Voluntary Self-Exclusion Program Review
British Columbia

January 2011

Prepared for British Columbia Lottery Corporation (BCLC) and
Gaming Policy and Enforcement Branch (GPEB)

RGC | CENTRE FOR THE
ADVANCEMENT OF
BEST PRACTICES

TABLE OF CONTENTS

BACKGROUND

The British Columbia Lottery Corporation (BCLC) and the Gaming Policy and Enforcement Branch (GPEB) have asked the RGC Centre for the Advancement of Best Practices to conduct a review of the Voluntary Self-Exclusion (VSE) Program.

The VSE Program in British Columbia was implemented in early 1999, shortly after BCLC took over the management of casinos. Since that time, the Program has undergone a number of notable changes. Today, VSE is available at all gaming facilities with slot machines including casinos, community gaming centres and the slot floor of racetracks. It is also available at all facilities offering bingo and the online gaming site "playnow.com".

For the purpose of this review, the RGC focused on casino-based VSE and selected five casinos from the 17 casinos in the province of British Columbia that represented a range of location, size and operator.[1]
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- View Royal, Victoria
- Lake City Casinos – Kelowna, Kelowna
- Starlight, New Westminster
- Edgewater, Vancouver
- River Rock, Richmond

OBJECTIVES

1. Examine the objectives and operating experience of the VSE program.
2. Compare the actual and intended process and procedures through which the program is currently delivered.
3. Compare processes and procedures to best practices in self-exclusion.

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[1] It is important to note that this review is not focused on a particular casino but rather uses observations from the sample of five venues to draw interpretations about the overall VSE program.

METHODOLOGY

INFORMATION SOURCES

The methodology reflects the need to assess the program from a range of perspectives including:

1. Interviews[2] with stakeholders:
   o General managers:
     - To establish how they support both the VSE and staff who are directly involved in it.
   o Security managers:
     - To examine their role in the registration of patrons in the VSE and detection of breaches.
   o Surveillance managers:
     - To examine their role in the detection of breaches.
   o Gaming floor managers:
     - To identify how patrons are linked to the VSE.
   o GameSense Advisors and Regional Team Leaders
     - To examine their role in the VSE process, from registration to breaching.
   o Treatment providers:
     - To understand their knowledge of VSE and their experiences as a support to clients.

2. Reviews of the *Casinos Standards, Policies and Procedures* as well as the VSE agreement forms, training materials and communication pieces for the program (i.e., brochures, posters).

3. Site visits to assess the promotion of the program.

4. Self-exclusion demonstrations at each of the five sites to obtain a first-hand account of the registration process.

5. An analysis of VSE data, including current number of registrants and breaches.

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[2] All questionnaires used in the interviews are provided in Appendix A

ANALYSIS

The review focused on two broad areas. First was a comparison of intended VSE processes and procedures (which are largely covered in policies) to actual processes and procedures. The second compared processes and procedures to best practices in self-exclusion. The best practices consisted of those policies and practices identified in the Responsible Gambling Council's 2008 report "From Enforcement to Assistance: Evolving Best Practices in Self-Exclusion"[3] as well as the Responsible Gambling Council's Self-Exclusion standard in the Responsible Gambling Index for venues.

The framework for the review was constructed around the following areas of VSE:

- Policies and procedures

- Staff training

- Promotion of VSE

- Registration process

- Role of the GameSense Advisors

- Significant other requesting VSE

- Detection and enforcement

- Reinstatement and renewal

- Data collection and management

REFERENCE GROUP

A reference group of three experts was established to review the methodology and assess the results of the review. The group is comprised of a gambling researcher, problem gambling treatment provider and an individual who has previously self-excluded. None of the individuals had any previous involvement with the VSE in BC. Rather, their independent review provides further validation of the process and final outcomes.

LIMITATION

Normally a review of this nature would include the views and experiences of individuals who have used VSE. However, because of privacy rules, we were unable to contact past users of the VSE Program in BC. An ongoing longitudinal study with VSE patrons in BC is currently underway that will provide information from the patron's perspective.

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[3] In 2007, the RGC initiated a thorough review of best practices in self-exclusion that served to identify those policies and practices that are likely to facilitate successful outcomes for people who choose to ban themselves from casinos.

POLICIES AND PROCEDURES

The BCLC has a Voluntary Self-Exclusion Policy and a set of *Casino Standards, Policies and Procedures*, of which various sections pertain to VSE.

The **VSE Policy** was last reviewed July 2010 and covers

- The scope (i.e., what locations the ban applies to)
- The context (i.e., the VSE options available)
- Policy statement (i.e., what the ban entails)
- Policy details (i.e., how to register)
- Compliance (i.e., conditions of the ban and consequences of breaching)

The sections of the *Casinos Standards, Policies and Procedures* relevant to the VSE Program are as follows:

Responsible Gambling (last reviewed July 2010)

- Role and Responsibility of GameSense Advisor or GameSense Regional Team Leader
- Placement of VSE Materials
- Appropriate Response Training Levels 1 and 2

Cash Assets – Ineligible Wins (last reviewed November 2007)

- Definition of an ineligible win
- Ineligible win procedures
- Ineligible win reporting

BCLC Head Office Voluntary Self-Exclusion (last reviewed July 2010)

- BCLC Head Office Application
- After hour procedures
- Venues included in the exclusion
- Exclusion period
- Agreement form and photo procedures
- System failure applications
- BC Gold Player Club Membership Suspension and Points Payout
- Exclusionary extensions

Gaming Integrity - Postpone or Delay Jackpot (last reviewed April 2009)

- Ineligible jackpots

BCLC Security Investigator (last reviewed December 2009)

- The investigation of Ineligible Wins for Voluntary Self-Exclusion and Provincially Barred persons

Security (last reviewed June 2009)

- Placement of security to watch for breaches

Together, the policy and procedures cover the major components of the VSE program. They are comprehensive, support-oriented, well-communicated and updated.

However, because the various components are spread over a number of sections, it takes effort to obtain an understanding of all aspects of the VSE Program. As well, there are no procedures specific to the role of security in dealing with breaches and requests from others for a patron ban.

When asked, all gaming staff members were able to identify the location where they could obtain a copy of the VSE policy and procedures. Some referred to a binder where the documents are held, while others spoke of accessing the information online. Updates to policies were generally communicated via email and there was a system in place in at least one venue that required staff to sign a form acknowledging that they had read the most recent policy updates. GameSense Advisors were also aware of the VSE policy and procedures and reported receiving updates through regional team leaders as well as casino staff.

COMMENTARY

The VSE policies and procedures for the VSE Program cover the important aspects of the program. They are support-oriented with direct referrals to counseling if the patron chooses. They have been recently updated, are well-communicated and readily available to staff.

