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Online Self- Exclusion – Recommended Code of Practice

CLS Working Paper Series 2025/04

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Online Self – Exclusion – Recommended Code of Practice

Margaret Carran

Abstract

Voluntary self-exclusion is one of the oldest and most prevalent tool that jurisdictions with regulated gambling almost uniformly expect to be available to players either through national self-exclusion registers and / or through gambling operators' schemes. As an element of their overall social responsibility toolbox, it is an important measure to minimise harm and to allow players to take an effective break from gambling that may cause harm.

However, the relative uniformity of the expectation that self-exclusion should be available ends here. Each jurisdiction sets their own specific rules relating to the duration of self-exclusion, initiation and termination, and what responsibilities accrue to players and operators following such self-exclusion. Furthermore, no best practice has yet been identified that could be applied internationally and current evaluation of effectiveness of existing schemes is limited. As such significant variations continue to exist across different states and very limited evidence is available as to what is indeed effective with helping players avoid gambling-related harm.

This voluntary self-exclusion Code has been devised by a group of passionate, international experts in order to support regulators, operators and other stakeholders in being able to identify best practices that are capable of being applied globally within many different jurisdictions. The project is a culmination of extensive work carried out in three phases – (1) international literature review, (2) task and finish working group composed of all stakeholders' representatives covering three different continents and (3) wide ranging international consultation on the draft recommendations.

Keywords: gambling self – exclusion, online, regulatory intervention, recommended legal text for adoption.

Introduction

Voluntary self – exclusion schemes facilitate binding agreements between gamblers and gambling operators. Players voluntarily undertake to refrain themselves from engaging in excluded forms of gambling and gambling operators undertake to prevent them from accessing those for the duration of the exclusion period. Self – exclusion schemes perform a number of functions. They operate as harm – minimisation measure that is intended to help players, who suffer from gambling related harms, to eliminate access to the source of their difficulties. They contribute to gambling operators ensuring that their services are offered sustainably and they help regulators and policy makers to demonstrate their commitments to safer gambling.

Self – exclusion is the oldest social responsibility tool¹. The scheme was invented by the industry itself but soon it became a mandatory requirement in many jurisdictions with legalised gambling. Operators were directed to offer them to their customers, often under a threat of a legal sanction. It typically constitutes part of operators' licence terms and conditions, breach of which may lead to the removal of the gambling licence, regulatory fines, or other penalties². Originally, operators developed and offered self-exclusion schemes individually. However, over the last decade several countries introduced national self-exclusion registers. Broadly, those allow players to exclude themselves from all operators licenced in the given jurisdiction, but some variations also exist. National registers allow players to self – exclude themselves from all operators with one registration but it is still the operators' duty individually to detect any potential attempts by those players to gamble and to preclude them from succeeding. A well – functioning self – exclusion scheme should adequately balance the protection of the players with the ability of the industry to operate sustainably. It should be available to those who need it, when they need it and should effectively assist players to stop gambling without any stigmatising connotations at a cost that is reasonable to the industry.

This ideal is still far from being achieved. One of the reasons is lack of internationally accepted standards that would be adopted across different jurisdictions. There is no international convention or other pan-national agreement that would harmonise how self-exclusion should operate, and each jurisdiction determines this for each self. In federal states specific requirements may differ even between individual parts of the same country as gambling regulations are sometimes devolved to local governments. Localised attempts have been undertaken to amend this position but those have not yet fully succeeded.

For example, within the European Union, the European Commission Recommendation 2014/478/EU aimed to initiate harmonisation of online gambling rules across the European Member States. It recommended that self – exclusion should be available to all players for a minimum period of 6 months³, encouraged Member States to create national self – exclusion registers⁴, specified that self – exclusion

¹ T Hayer, G Meyer, 'Self-Exclusion as a Harm Minimization Strategy: Evidence for the Casino Sector from Selected European Countries' (2011) 27 *Journal of Gambling Studies* 685

² See e.g., UK Gambling Commission Licence Terms and Conditions, latest edition.

³ EU Commission Recommendation 2014/478/EU, Art.33

⁴ EU Commission Recommendation 2014/478/EU, Art.37

should generally be initiated by the players' themselves⁵ or, if that was too restrictive, Member States should prescribe specific rules relating to third parties' exclusion⁶.

The Commission's recommendations were broad in nature, relatively rudimentary and were intended to apply in countries based in relatively small geographical territory. They still have not been consistently adopted, and significant variations continue to exist not only within the EU but everywhere. The variations are not confined to specific rules on how such schemes should operate but extend to even the most fundamental question of whether self – exclusion should be mandatorily prescribed or not and whether it should be administered by operators themselves or nationally through centralised registers, or both. While offering self – exclusion is a common licence condition in most jurisdictions with legalised gambling, this is not yet a universal requirement. In countries without such legal provisions, operators may wish to offer it on a voluntary basis. However, unless all providers within the relevant State offer it, those that do may lose out commercially to other competitors making it less likely to be available overall.

The most acute differences are buried in the details. They relate to the following:

- The duration of the schemes: those vary from 24 hours to permanent / lifetime exclusions. The minimum durations of 24 hours or 7 days exist in jurisdictions that do not use different terminology to describe self – exclusion 'proper' and temporary 'time-outs'. The maximum duration varies from 12 months to indefinite periods. Permanent or life – time exclusions are allowed in some countries but not in all. In those where they do exist, they are not necessarily permanent despite their titles but may be limited to a duration of 5, 7 or 12 years.
- Revocability of self – exclusion: in some jurisdiction's temporary self – exclusion is irrevocable during its duration while in others it may be revoked either with or without prior conditions having to be met. This is further complicated legally as sometimes a revocation may be deemed to be valid even though it is not formally permitted⁷. Permanent or life – time exclusion can typically be revoked but the conditions for revocation and minimum durations that must elapse differs.
- How self – exclusion terminates: in some places, self – exclusion terminates automatically upon expiry of the stipulated period and the player can resume gambling without any additional actions. In others, self – exclusion only terminates when a player takes an 'active step' to withdraw from the scheme. However, there is no consensus of what such 'active step' should entail.
- Whether self – exclusion needs to be initiated by the players themselves or whether it is possible for third parties to exclude someone else without their permission. In many countries, self – exclusion can only be initiated by the individuals who want to be excluded but, in some states, third – party exclusion is permitted. Third parties typically include operators, family members or other affected stakeholders. In some countries a court order is necessary but in others it can be effected at the instance of a third party alone. In some jurisdictions, specific

⁵ EU Commission Recommendation 2014/478/EU, Art.35

⁶ EU Commission Recommendation 2014/478/EU, Art.36

⁷ See, e.g, the decisions of an English court in the case of the Ritz Hotel Casino Ltd v Al Geabury [2015] EWHC 2297

individuals such as those in receipt of social benefits or professionals such as judiciary⁸ or government officials⁹ are barred from gambling by statutory provisions.

- Rules relating to initiation and termination of self – exclusion: those can be mandated by law or can be devised by the licence holders.
- Consequences for breaches of self – exclusion. Those vary from no legal consequence through to criminal liabilities¹⁰.

The rationale for the continuing existence of the aforementioned variations is difficult to discern. They can be explained by the protracted and controversial history that saw online gambling legalisation or recent reforms occurring at different times and being underpinned by different priorities of individual countries. Regulations regarding safer gambling measures were designed and implemented locally with or without reference to what was already adopted in other places, implicitly embedding variations as an inherent and unavoidable feature. While this explains the current status quo, it does not justify it. Indeed, the continuing acceptance of such a position is surprising. The variations were less problematic when gambling was a predominantly land – based activity but even then, it was not uncommon for gamblers to travel to neighbouring countries to access land – based casinos in another jurisdiction¹¹. This was likely to be feasible only for individuals whose residence was relatively close to their geographical borders or while on holiday, but this no longer represents a significant aspect. What is a current issue is the massive proliferation of online gambling that is accessible without physical constraints. This means that substantially greater number of players may be exposed to a variety of practices and degrees of safety standards, and they may be expected to follow different processes of various levels of difficulties and complexity.

Theoretically, this may be argued to be irrelevant. With the exception of a small number of jurisdictions, which operate on a reciprocity basis with other white-listed countries, most legalised frameworks require operators to be licensed in the jurisdictions in which they target players. As a result, any given player should only be exposed to one set of safer gambling tools, those of their home country. In reality, however, evidence shows that players may access not only the websites that are entirely unlicensed and inherently illegal but also those that are regulated but by a different state. Evidence collected by Casino Guru shows that affiliate websites commonly receive traffic from search engines that look for 'best online casinos' irrespective of their licence status. The analysis carried out by Ahrefs.com estimates that searchers for specific operators without a local licence range from 6% to 98%¹². Those include searches for online casinos that are unregulated and / or based outside the searcher's jurisdictions and those that can be accessed with or without VPN connection. While no robust evidence could be identified as to whether those sites are subsequently accessed for the purpose of money gambling, it is legitimate to assume that this may be the outcome for many of those.

⁸ E.g., Belgium

⁹ E.g., Philippines

¹⁰ M Carran, 'Consumer Protection in EU Gambling Regulations – Review of the implementation of selected provisions of the European Commission Recommendation 2014/478/EU across EU Member States. Follow up Study', November 2021.

¹¹ S Lischer, J Schwarz, 'Self-exclusion and Imposed Exclusion as Strategies for Reducing Harm: Data from Three Swiss Casinos' (2018) Journal of Gambling Issues 000.

¹² Casino Guru data, August 2023; ahrefs.com, last retrieved September 2023.

The above are not the only reasons as to why standardisation of safer gambling tools would be highly beneficial not only in the context of individual player's protection but also for regulators, researchers and other stakeholders. Harmonisation of approaches, especially if coupled with a longer period of stability of any regulatory regime would contribute to a more robust and accurate evaluation of the effectiveness of self – exclusion schemes and this could, over time, lead to a development of global standards. This, in turn, would better support evidence – based regulatory and policy approaches and could facilitate the creation of a global self – exclusion register. It would also help address another significant issue that is often not openly expressed. This refers to the lack of clear, precise and consistent articulation of the actual purpose of self – exclusion schemes and other safer gambling initiatives. Some focus on harm – minimisation at the population levels while others highlight the benefits that accrue to individuals¹³. This is also detrimental as effectiveness may be tested against some abstract notion as to what the safer gambling tools are supposed to achieve and with a potentially different perceptions of the measure of success¹⁴. This then often leads to different understanding of what represents a good practice and opens the opportunity for narratives that are intended to advocate specific points of view.

Easy solutions to those issues do not exist. Any harmonisation of rules would require a significant amount of international co-operation for which there does not seem currently to be much political appetite. However, the prevailing notion that self – exclusion schemes are well established and therefore do not require any further consideration should be dispelled. While several recommendations can already be found in existing literature they tend to focus on land-based self – exclusion in specific countries¹⁵; on specific forms of gambling¹⁶; or they derive proposals based on the views of selected stakeholders only¹⁷.

This project, whose recommendations and report appears below, is different. It was formed in 2023 out of a collective sense among various stakeholders that although self – exclusion schemes operate reasonably well in many places; this is not a universal position. There is still a basic need to establish common standards that would be suitable for adoption by any country and ones that are devised with references to views from all stakeholders. While many countries have their specific rules, there is no single document that would outline the ingredients of an optimal and effective scheme that could operate as a reliable reference point for jurisdictions that are currently developing their rules. The operation of existing schemes may also be improved and refined considering the technological advances and a dramatic expansion of gambling opportunities. In recognition of that, an international project working group was formed to address this gap and to devise a code of recommended practice

¹³ L Kraus, et al, 'Self-Exclusion from Gambling – A Toothless Tiger' (2022) *Front. Psychiatry* 13:992309. doi: 10.3389/fpsy.2022.992309

¹⁴ V Marionneau, J Jarvinen-Tassopoulos, 'Consumer Protection Licenced Online Gambling Markets in France: The Role of Responsible Gambling Tools' (2017) 25(6) *Addiction Research and Theory* 436

¹⁵ SM Gainsbury, 'Review of self – exclusion from Gambling Venues as an Intervention for Problem Gambling' (2014) 30 *Journal of Gambling Studies* 229

¹⁶ A Thomas, R Carson, J Deblaquiere, AA Armstrong, Sh Moore, D Christese, A Rintoul, 'Review of Electronic Gaming Machine Pre-Commitment Features: Self – Exclusion' Australian Government, Australian Institute of Family Studies (2023), republished with corrections in 2016.

