion is *voluntary* and so the ultimate decision to gamble or not belongs to the individual. The role of the operator should be to offer a variety of measures to help players in difficulty, on their own terms.

Finally, in the United Kingdom reinstatement after self-exclusion is an active process. It involves a positive action taken by the excluded party, either by phone or in person, indicating their intention to return to the gambling venue. This is followed by a twenty-four hour *cooling off* period, allowing players the opportunity to mitigate the potential risk of an impulsive act to reinstate by providing some time to reflect on their decision, prior to re-entry. There are no expectations on the part of the operator to assess a player's readiness to return.

## **Minimum Requirements for Operators**

The panel was split on whether operators could be subject to minimum requirements for reinstatement. Some believed that since a player had chosen to self-exclude they were declaring that he or she has a problem with gambling and it is the responsibility of operators to provide assistance. This assistance could include a minimum requirement of a meeting with a counsellor. Others noted that in addition to a meeting, reminders of how to gamble responsibly and information on support services could be instituted without being too restrictive.

On the other hand, some contended that while operators should provide informational and referral services to players reinstating, there should not be any mandatory requirements for reinstatement. The decision to gamble should be the choice of the player. With respect to mandatory requirements, some challenged the cost-effectiveness of such measures and the potential that they could dissuade players from choosing to self-exclude in the first place.

## **Challenges to Implementing Self-Exclusion and Reinstatement Policies**

All panelists noted challenges to implementing self-exclusion programs and reinstatement processes. For instance, some noted that it is difficult to keep track of players and recall what their specific issues may be, which have implications on approaching them in a venue. Marketing self-exclusion programs

was identified as another outstanding issue—particularly how best to go about making it understandable and straight-forward. Training on how to help at-risk and gamblers with a problem was also highlighted as a challenge operators faced. Despite this issue, many agreed that it is the responsibility of the operators to keep the best interests of players in mind, even if the appropriate approach may be in dispute.

In general, panelists agreed that evidence supporting the effectiveness of safeguards and requirements for reinstatement was noticeably absent.

### Audience Polling

Following the panel discussion, a series of questions were posed to the audience on topics related to reinstatement. While a strong positive consensus was achieved for some issues, such as *the importance of marketing restrictions for reinstated players* and *restrictions on access to credit for reinstated players*, many other topics featured split perspectives. Issues such as *limits on time and money after reinstatement*; *the importance of a probationary period*; *the importance of staff check-ins*; and *the importance of activity statements disseminated to reinstated players* all featured considerable agreement and disagreement. Below you will find a series of figures (Three to Seven) depicting these distributions in detail.

Figure 3: Importance of marketing restrictions for reinstated players

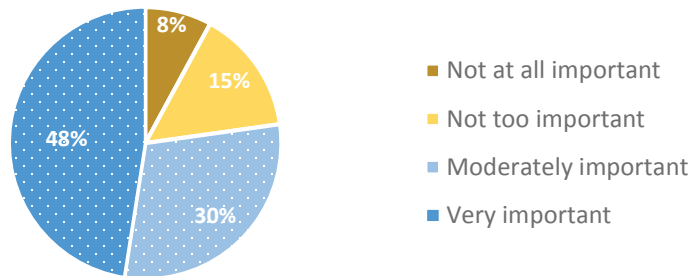


Figure 4: Importance of restricting player credit after reinstatement

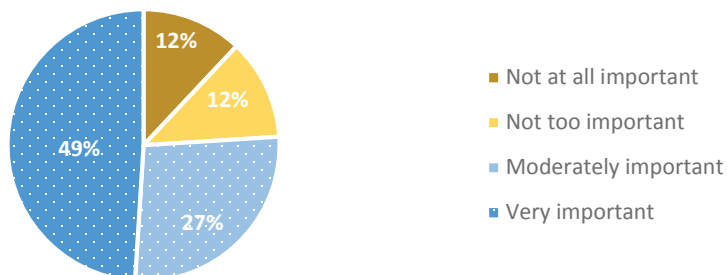


Figure 5: Importance of restrictions on player money and/or time limits after reinstatement

