

# Casino and Racing Entertainment Centre Voluntary Self-Exclusion Program Evaluation

## EXECUTIVE SUMMARY

The Alberta Gaming and Liquor Commission (AGLC) has conducted a comprehensive evaluation of its *Casino and Racing Entertainment Centre (REC) Voluntary Self-Exclusion (VSE) Program*. The program evaluation was the largest and most extensive formal evaluation ever conducted regarding casino voluntary self-exclusion programs.

### ***Purpose and Objectives***

The purpose of the Casino/REC VSE program evaluation research was to examine the current systems, processes and procedures used to support the delivery of the Alberta Casino/REC VSE program and to determine opportunities for improvement. This would include determining program objectives and assessing the effectiveness of the current program's design and implementation. Key program goals, objectives, and outcomes were to be determined through collaboration with key stakeholders. Relevant performance indicators, measures and targets would be developed based on the evaluation results.

Key objectives included:

1. Identifying the best practices in other jurisdictions along with other opportunities for program improvement.
2. Clarifying and documenting current systems, processes and procedures through which the program is currently being delivered.
3. Clarifying and documenting the Alberta Casino/REC VSE Program goals, objectives and desired outcomes.
4. Identifying key performance indicators and developing a set of reasonable performance measures by which to gauge program performance.
5. Identifying gaps between actual and intended process outcomes and recommending modifications to improve program effectiveness.

Key deliverables for the project were a list of program improvement recommendations, a program logic model and program template.

### ***Evaluation Type***

The Casino/REC VSE Program evaluation was conducted internally by AGLC administration in collaboration with AADAC and external stakeholders. Key stakeholders, including program clients, significant others, program administrators, casino management and security staff, gambling researchers, problem gambling treatment professionals, responsible gambling service providers, gaming suppliers and the legal profession, were an integral part of the evaluation process.

A formative (process) evaluation approach was taken to determine opportunities for program improvement. VSE program “best practices” were identified and compared to the Alberta program in order to identify programming gaps.

### ***Evaluation Design***

The objectives of this review were met through a mixed design that included both qualitative and quantitative measures. The evaluation design was comprised of three primary methods of data collection including: (1) cross-jurisdictional and program client surveys, (2) focus groups with VSE program staff, casino management and program client’s spouses and relatives (“significant others”) and (3) key informant interviews. A variety of data collection tools were developed and used to collect relevant information from program clients and other key stakeholders. This methodological triangulation was conducted in order to help check and establish the validity of the evaluation results.

### ***Ethical and Privacy Considerations***

The ethical and privacy considerations of program clients were of primary importance. All survey respondents were guaranteed anonymity. In addition, survey respondents, focus group participants and key informants were advised of the exact nature of his/her participation in the project, as well as who would have access to their personal information and how the information will be used. Respondents were advised of their right to refuse to participate or to withdraw at any time without implication to their ongoing participation in the Casino/REC VSE program. All responses and comments to any inquiries were recorded without attribution to the respondent. The research plan complied with all applicable sections of the *Freedom of Information and Protection of Privacy Act*.

### ***Summary of Key Findings***

The Casino/REC VSE Program Evaluation Stakeholder Advisory Committee reviewed the results of the cross-jurisdictional survey, VSE program client survey, focus groups and key informant interviews. Based on their analysis, the Committee determined a number of the key findings including VSE program “best practices” and “programming gaps”.

### **Best Practices**

The following VSE best practices were identified

#### **VSE is used as a Gateway to Treatment**

The Casino/REC VSE program is a significant first step for individuals who are concerned with their gambling behaviour. Most jurisdictions provide some form of referral services to VSE program clients. However the types of referral and consistency of the information provided vary by jurisdiction. Nevertheless, it is widely held that this service is a key feature of any effective VSE program.

#### **Variable length of agreement terms are offered**

Although the length of VSE contracts is not consistently applied, most jurisdictions offer a number of different enrollment terms ranging from three months to a lifetime VSE.

Evidence would suggest that the terms, such as a lifetime VSE, are more effective in assisting some VSE program clients to regain control of their gambling behaviour. There is some debate regarding the effectiveness of short-term VSE terms.

### **Violation penalties are well communicated**

Most jurisdictions have penalties in place to discourage VSE program clients from re-entering a casino or REC. There are two Canadian provinces that do not have any penalties for violating the VSE agreement. In general, multiple breaches may lead to trespassing or other charges being laid. The penalties range from a small fine to large fines of up to \$10,000 and the potential for prison time. The size or type of penalty actually imposed is deemed to be less important than the threat of potential stiff penalties in order to deter the chronic offender.

### **VSE program client databases are effectively used**

As VSE program utilization rates increase, the need for an effective system to collect VSE program client data and disseminate this information to other gaming facilities is essential. Most jurisdictions are considering upgrading their systems to enable more sophisticated searching and monitoring capabilities.

### **Mandatory training for program staff is provided**

The enrollment process is an opportune time to provide additional information and referral services to VSE program clients. At the same time, it is important that the roles and responsibilities of the VSE program client, regulator and gaming facility are clearly explained and well understood. This process can be an important factor in helping to mitigate any liability exposure as a result of offering the VSE program.