The RGC has two suggestions for consideration. One is to develop policies/procedures for those areas of the VSE program that do not currently have documentation including the role of security in responding to breaches and requests from others for a patron ban. The second is to consolidate the policies and procedures on VSE to facilitate access and understanding of the entire VSE Program.

STAFF TRAINING

All gaming staff interviewed (security, surveillance, gaming floor) had received at least one level of Appropriate Response Training (ART). ART Levels 1 and 2 cover the basic components of the VSE Program, what to say to patrons who ask about the program and who a patron should be referred to. In Level 1 training, if a patron requests self-exclusion, staff are to: provide them with a brochure that describes the program; offer to take them to a GameSense Information Centre to meet with the advisor and/or take them to a Security manager to sign-up for the program. In Level 2, staff are trained to provide patrons with a brochure, provide information on how the program works, ask if they are interested in learning more about the program or would like to register, and finally, take the customer to a security supervisor.

BCLC maintains detailed training records for all individuals who have completed ART since its implementation. Records are tracked using BCLC's Learning Management System. For ART Level 1, participants complete an online module and the Learning Management System automatically records their training record. For Level 2, participants attend a classroom session and then complete an online quiz for certification. As a result, all training records are housed in the same database. System administrators can view the training status of any user who has been registered for a course allowing them to determine who has yet to complete the training. Sites are audited for compliance to training requirements by both GPEB and BCLC.

For some gaming staff, it had been more than 7 years since their last ART training session. From the interviews it was not clear whether there were mandatory refresher courses – some staff felt that there were, while others were unsure.

In addition to the ART training, there is also a training program specific to the VSE process. This training is geared towards security managers or designated staff, GameSense Advisors and others responsible for VSEs. In 2009, BCLC Responsible Gambling staff conducted the training at each BC gaming facility and recorded 413 participants.

Lastly, there is a voluntary VSE-specific training called the "security enhancement training" provided by GameSense Advisors that gives updates on changes to the VSE and ways to support patrons during VSE registration.

During the interviews, some security staff and GameSense Advisors indicated that they would like more training specific to some of the recent policy changes. In particular, some of the interviewees noted the difficulty of implementing the policy regarding the role of GameSense Advisors in the breaching process. The *Casinos Standards, Policies and Procedures* outlines that the GameSense Advisors, when available, can assist security when an individual has breached their VSE agreement. While some venues found effective ways of implementing this policy, security staff and GameSense Advisors in other venues were unclear of how best to involve the GameSense Advisors.

COMMENTARY

BCLC has a comprehensive training program that provides all staff with some level of training specific to the VSE Program. More training is provided for supervisory levels. Refresher courses are recommended to maintain a level of knowledge of the VSE Program among all staff.

All staff who are directly involved in implementing the VSE program receive training specific to the VSE program. Some staff felt ill-equipped to implement the policy change that involves GameSense Advisors in responding to breaches. A more formal training process that addresses how security and GameSense Advisors can work together to respond to breaches would be beneficial and reinforce a consistent approach to the process. The experience of those venues that have successfully implemented this policy change could be incorporated as part of the training materials.

PROMOTION OF VSE

FINDINGS

All of the five venues visited followed the BCLC's guidelines for the placement of VSE materials. Materials were widely available in multiple formats and locations, in a variety of languages to accommodate the venue's patron demographic, and were in clear view. The materials contained information on the following:

- Description of VSE

- Locations where an individual can enroll

- How to sign-up for VSE

- What to expect during a VSE registration

- What happens once a person signs up

- How long a person can enroll in VSE

- Information on excluding a family member or spouse

- Consequences of a breach

- Ineligible jackpot

- Reference to counselling services and the PG Helpline

The graph below shows the awareness levels of the VSE Program among patrons. As shown, awareness has increased significantly since 2008.

Awareness of VSE Program among Past Year players

|					
21%	24%	29%	38%	52%	52%
FY 08	FY 09	FY 10	FY 11 (Q1)	FY 11 (Q2)	FY 11 (Q3)
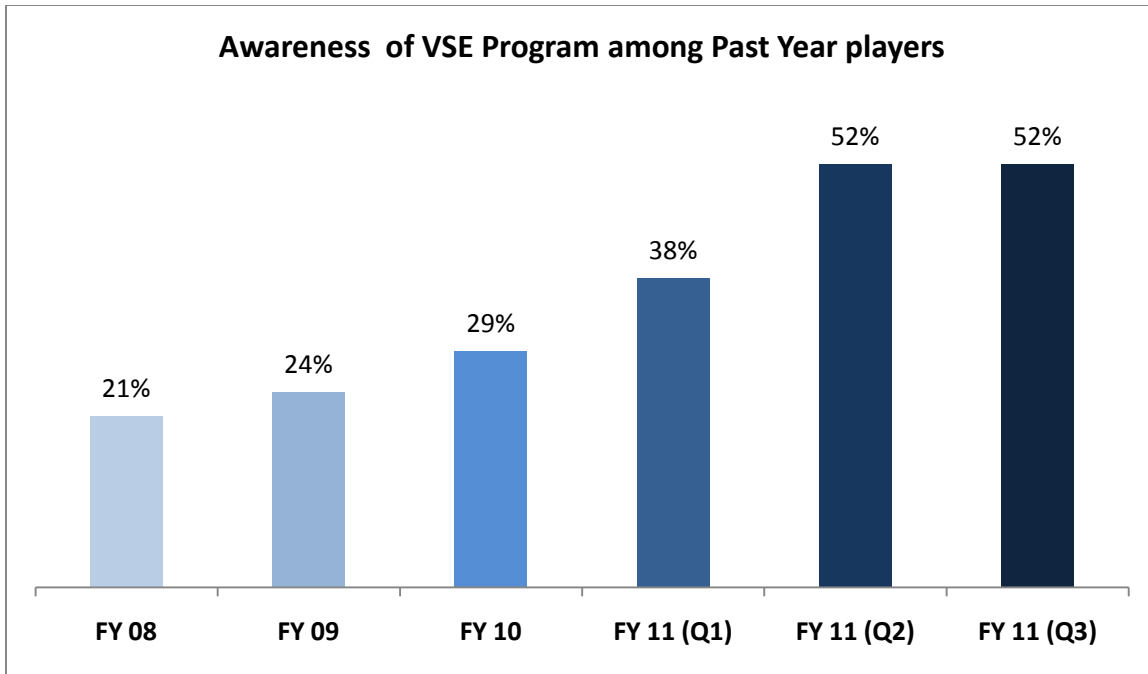
COMMENTARY

The VSE Program is well promoted with the use of multiple formats and information pieces throughout the venue. The information provided in the promotional materials is comprehensive and covers the key components of the VSE Program. Patron awareness of the Program has continued to increase significantly since 2008.