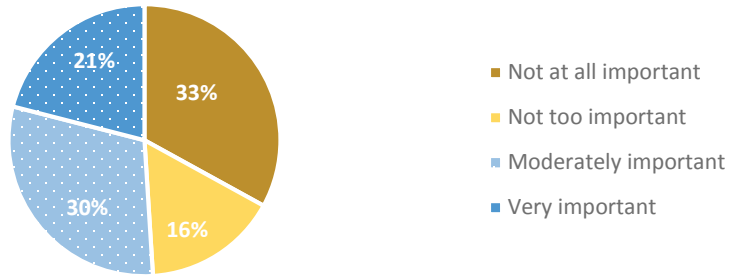


Figure 6: Importance of a probationary period for reinstated players

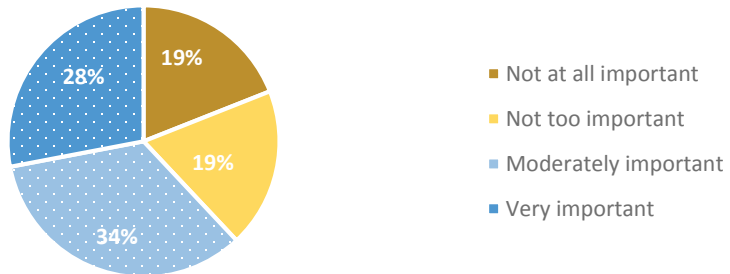
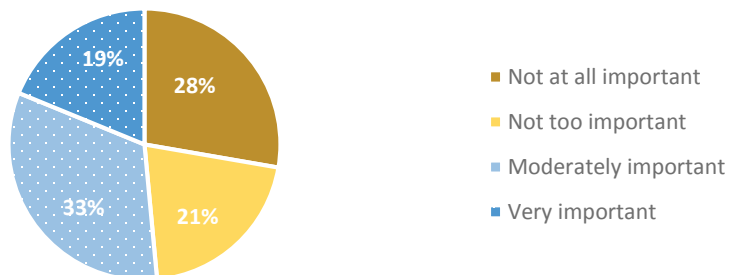


Figure 7: Importance of player check-ins by staff





## Insight Roundtable

The roundtable on reinstatement and renewal began with an overview of the *Insight* project and some preliminary findings that had emerged from early analyses. Following this introductory presentation, guest speakers, many of which had been panelists in the preceding session (*After Reinstatement: What Happens Next?*), described reinstatement and renewal practices in their respective jurisdictions. A brief question period was followed by group work, which included scenario-based discussions of reinstatement options and requirements; an inter-group feedback and critique process; an attempt to consolidate approaches and perspectives; and audience polling on the issue of self-exclusion renewal in conjunction with an *active* reinstatement process.

The following sub-sections include a brief summary of reinstatement and renewal elements in guest speakers' affiliated jurisdictions. A more detailed description of the findings from the various group activities is then presented.

### Guest Speaker Presentations

Four jurisdictions were covered in guest speaker presentations: Manitoba, Austria, Adelaide, and the United Kingdom. Each of these jurisdictions shared some common characteristics, such as active reinstatement processes and the critical importance of staff training. However, variations in self-exclusion, reinstatement and renewal were also apparent.

Manitoba started the first self-exclusion program in Canada, which was established in 1989. Over the years, this program has evolved to include self-exclusion periods of six months, one year, two years, and three years; provisions for online gambling self-exclusion; restrictions on marketing to self-excluded players; intensive training for staff facilitating self-exclusion processes; and a sophisticated reinstatement process. The reinstatement process features several components developed in collaboration with Addictions Foundation Manitoba. Active reinstatement requires players to write a letter to Manitoba Liquor and Lotteries indicating their intentions to return as well as a mandatory informational course, entitled *Pause and Plan*. The course is delivered both in person and online, and provides information on how gambling works, recognizing triggers to risky behaviour and plans for managing play. The course also addresses tools that a returning player may access, such as activity reports and resources such as on-site support centres.

In Austria, self-exclusion is offered for both land-based and online gambling. Unlike other jurisdictions, Austria also features exclusions based on observed play that has been deemed harmful to the player (responsible gambling exclusions), and third-party exclusions (e.g. by a spouse) if documentation of financial risk and harm can be provided to operators. Active reinstatement involves several steps and conditions, including a credit check; an assessment of gambling history; a responsible gambling meeting; restrictions on the number of visits; monitoring of gambling behaviour; and referrals to trained counsellors.