## **Casino/REC VSE Program Gaps**

The following Casino/REC VSE programming gaps were identified:

### **No lifetime enrolment option**

There is no provision for a lifetime VSE term. A significant number of VSE program clients indicate they would have selected this option if it were available.

### **No mandatory referral services are provided**

Some jurisdictions require the enrollment process to follow a defined script that includes offering to refer the VSE program client to a problem gambling treatment service. Most provide a variety of information regarding other support services that are available. In Alberta, these procedures are not consistently applied.

### **Communication of penalties is weak**

In Alberta, VSE program clients who violate their agreement are charged with an offence under Section 70 of the *Gaming and Liquor Act* (GLA). According to the Act, the maximum penalty can be a fine of up to \$10,000 or six months in jail. However, judges typically award a much smaller fine. Most jurisdictions reference the upper-range of penalties in their VSE program materials in order to help deter VSE program clients from violating their agreement.

### **Mandatory training is not provided**

Currently, there is no mandatory requirement for casino staff to take any training regarding the VSE program. Although training was provided when the VSE program was implemented, there has been no follow up training with casino staff. Certain elements of the VSE program have changed and there is generally a high turnover among casino staff.

### **Mandatory ID checks and Jackpot Forfeiture regulations are not required**

Some jurisdictions require casino patrons to provide identification upon entry. Other jurisdictions conduct random checks or require identification to be provided at natural checkpoints such as jackpot wins and cashier transactions. In some jurisdictions, jackpots won by VSE program clients are forfeited and instead directed to a designated problem gambling treatment provider.

### **Technological systems are not used to aid detection**

Facial recognition systems are currently in use in a number of jurisdictions. These systems are typically used to identify gambling cheats and other undesirables but have become increasingly useful as a detection tool for VSE programs. Other types of technological options to aid detection are being considered. Most report that the effectiveness of these systems is suspect or may not be publicly acceptable. However, the development of other biometric technologies (e.g. retinal scans, fingerprints, voice recognition) and growing public acceptance of tighter identification controls may make these systems more viable in the future.

## ***Recommendations***

In collaboration with key stakeholders involved in the program evaluation process, a total of 22 recommendations were developed in the following programming categories:

### **Administration**

#### **#1 - Designated Casino/REC VSE program contacts**

Casino and REC facilities should be required to designate a key contact for the Casino/REC VSE program in their gaming facility. All information related to VSE program changes should be directed to the designated contact. The contact should be responsible for overseeing the Casino/REC VSE program in their gaming facility and attend any related meetings as required. VSE program clients and significant others should be advised who the designated contact is for the gaming facility during the enrollment process.

#### **#2 - Enhance the role of Responsible Gaming Information Centres**

Responsible Gambling Information Centre (RGIC) workers should be the designated VSE contact for the casino in which they are located.

## **Program Promotion**

### **#3 - Improve Casino/REC VSE program advertising and promotion**

More should be done to promote the Casino/REC VSE program to gaming patrons and the general public. This could include mass media such as TV and radio public service announcements and other communication channels such as problem gambling treatment centers, physician's offices, and other support service.

### **#4 - Mandatory VSE signage**

VSE posters and brochures should be required to be prominently displayed in all casino and REC facilities.

### **#5 - Expand the Casino/REC VSE program to other gaming facilities *(This recommendation has been deferred pending the outcome of the Quebec VSE evaluation which is currently reviewing the effectiveness of VSE programs at VLT venues).***

The Casino/REC VSE program should be expanded to include a pilot test at other locations such as licensed bingo facilities and Video Lottery Terminal (VLT) Gaming Entertainment Rooms (VGERS).

### **#6 - Mandatory removal of VSE program clients from loyalty program mailing lists**

Casinos should be required to remove VSE program clients from all mailing and distribution lists related to loyalty programs or other promotions.

## **Training**

### **#7 - Mandatory training for designated Casino/REC VSE program contacts**

Designated VSE contacts should be required to attend a VSE training course. Course content should include: VSE program rules and regulations; the respective roles of the VSE program client, AGLC and casino/REC operator; how to conduct a VSE program client interview and complete the VSE agreement; the types of support services available; how to approach a VSE program client suspected of violating the agreement; and information respecting the use of the VSE database and other detection techniques. Refresher training should also be required on a regular basis.

### **#8 - Mandatory Re-entry Program**

VSE program clients should be required to attend a responsible and problem gambling awareness training program prior to the expiration of the VSE in order to be permitted entry to a casino or REC. Existing VSE program clients would be grandfathered from having to take this training.

### **#9 - Upgrade Casino/REC VSE program information in staff training programs**

Information provided to casino and REC gaming staff during mandatory training sessions should include more information regarding the Casino/REC VSE program. All casino and REC staff should be fully aware of the VSE program rules, how the program works, and who the designated contact is in their gaming facility.