REGISTRATION

From April 2009 to March 2010, 3905 patrons registered for VSE in British Columbia. As shown below, the number of casino enrolments continued to increase from 2006 through 2009.

Number of Self-Exclusion Enrolments

	2006	2007	2008	2009
	2567	2967	2958	3306
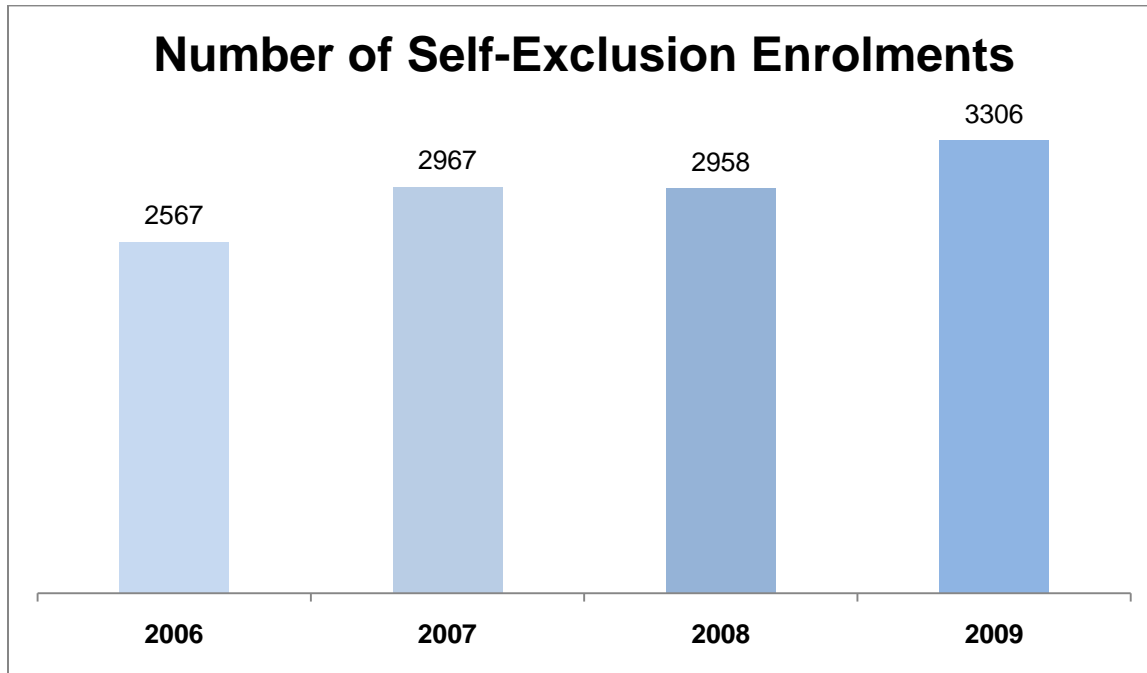
Registration Rooms
The registration rooms in the five sites that were visited varied in the level of comfort. There was also a difference in the level of privacy, with some of the rooms situated directly off the gaming floor and others in the back of house and out of sight of the gaming floor. The location of the room impacted whether security had to walk the patron out of the venue following completion of the registration via the gaming floor or some other more private route.

Role of Security and GameSense Advisors
A security staff member is always involved in the VSE registrations and the GameSense Advisors are involved when they are in the venue. All venue staff and GameSense Advisors interviewed were aware of and comfortable with their role in the registration process.

Security at all five venues found the inclusion of GameSense Advisors to be a benefit and felt that the registration process is now the best it has ever been. A number of security staff specifically noted that with the involvement of GameSense Advisors, the process is much more supportive and patron-focused. As well, given the amount of information that needs to be entered into the computer, the GameSense Advisor is able to fill gaps in silence and explain areas that are unclear to the patron. GameSense Advisors clearly described their role in the

registration process as a support to the patron. Some also explained that they work to de-escalate the more difficult situations.

Registration Forms
During registration, the GameSense Advisor or security staff member reads the VSE form to the patron which includes information on all of the major aspects of the program. The VSE agreement forms are available in English, Korean, Tamil, Mandarin and French. In one venue, the GameSense Advisor was not aware that the registration forms were available in a language other than English. Since 2002, the "permanent" option for self-exclusion was removed and replaced with 6 months, 1, 2 and 3 year options for length of exclusion.

A number of security staff and GameSense Advisors mentioned that sections of the registration form are complicated and that they would like to have a simpler form. Examples of parts that often need explanation:

"Neither BCLC, any of its service providers, nor any of the officers, directors, agents or employees of either of the foregoing (collectively, "BCLC and its service providers"), are responsible for any breach of this self-exclusion or for failure to enforce this self-exclusion."

"I hereby release and discharge BCLC and its service providers from any liability or claims including claims for financial loss related to my gambling (including any gambling I may engage in after signing the VSE agreement in breach of my obligations of this Agreement."

Since 2002, problem gambling counselling has been offered as part of the VSE registration process. In one section of the registration form, patrons are asked if they would like a referral to a problem gambling counsellor. When present, the GameSense Advisor explains this option, stressing that the service is free and can be a helpful tool when deciding to VSE. Security staff expressed support for the GameSense Advisor's role in introducing counselling to the patron. In all five sites, security staff and GameSense Advisors noted that a minority of patrons accept the offer for a referral. According to the information provided by BCLC, 16.5% of people who registered for VSE in 2009 accepted a referral to counseling. The rate has increased from 10% in 2006; 11% in 2007 and 13% in 2008.

Upon completion, patrons are given a hardcopy of the agreement along with an information package, which at present is only available in English. The information package includes frequently asked questions and brochures on counseling services. One of the benefits of the information package is that it translates some of the complicated information contained in the registration form into everyday language. The only parts of the registration form that are not included in the "frequently asked questions" are as follows:

- Clarifying the role of the patron and role of the venue
- What happens to personal information provided
- Future marketing materials discontinuation

- Not entitled to winnings if breach

Promotional Materials

During the VSE registration, the security staff member will send a request to surveillance with the name of the individual, who will contact the cash cage to determine whether the patron has any remaining points on their BC Gold Card. If a balance remains, a refund will be processed immediately and brought to the patron. At the same time, the patron's BC Gold Card is suspended, which in turn cancels any further promotional materials being sent to the patron. For VSEs conducted at the gaming venue, refunds are returned in cash.

License Plate

During registration, patrons are asked to provide their license plate number. The number is used for the license plate recognition technology. Following the completion of registration, the patron is escorted by security to ensure that the patron is off property and to verify the plate number. Some GameSense Advisors and treatment providers had discomfort with this procedure, as patrons have reported feeling uncomfortable or embarrassed while being escorted off the premises by security.