In Adelaide, Australia, self-exclusion is offered for a minimum of six months to a maximum of three years and is venue-specific (i.e. bans only apply to the venue at which the self-exclusion was initiated). Currently, all self-exclusion applications are forwarded to the state regulator by the operator. Active reinstatement involves a financial and gambling behavioural assessment. Players are then monitored actively for three months, then another three months passively.

Self-exclusion in the United Kingdom is offered for a minimum of six months up to five years. For remote gambling, bans of seven years are available. Recently, the Gambling Commission enacted

changes, which include the addition of six months following the end of a chosen self-exclusion period, unless the player takes positive action to reinstate. Positive actions include a telephone call to, or in person visit with, an operator to provide a statement of intent to reinstate and a self-assessment of their reasons and readiness to return. At the end of this process and before a player is allowed to re-enter a gambling venue, an additional twenty-four hour delay is applied. Marketing materials are indefinitely restricted, unless a player requests them. Other voluntary services are provided to returning players, including financial counselling and activity reports.

## **Scenario-Based Group Work**

Six working groups discussed three scenarios (i.e. first-time self-excluder, no breaches; multiple self-excluder, no breaches; self-excluder, one or more breaches) and produced outlines for what they believed to be appropriate reinstatement approaches. Discussions were followed by critiques and feedback by other groups on the advantages and impediments of these reinstatement approaches. While variations across each group were evident, all adopted an active reinstatement strategy.

One group developed a single approach for all three scenarios. It included a mandatory written letter requesting reinstatement, and participation in an educational session which could be completed online or in person. In addition, the group suggested several optional components which a player could choose to engage in. Some of these options included check-ins by staff and ongoing responsible gambling support; addictions and financial counselling; and gambling activity statements. Also, reinstated players would not receive marketing materials unless specifically requested. This active reinstatement process along with the availability of options for tailored support were perceived as advantages. The consistent approach across scenarios (i.e. not having to take into account breaching) was also considered helpful. However, the mandatory educational component was thought to be a potential deterrent to self-exclusion uptake. Offering too many support options was also seen as a potential drawback.

### **Scenario One: First Time Self-Excluder, No Breaches**

All groups either stated the need for a positive act to initiate reinstatement (e.g. a written request) or implied active reinstatement through the mandatory participation in a meeting or educational course. All groups included mechanisms for the provision of responsible gambling information, for example, through a standard reinstatement form that outlines the risks of gambling. Other options included having a one week cooling off period to mitigate possible impulsive decisions to reinstate, and behavioural monitoring through observation and player cards.

Several advantages to various reinstatement options were expressed. Understandably, there was support for active reinstatement strategies, which all groups had adopted. Having voluntary meetings available to returning players was viewed by some as a means of encouraging players to access support services without the risk of discouraging others from entering into self-exclusion, due to mandatory requirements.

Impediments perceived by some included the possible, unintended consequences of sending players responsible gambling information, such as triggering a desire to play and issues of privacy. Language barriers were cited as a possible challenge to overcome with respect to mandatory written requests to reinstate. Also, some believed that having mandatory educational courses could dissuade players for using self-exclusion.

## Scenario Two: Multiple Self-Excluder, No Breaches

Responses to this scenario featured very little variation from the first scenario. In fact, only one group provided a substantive addition to their reinstatement approach based on the second scenario. The group suggested that the returning player be assessed by a problem gambling professional. Such a counselling session would include the provision of tools for financial planning and discussions of what has changed between the time of entry into the self-exclusion program and now. This interaction would ideally be provided off-site. It is also notable to mention that this was the only option presented that directly addressed the issue of repeating cycles of self-exclusion and reinstatement. A possible drawback to establishing mandatory requirements is that they may dissuade some people from using the self-exclusion program as a responsible gambling, or self-control, tool. No further comments were made concerning how players trapped in a repeating cycle of problematic gambling behaviour, financial loss, self-exclusion, reinstatement and further problem gambling could be effectively addressed and mitigated.