## **Enrollment and Registration**

### **#10 - Mandatory Referral Process**

VSE staff should be required to offer to arrange for a referral to an AADAC problem gambling counsellor. In addition, information regarding responsible and problem gambling, household budgeting and financial planning, and other support services available should be provided for both the VSE program client and significant others. The interview exchange should be scripted. The VSE program client should be required to acknowledge in writing that these referral services and information packages were offered.

### **#11 - Lifetime Enrollment Option**

The Casino/REC VSE program terms should be changed to include a lifetime exclusion option.

### **#12 - VSE agreement amendments**

The VSE agreement should be amended so that VSE program clients can elect to opt in or out of any future VSE program evaluations or related research studies. VSE program clients should be required to authorize contact by an AADAC counsellor as required. A VSE program client should also be able to voluntarily provide the contact information for a significant other and authorize their contact as required by VSE program administrator.

### **#13 - Modify the 48 Hour “cooling off period” process**

A VSE program client should be able to rescind the agreement within the first two (2) days of enrollment. This should be done in person at the original location where the VSE program client enrolled in the VSE program.

### **#14 – Send information to VSE program clients prior to agreement expiry**

VSE program clients should be sent a letter inviting them to re-enroll in the VSE program prior to the agreement expiry. This letter should also advise them of their requirement to attend a responsible and problem gambling awareness training program in order to be permitted entry to a casino or REC. An exit survey should also be enclosed requesting feedback on their experience with the VSE program for evaluation purposes.

## **Program Monitoring**

### **#15 - Case management approach**

VSE program clients should be required to authorize an AADAC counsellor to contact them as required for follow up purposes.

### **#16 - The VSE enrollment process should be regularly monitored**

Random audits of the enrollment process should be conducted to ensure compliance with the mandatory referral process. This could be done through “mystery shoppers” or by following up with new VSE program clients through satisfaction surveys.

### **#17 - Upgrade the Casino/REC VSE program client database**

The Casino/REC VSE program client database should be upgraded to provide a variety of additional search and reporting capabilities.

## **Detection and Enforcement**

### **#18 - Investigate options to improve the VSE program client detection**

More needs to be done to identify VSE program clients that violate their agreement. Facial recognition and other card-based systems for player loyalty programs, gaming facility entry (i.e. membership), or play on electronic gaming machines should be explored. The use of portable hand-held devices that contain VSE program client information and photographs should be investigated. Simple approaches such as random identification checks, mandatory identification at natural check points followed by cross-referencing to the VSE database should be a minimum requirement.

### **#19 - Establish VSE program Client Detection Committees**

In communities or regions with multiple VSE gaming facilities, VSE program client Detection Committees should be formed to share information regarding violations. Regular meetings and/or informal networking should be encouraged in order to improve the detection of VSE program clients who violate their agreement. This could include the creation of a “watch list” for high risk and chronic offenders.

### **#20 - Standardize the procedures for successive violations**

VSE program clients should be sent a letter by the AGLC advising they may be subject to penalties the first time they are reported as having violated the VSE agreement. The letter should advise the VSE program client to seek problem gambling treatment and the consequences for successive violations. On the second violation, they should be sent another letter from the AGLC and contacted by an AADAC counsellor. VSE program clients should be automatically charged for a third violation. Chronic offenders should be expelled from the VSE program on the fourth violation, subject to a lifetime ban at all licensed gaming facilities, and charged with an offence for each successive violation.

### **#21 - Implement a fine option program**

A VSE program client who is charged with an offence should be able to attend a problem gambling counselling session in lieu of a fine. Verification of attendance must be provided by the required date.

### **#22 - The penalty for agreement violation should be clearly communicated**

All printed materials and VSE program information provided to VSE program clients should clearly identify the maximum penalties for chronic offenders. In addition, VSE program materials should reference that gaming facilities are also subject to penalties for not enforcing the agreement.

## Conclusion

The Casino/REC VSE program evaluation has successfully met its objectives and provided the stated deliverables as follows:

**Objective 1** was accomplished through a comprehensive literature search and by surveying and collecting material regarding VSE programs across Canada.

**Objective 2** was accomplished by conducting focus groups with Casino/REC VSE program staff, AGLC inspectors, and casino management and staff. Based on this information a Project Template was developed to describe key aspects, processes and procedures of the VSE program.

**Objectives 3 & 4** were accomplished by consulting with a wide range of VSE program stakeholders, including VSE program clients, significant others, Casino/REC VSE program staff and enforcement, casino management and staff, gambling researchers, problem gambling treatment professionals, responsible gambling service providers, gaming industry leaders, and legal professionals. Based on this information a Program Logic Model was developed that articulated program goals, objectives and desired outcomes. Key performance measures, indicators and targets were established.

**Objective 5** was accomplished using a diverse Stakeholder Advisory Committee to review current best practices in comparison to existing VSE program features to identify program gaps. Recommendations were developed by the Committee to address these gaps and to improve overall process outcomes and VSE program effectiveness.

The AGLC Casino/REC VSE program clearly has value, but requires the 22 recommended modifications be implemented to ensure it can achieve the VSE programs objectives and intended outcomes.