Non-Gaming Venue Registration

In addition to registering for VSE at the gaming venue, patrons can register at the BCLC head offices in Kamloops and Richmond or have a BCLC investigator meet them at alternative location such as a treatment agency. The benefits of VSEs at the head office and off-site is that patrons do not have to enter the casino to register and there is flexibility in time and location. Any outstanding BC Gold Card points are refunded to the patron in a form of a cheque.

In the past year, the Richmond head office has completed 65 VSEs, while the Kamloops head office has completed 44 VSEs. In total, there are 14 investigators responsible for VSEs in BC, with each responsible for a designated geographical area. Combined, these investigators have completed a total of 11 VSEs, with one investigator from Vancouver Island having completed 7 of the 11.

For the most part, the VSE registration that takes place outside of the gaming venue is identical to that in the venue. The major difference is that outside of the gaming venue, a patron's information is collected on a paper form and digital camera and later entered into the Casino Reporting System.

Of the five treatment providers interviewed, only one was aware of the option of having registrations conducted at the treatment centre.

COMMENTARY

The VSE registration is comprehensive and addresses the key components:
- Designated staff explain the details of the program and expectations of the gaming provider and the VSE patron
- Registration documents are provided in multiple languages
- VSE is carried out in a supportive manner
- VSE patrons are provided with details on all aspects of the program and given take away materials
- Ban length options are offered. Since 2002, the "permanent" option for self-exclusion was removed and replaced with 6 months, 1, 2 and 3 year options.
- Patrons are encouraged to take advantage of counseling services
- Patrons are able to register for VSE at locations other than the venue
- Promotional materials are immediately discontinued and the BC Gold Card is suspended
- The ban extends across BC and includes multiple types of games

There are a few areas of the program that could be strengthened. One is simplifying the language in the registration form and ensuring that the frequently asked questions section of the information package cover all key points in the registration form. In a related manner, the registration form and the VSE promotional materials are provided in multiple languages, therefore it would be beneficial to offer the take away package in multiple languages as well.

Another area for consideration involves the introduction of support services. Registering for self exclusion is a highly emotional time; numerous security and GameSense Advisors noted that the most important thing for patrons is to leave the venue. An option is to ask patrons if they would like to be contacted in a week or so as a follow-up at which time the person making contact can re-introduce counseling as an option. As well, given the stress of the situation, to the maximum extent possible, options to minimize the embarrassment associated with having security escort VSE patrons off the premises is recommended.

Finally, there is opportunity to increase treatment providers' awareness of the option to register for VSE outside the venue. This would benefit those patrons who want to register outside the gaming venue and cannot access the head offices.

FINDINGS

In 2005, Responsible Gambling Information Centres were opened in two casinos in BC. In 2009, the program expanded to include all 17 casinos in the province and the Centres were subsequently renamed GameSense Information Centres. Also in 2009, VSE specific training was introduced and the roles of GameSense staff were expanded to include support to patrons during VSE registration as well as breaches.

The GameSense Information Centres located at the casinos are staffed by GameSense Advisors for up to 40 hours per week, including evenings and week-ends. The GameSense Information Centres are highly visible and accessible to patrons and GameSense Advisors regularly interact with patrons. The interviews show that gaming staff support and value the role of the GameSense Advisors role in the venue. Depending on the venue, some gaming staff felt that the GameSense Advisors should be on site at all hours that the venue is open, while others felt that the Advisors are present at the key times. According to the *GameSense Information Centres* report prepared in March 2010, GameSense Advisors were present for approximately 22% of all VSE registrations.

COMMENTARY

There are clear benefits to having the GameSense Advisors working in the venue and involved in the VSE process. The location of the GameSense Information Centre on the gaming floor gives the GameSense Advisors direct access to patrons. This maximizes opportunities to build trusting relationships with patrons that can lead to referrals to VSE. The inclusion of GameSense Advisors in the VSE registration offers added support to both the patron and the security staff. In some venues, there may be potential value added by increasing the GameSense Advisors' hours of availability.

SIGNIFICANT OTHERS REQUESTING VSE

FINDINGS

There is no policy or procedure specific to how to respond to a significant other's request to exclude a patron. All staff interviewed indicated that a significant other was not able to have another patron excluded - that the request must come directly from the patron. Some gaming staff interviewed responded to others request for a VSE by directing these individuals to resources such as the helpline.

COMMENTARY

All staff are aware that a VSE request must come directly from the person who wants to exclude; however, to ensure consistent implementation across venues the development of a policy regarding significant others' requests to have a patron excluded is recommended.

DETECTION AND ENFORCEMENT

Over the years, a number of measures have been tested and implemented to detect self-excluded patrons and deter re-entry among those excluded. In 2004, facial recognition was piloted at the larger casinos and eventually introduced at all casinos throughout BC. Currently, however, most sites do not use facial recognition because of continued problems with the tracker. A pilot project is currently underway to test enhancements to the system. License plate recognition was introduced in June 2009, with a pilot at River Rock Casino. This tool is now available at River Rock, Grand Villa, Edgewater, Starlight, Boulevard, Cascades, Chances Kelowna, Vernon, Treasure Cove, Penticton, View Royal and Chances Abbotsford. It is available at all sites that have the capacity to monitor the parking lot. In 2009 the Jackpot ineligibility policy was introduced. This policy deters breaching among VSE patrons by making them ineligible for jackpot wins.

The computerized *Casino Reporting System* Venues is used to post "be on the look-out" (BOLO) lists. BOLO lists provide gaming staff, significant others and treatment providers the ability to place VSE patrons on a watch list if there is reason to believe that they are breaching their agreement. A BOLO bulletin is created that includes details about the patron and their gambling patterns that is then forwarded to all casino/community gaming centres/Bingo sites - asking staff to keep an extra watch for the patron.

From April 2009 to March 2010, there were a total of 8141 detections: 83% by security and surveillance, 15% by license plate recognition and 1.3% by way of jackpot ineligibility. As shown in the graph below, the number of detections has increased since 2006.

