

Produced the Gambling Commission in April 2018

## **Project 7.1: Evaluation of the impact of Multi-Operator Self-Exclusion Schemes and awareness and barriers to self-exclusion**

### **Introduction**

1. A significant amount of investment is taking place in multi-operator self-exclusion schemes. It will be important to understand the impact of this investment on gambling-related harms. As well as evaluating the effectiveness of these schemes, it may also be necessary to understand, across all sectors, consumers' awareness of self-exclusion and barriers to its use.
2. This brief sets out the requirements for an evaluation of the ongoing impact of introducing multi-operator self-exclusion schemes. This will incorporate and be an enhancement of Project 7.1 in the [RGSB Research Programme 2017-2019](#), which falls under priority action 7 in the [National Responsible Gambling Strategy](#).
3. This research will evaluate gamblers' awareness and perceptions of self-exclusion, and the impact of multi-operator schemes that have been developed for the arcade, betting, bingo and casino sectors. This will include establishing a theory of change and research methodology for the evaluations.

### **Research governance**

4. In September 2016, the Responsible Gambling Strategy Board (RGSB) and GambleAware published a Research Commissioning and Governance Procedure which describes how research priorities are set and how research programmes are commissioned under the tripartite agreement between the Board, GambleAware and the Gambling Commission (the Commission)<sup>1</sup>. The purpose of the Procedure is to give transparency about the arrangements and to provide assurance that research priorities are set independently and are delivered with integrity.
5. The Research Procedure makes clear that the Responsible Gambling Strategy Board, not GambleAware, is responsible for producing the briefs that set out the questions and context for the research that is then commissioned by GambleAware.

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<sup>1</sup> [Research Commissioning and Governance Procedure](#), Responsible Gambling Strategy Board, September 2016

## Background and policy context

6. Self-exclusion is a service that every operator is required to offer. Self-exclusion allows a customer to request that an operator takes all reasonable steps to prevent them from gambling for a period of time (minimum six months) and cease to send them marketing materials unless they opt to receive them again once the self-exclusion has elapsed.
7. Self-exclusion is widely accepted as an important harm minimisation tool for those that have recognised that they have a problem with their gambling. The requirement for all licensees to have and put into effect procedures for self-exclusion (and to take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling) has been included in the Commission's Licence Conditions and Codes of Practice (LCCP) from the outset. The relevant social responsibility code provisions (3.5.1 and 3.5.3) are supported by further detail and examples of good practice included within ordinary code provisions.
8. Until April 2016 if an individual wished to self-exclude entirely from gambling they needed to do so separately with each operator they gamble or might gamble with. The ease with which consumers could continue to gamble at other venues, sites, operators, sectors or jurisdictions was a significant criticism highlighted in research published by GambleAware (formerly the Responsible Gambling Trust) on self-exclusion in relation to both-land based and online gambling<sup>2</sup>. The research recommended that 'we find compelling justification for continuing to explore the opportunities for connecting self-exclusion across venues and operators. This in our view represents a key priority for strengthening self-exclusion and harm minimisation more generally.'
9. Since April 2016, following a public consultation, the Commission have required all non-remote operators in the land-based arcade, betting, bingo and casino sectors to participate in multi-operator self-exclusion schemes, in addition to offering their own schemes<sup>3</sup>. The multi-operator schemes were developed and managed by the industry and allow customers to exclude from multiple operators with a single request from that sector. Details of the current schemes are as follows:
  - [Self-Enrolment National Self-Exclusion](#) (SENSE) allows people who believe they have a problem with their gambling to voluntarily enrol in a scheme to exclude themselves nationally from all land-based **casinos** in the UK.
  - [The Bingo Industry Self-Exclusion Scheme](#) enables people to request exclusion from all land-based licensed **bingo** premises across Great Britain
  - The [Multi Operator Self Exclusion Scheme for Betting Shops](#), run by a subsidiary of the Senet Group, allows people to self-exclude from **betting** shops centrally with more than one operator.