## Scenario Three: Self-Excluder, One or More Breaches

The third scenario offered more variation in the options and requirements of reinstatement than the first and second. In general, approaches to reinstatement in this scenario included more mandatory requirements. With the exception of one group, all of the outlined approaches featured a mandatory interaction that directly addressed breaching behaviour. Such reinstatement meetings took the form of discussions with responsible gambling staff to explore what issues led to the multiple breaches and how to help; sessions with counsellors to review and discuss breaches and gambling habits; and assessment by a problem gambling professional to address breaches and determine a player's readiness to reinstate. One group recommended voluntary interactions, such as offering a meeting with an On-Site Responsible Gambling Information Centre staff person when the player is caught breaching.

Mandatory interactions, such as counselling, were considered advantageous as they represent an opportunity for the player to consider their past behaviour and if they truly feel ready to return, while reducing operator concerns of liability. Some noted that mandatory interactions would benefit those breaching several times, as opposed to once or twice.

Some potential challenges of mandatory interactions included: the player's openness to discuss personal experiences; potential anxiety; and, the possibility of triggering a negative view of the self-exclusion program. Others argued that determining readiness to return through a more formal assessment process would be difficult and put legal liability on the problem gambling professional. The lack of a mandatory interaction was, however, seen as detrimental to the player's ability to address apparent behavioural control issues, indicated by multiple breaches.

## Renewal in Light of Active Reinstatement

The last activity of the *Insight* roundtable involved a poll of each working group (n=6). The question posed to the audience was: If a gambling venue has an active reinstatement process, is there a need for a self-exclusion renewal process?

Four out of the six working groups stated that, yes, a renewal process would still be helpful. Those supporting a renewal process argued that having the option to renew prior to the end of the self-exclusion term could help to calm any anxiety caused by the approaching opportunity to reinstate. Others argued that the option to revoke self-exclusion (i.e. reinstate before the end of the agreed

term) in some jurisdictions created a need for a renewal option. The audience agreed that any potential renewal process should include an opportunity to renew off-site.

Two groups indicated that there would be no need for a renewal process. Arguments against the need for a renewal process were not clearly articulated or resolved following the discussion of its usefulness in certain situation.

## CHAPTER 6: KNOWLEDGE SYNTHESIS & BEST PRACTICES

The preceding chapters have provided a snapshot of self-exclusion, reinstatement and renewal in Canada and beyond. While the evidence, policies and testimony presented herein have been divergent at times, there are clear directions to put forward recommendations for *active* reinstatement and renewal best practices.

### Active Reinstatement

Several options and process requirements for reinstatement were reviewed. The information points to a strategy of *active* reinstatement as current best practice, with consideration given to ensure a process that is not so onerous that it may deter potential registrants. RGC has developed such a strategy that presents two general streams for reinstatement (Figure Eight).

The streams of reinstatement are separated by either the presence or absence of risk warning signs at the end of a self-exclusion term. Risk warning signs may include evidence of multiple breaching behaviour, or other red-flags (e.g., customer service contact from concerned family members, history of threatening behaviour, etc.). Making the distinction between those who fulfill their self-exclusion term without incident and without other markers of gambling risk, and those who have breached their agreement and/or demonstrated red-flag behaviour is a reasoned and fair approach to reinstatement. It does not impose additional mandatory requirements on those who have not displayed high risk signs and have adhered to their agreements, while protecting those who may be at-risk of gambling harm. With this context in mind, RGC proposes a 3-step strategy to reinstatement of self-excluded gamblers.

#### Step 1: Positive Action

With these two reinstatement conditions in mind, the first step in any active reinstatement process includes a positive action, such as completing and submitting a form that indicates one's interest and readiness to return to the gambling venue (Parke & Rigbye, 2014; Responsible Gambling Council, 2011). This step would be mandatory for both streams of reinstatement and represents the least inconvenient option for initiating the process of active reinstatement. Most jurisdictional policies reviewed included some sort of active reinstatement letter or form declaring the intent of the player to return to the gambling venue. At the *Insight* roundtable, participants reached a consensus regarding the need for a positive action to initiate reinstatement, such as a written letter or form. A cooling off period<sup>2</sup> following the application for reinstatement was supported by over 60% of polled respondents at the *Discovery 2015* conference as well as some working groups at the *Insight* roundtable who suggested, for example, one week across all reinstatement scenarios. This cooling off period between the application and other subsequent reinstatement steps also presented an opportunity for the player to reflect on their decision prior to re-entering the gambling venue. Upon submission of a reinstatement form, the operator will have the opportunity to review the records and history of the applicant.