Number of Self-Exclusion Detections

Year	2006	2007	2008	2009
Detections	4616	5440	7617	7302
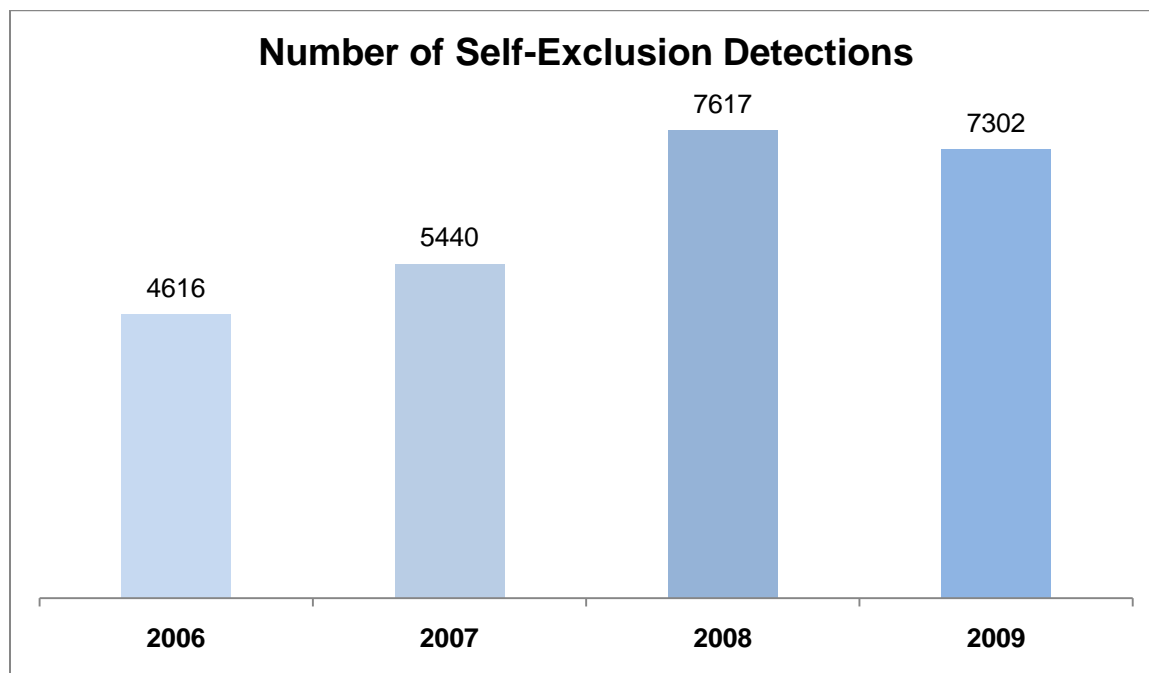
Security staff are given one hour prior to starting a shift to review the VSE list. A larger venue, and therefore a larger VSE list, increases the difficulty in detecting breaches. Smaller venues have fewer patrons which makes it easier for staff to be more familiar with the venue's customer base.

Among all venue staff, regardless of position, the largest challenge is detecting individuals who are violating their agreement. There is strong support among staff for both license plate recognition and ineligible jackpots. Facial recognition has not been as successful as hoped. While there has been greater success with the license plate recognition (which is monitored by surveillance), not all sites are able to use this technology. For instance, it cannot be used if the venue does own the accompanying parking lot. As well, one surveillance staff member noted that it is easy to miss a license plate recognition alert because it is a separate screen from the one that monitors the gaming venue. They recommended that security have access to the alerts, and that the alert included an audible notice.

Treatment providers can also play a role in detection by alerting the venue of a possible breach. This can occur when a client admits to their treatment provider that they are breaching and give the counsellor permission to contact the venue. The casino can place individuals under a "BOLO" - be on the look-out". Of those treatment providers interviewed only one individual was aware of this option.

All individuals interviewed were asked what could be done to improve detection. Solutions included:

- Better biometrics and facial recognition

- Reward security staff for detecting the highest number of breaches

- Allow staff other than security access to the VSE list so that they can assist in detection

- Implement the license plate recognition in more venues where possible

- Place the most frequent and/or recent violators on BOLO -it should be noted that some venues regularly do this

- Communicate the BOLO option to ALL treatment providers so they may assist in the detection of potential breaches

The protocol in responding to a breach is unclear. There is no policy specifically outlining security's role in the identification of a breach. Generally, when a breach is suspected, security will first confirm the identification with surveillance. If surveillance makes a positive identification, security along with a floor manager will approach the patron and ask for identification. If the person has indeed excluded, they are reminded of their expiry and escorted off the property. The breach will then be noted in the patron's file.

The extent to which the GameSense Advisor is involved in a breach varies by location. In one venue, the GameSense Advisor was contacted immediately between the initial detection and the formal identification of the patron so that they could assist with escorting the patron out of

the venue. This practice increased the likelihood of the GameSense Advisors speaking with the violators about the exclusion and outside supports. In another venue, the GameSense Advisors did not have a role in the breaching process.

Although the patrons are advised during registration that they risk being fined for violating their agreement, this does not appear to occur. None of those interviewed could recall a patron being fined. This being said, many staff commented positively on the new jackpot ineligibility, which acts as both a deterrent and a consequence of violating. Gaming staff and GameSense Advisors felt strongly that the VSE needed to have "more teeth" to deter patrons from breaching. From statistics provided by BCLC, out of a sample of 1383 breaches, 5% breached more than 25 times. These repeat breaches require a great deal of resources, are difficult for staff and undermine the program.

COMMENTARY

In 2009-2010, over 8,000 breaches were successfully detected using various means of detection. The license plate recognition has proven to be a useful tool for detection of breaches, while the jackpot ineligibility is valuable as both a consequence and deterrent of breaching.

Some areas of consideration for the detection of breaches and the enforcement of the program include enhancing the effectiveness of the license plate recognition by adding an audible alert and allowing security staff access this database to avoid missing alerts resulting from breaches. Other considerations include: BCLC clearly identifying patrons at higher risk of breaching by creating shortlists of the most frequent and/or recent violators; creating greater awareness of the BOLO option among treatment providers may further assist in the detection of potential breaches; and clarifying the role of the GameSense Advisors in responding to breaches.

Consistently, a point of frustration among all staff is repeat breaches. While staff view jackpot ineligibility as an important deterrent, they want the program to have more teeth when dealing with breaches. This may involve instituting fines or some other form of deterrent. It is strongly recommended that BCLC explore options for establishing consistent and escalating consequences for breaches.

RENEWAL AND REINSTATEMENT

FINDINGS

Renewing a VSE agreement is described in the VSE agreement form and in the information package provided to patrons during registration. If a patron renews the ban before the expiry of the ban, they can do so without going to the venue. However, if the expiry date has passed, the patron is required to visit the casino or one of the head office locations to have their information updated. Providing additional ways to renew the ban when the expiry date has passed would be beneficial.

There is no policy specific to the reinstatement of patrons into the venue following their ban. Currently, patrons may return to the venue after their agreement expires. There is no active reinstatement process prior to re-entry. A number of staff specifically pointed out the benefits of an active reinstatement process particularly for repeat breachers.

COMMENTARY

While patrons have the option of renewing their ban prior to expiry, there is no policy on reinstatement. It is recommended that BCLC create an active reinstatement policy and procedures that include:

- The option to renew the ban

- Support and information regarding community resources, including tips and information about responsible gambling

- Discussion of any breaches that may have taken place

- Documentation that the patron wishes to return to gambling and is making an informed decision to reinstate.