¹⁷ J Parke, J Rigby, 'Self – Exclusion as a Gambling Harm Minimisation Measure in Great Britain: An Overview of the Academic Evidence and Perspective from Industry and Treatment Professionals', Responsible Gambling Trust, 2014.

that would be culturally natural as to be suitable for adoption in any jurisdictions that offers online gambling.

The project itself is underpinned by the desire to achieve several interrelated aims. The first primary objective is to encourage the provision of self – exclusion in all jurisdictions, irrespective of whether such schemes are mandatorily required or not. The project aims to nudge regulators or policy makers in jurisdictions where self – exclusion is not legally mandated to impose such a requirement on their gambling industry. The recommended Code of Practice aims to facilitate this as it provides an ‘off the shelf’ solution that can be implemented in entirety or partially. It outlines in one easy document the recommended guidelines using wording that has been carefully drafted to ensure easy translation into other languages and to minimise any specific cultural undertones. In jurisdictions with established self – exclusion schemes, it aims to highlight the need for further discussions among the industry and the regulators / policy makers as to what represents best practice and to encourage standardisation of the requirements. The members of the project group are passionate about players’ protection and hope that our recommendations will prompt regulators to re-evaluate their existing schemes and to consider to what extent their practices could be aligned for the benefit of all international stakeholders.

The project’s secondary purposes stem from the wish to further contribute to the efforts already undertaken by the regulators and the industry to destigmatise the use of self – exclusion and other safer gambling tools. As it has been eloquently pointed out by Thomas et al¹⁸ there are “*many cultural barriers for some people*”¹⁹ but stigmatising language continues to be used. This remains so even though gambling disorder²⁰, since 2013, has been formally classified as a substance based psychiatric disorder that may affect anyone engaged in gambling regardless of their actual or potential vulnerability status or individual characteristics and one that individuals may find very difficult to recover from in the absence of additional help²¹. Therefore, our recommended code of practice also contains provisions that aim to facilitate the design of self – exclusion schemes in a manner that should contribute to the normalisation of online SE as a tool for harm – minimisation and in a manner that reduces negative connotations associated with its usage.

Project’s scope

The Recommended Code of Practice is intended to be relevant for online self – exclusion schemes only.

It has been agreed upon by a group of passionate self – selected individuals who undertook a detailed analysis of existing evidence and drew from their professional expertise to draft recommendations that are capable of being adopted in any country. Throughout the project, conscious and positive efforts were undertaken to avoid any provisions that could be seen to be very culturally specific, and which could hinder the recommendation’s international nature.

¹⁸ A Thomas, R Carson, J Deblaquiere, A Armstong, ‘Review of Electronic Gaming Machine Pre-Commitment Features: Self – Exclusion’ (2016) Australia Government, Australian Institute of Family Studies, Australian Gambling Centre

¹⁹ Ibid (ref 18)

²⁰ DSM-V (2013)

²¹ MA Carran, ‘Gambling Regulation and Vulnerability’ (2018) Elgar Studies in Law and Regulation, Edward Elgar Publishing

To achieve that, the project working group was purposefully composed of individuals who represented three continents (Europe, North America and Africa) and 6 different countries (the United Kingdom, Malta, Slovakia, Gibraltar, Canada (Ontario) and Uganda). This ensured representation from both civil and common law jurisdictions with various approaches to safer gambling measures. It also purposefully drew from all stakeholders' groups to ensure a balanced and wide-ranging deliberations of all relevant provisions. The project team included representatives from the academia, regulatory body, treatment providers, mental health professionals, gambling industry, those with lived-in experience, sustainability group, and a member of the public. Nevertheless, it needs to be acknowledged that only evidence that was available in English was considered, and all deliberations were conducted in the English language.

The Recommended Code of Practice does not have any formal legal status. It is intended to complement existing regulatory frameworks until and unless it is incorporated by the responsible authorities. In cases of conflict between our recommendations and any relevant legal requirements, the latter must always be adhered to, and this code cannot be used as a defence to any regulatory action.

The Code adopts, as its underlying principle, a precautionary approach. While we recognise that self – exclusion may not be relevant to many people to start with or ever during their gambling lives, our recommendations operate on the presumption that those schemes aim to protect everyone for whom they may be essential or beneficial.

Methodology

The final text of the Online Self-Exclusion Recommended Code of Practice was devised following a four – stage process.

Stage One involved systematic literature review of international evidence on self-exclusion schemes carried out between April and September 2023. This review focused on peer-reviewed articles available either through open access or through City St George's, University of London's online and physical library. It also included appropriate materials from 'grey' sources to ensure that all available evidence can be reviewed by the group²². This included a snapshot overview of how self – exclusion is regulated in five separate jurisdictions: UK, Malta, Denmark, Ontario (Canada), and Gauteng (South Africa). The jurisdictions were chosen to include both civil and common law systems and to ensure that they represented varied regulatory approaches.

This literature review was carried out by the chair of the project with the assistance from two students. Articles were identified by the students based on various combinations of the following search criteria: 'self-exclusion'; 'online self-exclusion', 'components of self-exclusion', 'mandatory requirements', 'stigmatisation', 'regulatory approaches', 'safer gambling', 'safer gambling tools', 'guidance', 'mandatory requirements', and 'social responsibility measures'. The articles were then rejected or accepted for inclusion by the chair of the project based on the following original criteria: (1) written in the last 10 years; (2) primarily focused on the effectiveness of individual components of online self – exclusion schemes; (3) written in English and (4) did not represent substantial repetition from other sources. The

²² Online resources included ResearchNet; Google Scholar; PubMed central and others.

initial results resulted in a very small number of relevant articles and a high level of repetition. As such the search was extended to articles that evaluated the effectiveness of self-exclusion schemes and their components in land-based venues, and the date of publications was extended to cover the last 25 years. Articles were then analysed using narrative method and this provided the base for project members' analysis and discussions. Additionally, the group carried out an analysis of 597 self – exclusion related complaints that were received by Casino Guru from gamblers against their gambling providers between March 2021 and June 2023. The project team has also reviewed details regarding most common self – exclusion initiation methods prevalent in the UK, Curacao, Ontario (Canada), Denmark and South Africa, and details regarding cross-jurisdictional offer and the extent of players' intention to gamble on websites that are outside their own territory.

Stage two involved a two-year process during which the members of the project group extensively analysed findings from the literature, evaluated and ascertained existing trends and practices against available evidence and in light of their own professional gambling – related experience. Member of the project working group, their credentials and contact details are included in Appendix 1. Deliberations took place during face to face and online meetings. In total the group participated in three whole day face to face sessions and four remote sessions conducted via Teams. Those meetings took place between September 2023 and March 2025. The discussions followed a semi-structured format. The agendas were divided into each of the different self – exclusion components. Each session commenced with the identification of existing issues, agreement regarding the scope of our project and underlying principles. In – between the meetings members of the project group worked on specific areas of the recommendations that was then agreed by the overall group. The first draft of the recommendations was written by the chair of the project and specific wordings were then discussed, amended and agreed upon by all the members. The completed draft was then subject to international consultation as explained in stage three. Following the receipt of the consultation feedback, the project group met again twice to review all consultation comments and to agree on the wording of the proposed final text.

In Stage three of the project, international stakeholders and any interested parties that were independent from the project group members, were invited to provide feedback on the draft recommendations. Respondents were identified using snowballing methodology and feedback was provided via Qualtrics survey. Members of the project group send the invitation to participate in the survey to their contacts known for their expertise or interest in gambling – related matters and those were then asked to forward them to their respective contacts. In order to prevent duplication of responses, respondents were mandated to provide their names and affiliations, but they were able to request anonymisation of their contribution. Reliability of responses were tested by the chair of the project with reference to the internal consistency of responses. In total 118 responses were received. Out of those, 64 responses were deleted due to duplications, internal inconsistencies, lack of answers to more than 50% of the survey questions, responses being provided in a language other than English or due to responses having no relevance to the questions being asked. This left 54 usable responses. All of them were included in the final consideration and are referred to in this report. Respondents have

not always engaged with all of the survey questions. This resulted in the number of responses under each section to differ and this is why they do not always add up to 100%.

Valid responses were received from the following jurisdictions: UK (15), Malta (9), Spain (4), the Netherlands (3), Canada (3), Macao (3), Belgium (2), United States (2), Greece (1), Lithuania (1), Czech Republic (1), Bulgaria (1), Singapore (1), Germany (1), Uganda (1), Denmark (1), Ireland (1), Gibraltar (1), Italy (1), and Romania (1). One responded associated themselves with two countries – the UK and Italy. Respondents range from industry members, academic researchers, regulators, those who deal with gambling related disputes and those with lived-in experience. 40 responses represented the view of the individuals, 8 declared that the responses represent the view of the respondent's organisations and 6 declared that the responses represent the views of both: their individual ones and their organisations. Respondents' names, affiliation, if any, and their authorisation for inclusion in this report is listed in Appendix 2

All feedback was accepted and valued in the same manner regardless of whether it was provided on behalf of the individual involved or on behalf of the organisation. Responses were analysed using narrative method and feedback was evaluated during final two project meetings. The final wording of the Code includes consideration of the consultation feedback as agreed upon by the project group and is presented in the section two of this report. Example of consultation comments (positive and negative) are included in section three.

This report is written by the Chair of the project, and the copyrights belong to the author and the City St George's, University of London. This report was written without the use of generative AI.

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The project has been fully funded by Casino Guru, an affiliate company incorporated in Czech Republic. Casino Guru was also responsible for the organisations of the logistical aspects of the project such as booking meeting venues, note taking and booking flights for project members. The project was chaired and supervised by the author of this report under the auspices of City St Goerge's, University of London. All members of the project working group represented their own views. Those were underpinned by their stakeholders' affiliation and their own professional expertise but may not reflect and should not be attributed to their reflective employers. The chair of the project was paid a fee for its completion. There is no other conflict of interest to disclose.

Acknowledgement

The completion of this project would not have been possible without the enormous efforts of the project working groups members and without the very detailed and insightful comments that we received as part of the consultation process. As such I would like to offer a sincere thanks to all contributors who enabled this to happen. I also would like to thank Casino Guru for all their logistical help in organising the project and enabling it to happen. All errors are mine.

1. ONLINE SELF-EXCLUSION RECOMMENDED CODE OF PRACTICE

Preamble

Self – Exclusion is an important harm minimisation tool that should be available to all players who may be suffering from gambling related harm. This Recommended Code of Practice has been drafted with the following aims: (1) to encourage the provision of self – exclusion schemes in all jurisdictions irrespective of whether such schemes are mandatorily required or not; (2) to highlight the need for further discussions among the industry and the regulators regarding online self – exclusion best practices; (3) to encourage standardisation of requirements for online self – exclusion across different jurisdictions; (4) to contribute to the destigmatisation of online self – exclusion; (5) to encourage normalisation of the online SE as a tool for harm – minimisation that may be needed and / or beneficial to anyone at some point in time, in addition to other safer gambling tools and measures, and (6) to outline in one easy document recommended guidelines for the operation of self – exclusion schemes.

1. General Principles - Self-exclusion should be available to all gamblers in all jurisdictions.

1.1. Self-exclusion scheme should be offered by every operator.

1.1.1. Where national self-exclusion register exists, operators must subscribe to the national register. They may also choose to keep their own scheme or be mandated to have one, so the gamblers have the flexibility to register either on the national self-exclusion register that exclude them from all operators within the given jurisdictions or the operator's scheme alone, or both.

1.1.1.1. When subscribing to national registers, provisions contained in s.2, 4, 6 and 8 of the Code should be implemented by the operators themselves.

1.1.1.2. National register may adopt provisions contained in s.3, 5 and 7 of the Code.

1.2. Operators' Self-exclusion should enable the gambler:

1.2.1. To exclude themselves from all gambling activities provided by the operator, or

1.2.2. To exclude themselves from selected gambling activities provided by the operator.

1.2.3. Exclusion from all gambling activities should by default trigger exclusion from all activities offered by the operator and the operator's brand unless the gambler chooses otherwise.

1.2.4. Operators should ensure that this choice is communicated to the gambler in a clear, accessible and visible manner and is made by the gambler.

2. SE Awareness Raising and De-stigmatisation

2.1. All operators should ensure that gamblers are notified about the availability of safer gambling tools including self-exclusion options during online gambling account registration, through the information located in a permanent place on the operators' websites and as part of an ongoing periodical and targeted communication.