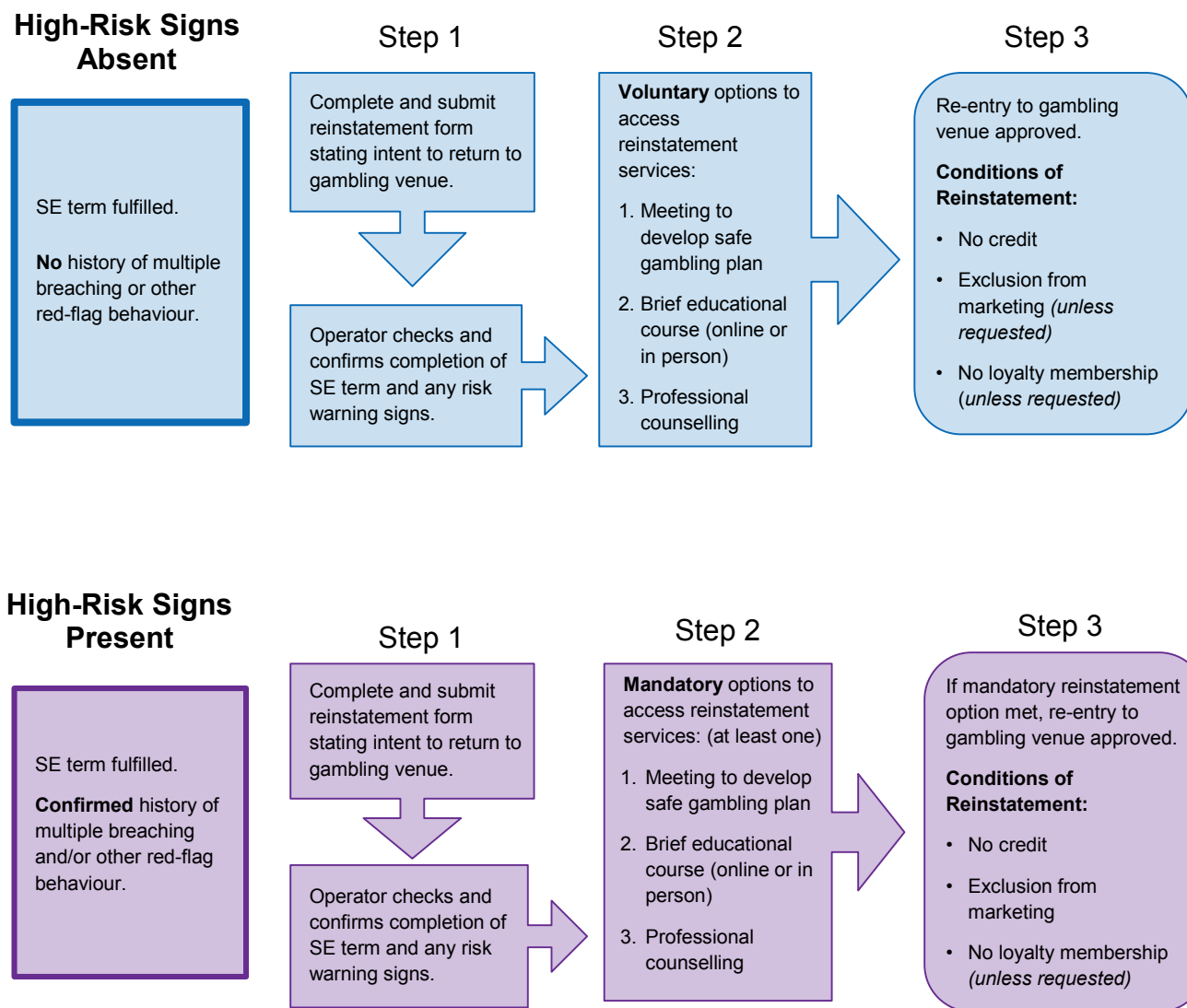
At the time of self-exclusion registration the individual should be provided with the details and steps involved in the reinstatement process once they have reached the conclusion of their determined ban

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<sup>2</sup> Probationary or cooling off periods establish a final period of restriction before a reinstated player is allowed to re-enter the gaming venue.

length. Such instructions should include where to locate any necessary forms and information to apply for reinstatement, and the avenues available to the person to apply (e.g., online, on-site, off-site, etc.)