DATA COLLECTION AND MANAGEMENT

FINDINGS

In the early years of the VSE Program, gaming sites were responsible for manually completing the paperwork for VSE registrations and forwarding the originals to BCLC Kamloops, where it was entered into a reporting system. BCLC staff would post dossiers of VSE patrons to an Extranet site, and the various sites would print the material and maintain binders of VSE patrons for their region. In September 2002, IRIMS, the first version of a centralized system, was developed. In 2004, a more sophisticated casino reporting system was introduced (iTrack), allowing VSE registrations to be completed in "real time".

The *Casino Reporting System* is used across all venues in British Columbia, allowing for the sharing of information about VSE registrants, including breaching information. Since its development in 1999, the system has undergone a series of improvements and provides an efficient means for collecting and sharing information.

Security had a number of suggestions on how the system could be improved to assist them with detection of breaches. At present, the *Casino Reporting System* program does not allow for filtering by ban type, which they found cumbersome when attempting to identify violators. As well, the system does not give staff access to the supplemental information section of the *Casino Reporting System* for VSEs that have occurred at other venues. Staff felt that access to this information would be beneficial when approaching detected breachers. Finally, staff recommended establishing a better process of sharing information on patrons at high risk of breaching (BOLO).

COMMENTARY

The BCLC has implemented a province-wide electronic system for monitoring and tracking VSEs, and efficiently sharing information among the various sites. A number of staff felt that there is opportunity to further improve the system by expanding the filtering capabilities (i.e., being able to filter by ban type) and access to secondary information. An additional consideration is investigating opportunities to be more proactive among adjacent properties with sharing information on high risk breaches.

FINAL COMMENTS

It is clear from this review that subsequent to the introduction of the Voluntary Self-Exclusion program in 1999, the program has undergone several enhancements. Notable among these enhancements are the introduction of IRIMS and iTrack reporting systems (2002, 2004), offering links to counselling agencies (2002), the expansion of staff training to include VSE components, the use of licence plate recognition (2009); and the prohibition of winnings for VSE registrants (2009). These and many other systemic changes have added to the impact of the program as demonstrated by the growth in the number of detections between 2006 and 2009. British Columbia was an early adopter of facial recognition technology in an attempt to identify breaches of self-exclusion agreements. The introduction of the facial recognition technology was not as successful as BCLC had expected. This technology has evolved considerably in recent years and it is hoped that the current pilot enhancements will be the first step in a more effective system.

This report identified a number of smaller operational enhancements that can improve the day to day functioning of the program, including clarifying the involvement of GameSense Advisors in responding to breaches, training specific to policy changes, and simplifying the VSE agreement. These and other proposed changes will all add to the overall effectiveness of the program.

Perhaps the most important issue identified in this review is the issue of consequences for breaching VSE agreements. Currently, the only real consequence for breaching a VSE agreement, aside from ejection from the venue, is the withholding of winnings. This is a good step but not sufficient. Consistently, those interviewed for this review expressed the need for more meaningful consequences. This importance of having consequences and a graduated response for increased breaches is consistent with the extensive discussions that have occurred with gaming providers, treatment providers, and gamblers in the development of best practices and standards for VSE Programs. That is why this report recommends that BCLC review its options in this area and build in greater "teeth" in its process. While there is no single model self-exclusion program that would fit with the BC experience there is a great deal of operating experience in many jurisdictions that BCLC could draw on in introducing greater consequences to the self-exclusion program.

The RGC Centre for the Advancement of Best Practices commends the British Columbia Lottery Corporation and the Gaming Policy and Enforcement Branch for initiating this review and recommends that these results be shared with the gaming providers and corporations across Canada who face similar challenges as they work to improve the effectiveness of their self-exclusion programs.

APPENDIX A – INTERVIEW QUESTIONNAIRES

The following the document has seven different interview questionnaires. See below.

1. General Manager
2. Director, Corporate Social Responsibility
3. Security
4. Surveillance
5. GameSense
6. Gaming Floor
7. Treatment providers

SELF-EXCLUSION GENERAL MANAGER INTERVIEW QUESTIONS

1. What are the objectives of self-exclusion?

2. What is your role, when it comes to self-exclusion?

3. How do you help your staff understand the importance of self-exclusion to the business?

4. Other than through training, how is self-exclusion communicated to staff?

    a. Specifically, how is the policy communicated?
    b. How are the details of the program communicated?

5. Have there ever been issues with getting staff trained with ART? Please elaborate. How often are staff trained?

6. Concerning the casino's relationship with local treatment providers…

    a. Are there ever meetings or information sessions provided to educate treatment staff about self-exclusion?
    b. Do you see there being a benefit to this?

7. How does the process of registration at the head office differ from the casino based registration?

    a. Have there ever been problems related to having players registered at head office or other sites?
    b. What are the benefits?

    c. Is the suspension of the loyalty card and payout of points in the form of a cheque different?

    d. How do patrons learn about all the registration options?

8. Overall, what are the strengths of the program?

   Can you comment on the strengths of each of these areas?

    a. Registration/sign-up
    b. Promotion and patron knowledge of the program
    c. Detection of breachers
    d. Dealing with breaches
    e. Reinstatement into the venue
    f. Renewal of the ban
    g. Training of staff
    h. Linking casino gamblers to outside supports

9. Overall, what opportunities exist for improvement?

   Can you comment on the opportunities for improvement in each of these areas?

    a. Registration/sign-up
    b. Promotion and patron knowledge of the program
    c. Detection
    d. Dealing with breaches
    e. Reinstatement into the venue
    f. Renewal of the ban
    g. Training of staff
    h. Linking casino gamblers to outside supports

10. Overall, would you say that the program is working? Please elaborate?

    a. How do you measure the success of the self-exclusion program?

11. Right now, when a person breaches, they are escorted from the building and although they can be charged a fine, this rarely happens.

    a. What are your thoughts on having escalating consequences for repeat breaches?
    b. Do you feel this would be deterrent from breaching?
    c. What are your thoughts on how to reduce the number of repeat breaches?

12. Right now, when a person ban expires, they may simply re-enter the casino.

    a. What are your thoughts on having an active reinstatement process, where the player must attend a meeting with GameSense staff prior to returning to the venue to gamble?

    b. What are the upsides/downsides?

13. What are the future plans for self-exclusion?

14. Is there anything else that you can tell me about SE that I have missed?

SELF-EXCLUSION DIRECTOR OF SOCIAL RESPONSIBILITY INTERVIEW QUESTIONS

1. What are the objectives of self-exclusion?

2. Please describe the role you play in self-exclusion.

3. Have there ever been issues with getting staff trained with ART? Please elaborate. How often are staff trained?

4. Has BCLC ever consulted with treatment providers in developing/maintaining self-exclusion?

    a. Are there ever meetings or information sessions provided to educate treatment staff about self-exclusion?
    b. Do you see there being a benefit to this?