2.2. Information provided during gamblers' registration for online gambling account should:

- 2.2.1. Be concise, unobtrusive and engaging considering the operators' target audience.
- 2.2.2. Be written in a neutral, non-judgmental language.
- 2.2.3. Not be dismissive or derogatory and should not attempt to dissuade gamblers through UX design from engaging with the SE.
- 2.2.4. Be integrated into the standard gambling account opening process.
- 2.2.5. Be separate from other terms and conditions.
- 2.2.6. Be separate from other contractual information.
- 2.2.7. Require positive affirmation that it has been understood.

2.3. Information provided on the operators' websites / within applications should:

- 2.3.1. Be detailed and engaging in line with the operator's target audience.
- 2.3.2. Include direct link/entry button to where SE can be initiated.
- 2.3.3. Be accessible directly from operator's home page / application menu.
- 2.3.4. Located in a prominent position on the website or as a separate line within the application menu.
- 2.3.5. If located in the footer of the website, this should be in addition to 2.3.4.
- 2.3.6. Include interactive elements that facilitate active engagement by gamblers such as self-assessment tools or quizzes, etc.
- 2.3.7. Include information of third parties' treatment providers, support services and other relevant links such financial or housing support, where such services are available and information about the availability of gambling blocking software.

2.4. Operators should periodically check how easy it is to access information about self-exclusion by directly asking their gamblers for feedback.

- 2.4.1. Such feedback should not be sought from those gamblers who have already self-excluded themselves.

2.5. Operators should create an ongoing communication schedule that will remind gamblers at specific intervals about the availability of self-exclusion options and other safer gambling tools at their disposals. Social responsibility messages should be included in marketing communications but should also be promoted through separate, stand-alone targeted campaigns. Those should:

- 2.5.1. Be clearly distinguished from any communication that aims to incentivise gambling.
- 2.5.2. Encourage gamblers to make use of all available safer gambling tools including limit setting, reality checks, diaries, and similar.
- 2.5.3. Assist in normalising the use of safer gambling tools by all gamblers.
- 2.5.4. Be relevant and personalised to the individual gambler, ideally based on their gambling behaviour.
- 2.5.5. Intended to model positive and safe gambling behaviour.
- 2.5.6. Be varied to prevent desensitization to the messages being conveyed.

3. Initiation of self-exclusion:

3.1. Operators should ensure that self-exclusion can be initiated without any barriers.

3.2. Operators should ensure that gamblers can initiate self-exclusion at the first point of contact without any requirement to speak to another person.

3.3. Initiation of SE should not be prevented or delayed on account of full identity verification of the gambler or on account of funds still being available in the gambling account.

3.3.1. If identity verification has not yet been completed at the time the customer requests self-exclusion, the account should be frozen and no withdrawal, deposits, or playing should be permitted.

3.3.2. Once the identity verification is completed, the customer should be entered onto the self-exclusion register.

3.4. Operators should offer a variety of options to initiate self-exclusion. These should include:

3.4.1. Initiation within the gamblers' gambling accounts:

3.4.1.1. SE registration place should be accessible in line with recommendation 2.

3.4.1.2. Information provided on the direct SE initiation place should be concise, and limited to essential information about the nature of the self-exclusion, the commitment required from the gambler, and details of how the gambler can access treatment, as well as financial and other forms of support during their SE.

3.4.1.3. Operators should ensure that SE initiated within a gambling account commences automatically without any additional requirements being imposed on the gambler.

3.4.2. Initiation through non-simultaneous communication methods outside of gamblers' gambling accounts:

3.4.2.1. Gamblers should be able to initiate self-exclusion without accessing their online gambling account through a variety of communication channels (emails, text messages, and others).

3.4.2.2. Contact details to initiate SE through non-simultaneous communication should be easily accessible to gamblers on operators' websites and in all their marketing and non-marketing communications.

3.4.2.3. Operators should ensure that self-exclusion requests are time-stamped (electronically or otherwise) upon receipt.

3.4.2.4. Operators should ensure that self-exclusion entered into by non-simultaneous communication methods is initiated as soon as possible but not later than 24 hours from the receipt of communication.

3.4.3. Initiation through simultaneous communication method outside of gamblers' gambling accounts:

3.4.3.1. Gamblers should be able to initiate self-exclusion through direct contact with a customer service department of the gambling operator.

3.4.3.2. SE initiation should be able to be carried out by the first person who accepts simultaneous contact from the gambler.

3.4.3.3. Operators should ensure that SE initiated through simultaneous communication method commences automatically upon confirmation of the wish to enter the scheme.

3.5. Upon receiving request to enter self-exclusion, operators should explain the nature of self-exclusion, obligations of the operators and the gamblers.

3.5.1. Operators should also provide their customers with relevant information about possible treatment available in their given territory and self-treatment strategies. This information must be devoid of any marketing messages.

3.5.2. Information referred to in s.3.5.1. should be downloadable for subsequent use or customer should be informed where to find those details if required.

3.6. Operators should review how they allow gamblers to self-exclude on a regular basis and evaluate how artificial intelligence / automated processes may be used to further facilitate access.

4. Operators' responsibilities following entry into self-exclusion by the gamblers.

4.1. Operators must devise robust policies and procedures that will prevent breaches of self-exclusions.

4.2. Activation of self-exclusion should be followed by:

4.2.1. Removal of the gambler from all marketing activities undertaken by the operator.

4.2.2. Return of all funds that belongs to the gambler within 24 hours of SE's initiation. If identity verification process has not yet been completed, within 24 hours from when the identity of the customer has been verified.

4.2.2.1. The funds should be returned to the customer's payment methods from which the deposit originated unless refund to the original payment method is not possible.

4.2.2.2. In those circumstances, customers should be given the opportunity to provide details of alternative refund options.

4.2.2.3. Any communication regarding refunds should be devoid of any marketing content.

5. Duration

5.1. The duration of self-exclusion should be selected by the gamblers from the options offered by the operators.

5.1.1. Operators should offer gamblers the option to self-exclude for the durations of 3 months, 6 months, 12 months, 24 months, 5 years or indefinitely.

5.1.2. The minimum duration of self-exclusion should be set at no less than 3 months. The operators should permit indefinite self-exclusion and should not impose any mandatory maximum duration.

5.2. Irrespective of the other provisions of this code, operators should ensure that gamblers are able to restrict their gambling activities during specific dates/times on a regular and recurring basis (such as weekends, payday, major national sport events) without the need to enter into a full self-exclusion agreement.

6. Panic button

6.1. Gambling websites should include a 'panic button' that allows gamblers to instantly block their ability to gamble on the given website/within the given application for a period of 24 hours.

6.1.1. Panic button should be located on all pages accessible to the gamblers or within the application's menu.

6.1.2. The location and functionality of the panic button should minimise the risk of the panic button being activated accidentally.

6.1.3. Gamblers activating panic button should be asked by a pop-up window to confirm that they wish to be locked out of ALL gambling with the operators for a duration of 24 hours. This pop-up window should contain no further information or any elements that may attempt to dissuade the player from confirming.

6.1.4. Activation of a panic button should automatically trigger contact with the customer by safer gambling team, within 3 days of activation, to determine whether any further support should be offered or whether other interaction may be beneficial for the player. If activation occurs on consecutive days such contact needs to be made only after the first activation or if there has been more than 3 weeks break between them.

6.1.5. The existence of a panic button should complement and not replace other short-term play-breaks / time-outs as mandated by the operators' specific jurisdictions.

7. Termination

7.1. Self-exclusion should continue for the full duration of the period that was selected by the gambler.

7.1.1. Temporary SE should not be revocable regardless of the reasons why that VSE was initiated unless the original registration was requested by third parties and was not authorised by the affected gambler.

7.1.2. Indefinite SE should be revocable only upon the expiry of the maximum stipulated period of 5 years.

7.2. Self-exclusion should not terminate automatically but should require gamblers to take an 'active step' to resume gambling.

7.2.1. Gamblers should not be reminded that their SE period is due to expire or has expired.

7.2.2. Gamblers who wish to reinstate their gambling account should notify the operators of their wish to resume gambling. This notification should be in a form that enables a record to be kept.

7.2.3. Operators should impose a minimum cooling off period of 24 hours before the account is then reinstated.

7.3. Returning gamblers should be categorised as gamblers with higher risk of experiencing gambling harm and should be supported through enhanced monitoring by the operators:

7.3.1. Returning gamblers should be required to set up financial limits, which should apply to their accounts for a minimum of 6 months. This may take the form of either a loss limit or a deposit limit. Additionally, the gambler should set a time limit.

7.3.2. Additionally, the operators may offer the following support and tools to their returning gamblers: additional check-ins and other safer gambling tools such as diaries, calculators, and similar.

8. Organisational culture

8.1. Operators should ensure that everyone in their organisation has training and awareness of the self exclusion scheme.

8.2. Training should be offered, as a minimum, on an annual basis and refresher courses should be provided at periodical intervals.

8.3. All operators should have an independent individual(s), or a team dedicated to voluntary self-exclusion.

8.4. Dedicated individual(s) may be appointed within the organisation itself, or this task may be delegated to an independent third party.

8.5. Designated person(s) / teams should be of sufficient seniority to ensure accountability and to ensure that they are part of teams that take strategic and operational decisions.

8.6. Their internal rank and status should equal those afforded to individuals responsible for the commercial side of the operator.

8.7. They should be responsible for strategy relating to, and oversight of, the self-exclusion scheme.

9. Glossary

9.1. **Self-exclusion** - means a scheme for a period, irrespective of actual duration, whereby a gambler voluntarily requests their gambling providers to prohibit them from accessing gambling activities, either as a whole or partially. This will include temporary, short-term break,

time-outs, and other pauses but will exclude any suspensions that would fall under the definition of forced exclusion below.

9.1.1. Temporary SE is defined as an exclusion with a stipulated commencement and end point.

9.1.2. Indefinite SE is defined as an exclusion that is intended to operate permanently unless the gambler requests its termination.

9.2. **Initiation** – this term represents the process by which gamblers request the operators to exclude them from being able to gamble on their website(s) / within their application(s).

9.3. **Termination** – this term represents the process by which gamblers' self-exclusion period comes to an end regardless of whether the gambler wishes to reinstate his ability to engage in gambling activities or not.

9.4. **Panic button** – form of a request for a time-out (separate and independent from formal self-exclusion) that prevents gambler who pressed on the link from engaging in any form of gambling offered by the given operator for 24 hours.

9.5. **Online Operator** – A business or commercial organisation that offers gambling activities to customers, including all their brands and subsidiaries that can be accessed directly online or through an online platform or through an application.

9.6. **Forced / third party's exclusion** – exclusion that is initiated on behalf of the gambler by a third party such as a relative or an operator or exclusion that is due to any legal or statutory provisions applicable within the given jurisdiction.

9.7. **Simultaneous communication** – means a communication that takes place in real life at the same time between the customer and the operator. This may take the form of discussion in person, over the phone, via life-chat but will exclude communication with bots or other forms of automated communication.

9.8. **Non-simultaneous communication** – means a communication that does not take place in real life at the same time between the customer and the operator. This will include communication via emails, text messages, letter or other forms that are not instant.

2. RATIONALE AND JUSTIFICATIONS

2.1. Part 1 of the Code – General Principles

The creation of the recommended code of practice was motivated by desire of the project group to ensure that self – exclusion is available to all players as a secondary harm minimisation measure regardless of the players' geographical locations or jurisdiction. While disagreement continues to exist between industry, researchers, government and mental health professionals as to the extent to which self – exclusions schemes are effective and what individual elements facilitate their effectiveness, it is undisputed that, at least to a certain extent, they contribute to players' protection overall.

The debate on the effectiveness of safer gambling tools was emphasised already early on by Blaszczynski et al who argued, when commenting on Australasian jurisdictions that *'there is a significant absence of credible research data on the effectiveness of specific interventions'* and that there is *'virtually no evidence to confirm their effectiveness'*²³. Since this statement was made, several empirical studies have been carried out to provide relevant evidence but many of them suffer from limitations that expose their findings to challenges. Those were comprehensively listed by Livingstone et al²⁴ and include *'lack of baseline data; the study sample not being representative of SE populations and / or not generalisable to other jurisdictions because of specific characteristic (such as jurisdictional requirements for identification of patrons prior to admission to gambling venue [or to create a gambling account that is needed to access online gambling services] or heavy penalties applying to venue management who admit excluded patrons; lack of validated measurement instruments; absence of control groups; and possible unreliability associated with self – reports'*²⁵. Other limitations include small number of study participants; use of survey with questions that were not robustly tested for validity and consistency of interpretation of questions by those completing the surveys²⁶; and the near impossibility of proving causation (as opposed to correlation) due to multitude of factors that affect individual behaviour and the overall impact that any scheme has on them²⁷.