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<sup>2</sup> [Self-exclusion as a Gambling Harm Minimisation Measure in Great Britain](#) (J Parke and J Rigbye, 2014)

<sup>3</sup> In 2015 the Commission also recognised that the ultimate goal would be to implement one cross-sector multi-operator scheme. Whilst this wasn't deemed feasible at the time, it would be valuable to get some insight into the value of such a facility from this evaluation.

- [Bacta](#) and Smart Exclusion have also launched a multi-operator self-exclusion scheme for the **arcades** sector. Although there is a single scheme, sharing a single database, there are two suppliers in the arcades sector offering operators different tools to administer self-exclusions.
10. The online sector are developing (and will manage) an **online** multi-operator scheme which will be available in 2018. This will allow customers to self-exclude in one place from all online gambling (except for society lotteries that do not offer Instant Win Games) legally offered to consumers in Great Britain with a single request. Camelot will also participate in this scheme for their online Instant Win Games.
11. The Commission, RGSB, and GambleAware want to ascertain the impact and effectiveness of these schemes. Following discussions with the industry, RGSB and GambleAware, the Commission decided that the most effective approach would be to commission a single evaluation that would consider each of the five schemes. The research will be used to inform regulatory policy or good practice guidance and will also be used by industry to improve the functioning of the schemes.

## Related research

12. GambleAware funded research in this area includes:
- [Self-exclusion as a Gambling Harm Minimisation Measure in Great Britain](#) (J Parke and J Rigbye, 2014)
  - [Operator-Based Approaches to Harm Minimisation in Gambling](#) (A Blaszczyński, A Parke, J Parke, J Rigbye, 2014)
  - [Evaluation of the Multi-Operator Self-Exclusion Scheme \(MOSES\)](#) (Chrysalis Research, 2017)
13. In addition the Commission reported in [Gambling participation in 2017: behaviour, awareness and attitudes](#) (2018) that:
- 41% of gamblers were aware of self-exclusion, but only 6% had ever self-excluded.
  - On average those who have self-excluded have done so from two companies.
  - 54% of those who had self-excluded did so to help control the amount they were gambling overall (as opposed to with a particular company).

## Research objectives

14. This research project should meet the following core objectives:
1. Evaluate gamblers' awareness and perception of self-exclusion, and of the multi-operator schemes
  2. Evaluate whether there are barriers to participating in self-exclusion and the multi-operator schemes
  3. Evaluate how effective multi-operator schemes have been as a harm minimisation tool for different kinds of participants, including whether this

changes when combined with other interventions (e.g. participation in a form of treatment)

4. Evaluate whether or not there is a cumulative impact of being registered to more than one multi-operator scheme
  5. Identify any improvements that could be made to the schemes to improve effectiveness and explore whether a cross-sector multi-operator scheme would be viable
15. We encourage prospective bidders to develop innovative and flexible approaches to meeting these objectives, however we have outlined below what we deem the scope of this project to be and some suggestions and guidance taken from our [Evaluation Protocol](#).

## Research scope

16. We envisage that the first phase of this research will begin to answer the first two research objectives (potentially via a survey of gamblers and qualitative research for insight and understanding), as well as the development of a theory of change and tailored evaluation methodologies for each sector. There may also be the opportunity to conduct a counterfactual study with online gamblers ahead of the launch of the upcoming online multi-operator scheme, depending on project timescales and the ultimate launch date for the scheme.
17. The second phase of the research would then involve conducting process and impact assessments of multi-operator schemes, followed by a third phase revisiting gamblers' awareness and perception of self-exclusion and multi-operator schemes, and barriers to participating, once the schemes have been embedded.
18. A [set of principles](#) have been produced to help support evaluation of the schemes which outline the features that the Commission and RGSB consider should be included in effective evaluations of multi-operator schemes. We would want the successful contractor to take account of these principles in developing their plans for undertaking this work.
19. We have developed the principles with the [National Responsible Gambling Strategy](#) and the Evaluation Protocol in mind, and we expect that the successful bidder/s will devise a methodology that is consistent with these principles. In the first phase of the research, teams will be expected to develop a theory of change, propose and justify their evaluation methodology and ethics, assess existing data and set up additional data collection. Key elements of these principles are set out below.