**Figure 8: RGC Strategy for Self-Exclusion Reinstatement**



## Step 2: Reinstatement Service Options

The second step in the reinstatement process depends on the confirmed presence or absence of multiple breaching during self-exclusion and/or another high-risk warning sign. Those who have fulfilled the terms of their self-exclusion agreement and do not present significant markers of gambling risk will be offered voluntary options for responsible gambling services, such as: 1) a meeting with a trained responsible gambling staff member to develop a safe gambling plan; 2) a brief online or in-person educational session to enhance knowledge of responsible gambling; and/or 3) referral to professional counselling, if so desired. For this group of reinstating players, the *option to forego* additional responsible gambling services prior to re-entry is also available. For those who have presented with risk warning signs, a *mandatory* choice of at least one of the abovementioned options would be required. The satisfactory completion of this requirement would prompt approval for re-entry into the gambling facility.

### 1. Reinstatement Meetings

*Reinstatement meetings* were identified as a useful option to engage players to reflect on their readiness to return to gambling and provide information for responsible gambling (Blaszczynski et al., 2007; Nowatzki & Williams, 2002; Parke & Rigbye, 2014). In international jurisdictions, meetings were often cited as a common reinstatement option and varied in intensity from casual interactions at informational sessions to counselling with problem gambling specialists to board hearings. In Canada, some active reinstatement processes also included meetings to engage with players and provide information on responsible gambling. The majority of interviewees felt that meeting requirements were regarded as fair by patrons. Meetings may be considered a valuable voluntary option for self-excluded players who have honoured their agreements without incident, as well as a best practice requirement for those who have shown high-risk gambling signs. To this end, meetings may be aptly paired with the development of safe gambling plans for reinstated players (Murray & Savage, 2010; Nowatzki & Williams, 2002). Responsible gambling staff members (such as a casino staff person with a responsible gambling role, or On-Site Responsible Gambling Centre staff person) would be ideally positioned to facilitate the implementation of this option.

### 2. Educational Session

An *educational* component for reinstatement offers several benefits to the promotion of safer gambling and is supported by numerous experts (Nowatzki & Williams, 2002; Tremblay et al., 2008; Verlik, 2008). Education can take on different forms, such as a course on gambling risks, myths and facts about games, financial planning, and safer play. In a few international and Canadian jurisdictions, reinstatement applicants are required to attend an educational session prior to re-entry. Interviewees, focus group participants and *Insight* roundtable attendees all supported the idea of an educational course or session for reinstatement. For instance, informants from jurisdictions with existing educational session requirements stressed that the objective of this option should be to have the patron reflect on responsible gambling content and their own readiness to return to gambling. As with reinstatement meetings, an educational component would benefit from the design, development and administration of experienced responsible gambling staff members. Key issues to investigate in the development of the course include the ideal length (e.g., 30 minutes, half-day, full-day, etc.), and the efficacy of online delivery versus in person (or both).

### 3. Counselling

*Professional counselling* is a useful best practice option for those reinstating and interested in the assistance of treatment specialists or other trained individuals to help gain control of their gambling behaviour. These interactions would cover changes in motivating factors between the time of entry into

the self-exclusion program and reinstatement application and provide tools and information for financial planning and safer gambling. This option was generally thought of by gaming staff to be a good idea, but informants cautioned that this would be highly dependent on the availability of trained professionals. Others argued that some players would not be receptive to counselling, reducing the potential benefit of the option. Focus group participants generally thought counselling could be beneficial, if provided by a reputable treatment provider, though they questioned the purpose of having the counsellor conduct an assessment of the person's ability to return to gambling. In-person sessions were favoured over phone or online options, and *group* sessions instead of one-on-one were also thought to be better as an initial step. At the *Insight* roundtable, some groups suggested counselling could benefit those who have self-excluded multiple times.