Many of those limitations are unavoidable and inherent in evaluation of any initiative irrespective of the industry or of what initiatives are being examined. Per se those should not invalidate studies' results or be used as an excuse to prevent appropriate measures from being adopted²⁸. Researchers minimise the risk of unreliable results by including control groups, by ensuring that participants are more representative of the relevant sub-groups of the populations, and by using only verified measures, when those are available. Indeed, current technological advances, especially online, allow for behavioural

²³ A Blaszczynski, R Ladoucer, L Nower, 'Self-Exclusion: A Proposed Gateway to Treatment Model' (2007) 7(1) International Gambling Studies 59

²⁴ Ch Livingstone, A Rintoul, L Francis, 'What is the Evidence for Harm Minimisation Measures in Gambling Venues' (2014) Issue 2 Evidence Base, journal.anzso.gov.au

²⁵ Ibid (ref 24)

²⁶ Ibid (ref 23)

²⁷ N Hopfgartner et al, 'The Efficacy of Voluntary Self-Exclusion in Reducing Gambling among a Real – World Sample of British Online Casino Players' (2023) Journal of Gambling Studies

²⁸ MCI V Schalkwyk, R Cassidy, 'The Gambling Industry: Harmful Products, Predatory Policies, and the Politics of Knowledge', Chapter 13 in The Commercial Determinants of Health, edited by N Maani, M Petticrew, S Galea, (2023) OUP

monitoring to be carried out in an entirely objective manner thus eliminating self – report or recollection biases. However, studies that rely on purely objectively collected data are still relatively novel.

Nevertheless, there is ample evidence that conclusively demonstrates that self – exclusion is sufficiently beneficial as part of the overall national harm minimisation strategies to position it as a necessary and essential requirement²⁹. This is so even though what is understood to be ‘beneficial’ in this context may vary from state to state and between individuals³⁰ and even though the positive outcomes may accrue for a relatively short term. Positive consequences include the reduction of the number of players with a gambling disorder (previously pathological gambling) at a population level³¹, reduction of problem gambling scores observable through increased work performance, enhanced wellbeing and better financial security³², support that it offers to players to help them quit all or specific forms of gambling, and a reduction in individual characteristics associated with problem gambling such as illusion of control and perceived inability to stop³³.

For example, Turner et al study of 235 self – excluded players in Canada showed a significant reduction in PGSI scores not only during the duration of the programme but also at a 12-month interval afterwards³⁴. Similarly, McCormick et al showed a significant reduction in PGSI scores among self – excluded players in the British Columbia region with the main effect being seen between 1 and 6 months after their enrolment³⁵. In Europe, Hayer and Meyer highlighted that longitudinal studies show that “*various gambling – related parameters indicate a clear improvement in psychosocial functioning subsequent to self – exclusion*”³⁶. More significantly perhaps, no study has pointed out to any long term adverse or harmful effect that self – exclusion would have on mental health³⁷. In some cases, return to gambling following exclusion caused a significant short-term increase in the intensity of gambling but those “typically stabilised” over time³⁸. Some gamblers suffer from relapse of their gambling disorder and others return to unsafe gambling³⁹. However, this cannot be attributed to the self – exclusion itself but rather to the underlying disorder and potentially premature return to gambling.

²⁹ M Regan, M Smolar, R Burton, Z Clarke, C Sharpe, C Henn, J Marsden, ‘Policies and Intervention to reduce harmful gambling: an international Delphi Consensus and Implementation Rating Study’ (2022) 7 Lancet Public Health e705-17

³⁰ V Marionneau, J Jarvinen – Tassopoulos, ‘Consumer Protection in Licenced Online Gambling Markets in France: The Role of Responsible Gambling Tools’ (2017) 25(6) Addiction Research and Theory 436

³¹ T Hayer, G Meyer, ‘Self-exclusion as Harm Minimization Strategy: Evidence from the Casino: Evidence from the Casino Sector from Selected European Countries (2011) 27 Journal of Gambling Studies 685

³² L Kraus, A Bickl, L Sedlacek, L Schwarzkopf, JC Ornberg, JK Loy, ‘We are not the Ones to Blame: Gambler’s and Providers’ Appraisal of Self – Exclusion in Germany’ (2023) 23 BMC Public Health 3222

³³ J Caillon et al, ‘Effectiveness of At-Risk Gamblers’ Temporary Self – Exclusion from Internet Gambling Sites’ (2019) 35 Journal of Gambling Studies 601

³⁴ N Turner, J Shi, J Robinson, S McAvoy, S Sanchez, ‘Efficacy of a Voluntary Self – Exclusion Reinstatement Tutorial for Problem Gamblers’ (2021) 37 Journal of Gambling Studies 1245

³⁵ AV McCormick, IM Cohen, G Davies, ‘Differential Effects of Formal and Informal Gambling on Symptoms of Problem Gambling During Voluntary Self – Exclusion’ (2018) 34 Journal of Gambling Studies 1013

³⁶ T Hayer, G Meyer, ‘Self-Exclusion as Harm Minimization Strategy: Evidence for the Casino Sector from Selected European Countries’ (2010) 27 Journal of Gambling Studies 685; R Ladouceur, C Sylvain, P Gosselin, ‘SE Program: A Longitudinal Evaluation Study’ (2007) 23 Journal of Gambling Studies 85

³⁷ However, there are studies that show that gamblers may experience annoyance or frustration at being unable to play or they felt that their freedoms were restricted. Any arguments regarding restriction of freedom cannot legitimately apply when entry to self – exclusion was voluntary and frustration with being unable to gamble must be attributed to recovery process and therefore potentially unavoidable. If players were able to stop gambling without any additional restrictions, SE schemes would become unnecessary.

³⁸ F Motka, B Grune, P Sleccka, B Braun, JC Omberge, L Kraus, ‘Who Uses Self – Exclusion to Regulate Problem Gambling? A systematic Literature Review’ (2018) Journal of Behavioural Addiction; DOI: 10.155/2006.7.2018.96

³⁹ N Turner, J Shi, J Robinson, S McAvoy, S Sanchez, ‘Efficacy of a Voluntary Self – Exclusion Reinstatement Tutorial for Problem Gamblers’ (2021) 37 Journal of Gambling Studies 1245

The importance of the existence of self – exclusion has also been strongly reaffirmed during the project team’s deliberations by mental health professionals and those with lived-in experience. They confirmed that such scheme is a critical tool that assist with recovery and that such recovery for some players may not potentially be possible without it. The project group noted that not everyone who self – excludes is at the severe spectrum of suffering from gambling harms and that the scheme may be utilised as a self – management tool. However, we view this as the advantage of the existence of the scheme as it reiterates that the benefits of self – exclusion can accrue to many. We recognise that self – exclusion is unique to gambling industry and that its importance stem from the recognition that those who suffer from gambling harm may need to be prevented from being able to gamble and may not be able to commit to gamble free lifestyle purely by themselves.

This is why our primary recommendation is to ensure that self – exclusion is indeed available to players in all jurisdictions and that it should be a regulatory / legal requirement. This has received an overwhelming support in our consultation as 52 respondents agreed that SE should be offered by all operators and only 2 respondents stated that this should not be the case. However, those two respondents were not objecting to the overriding principle per se but disagreed with our initial recommendation that operator’s self – exclusion should be available even if there is a national self – exclusion register. Their objection was reinforced by 4 other respondents from jurisdictions with national self – exclusion schemes who argued that *“if there is a national service first, then there would be a redundancy. In the [name of the country] operators have to abide by a lot of rules already. If they have proper VSE scheme, then it will be an extra burden for both operators and potentially players to have another mandatory scheme in place. This could in the end lead to players or operators moving to illegal markets”*.

Our recommendation to have a dual approach stemmed from the underlying ethos that emphasises players’ autonomy as long as it does not hinder harm reduction. It was also derived from the acceptance of the proposition that safer gambling tools are more likely to be engaged with by the players if they operate with maximum flexibility. Gambling disorder works on a scale and offering a choice balances competing needs across individual spectrums. It adds an additional layer that may resonate with individuals who would not want to put themselves on national registers but who may wish to exclude themselves from their favourite operators, or from some of those where they spent most of their money, or which they may find particularly alluring and difficult to resist. We recognise that total abstinence is the most effective treatment method and partial self – exclusion may not be as efficient as a full exclusion but there are still many jurisdictions where national registers do not yet exist⁴⁰. Furthermore, the availability of operators’ schemes would still provide more protection for individuals who finds national registers too restrictive that it would be the case if there was not alternative to the centralised system. However, we recognise that having separate schemes in countries with national registers would create a potential duplication and additional burden which is why our recommendation is that, in those jurisdictions, operators’ schemes should be offered on a voluntary basis unless the relevant laws dictate

⁴⁰ Countries with national self – exclusion include but are not limited to: UK, Belgium, Denmark, Italy, Latvia, Lithuania, Portugal, Spain, Sweden and more recently Australia.

otherwise. Our recommended code remains relevant as, even in places with national schemes, it is still for the operators to ensure that self – exclusion is effectively enforced and that the players are offered the necessary protection. As such both operators’ responsibilities and national scheme’s responsibilities can complement rather than work to the exclusion of each other.

Our recommendation that the default self – exclusion setting should ensure that players are excluded from all brands offered by the operators unless requested otherwise is likely to be a novel proposition in several jurisdictions. It already exists partially in Malta. There, if the operators have sufficient reason to believe that the players are excluding themselves due to gambling – related harm, they must exclude them not only from the requested website but also from all brands that are operated under the same licence. From January 2023 this was enhanced in Malta by making the requirements applicable irrespective of whether those brands require separate players’ registration or not⁴¹.

We believe that this represents good practice and as such should be extended to all. However, we do not believe that this should be dependent on whether the player wants to self – exclude only due to gambling harm. It should be the default position regardless of the reasons for self – exclusion subject only to the players’ right to opt-out, should they choose to do so. Despite many monitoring tools that are utilised by operators, they are still not best placed to make a reliable assessment of this nature as they are not trained health professionals. Furthermore, there is the potential for a conflict of interest that may incentivise the industry to dismiss markers or indicators of harm, even when present, which our default recommendation avoids entirely. We also recommend that, by default, self – exclusion should prevent players from accessing all forms of gambling unless they choose otherwise as this is what would normally be expected by them.

Consultation feedback regarding recommendation 1.2 was mixed. However, positive comments substantially outweighed negative ones. Comments that were more negative in nature emphasised the need to ensure that party’s autonomy is respected and that the default position is clearly explained and signposted and should not potentially be buried in a ‘fine print’. In the alternative some respondents argued that our recommended default position is indeed correct but that players should not be allowed to choose otherwise. Only two respondents raised concerns that excluding players from all brands may create commercial hindrance and may be undermine operators’ profitability.

Table A – Sample of consultation responses on this section.

“Different players have different reasons to chose to self – exclude themselves. Player should have four options clearly communicated to him, in every jurisdiction. Player should be able to self – exclude himself from a product, from the brand, operator’s exclusion and national exclusion”.

“Quantitatively, in my decade and a half working as an individual who manages complaints officially and unofficially, in encounter with regularity players contacting to complain that their self-exclusion at one property did not carry over to other properties on the license. Conversely, I could count on

⁴¹ Maltese Gaming Act 2018; Maltese Directive 2 of 2018 (amended in 2029) – s.11; s.12(1)

one hand the number of complaints I have managed where a player is contesting that their self – exclusion on one brand should not have been carried over to another. Players naturally expect that once they have told a company that they struggling to control their gambling that they company will act responsibly and prevent them from accessing the services that are harming them, regardless of the URL the service is provided on”.⁴²

“The default position should be an exclusion from all brands”.

“In my opinion if a customer is holding multiple accounts and requests SE for issues relating to problem gambling, that they should be excluded from all brands as they clearly state that they are not in control of their gambling”.

“Regardless of online gaming systems, the player has identified that they have an issue with their gambling and want to self – exclude. In order to protect the individual in the long term, I agree that the individual should be self – excluded from all brands”.

“If a player at any time requests any type of self – exclusion, it should be implemented across all of the organisational platforms”.

“Since of the sighs that players is losing control over the play is denial, it is for sure wise to exclude such players from all brands, otherwise the player will wake up some day eager to try luck once more time and simply uses different brands to log on to [their account]”.