## Data collection

20. These principles cover how the sample for the impact assessments should be sourced, how reflective it should be of the scheme user population as a whole, and how the assessment of impact should be analysed and refreshed:
- Interview sample should be as representative as possible of all scheme users

- Data will need to be extrapolated and weighted where scheme user profiling information is available. Sample size for surveys therefore need to be sufficiently robust to allow for this.
- The methodology used should allow data to be refreshed following the initial impact assessments, to provide an assessment of scheme impact over time.

21. The following principles set out what data we feel would need to be fed into the process and impact evaluations:

- Management information data (where available):
  - Number of individuals registered on the individual schemes
  - Individual's use of multiple MOSE schemes
  - Number of individuals who have returned to gambling following MOSES period
  - Number of breaches of MOSES (where customers have been able to gamble while self-excluded)
- Feedback from scheme users:
  - Why did they sign up to MOSES?
  - What would they have done if MOSES was not available?
  - Changes to behaviour since signing up and impact of these changes
  - Whether or not they believe the scheme made a difference
  - Interaction of scheme impact with any other interventions or treatment
  - Assessment of problem gambling status<sup>4</sup>
  - History of the scheme user's self-exclusion:
    - Have they self-excluded from individual operators previously, and was this effective?
    - Have they attempted to gamble whilst self-excluded and have they been able to do so?
    - Have they received any direct marketing material during their self-exclusion from operator that they had self-excluded from?
  - Customer satisfaction with the scheme service / interface
  - Future intentions for gambling behaviour/self-exclusion
  - Wider impact of changes on mental wellbeing, family, work/study and relationships

### **Protecting self-excluded respondents**

22. We recognise the inherent vulnerability present in a sample of currently self-excluded respondents. As such we have developed some principles to ensure as far as possible these respondents are protected from harm. These principles are designed to safe-guard the scheme user as far as possible and ensure that taking part in the research is not an uncomfortable experience for them:

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<sup>4</sup> Ideally via the full PGSI screen but via the PGSI mini-screen if this is not practical

- Research will be conducted according to established ethical standards for social research, having regard to the specific circumstances of the gambling sector.
- Researchers should only conduct interviews when they have obtained informed consent.
- Researchers should state at the start of the interview that if respondents do not wish to answer any questions they do not have to.
- Researchers should advise the respondent that if they want to talk to anyone further about any of the issues raised they can contact a range of support agencies, and signpost the respondent to these if they are interested.