### **Step 3: After Reinstatement**

Following the approval of reinstatement for both streams of gamblers, some conditions would apply. For the gamblers who fulfilled the terms of their self-exclusion agreement and did not present with significant markers of gambling risk, basic conditions would include 1) restriction of credit, 2) passive exclusion from marketing, and 3) passive exclusion from loyalty programs. Passive exclusion from marketing and loyalty programs means that individuals would be excluded from these services as a default following reinstatement, but would be able to register for them, if they so choose. For those players considered to be of higher risk of problematic gambling, two of the conditions, ineligibility of credit and passive exclusion from loyalty programs, would apply similar to the first group. However, marketing restrictions would remain in place in order to protect them from potential triggers of risky gambling behaviour.

#### **Restriction of Credit**

Credit restriction was strongly supported by 76% of respondents polled at *Discovery 2015*. For those who have self-excluded, whether or not they have presented with other gambling risk warning signs, restriction of credit is an important precautionary measure designed to reduce the risk of returning players gambling beyond their means. While the proposed strategy for reinstatement appreciates that players may have honoured their self-exclusion agreement and present no obvious risk warning signs, it is also acknowledged that the majority of self-excluders have experienced some form of gambling related problems—self-exclusion enrollment is an admission of a gambling control issue (Haefeli, Lischer, & Schwarz, 2011; Ladouceur et al., 2000). With this in mind, credit ineligibility is considered an important feature for *all* reinstating players.

#### **Exclusion from Marketing**

Exclusion from marketing aims to reduce the triggers that may lead to risky gambling behaviour. Restrictions on marketing to reinstated players is widely supported as best practice (Gainsbury, 2014; Parke & Rigbye, 2014). 78% of polled respondents at the *Discovery 2015* conference thought marketing restrictions for reinstated players was either *moderately* or *very important*. Exclusion from marketing following reinstatement would apply to all returning gamblers, although those who do not demonstrate obvious high-risk signs would be able to re-enroll to receive direct marketing.

#### **Exclusion from Loyalty Programs**

Like direct marketing, passive exclusion from loyalty programs seeks to limit the potential triggers of risky gambling behaviour for reinstated players. Following reinstatement, players would continue to be unregistered from the loyalty program but would be free to enroll again, if they wish. Because loyalty programs monitor gambling patterns, they can serve as an important source for identifying risky gambling



behaviour (e.g., increasing intensity and frequency of betting, increasing monetary loss, and significant involvement in time spent gambling, etc.).

Some have suggested that gaming providers actively monitor all individuals who return to gambling after self-exclusion. This may not be feasible, especially in those cases where the patron is not enrolled in the loyalty program. It is possible, however, to designate 'returning from self-exclusion' as a 'red flag' in whatever responsible gambling information system the venue is using.

## Renewal

Renewal can be perceived as an active or passive process. In light of an active reinstatement process, passive renewal is inferred. In other words, self-exclusion is an indefinite program, regardless of the agreed term, unless active steps are taken to reinstate once eligible. The policies on the process of renewal usually involve written notification, delivered in-person. In some cases, self-excluders are required to take another photo for security identification.

Although renewal is inferred with an active reinstatement process, players should be offered an opportunity to renew an exclusion if they so choose. Focus group participants emphasized the importance of not having to visit the gambling venue to do so, and suggested the options of calling in or writing a letter to renew or update their self-exclusion agreement and records. If requirements of a renewal process did require in-person visits, off-site locations should be made available, according to most information sources.

## Revocation

Revocation is notable as it calls into question the integrity of initially established terms of self-exclusion—especially those choosing longer or indefinite bans. The basis for revocation supports those who may feel that they have regained control of their gambling in advance of their full self-exclusion term. However, no evidence or clear information was found to support this premise. On the other hand, testimony from the *Insight* roundtable did clarify the potential risks associated with having a revocation option available, as it provides a relatively easy route back to the gaming venue in moments of vulnerability. As such, eliminating revocation is an advisable step towards strengthening voluntary self-exclusion programs.

## CONCLUDING STATEMENT

This report brings together numerous perspectives on the state-of-the-art for reinstatement and renewal. The reviewed body of evidence has provided directions for current best practices. Overall, there is strong support for an *active* reinstatement approach. The recommended approach carefully considers the differences in players who self-exclude. It provides a balanced approach for players who wish to reinstate as simply as possible with the introduction of additional safeguards for those who have presented risk warning signs and may require further assistance.

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