“Yes, I think the option is important. It gives the person options to take control of their gambling. ... to allow them to play in smaller capacity with same operators under and different brand. So, you will already have some information available which can be used to curb spending and have preset restrictions on the account, which already makes for a safer gambling environment than if they were to go to another casino with no restrictions”.

“I am in favour of Group – SE policies amongst operators because ultimately it protects the companies from unnecessary liability; especially in cases where a company may have multiple platforms or licenses. This being said, I would vehemently argue that ‘all brands consequence’ should be heavily signposted and highlighted to users before they initiate their exclusion process. This aspect should not be in the ‘fine print’.

“The gambler may not be aware of all the brands run by one operator. I suggest that this should be an option, and a full list provided so the gambler can choose to self – exclude from specific brands or from all”.

⁴² Quote slightly amended to remove potentially identifying details

“If a player goes to the trouble of self – excluding, it is likely that they would have applied to other brands. It would be a barrier to a positive play if they were also forced to SE from multiple brands”.

We believe that the current wording of recommendation 1.2.4 of the Code appropriately resolves concerns that were raised regarding the need to ensure that the default settings are clearly articulated to players and that this is communicated in a clear, easily accessible, and visible manner. We have not accommodated the suggestions that the default position should not be capable of being opted out from because this would contravene the underlying ethos of our code that emphasises respect for individual’s own agency. Self – exclusion is only likely to be effective if the player truly commits to its extent and as such the need to be given this choice remains paramount even if ultimately, players may not necessarily be making the best choices. This principle also underpinned our reasoning for recommending that operators should have their own scheme even in countries with national self – exclusion registers exist. This enhances the overall flexibility of the tool without undermining their integrity or purpose. We also disagree with the comment that this would create a commercial hindrance as we strongly believe that gambling operators can only be commercially successful over a sustained period if they truly care about their customers and ensure that they do not profit from individuals who suffer from gambling – related harm.

2.2. Part 2 - SE Awareness Raising and De-stigmatisation

Existing evidence suggests that the overall participation in self – exclusion programmes is steadily rising but the creation of national self – exclusion registers may have biased the results. Some individuals, who have never gambled before, use the schemes in an anticipatory manner or potentially to ensure that they are not targeted by gambling advertisements. The use of self – exclusion among those who suffer or are at risk of suffering from gambling – related harm continues to be relatively low. Bijker et al analysed fifteen studies that reported self – exclusion uptake rates and concluded that only “*one in 40 moderate – risk gamblers and 1 in 7 problem gamblers have used self – exclusion*”⁴³. Earlier estimates indicated that the proportion of problem gamblers who exclude varied between 0.6% and 17% for land – based venues and between 5.4% and 11% online⁴⁴. Those estimates are objectively low, especially when it is considered that self – exclusion is primarily needed by those who already suffer from gambling harm and should theoretically be of benefit to all of them.

The two most cited reasons for this are lack of awareness of the existence of the programmes and stigmatisation of its use. There appears to be a continuing discrepancy between what the industry perceives to be a sufficient promotion and the views of the players who frequently declare that they were not aware of the possibility to self – exclude. Gamblers often complain about the absence of appropriate advertisement or other campaigns that would publicise this more effectively. In light of the regulatory provisions that often mandatorily require operators to provide relevant information to players

⁴³ R Bijker, N Booth, SS Merkuris, NA Dowling, SN Rodda, ‘International Prevalence of Self-Exclusion from Gambling: a Systematic Review and Meta-analysis’ (2023) 10 Current Addiction Reports 844

⁴⁴ F Motka, B Grune, P Slecicka, B Braun, JC Ormberg, L Kraus, ‘Who Uses Self – Exclusion to Regulate Problem Gambling? A Systematic Literature review

in an *'easy and accessible'* manner, it should be seen as rather surprising that that a recent study published in 2023 by Devault – Tousignant et al still reported that many participants *"complained about the absence of advertisements for self – exclusion, as none of them had heard of self – exclusion before they started acknowledging their gambling problems"*⁴⁵. Relative lack of knowledge of the availability of self – exclusion schemes has also been highlighted by Bijker et al who reported that *"just over one in 10 people who gamble have awareness of self – exclusion to reduce gambling harm"*⁴⁶.

The aforementioned results are from relatively recent studies indicating that improvements and initiatives undertaken by the regulators and the industry do not appear to have achieved the desired effect. To some extent, this dissonance may be attributed to the fact that operators and those who work in the gambling sector are exposed to gambling related topics daily whereas those who engage with the activity may do so occasionally. This may create an exposure bias whereby those who are directly involved with the industry may have the perception that social responsibility messages are ubiquitous, but this may not be seen in the same manner by the public. Once gambling starts causing harm, finding relevant information may also become subjectively more challenging as players may be overwhelmed by negative emotion that hinders information seeking on matters that may fuel those adverse feelings. Additionally, an often-overlooked factor is the diversity of linguistic and other abilities of players that may affect whether and how information about safer gambling messages is received.

Furthermore, a quick scan of various gambling websites undertaken by the project group confirmed that, despite claims to the contrary, the information about self – exclusion is not in fact prominent and had to be specifically searched for. This indicates that generic advertisements or information contained only in the social responsibility sections of the operators' websites are clearly not effective and a more innovative and direct methods are needed. The reliance on what is now a very old-fashion format of providing information via dense text dismisses the increasingly recognised phenomenon that individuals' engagement with any written long online text tends to be passive and superficial. Lack of interactive elements further contributes to much of the information being missed, not properly understood or quickly forgotten, especially if only accessed when the need for its usage has already arisen rather than beforehand.

The willingness of gamblers to self – exclude is also undermined by the stigmatisation of gambling problems within the society and more specifically the stigmatisation of the need to self – exclude. There are many cultural, social and historical barriers that prevent people from admitting that they need help. Those include 'denial of having problems', 'insufficient awareness of the existence of the scheme', 'desire to address the problem on their own'⁴⁷ as well as unwillingness, due to shame or embarrassment to talk to staff about the need to self – exclude⁴⁸. In some cultures, it is seen as a sign of a failure.

⁴⁵ C Devault – Tousignant, N Lavoie, M Cote, S Audette – Chapdelaine, AM Auger, A Hakansson, M Brodeur, 'Qualitative Experience of Self – Exclusion Programs: A Scoping Review' (2023) 20 Int J Environ Res Public Health 3987; DOI.ORG/10/3390/ijerph20053987

⁴⁶ Ibid (ref 43)

⁴⁷ T Hing, B Tolchard, B Nuske, E Holdworth, L., M Tiyce, 'A Process Evaluation of a Self – Exclusion Program: A Qualitative Investigation from the Perspective of Excluders and Non-Excluders' (2014) International Journal of Mental Health and Addiction, DOI: 10.1007/s11469-014-9492-5

⁴⁸ NR Nowatzki, RJ Williams, 'Casino Self – Exclusion Programmes: A Review of the Issues' (2002) 2(1) International Gambling Studies 3.

Historical references to pathological gambling, inherently negative terminology used to describe those who need help (such as addicts, problem gamblers) and the terminology associated with responsible gambling perpetuates the incorrect perception that gambling harm is only suffered by those who are weak, lack control or somehow behave irresponsibly⁴⁹. This contributes to the limited understanding among many people, that anyone, and not only those with specific psycho-social characteristics, may find themselves vulnerable to gambling harm.

Those issues caused the project team to recognise that there is a significant need to educate the players as well as the public of the aims and impact of the tool. To do so effectively, it has to be recognised that appropriate information needs to reach all players and not only those that may be identified to be at risk. This requires a prolonged and sustained awareness raising activities that move away from transmission models of communication to interactive and transactional ones⁵⁰. To achieve that we recommend the adoption of a three-prong approach that would publicise the availability of self – exclusion in three separate stages: (1) during the opening of a gambling account, (2) through provision of more in-depth, interactive and engaging information on the operators' website and (3) through ongoing communication that would reach customers at various times during their gambling journey.

Extending the information to all customers facilitate the message that nobody is being specifically targeted and that gambling – related harm may affect anyone. Over time, this is likely to facilitate normalisation of voluntary self – exclusion without trivialising the nature of the disorder. Information about safer gambling measures should not be muddled up with marketing or other promotional messages or with other contractual small prints. Those are typically not read or absorbed in practice, even if customers tick the box to confirm otherwise. This is where the project team strongly feel that the operators who have a direct and often personal contact with the players, can have a particularly beneficial effect. Operators have extensive knowledge of the profiles and preferences of their customers and knows well what messages do or do not work effectively as their commercial success is fully dependent on that. This places them in a unique position to ensure that information given to players about self – exclusion is based on the same principles as their marketing that aim to induce players to engage with them. They can use their in – depth insight of their customers to ensure that messages are delivered in a manner that will invoke active engagement, are interactive and are sent at the appropriate intervals.

We recognise that a fair progress of destigmatisation has already been achieved but there is still a substantial amount of work that needs to be done. Negative language encourages negative stereotypes and too often there is insufficient differentiation between the behaviour and impact of harm from the person displaying said behaviour. We note that many gambling operators in many countries still use the term 'responsible gambling' despite strong evidence that suggests that this term, of itself, is stigmatising. We also note that many words can carry different stigma depending on jurisdiction, culture and language and that it may be difficult to encourage the industry and the regulators to improve the language that is

⁴⁹ T Hing, B Tolchard, B Nuske, E Holdworth, L., M Tiyce, 'A Process Evaluation of a Self – Exclusion Program: A Qualitative Investigation from the Perspective of Excluders and Non-Excluders' (2014) *International Journal of Mental Health and Addiction*, DOI: 10.1007/s11469-014-9492-5

⁵⁰ M Carran, *Gambling Regulation and Vulnerability*, (2018) Edward Elgar Publishing

used. We also note that messaging must not be oversimplified. Gambling disorder is a serious condition that must not be trivialised, and all parties have to play a part in preventing it. Ultimately, only a balanced approach is likely to achieve the intended goal which is why it is important to refer to addictive and problematic patterns of play rather than labelling individuals with any specific terms. All individuals who suffer from gambling harm can recover, and gambling harm can be transient. As such our code contains a detailed instruction on the principles that should guide the operators when designing their messaging strategies which emphasises players' protection and destigmatisation attempts.

Respondents to our consultation were overwhelmingly positive about these aspects of our recommendation. 50 of them answered 'definitely yes' or 'probably yes' to the question as to whether SE awareness raising should take place in the proposed manner and only four disagreed.

Table B - Sample of consultation responses on section 2.

"It should be mandatory on account sign up that responsible gambling tools are identified to the player".

"The way to normalise an activity is to talk about it regularly, so that it becomes something that everyone is familiar with. It's only by normalising that we can get people to engage in large numbers".

"I agree with the three – pronged approach, and in my opinion, this should be an industry standard. Operators should provide tools (ranging from links to support / treatment services, having a PGSI available onsite, through to different exclusion / break options relative to their individual requirements) which are sufficient in volume and quality that an individual may utilise / navigate with ease and confidence. In addition, I believe that a proactive approach is crucial to development in this matter".

"It's good practice to have awareness raised throughout the players' lifecycle with an operator. Especially awareness that is promoted without the inclusion of promotions of offers and games".

"It is necessary to remind gamblers again and again".

"It is important that RG messaging is regularly sent to all players, not only the high-risk ones".

"The proposal definitely normalises the use of self – exclusion".

"Visibility and easy access to the VSE, including regular proactive information on the availability and benefits of the VSE, are key prerequisites for raising awareness of the VSE in the long term. There should be mandatory rules for this, as gambling providers usually place player protection as inconspicuously as possible".

"For the most part, I agree with the 3-vector approach outlined, however without seeing copy or mock ups on how exactly information will be conveyed to the public; I have some reservations. The devil is in the details".

“Yes, however, “be detailed and engaging with the operators’ target audience” will be challenging as the audience is vast”.

“But this will become white noise quickly. More effective if communication is personal and includes deposit / withdrawal (net loss) data”.

“Having flags in place to periodically address concerns is a must but I think what you suggest is too much”.

The project working group recognises that gamblers are already subjected to a plethora of different communications from their operators and that many of them may receive similar details from a variety of brands. Some of the information may also appear not to be relevant to them, especially if they are new to the activity. We recognise that there is a risk of the messages becoming ‘white noise’ (as highlighted by one of our respondents) and that some customers may be irritated. However, taking into consideration that most of the information provided to internet users are skimmed read and quickly forgotten, we maintain our view that direct information that is engaging, regular and interactive is the only way to ensure that awareness is in fact raised. Ongoing repetition that uses various formats will eventually reach everyone unlike current methods. By analogy to digital cookies, there is still a large number of people who do not understand how computer cookies truly work, but it would be very hard to find anyone using the Internet who would say that they have never heard about them or what they are used for⁵¹. We also maintain that operators are best placed to devise safer gambling communication programmes that will resonate with their customer base, but we also want to ensure that this communication is devised with customers’ protection in mind and is not taken over by commercial consideration and the desire to induce players to gamble. Therefore our code includes a set of specific instructions as to how such communication should be devised to avoid those risks.