5. How does the process of registration at the head office differ from the casino based registration?

    a. Have there ever been problems related to having players registered at head office or other sites?
    b. What are the benefits?
    c. Is the suspension of the loyalty card and payout of points in the form of a cheque different?
    d. What percent of registrations take place at the head offices?
    e. How do patrons learn about registration options?

6. What are the objectives of having a GameSense staff person present at the registration?
    a. What percent of self-exclusion enrollment is a GameSense staff present?

7. How do you deal with language barriers?

8. Overall, what are the strengths of the program?

    Can you comment on the strengths of each of these areas?

    a. Registration/sign-up
    b. Promotion and patron knowledge of the program
    c. Detection of breachers
    d. Dealing with breaches
    e. Reinstatement into the venue
    f. Renewal of the ban
    g. Training of staff
    h. Linking casino gamblers to outside supports

9. Overall, what opportunities exist for improvement?

   Can you comment on the opportunities for improvement in each of these areas?

   a. Registration/sign-up
   b. Promotion and patron knowledge of the program
   c. Detection
   d. Dealing with breaches
   e. Reinstatement into the venue
   f. Renewal of the ban
   g. Training of staff
   h. Linking casino gamblers to outside supports

10. Overall, would you say that the program is working? Please elaborate?

    a. How do you measure the success of the self-exclusion program?

11. Right now, when a person breaches, they are escorted from the building and although they can be charged a fine, this rarely happens.

    a. What are your thoughts on having escalating consequences for repeat breaches?
    b. Do you feel this would be deterrent from breaching?
    c. What are your thoughts on how to reduce repeat breaches?

12. Right now, when a person ban expires, they may simply re-enter the casino.

    a. What are your thoughts on having an active reinstatement process, where the player must attend a meeting with GameSense staff prior to returning to the venue to gamble?
    b. What are the upsides/downsides?

13. What are the future plans for self-exclusion?

14. Is there anything else that you can tell me about SE that I have missed?

SELF-EXCLUSION SECURITY INTERVIEW QUESTIONS

1. Can you describe the role of security in the self-exclusion process?

2. Please tell me all the ways you have learned about self-exclusion (e.g., training, back of house messaging, meetings etc…)?
   a. Were you trained on how to talk to patrons about self-exclusion?
      i. Do you feel comfortable doing this? Please elaborate.
   b. Were you trained to respond to patrons in distress?
   c. Were you trained on how to enroll a patron in self-exclusion?
      i. Do you feel comfortable in your role in registering a patron?
   d. How did you find your training? Do you feel it adequately prepared you? Please elaborate.

3. Is the policy on self-exclusion readily available to security staff?

4. In your experience, if a patron approached a staff person wanting self-exclusion, how long does it take to get the process going?

5. What occurs in a situation where a significant other wants a patron banned from the casino?

6. Is the registration process as well as information received by patrons available in multiple languages?

7. If a person agreed to be referred to counselling what process do you follow to ensure that they get a call?

8. Are patrons given the chance to talk through issues if they need to?

9. How is the loyalty card suspended?
   a. How long does it take for the player to have their name removed from mailing lists
   b. How long does it take for the player to receive their points in a cheque form?

10. What information system is used to track self-exclusion?

    a. Is it linked with any other system, such as those used to document patron interactions?
    b. How does it work?
    c. Is there maintenance of the database?
    d. Are photos ever updated?

11. What tools are you provided to help detect SE breachers?

    a. Please describe the process you follow when you or someone else detects a breacher?
        i. Who is involved and what happens?
        ii. How are the breaches documented?
    b. How often are people charged for trespassing?

12. What is the renewal process for self-exclusion?
    a. Can a renewal take place outside of the venue?
    b. Are PG resources provided to the patron when they renew?

13. If all systems were down and a self-exclusion was requested, what process would you follow?

14. Are patrons ever told they have the option of registering at the head office? How do patrons learn about this?

15. What are the objectives of having a GameSense staff person present at the registration?
    a. What percent of self-exclusion enrollment is a GameSense staff present?
    b. What are the benefits?
    c. Are there any downsides?

16. Overall, what are the strengths of the program?

    Can you comment on the strengths of each of these areas?

    a. Registration/sign-up
    b. Promotion and patron knowledge of the program
    c. Detection of breachers
    d. Dealing with breaches
    e. Reinstatement into the venue
    f. Renewal of the ban
    g. Training of staff
    h. Linking casino gamblers to outside supports
    i. Your role in self-exclusion

17. Overall, what opportunities exist for improvement?

    Can you comment on the opportunities for improvement in each of these areas?

    a. Registration/sign-up
    b. Promotion and patron knowledge of the program
    c. Detection
    d. Dealing with breaches

e. Reinstatement into the venue
f. Renewal of the ban
g. Training of staff
h. Linking casino gamblers to outside supports
i. Your role in self-exclusion

18. Overall, would you say that the program is working? Please elaborate?

19. Right now, when a person breaches, they are escorted from the building and although they can be charged a fine, this rarely happens.

   a. What are your thoughts on having escalating consequences for repeat breaches?
   b. Do you feel this would be deterrent from breaching?
   c. What are your thoughts on how to reduce the number of repeat breaches?

20. Right now, when a person ban expires, they may simply re-enter the casino.

   a. What are your thoughts on having an active reinstatement process, where the player must attend a meeting with GameSense staff prior to returning to the venue to gamble?
   b. What are the upsides/downsides?

21. Is there anything else that you can tell me about SE that I have missed?

SELF-EXCLUSION SURVEILLANCE INTERVIEW QUESTIONS

1. What are the objectives of self-exclusion?

2. Would you say that it is working? Please elaborate.

3. Can you describe your role in the self-exclusion process?

4. Please tell me all the ways you have learned about self-exclusion (e.g., training, back of house messaging, meetings etc…)?

5. If you wanted to see the policy on self-exclusion, would you know where to find it?

6. Can you describe the process you follow when you identify a self-excluded person on the gaming floor?

7. What are the ways that you have generally identified a breach? Comment on what ways are most successful. How does the license plate recognition compare to the other methods, what are the strengths and weaknesses?

8. Overall, what are the strengths of the program?

   Can you comment on the strengths of each of these areas?
      a. Detection of breachers
      b. Dealing with breaches

9. Overall, what opportunities exist for improvement?

   Can you comment on the opportunities for improvement in each of these areas?
      a. Detection
      b. Dealing with breaches

10. Right now, when a person breaches, they are escorted from the building and although they can be charged a fine, this rarely happens.
      a. What are your thoughts on having escalating consequences for repeat breaches?
      b. Do you feel this would be deterrent from breaching?
      c. What are your thoughts on how to reduce repeat breaches?

11. Right now, when a person ban expires, they may simply re-enter the casino.

     a. What are your thoughts on having an active reinstatement process, where the player must attend a meeting with GameSense staff prior to returning to the venue to gamble?

     b. What are the upsides/downsides?