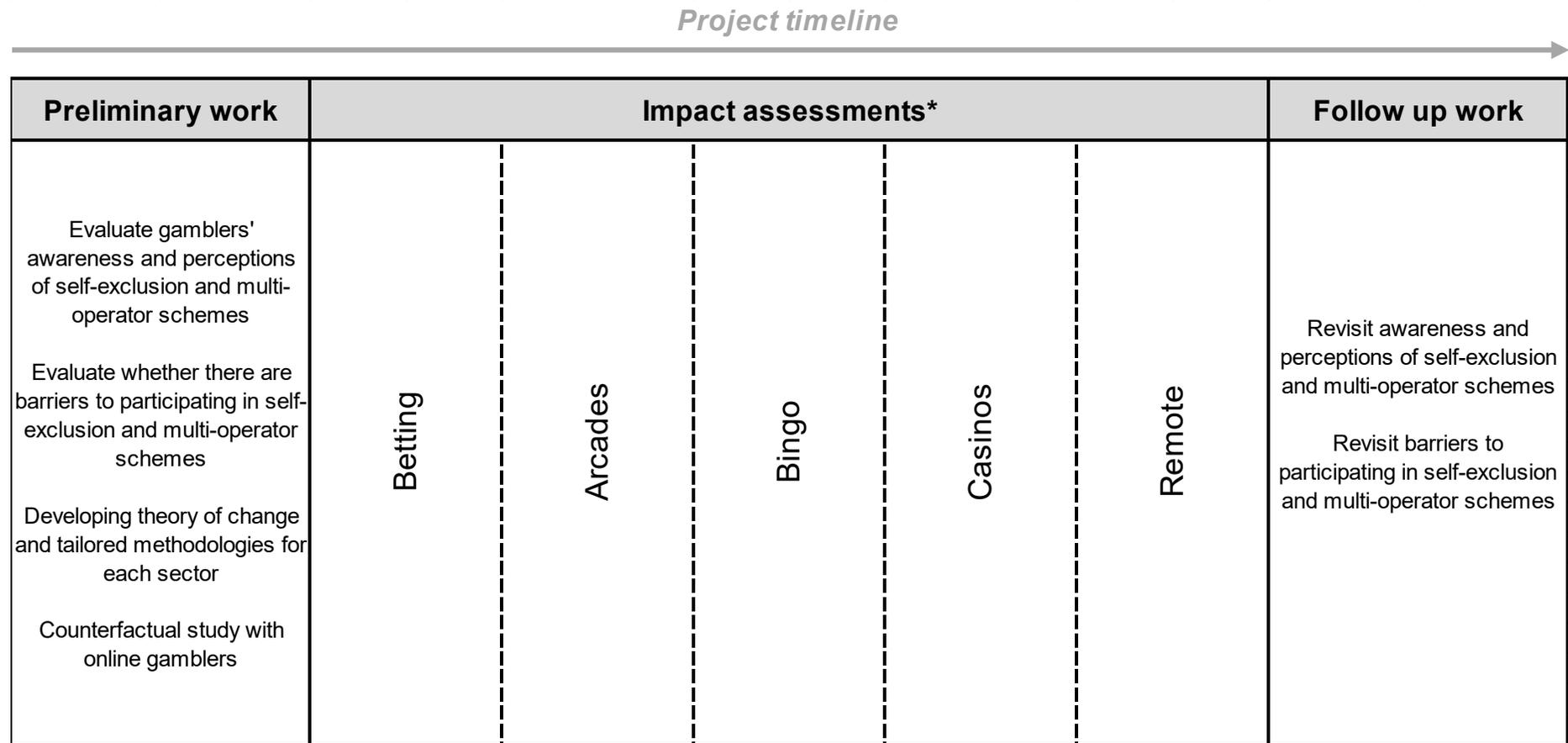
23. Furthermore, as per the GambleAware policy, the appointed supplier will be required to obtain ethical approval from an appropriate research ethics committee independent from the research team.

### **Considerations**

24. There are some constraints in relation to access to a sample group of participants of the schemes. Currently only the betting sector have a cohort of participants that have agreed to be contacted at a later date. The online sector will ask people when their scheme goes live (they are currently planning to launch in Spring 2018).
25. The arcade (2,462 self-exclusions since April 2016), bingo (1,187 self-exclusions in the last 12 months) and casino schemes (10,761 self-exclusions since August 2015) are not currently asking people if they would be prepared to be re-contacted for further research. This is something that they will start doing this year.
26. Given these constraints the interviews with participants will need to be undertaken in the second phase of this research, with sector evaluations staggered depending on the availability of sample. Figure 1 in the Annex provides a suggested approach to sequencing the different work elements.
27. We would also like to contact participants of single operator only self-exclusion schemes, to find out why they wanted to self-exclude just from a single operator rather than join a MOSE scheme and whether there were any barriers to MOSE schemes for those who might benefit. At the moment no operator asks participants whether they would be prepared to be contacted at a later date. It is possible therefore these participants could be sampled as part of the survey of self-excluded gamblers exploring awareness and barriers, or via existing gambling surveys.

# Annex

Figure 1: Potential project sequencing



\* Likely to overlap with staggered start dates, as opposed to running sequentially