2.3. Part 3 of the Code – Initiation of Self – Exclusion

There should be relatively little controversies regarding the need for the entry to self – exclusion to be straightforward, linear and devoid of any elements that may unnecessarily delay the process. Yet, the current industry practices still, in some places, impose certain requirements that may jeopardise this underlying consideration. Some of it is caused by the industry’s dislike to self – exclusion being used for purposes that are not associated with gambling harms, but which may relate to commercial considerations.

It is natural to assume that self – exclusion programmes are or should only be utilised by those who suffer from gambling harm. However, evidence shows that other uses may also be common. For example, Dragicevic et al showed that 25% of individuals who excluded themselves from online gambling have done so within the first 15 days of registration and of those 25% excluded themselves

⁵¹ Internet Cookies Statistics, retrieved from <https://www.cookieeyes.com/blog/internet-cookie-statistics/> April 2025.

on the first day⁵². Haeusler⁵³ analysed financial transactions of 2696 self – excluded players and reported that 23.3% of them had zero balances on their account up to a year prior to registering with the scheme. This was argued by Catania and Griffiths to indicate that online gamblers may exclude themselves not only due to gambling harm but also due to other commercial reasons such as “*gamblers experimenting and evaluating the online gambling operator, or [due to] the sign-up bonuses not being up to gamblers’ expectations*”⁵⁴. Family members or friends of an individual who suffers from gambling harm may wish to register with the scheme despite lack of their own gambling – related problems as a demonstration of a commitment to a non-gambling lifestyle and as an act of support for their friends or significant others⁵⁵.

Self – exclusion may be preferred over a simple account closure because the registration with the programme typically triggers automatic protection from all direct advertisements and other marketing materials that they could otherwise be targeted with. However, self – exclusion may be misused. For example, in Canada, Yahoo Finance reported in June 2022 that some gamblers self – excluded themselves from some online operators to avoid losing bets while at the same time they had a valid sport bet on the opposing team with another operator. This has allowed gamblers to receive a refund on the losing bet and to receive the winnings from another provider from the same sporting event⁵⁶. In Ontario, this is no longer possible due to the amendment to regulations that was introduced by the Alcohol and Gaming Commission of Ontario (AGCO) in January 2023, but it articulates the main reason as to why gambling providers want to ensure that self – exclusion is used only for the intended purpose.

However, it would be somewhat naive to argue that it would be possible or even desirable for operators to distinguish players who wish to self – exclude due to harm or due to other considerations. Even studies that were specifically conducted to depict accurate reasons produced inconclusive results. For example, Luquiens et al examined the motives of 5154 self – excluded online poker players that were provided to the operators over a period of 7 years. The analysis was carried out in conjunction with evaluation of how many gamblers return to gambling after the self – exclusion ended. Of the overall number of registrations, 3319 were classified as relating to gambling problems but 1835 suggested a commercial motive. Those included ‘dislike of the providers’ software’, ‘gambling with alternative operators’, ‘disappointment with customer service support’, ‘experience of security issues’, and other reasons that were added individually by the study participants. However, the authors themselves

⁵² S Dragicevic, C Percy, A Kudic, J Parker, ‘A Descriptive Analysis of Demographic and Behavioural Data from Internet Gamblers and those who Self – Exclude From Online Gambling Platform’ (2015) *Journal of Gambling Studies* 105

⁵³ J Haeusler, ‘Follow the Money: Using Payment Behaviour as Predictor for Future Self – Exclusion’ (2016) 16 *International Gambling Studies* 246

⁵⁴ M Catania, MD Griffiths, ‘Behavioural Tracking, Responsible Gambling Tool, and Online Voluntary Self-Exclusion: Implication for the Gambling Industry’ (2019) *Casino and Gaming International* 41 (September); M Catania, MD Griffiths, ‘Understanding Online Voluntary Self – Exclusion in Gambling: An Empirical Study Using Account – Based Behavioural Tracking Data’ (2021) 18 *Int J Environ Res Public Health* 2000

⁵⁵ A Hakansson, C Widinghoff, ‘Gambling Despite Nationwide Self – Exclusion – A Survey of Online Gamblers in Sweden’ 11 *Front, Psychiatry* 599967; DOI: 10.3389/fpsy.2020.599967

⁵⁶ <https://www.covers.com/industry/ontario-self-exclusion-loophole-cisoe-online-sports-betting-march-2023>, last retrieved September 2023

warned against any reliance on the study findings as the “*self – reported motives ... seemed inconsistent, unreliable and irrelevant*”⁵⁷.

Most other studies typically presupposed gambling harm as the reason for self – exclusion. Hayer and Meyers examined 152 surveys of barred players from Germany, Austria and Switzerland to analyse the motives for entry into the scheme. However, only one of the possible 12 options that were offered, was not connected directly to gambling harm as it referred to ‘annoyance with casino staff’⁵⁸. Similarly, Lischer and Schwarz analysed motivations of 8170 players who self – excluded between 2006 and 2015 but the form also included only one generic and all-encompassing option of ‘other reasons’⁵⁹. In Australia, Hing et al did not even offer a single option not related to gambling harm as all possibilities related to financial losses, difficulties with health, legal problems, issues at work or in personal relationships⁶⁰ - all of which are potential consequences of excessive gambling.

The variety of motivations for self – exclusion have been fully noted by the project team but ultimately, we concluded that this should not alter the initiation methods that should be recommended. Regardless of the actual reasons for initiation of self – exclusion, it should always be assumed that the request is underpinned by the risk of gambling harm and the entry should be facilitated in a most efficient manner without any barriers. This efficiency will be achieved provided players are offered a variety of methods to initiate self – exclusion and provided that the requests are actioned as quickly and seamlessly as possible. We recommend that operators should offer synchronous and asynchronous entry points and that those requests should be processed internally irrespective of whether they were received directly by the safer gambling teams or someone else within the organisation. The methods must include the possibility of self – exclusion to be initiated without the necessity of logging into the players’ gambling account and without the need to speak to any given individual. This is intended to protect players from encountering unnecessary frictions before the exclusion takes place and to prevent them from being potentially passed from person to person, during which time, they may decide, to their own detriment, not to proceed.

Initially, we recommended that asynchronous requests should be actioned within 48 hours of receipt. However, this duration was heavily criticised by several consultation respondents (32) who argued that 48 hours is too long. Respondents suggested much shorter periods of 10 minutes, 4 hours, 12 hours and 24 hours. In the alternative, some highlighted that operators have various models and that not all of them are large corporations. As such some “*can get busy and be overwhelmed by contacts*

⁵⁷ A Luquiens, D Vendryes, H-J Aubin, A Benyamina, S Gaiffas, E Bacry, ‘Description and Assessment of Trustability of Motives for Self – Exclusion reported by Online Poker Gamblers in a Cohort Using Account – Based Gambling Data’, (2018) BMJ Open 8 DOI:10.1136/bmjopen-2018-022541

⁵⁸ T Hayer, G Meyer, ‘Self – Exclusion as Harm Minimisation Strategy: Evidence for the Casino Sector from Selected European Countries’ (2010) 27 Journal of Gambling Studies. Other options that were given to study participants were as follows: “(1) lost too much money; (2) as preventative measure; (3) loss of control; (4) financial problems due to casino gambling; (5) spent too much time in the casino; (6) placing bets that bore no relation to income level / wealth; (7) family or relationship problems due to casino gambling; (8) in debt because of casino gambling; (8) at the request of family and friends; (10) problems at work due to casino gambling, and (11) part of my gambling counselling / treatment program”.

⁵⁹ S Lischer, J Schwarz, ‘Self – Exclusion and Imposed Exclusion as Strategies for Reducing Harm: Data from Three Swiss Casinos’ (2018) Issue 000 Journal of Gambling Issues; <https://lqi.camh.net/doi/pdf/xxx>

⁶⁰ N Hing, B Tolchard, E Nuske, L Holdworth... & M Tyice, ‘A Process Evaluation of Self – Exclusion Program: A Qualitative Investigation from the Perspective of Excluders and Non-Excluders’ (2014) International Journal of Mental Health and Addiction DOI:10.1007/s111469-014-9482-5

depending on operational issues and increased volumes". This led the project team to adopt a balanced position that reflects both perspectives and recommend that synchronous requests should indeed be actioned immediately but that asynchronous self – exclusion should be actioned as soon as possible but not later than within 24 hours of receipt.

Table C – sample of consultation feedback on timing.

"It's a tricky question. Not all self – exclusions are triggered by gambling harm. And would be a decision that would impact the operators' commercial baseline heavily. Sometimes the discontent results in self – exclusion. But 48 hours wait for an account to be self – excluded can be enough for someone to deposit their full monthly allowance".

"I believe a VSE should be operative immediately and reviewed as soon as possible. A 48 – hour window could allow for things such as untenable losses to take place ..., further negative impact on the individuals' mental (and possibly physical) health, etc".

"The question feels the wrong way round. The standing point must be to execute any request for self – exclusion as quickly as possible. If the standard is set to allow 48 hours, might one business, even one, choose to take a position, 'yes we will exclude this player in 48 hours (to meet the standard) but let's just see how much money they loose first...'. The earlier possible exclusion should be promoted."

The project team considered at depth whether gamblers who wish to self – exclude should be required to speak to a healthcare professional because a mere provision of information on the website appears not to be sufficient⁶¹. The question whether there should be a requirement to attend an interview, take a self – test or speak to a mental health expert upon initiation of self – exclusion attracted highly contradictory views. On one side, gamblers' reluctance to seek help from healthcare professionals even when suffering from gambling related harm is well evidenced⁶². However, the individual assistance model strongly advocates that such help would be highly beneficial not only as part of a formal treatment but especially at the initiation stage⁶³. Often there is a disconnect among gamblers between recognition that they need professional help and seeking it. A major discrepancy exists between "*what the gamblers think [or say] and what they actually do*" when choosing to ban themselves as showed by the difference in the number of gamblers who indicate at the time of entry onto the self – exclusion scheme that they would like a treatment meeting and the number of those attending it, when offered⁶⁴.

⁶¹ J Parke, J Rigby, 'Self – Exclusion as a Gambling Harm Minimisation Measure in Great Britain: An Overview of the Academic Evidence and Perspective from the Industry and Treatment Professionals' (2014) Responsible Gambling Trust.

⁶² H Suurvali, J Cordingley, DC Hodkins, J Cunningham, 'Barriers to Seeking Help for Gambling Problems: A Review of the Literature' (2009) 25 Journal of Gambling Studies 407

⁶³ T Hing, B Tolchard, B Nuske, E Holdsworth, L., & M Tiyce, 'A Process Evaluation of Self – Exclusion Program: A Qualitative Investigation from the Perspective of excluders and Non-Excluders' (2014) International Journal of Mental Health and Addiction. DOI:10.1007/s11469-014-9492-5

⁶⁴ R Williams, B West, R Simpson, 'Prevention of Problem Gambling: A Comprehensive Review of the Evidence and Identified Best Practice', Ontario Problem Gambling Research Centre and the Ontario Ministry of Health and Long Term Care (2012); O Dwarika, 'Integrating Telephone Recovery into Voluntary Self – Exclusion', Poster presented at the 18th International Conference on Gambling and Risk Taking, 2023, Las Vegas, Nevada, USA.

In the alternative, gamblers who feel the need to ban themselves are often in a fragile state that may be additionally fuelled by anxiety and self – guilt⁶⁵. While this does not always apply and many self – exclusions are entered into following careful consideration, some are the results of an impulse and a spontaneous decision at the height of the gamblers’ difficulties and any additional steps or delay in the registration process may undermine their willpower to complete it⁶⁶. A mandatory referral to support services at the entry to self – exclusion could also dramatically overwhelm national health services; alternative treatment providers or relevant charities and such support may not even exist in some jurisdictions. It would also create the additional complexity of identifying a suitable referral service that may not be feasible in practice. Furthermore, compulsory referral would encroach on individuals’ freedoms to decide how they wish to address their own health and as such it would not fit easily into our model that emphasises personal choice.