12. Is there anything else that you can tell me about SE that I have missed?

SELF-EXCLUSION GAMESENSE INTERVIEW QUESTIONS

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

2. Can you describe your role in self-exclusion?

3. How knowledgeable do you feel about the policy on self-exclusion?

    a. How did you learn about it?
    b. Do you have access to the policy?

4. What training have you received when it comes to the self-exclusion registration process?

    a. Do you feel adequately trained for the role you play in the registration?
    b. Have you been trained on how to speak to with players who are self-excluding?
    c. Have you been trained on how to handle situations when a player is experiencing distress?
    d. What is your experience with training casino staff on self-exclusion?

5. Approximately what % of SEs are GameSense staff involved in? OR.. On average how many SEs are GameSense staff involved in?

    a. What are your objectives when involved in the registration process?

6. Do you discuss the community resources available? If so, what ones do you rely on most in your area?

    a. How receptive do you find the patrons?

7. What is the nature of your relationship with local treatment providers?

8. How many times have you been involved with a customer who has breached their agreement?

    a. Can you describe your role?
    b. What if anything would you change

9. Thinking outside of the registration process, is it common to talk to a customer about self-exclusion, either on the gaming floor or at the GameSense booth?

    a. What type of information is provided?

10. Overall, what are the strengths of the program?

Can you comment on the strengths of each of these areas?

    a. Registration/sign-up
    b. Promotion and patron knowledge of the program
    c. Detection of breachers
    d. Dealing with breaches
    e. Reinstatement into the venue
    f. Renewal of the ban
    g. Training of staff
    h. Linking casino gamblers to outside supports
    i. GameSense staff role in self-exclusion

11. Overall, what opportunities exist for improvement?

Can you comment on the opportunities for improvement in each of these areas?

    a. Registration/sign-up
    b. Promotion and patron knowledge of the program
    c. Detection
    d. Dealing with breaches
    e. Reinstatement into the venue
    f. Renewal of the ban
    g. Training of staff
    h. Linking casino gamblers to outside supports
    i. GameSense staff role in self-exclusion

12. Would you say the program is working? Please elaborate.

13. Right now, when a person breaches, they are escorted from the building and although they can be charged a fine, this rarely happens.

    a. What are your thoughts on having escalating consequences for repeat breaches?
    b. Do you feel this would be deterrent from breaching?
    c. Thoughts on how to reduce the number of repeat breaches?

14. Right now, when a person ban expires, they may simply re-enter the casino.

    a. What are your thoughts on having an active reinstatement process, where the player must attend a meeting with GameSense staff prior to returning to the venue to gamble?
    b. What are the upsides/downsides?

15. Is there anything else that you can tell me about SE that I have missed?

SELF-EXCLUSION **G**AMING **F**LOOR **I**NTERVIEW **Q**UESTIONS

1. Can you describe your role in the self-exclusion process?

2. Please tell me all the ways you have learned about self-exclusion (e.g., training, back of house messaging, meetings etc…)?
   a. Were you trained on how to talk to patrons about self-exclusion?
      i. Do you feel comfortable doing this? Please elaborate.
   b. Were you trained to cope with patrons in distress?
   c. Were you trained on how to enroll a patron in self-exclusion?
      i. Do you feel comfortable in your role in registering a patron?
   d. How did you find your training? Do you feel it adequately prepared you? Please elaborate.

3. If you wanted to see the policy on self-exclusion, would you know where to find it?

4. In your experience, if a patron approached a staff person wanting self-exclusion, how long does it take to get the process going?

5. Are you involved in detecting people who breach their agreement?

   a. What tools are you provided to help detect SE breachers?

6. What occurs in a situation where a significant other wants a patron banned from your casino?

7. Overall, what are the strengths of the program?

   Can you comment on the strengths of each of these areas?

      c. Registration/sign-up
      d. Promotion and patron knowledge of the program
      e. Detection of breachers
      f. Dealing with breaches
      g. Reinstatement into the venue
      h. Renewal of the ban
      i. Training of staff
      j. Linking casino gamblers to outside supports

8. Overall, what opportunities exist for improvement?

   Can you comment on the opportunities for improvement in each of these areas?

      a. Registration/sign-up

b. Promotion and patron knowledge of the program
c. Detection
d. Dealing with breaches
e. Reinstatement into the venue
f. Renewal of the ban
g. Training of staff
h. Linking casino gamblers to outside supports

9. Overall, would you say that the program is working? Please elaborate?

10. Is there anything else that you can tell me about SE that I have missed?

SELF-EXCLUSION TREATMENT PROVIDER INTERVIEW QUESTIONS

1. What is your experience with self-exclusion at the local casinos?

2. Generally speaking, can you describe SE and how it works?

3. What would you say is the role of self-exclusion?

4. What is the treatment agencies relationship with the local casino?

5. Have you ever recommended self-exclusion to any of your clients? Please elaborate.
   a. Under what circumstances
   b. If not, why so?

6. Overall, what proportion of your clients come to you having already self-excluded?

7. Can you comment on the effectiveness of self-exclusion? For example, have you found that your clients have benefited from it?

8. Have any of your clients ever commented on the self-exclusion registration process as being a positive or negative experience. Please elaborate.

9. Have you had clients who breached their agreement?
   a. If so, what do you think are the biggest issues that contribute to a patron who breaches?

10. What do you think are the best strategies for the casino to link casino patrons to local help resources?

11. Overall, what are the strengths of the program?

    Can you comment on the strengths of each of these areas?

        j. Registration/sign-up
        k. Promotion and patron knowledge of the program
        l. Detection of breachers
        m. Dealing with breaches
        n. Reinstatement into the venue
        o. Renewal of the ban
        p. Training of staff
        q. Linking casino gamblers to outside supports

12. Overall, what opportunities exist for improvement?

Can you comment on the opportunities for improvement in each of these areas?

- j.　Registration/sign-up
- k.　Promotion and patron knowledge of the program
- l.　Detection
- m.　Dealing with breaches
- n.　Reinstatement into the venue
- o.　Renewal of the ban
- p.　Training of staff
- q.　Linking casino gamblers to outside supports

13. Overall, would you say that the program is working? Please elaborate?

14. Right now, when a person breaches, they are escorted from the building and although they can be charged a fine, this rarely happens.

- d.　What are your thoughts on having escalating consequences for repeat breaches?
- e.　Do you feel this would be deterrent from breaching?
- f.　What are your thoughts on how to reduce the number of repeat breaches?

15. Right now, when a person ban expires, they may simply re-enter the casino.

- c.　What are your thoughts on having an active reinstatement process, where the player must attend a meeting with GameSense staff prior to returning to the venue to gamble?
- d.　What are the upsides/downsides?

16. Is there anything else that you can tell me about SE that I have missed?