Therefore, the project team decided that, on balance, inclusion of such a recommendation would not be practical. However, this does not preclude the operators from ensuring that their customers are cared for during what may be a very difficult period in their life. We therefore recommend that the operators, as part of the initiation process, must provide relevant information to ensure not only that players understand the nature and consequences of self – exclusion but are also aware of what support may be available in their geographical locations and what self – help methods may be beneficial. This information should be devoid of any overt or covert marketing messages and must be devoid of any attempts to incentivise players to return to gambling. This stemmed from the project team’s view that operators should have a special role to play in ensuring that information about available mental health treatment and other charities that may offer gambling – related support reaches the gamblers quickly and in an appropriate format. Due to the potential of a major conflict of interest that may arise in this context, operators should not be directly involved in ongoing support, but this should not preclude them from helping their customers finding such support easily and promptly. Consultation feedback for this section was largely supportive. Some respondents stressed that self-exclusion abuse exists but most agreed with our approach and simply re-emphasised the need to inform player of the consequences of self – exclusion. However, we felt that the cumulative effect of recommendations contained in section two and three already addresses this effectively and that the wording of part four did not require any further changes.

Mental health professionals argue that there is a relatively short period of time in which those in need must be reached before the effectiveness of support substantially reduces⁶⁷. Players are much more receptive to offers of support if it is given to them at the time of self – exclusion or shortly afterwards. They are more likely to accept it then and the positive impact is higher than it is the case if the same offer reaches the gambler after some delays. This places the operators in a unique position to know the most optimal time to target their customers and to ensure that this information is provided to them at that time. The project team recognises that this may lead to self – excluding gamblers receiving multiple

⁶⁵ T Hayer, G Meyer, ‘Self – Exclusion as a Harm Minimisation Strategy: Evidence for the Casino Sector from Selected European Countries’ (2010) 27 *Journal of Gambling Studies* 685

⁶⁶ *Ibid* (ref 65)

⁶⁷ Professional experience of the mental health professional member of the project group.

packs or emails with broadly similar details. However, we concluded that this should be carried out by the operators and not by every individual brand and this would minimise the risk of customers being inundated.

More controversially, our initial recommendations also included a statement that initiation of self – exclusion should not be delayed on account of lack of identify verifications or on account on any funds being left in the gambling account. The project team recognised that some operators still refuse to exclude customer if identity verification has not been completed or until the player withdraws any remaining funds. This may be underpinned by practical difficulties but more often than not those conditions are mere excuses to delay the registration process. They also impose additional burdens on the gamblers rather than on the providers themselves. While operators have to ensure that identify of the player is confirmed to comply with anti-money laundering legislations, data protection rules, and to ensure that the correct person is excluded, there are no legal reasons why the account cannot be locked so no further deposits, gambling, or withdrawals take place until this is carried out.

Nevertheless, respondents to our consultation were clearly concerned about ensuring that our recommendations consider legal requirements relating to AML and data protection fully. Comments to this effect included: *“Full identity verification is important to ensure customers’ privacy and security”*; *“based on protecting the right of personal data (privacy) we need to do identity verification of applicants to ensure accuracy”*; or *“if there is no full identity verification this could lead to problems later. Ideally the account should be cleared of funds before the exclusion beings otherwise the operator is holding money of an individual who has no access. I suggest a brief period to allow time for full identification and then refund of money in the account prior to self – exclusion being formally activated”*. Those comments highlighted to us that the wording of our initial recommendation needed alteration to make it clearer that anti-money laundering and data protection laws must still be adhered to. This has now been reflected in the current text of part 3. Hower, this does not mean that the self – exclusion itself should be delayed; only that identity may have to be verified after such exclusion has already commenced.

2.4. Part 4 of the Code – Operators’ Responsibilities

The practical benefits of voluntary self – exclusion are predicated on the operators’ ability to effectively prevent players from engaging with all or specific forms of gambling that they have excluded themselves from. The whole rationale for the existence of the self – exclusion scheme is based on the fundamental acceptance that those who need it are unable to stop gambling by themselves and need the assistance from others.

Breaches of self – exclusion online should be rare. Unless the player commits fraud and attempts to register again on the self – excluded website under incorrect credentials, there should be no reasons why the operators would fail to prevent the gambler from accessing their accounts. No manual recognition of physical appearance is required and no physical interaction that could be difficult takes place. However, this is only accurate in jurisdictions that require customer verification to take place prior to the first deposit being made. There are some countries that allow verification to take place up to 30 days from account opening or when triggered by anti-money laundering legislation. This creates a

tension between the rules that require operators to check all customers against self – exclusion registers and the rule that allows this to happen potentially only after 29 days or more as operators may not necessarily know the identity of their players until KYC procedures are carried out.

Online self – exclusion does not necessarily stop players from gambling in land-based venues or on alternative sites. This remains true even in jurisdictions that have national self – exclusion registers. For example, Hakansson and Widinghoff noted that 38% of Swedish participants in their study published in 2020 admitted to gambling despite being excluded through the national register *Spellpaus*. Those breaches included gambling with another online casino (52%), another online sports betting sites (16%) and with illegal gambling establishments (4%)⁶⁸. Similarly high rates were reported by Hakansson and Akesson who identified in a separate study that 68% of 85 Swedish self – excluded gamblers in treatment continued to gamble on unlicensed online sites despite their exclusion and despite participating in professional counselling. It is legitimate to suggest that comparable rates may exist in other jurisdictions⁶⁹.

However, it is not the operators' role to ensure that players do not engage with alternative providers or other forms of gambling. Operators' primary responsibility must focus on their own processes and standards to ensure that self – excluded players are correctly identified and prohibited from gambling. This is particularly important as it is well known that gamblers who suffer gambling harm may go to great lengths to alter, even if only slightly, their registered name and / or addresses and they may attempt to re-register with the names of family members. Those realities must be recognised by the operators and their processes must refer to a variety of methods that are feasible in the operators' jurisdiction and which would strengthen their detection rates. However, the project team recognised that due to large variations in the level of digital footprints that individuals in different countries have and significant discrepancy in digital and operational capabilities that operators possess or have access to, it would not be feasible to provide an exhaustive check – list that would be suitable everywhere.

This is why we emphasise that operators must devise robust and reliable methods that will prevent breaches of self – exclusion but the specific methods to be adopted should be determined by the operators' themselves. However, we also recognise that a mere token of compliance should not be acceptable, and all processes should be reviewed on a regular basis.

Our consultation respondents who answered this part largely agreed with our proposals, but this section was one that many respondents did not engage with. The reasons for this could not have been determined from the answers themselves. It may be speculated that the lack of engagement stems from the fact that this section largely corresponds to what is already typically required in respondents' jurisdictions and as such was most likely uncontroversial. The same applies to our statement that self – excluded gamblers should be automatically removed from any marketing communication upon exclusion.

⁶⁸ A Hakansson, C Widinghoff, 'Gambling Despite National Self – Exclusion – A Survey of Online Gamblers in Sweden' (2020) 11 Front. Psychiatry 599967; DOI: 10.3389/fpsy.2020.599967

⁶⁹ A Hakansson, G Akesson, 'Multi-Operator Self – Exclusion as a Harm Reduction Measure in Problem Gambling: Retrospective Clinical Study on Gambling Relapse Despite Self – Exclusion' (2022) 9(8) JMIR Mental Health DOI:10.2196/37837

The draft code that was subject to the consultation included a recommendation that operators should send unbranded, non-marketing communication with information about availability of mental health treatment that is available in the gamblers' jurisdiction as well as details of other available support. This was also met with largely positive responses. However, concerns were raised that this may breach regulatory rules prevalent in many countries that tend to prohibit communication between operators and gamblers after self – exclusion and that if the information was unbranded, it is unlikely to be trusted or even opened by the players. This led the project team to remove this recommendation from this section and to place it in section three to emphasise that this should be part of the initiation of self – exclusion rather than a subsequent activity. This has already been discussed under part three.

Our recommendation that operators should automatically refund any funds that are remaining in the account upon self – exclusion without waiting for any specific requests proved more contentious. Such automatic refund should only be carried out provided full identity verification has been completed to comply with anti-money laundering laws. However, once identity is verified, the only reasons not to do so are commercial. The amount of money in accounts may be lower than the cost of the refund transaction and this is likely to disproportionately affect smaller operators. This led five of our consultation respondents to agree with our proposal but only if minimum amounts were set below which the operator should not be expected to make a refund. However, what minimum amount would be appropriate for any given country would vastly vary. The project team reviewed the possibility of setting such minimum amount with reference to main global currencies, with reference to median income, with reference to minimum hourly wage in the players' jurisdictions, or with reference to average amounts that the player had in their account prior to self – exclusion. However, after careful consideration we concluded that none of the above options would be appropriate as they would still prioritise commercial concerns over the rights of the players to receive their own money back. Therefore, on balance we decided to retain the recommendation as it was.

2.5. Part 5 of the Code – Duration of Self – Exclusion

There is no optimal duration that would be appropriate for all players as gamblers do not represent a homogenous group of people, and their needs (real and perceived) will depend on their own individual circumstances. Gamblers who need to exclude themselves come from all sectors of the societies and possess many different psychosocial characteristics. Gambling harms operates on many different spectrums and for some a short breathing space will suffice to regain control while for others only a lifetime ban will be effective.

Durations in existing schemes vary from 24 hours to permanent. Permanent duration formally refers to exclusion for a lifetime of the gambler but in several jurisdictions, despite the name, it is in fact limited to 5, 7 or 12 years. Very short periods of 24 hours or 7 days are relatively uncommon and typically exist in jurisdictions that do not formally use different terminology to differentiate between self – exclusion

'proper' and temporary time – outs. Most adopted durations across the world are 3 months, 6 months, 12 months, 2 years, 5 years and 7 years⁷⁰.

Effectiveness of different durations were examined in a few studies, but none was able to determine an exact optimal length. This is likely to be impossible as players' needs differ and perhaps should not be attempted. While specific periods have been recommended in the past, those tended to be based on the authors' professional preferences and were not supported by empirical evidence that would encompass everyone's needs⁷¹. Nevertheless, some observations must be noted as they influenced the drafting process. Sufficient empirical support exists to indicate that, while short term exclusions can have a positive effect on gamblers' mental health and wellbeing, self – exclusion of longer durations are much more effective in preventing relapse upon return⁷². Luquiens et al evaluated levels of expenditure among online poker players following a period of self – exclusion. Gambling break of any duration caused significant reduction in the amounts gambled generally but on those who entered short term exclusion and were most heavily involved, short – term duration had no significant impact⁷³.

Hopfgartner et al's examinations of a total of 1382 out of 3203 self – excluded players who returned to gambling after their exclusion period ended reinforced those findings. Of the 3202, 1820 opted for a short-term exclusion while 1383 chose the longer option. 75.3% (1379) short term exclusion participants started gambling again after their duration ended while only 0.9% (12) of longer-term exclusion did the same⁷⁴. Longer term exclusion was also associated with a reduction in how much money players spent on gambling upon return while such association was not established for short durations⁷⁵.

Caillon et al examined financial outlay and time spent on internet gaming sites by French gamblers 15 days and 2 months after their 7-days self – exclusion period. In comparison to the control group, 15 days' abstention had no impact but after two months there was a positive reduction in gambling urges and gamblers' perceptions of their inability to stop gambling⁷⁶. Representation from mental health professionals and the industry on the group also strongly indicated that a period of 6 months represents the minimum that is necessary for medical intervention to have a chance to succeed.

However, periods should not be too long either. Collins and Kelly⁷⁷ and others⁷⁸ argued that durations that are too long may be counterproductive as players may want to terminate their agreements

⁷⁰ M Carran, 'Consumer Protection in EU Gambling Regulations – Review of the Implementation of Selected Provisions of The European Commission Recommendations 2014/478/EU across EU Member States – Follow up Study', November 2021

⁷¹ D Pickering, A Blaszczynski, 'Should I Stay or Should I Go? A Comparative Exploratory Analysis of Individuals Elective to Continue or Discontinue Self – Exclusion from Land – Based Gambling Venues' (2022) 20 *International Journal of Mental Health and Addiction* 1182

⁷² R Ladocuer, C Sylvain, P Gosselin, 'Self-Exclusion Programme: A Longitudinal Evaluation Study' (2007) 23 *Journal of Gambling Studies* 85

⁷³ A Luquiens, A Dugravot, H Panjo, A Benyamina, S Gaiffas, E Bacry, 'Self-Exclusion Among Poker Gamblers: Effect on Expenditure in Time and Money as Compared to Matched Controls' (2019) 16(22) *International Journal of Environmental Research and Public Health* 4399

⁷⁴ N Hopfgartner, M Auer, D Helic, MD Griffiths, 'The Efficacy of Voluntary Self – Exclusion in Reducing Gambling Among a Real World Sample of British Online Casino Players' (2023) *Journal of Gambling Studies*; DOI:10.2007/s10899-023-10198-y

⁷⁵ N Hopfgartner, M Auer, D Helic, MD Griffiths, 'The Efficacy of Voluntary Self – Exclusion in Reducing Gambling Among a Real World Sample of British Online Casino Players' (2023) *Journal of Gambling Studies*; DOI:10.2007/s10899-023-10198-y

⁷⁶ J Caillon, M Grall – Bronnec, B Perrot, J Lebourcher, Y Donnion, L Romo, C Chellet – Bouju, 'Effectiveness of At-Risk Gambles

⁷⁷ P Collins, J Kelly, 'Problem Gambling and Self – Exclusion: A Report to the South African Responsible Gambling Trust' (2002) 6 *Gaming Law Review* 517

⁷⁸ E.g., S Gainsbury, 'Review of Self-Exclusion from Gambling Venues as an Intervention for Problem Gambling' (2014) 30 *Journal of Gambling Studies* 229

prematurely. It may also constitute another barrier as most individuals are reluctant to commit to prolonged periods when their circumstances, ability to control their gambling or other factors affecting their decision may change. Some authors argued that duration should be entirely selected by the players and could be as short as one hour⁷⁹.

Our initial recommendation specified that the minimum duration should be 6 months and that the other durations should include 12 months, 24 months, 5 years and permanently. Our initial recommended durations were supported by 39 consultation respondents but 7 disagreed and 8 did not provide any answer. Those who disagreed could be divided into two sub-groups: those who argued that shorter exclusions should be available and those who argued that durations of self-exclusions should be determined entirely at the behest of the individual players.

Table D – sample of consultation responses on self – exclusion durations

“It seems better to provide a shorter duration as well. 6 months may seem long and possibly may deter gamblers”.

“I agree with the proposed periods and would add the option to exclude for a period of 3 months (with this period of time the average person is able to develop new behavioural patterns / habits). In turn I believe that for a lower risk individual this would be ample time to consider the implications gambling”.

*“There should be no minimum time frame and actually, as we see with the [name of a country⁸⁰] licence, users should be able to apply and chose data – range. This is a marginal call. I *just* prefer for an individual to set their own self – exclusion plans. I would fear that a minimum of 6 months may dissuade vulnerable people from making that step”.*

“Players should be given a range but also choose their own range as there may be other reasons for SE other than gambling harm”.

“In principle, all measures including VSE should be tailor – made. Also think of the use of colling off period as it will make it more flexible”.

“I believe that a VSE should only be 6 months but with no end date. Since 6 months is the minimum period, people can request to come back earlier. And the state of mind when they select ‘permanent VSE’ would be very different than 1 year away. It also makes returning from VSE more challenging since people make complaints / legal threats because they say ‘why did you let me back after 3 years when I said I want to be permanently excluded, etc”.

“VSE should be available for 24 hours, 3 days, 2-week, 1 month”.

⁷⁹ A Thomas, R Carson, J Deblaguiere, A Armstrong, ‘Review of Electronic Gaming Machine Pre-Commitment Features: Self – Exclusion’ (2016) Australia Government, Australian Institute of Family Studies, Australian Gambling Research Centre

⁸⁰ Name of the country removed as it would amount to an identifying information.

Considering the consultation feedback, we have revised this section in two material manner. The word 'permanently' was changed to 'indefinitely' as we agreed that this reflects the realities of the proposed duration better and we have included the shorter durations of 3 months.

The project team considered the representations that suggested that self – exclusion duration should be set entirely by the players in a wholly unrestricted manner. This would permit gamblers to set whichever period they choose, and they would not be limited to pre-determined options. This could potentially offer a highly individualised approach and could attract some important benefits. We recognise that this is viewed by many as the optimal situation. However, the initiation of voluntary self – exclusion imposes material regulatory responsibilities on the operators and those should not be triggered unless it is for a sufficiently meaningful period. While it is recognised that self – exclusion is used for a variety of purposes, our Code is strongly underpinned by it being a harm minimisation measure that aims to protect players from harm rather than facilitate any other uses.

There also does not appear to be any evidence that would support the proposition that self – excluding players have any reasonable means of assessing themselves for how long they need their break to last and expecting a mental health professional or a designated person to determine this for any given individual would be unfeasible in practice. Offering the players an unlimited choice would likely complicate their decision which may lead to the potential consequence of them not entering the scheme at all even when needed or entering it for a very short duration that would not bring any real benefits. It would also impose a high level of fluctuations that gambling operators may not be able to cope with thus ultimately hindering compliance.

More critically, it needs to be emphasised that our recommended code of practice does not suggest any removal of temporary breaks or time-outs that are available and indeed we recommend that panic button should be available on all gambling sites (see Part 6 of the Code). Therefore, the project team determined that, on balance, offering such unrestricted choice to players, while appearing attractive in theory, should not be necessary and indeed may lead to unintended negative consequences that could outweigh the positives. For the same reasons, we retained the recommendation to offer an indefinite period of exclusion primarily as our recommendation also permits its revocation which eliminates most of the concerns that were raised during the consultation.

On the question of whether permanent exclusion should be permitted, 43 respondents agreed, 8 disagreed and 3 did not provide an answer. Those who disagreed provided the following reasons: *“There is no right answer here. I feel that if the exclusion has a five year cap, at least the gambler has the opportunity to re-engage with licenced and regulated casinos in the future, rather than the black market only”*; *“People have a right to work on themselves and change their minds later down the line”*; *“People should have a right to choose their own behaviours at some point in the future”*; *“Because the state of mind they are in when self – excluding themselves, is very different to what it could be in 2 years”*. We believe that our recommended right to revoke 'indefinite' self – exclusion addresses those concerns effectively and this led us to retain this option in the code despite the above comments.

2.6. Part 6 of the Code – Panic Button

Panic buttons operate in a similar manner to a temporary time-out. However, it differs from the traditional tools in the sense that panic button is intended to be highly visible and to offer an immediate respite for customers who may want to lock their account with one simple click. Panic buttons are not new. They already exist in some jurisdictions such as Sweden⁸¹, Czech Republic and since 2022, Germany (among others) but the requirement for them to be omnipresent on all sites where gambling takes place is relatively novel. Panic buttons allow players to be forced to immediately stop gambling for a period of 24 hours, 48 hours or one week.

The activation of an online panic button gives gamblers an instant help during times when they may be particularly vulnerable to gambling – related harm. Their existence directly connects to self – exclusion in the sense that this, in substance, offers a very short-term ban. It may also operate as a prelude to a longer-term self – exclusion and to seeking medical treatment. It gives players the breathing space to decide on next steps without the temptation of gambling but still at the time when the feeling of anxiety and stress is recent in their minds. Empirical research about the usage and impact of a panic button is still at its infancy but early anecdotal indicators suggest the tool to be a valuable and promising addition to existing portfolio of social responsibility measures.

As such the project team concluded that panic button should be recommended subject to certain safeguards and conditions to prevent misuse or accidental triggers and that it should be accessible in all areas where gambling takes place. It should lock the account for a single period of 24 hours, but players should not be prohibited from recurring use. The activation should be available with one click and the pop – up window is introduced to prevent accidental activation which has been highlighted in the internet gambling discussion forums as one of the major drawbacks of the tool. Additionally, in our view, any customer who triggers a panic button (excluding accidental activation) should be automatically deemed to be at a higher risk of gambling harm and it should automatically initiate appropriate intervention. This should take place within 3 days as the period where such intervention is likely to be received constructively and be helpful is relatively limited⁸².

Consultation feedback on this section was varied. While there was an overall majority support for the recommendation that panic button should be available on all sites, its duration generated more mixed comments. For the first question on whether this tool should be recommended at all, 23 respondents answered - 'definitely yes', 17 - 'probably yes', 6 - 'might or might not' and only 2 - 'definitely not'. For the second, 37 respondents agreed with 24-hour duration while 14 offered alternative suggestions of shorter and longer ones.

Positive comments recognised that the main advantage of this tool over existing set of what may be considered to represent similar measures is the immediacy and accessibility of the tool to stop gambling there and then.

⁸¹ M Egerer, V Marionneau, J Nikkinen, 'Gambling Policies in European Welfare States', Current Challenges and Future Prospects, 2018. Part of the book series Work and Welfare in Europe.

⁸² Professional views of project group members.

Table E (1) – sample of consultation feedback on the panic button – positive

“A player who realised that they need help should be able to immediately access the help. A panic button is the best way to do that. An instant stop will protect so many people”.

“When someone is in crisis, offering a quick pathway to block is essential”.

“We already have this in the [country name⁸³] and it is highly appreciated by our customers”.

“In [country name⁸⁴] panic button was in my opinion one of the ... practices that really crated a big impact and should be extended to the rest of jurisdictions sooner rather than later. ... Again, commercial and business impact should be considered but it’s a great tool to control gambling in moment where the control is lacking”.

“In theory this could be a great tool, providing that its function / purpose is made clear to the customer (in an easily identifiable location) and that it is not only positioned sensibly on the site but programmed in a manner that prevents accidental triggers, i.e., instead of a single click, have a second pop-up asking them to confirm the action (as a means to prevent false RG alters that could distract from others)”.

“Panic button was in my opinion one of the ... measure applied that can bring a real impact”.

“Panic button is a shelter for gambler to calm down once they have felt lack of control in gambling, so it must be accessible easily”.

“This is a vital service and essential to emotional game management”.

“An absolute necessity”.

“I like the instant look of a panic button idea”.

Neutral comments primarily stemmed from respondents’ self-declared insufficient knowledge of the concept or from reluctance to support introduction of a tool that hasn’t yet been properly researched. Negative comments focused on the abundance of safer gambling tools that exist already, lack of evidence of panic button’s effectiveness, high risks of accidental triggers, and the potential for panic button to convey a message that gambling is “dangerous and questionable”. Some responses disliked the term ‘panic button’ while still being positive about the concept itself and recommended to choose an alternative name.

⁸³ Country name removed as it would be an identifying factor

⁸⁴ Country name removed as it would be an identifying factor

Table E (2) – sample of consultation feedback on the panic button – neutral or negative

“If this is only a recommendation then yes. Not sure if panic button should be mandated at this point until more is known about how useful they are”.

“Apparently the panic button is like a minimal voluntary self – exclusion alternative to the main VSE scheme. Some further research on this is needed before it should be recommended”.

“I don’t agree with the term ‘panic button’ but I agree with the approach.

“It’s a glorified ‘take a break’. And the overwhelming majority of gamblers gamble without any issue so I think that the framing of it makes the experience of regular customers worse. It suggests that what they are doing is dangerous and questionable. TAB and VSE are good options, but the addition of a panic button is overreach”.

“In real world scenarios the accidental activation of the panic button is more frequent than expected. A procedure should be in place to allow players to request cancellation of the break in case of accidental activation”.

“There surely can be a better, positive set of tools rather than a panic button. It may work at cross – purposes to primary and secondary prevention efforts. I would re-think this one.”

With regards to the duration of how long the account should be locked following panic button’s activation alternative suggestions included 72 hours, 48 hours, flexible and selected by the player from between 24 hours and 7 days as well as any other duration that the player may wish to select. Two respondents proposed that the account should be locked until the customer was risk assessed by the safer gambling teams and if a genuine issue was identified a time-out or self – exclusion should be applied but until then the player should not be allowed to re-engage in gambling.

Considering the feedback, we adapted some of our recommendations accordingly. However, we rejected the proposition that panic button should be available for a variety of durations to be selected by the player. Such individualisation would introduce complexity that could hinder the ability for operators to automate the process. Asking gamblers to make a choice would also inherently introduce some delay. This would de-facto eliminate the most important benefit of instantcy and immediacy of the tool’s operation and would substantively convert this tool into a time-out with a different name. The project team further considered the possibility of changing the name as the word ‘panic’ is likely to have negative connotations. However, a quick review of a selection of languages⁸⁵ showed that the word ‘panic’ is relatively easily recognisable in many, albeit not all, languages whereas any other alternative would be much harder to translate. The function of the measure aims to recognise the immediate

⁸⁵ Including Japanese, Spanish, Slovakian, and others

distress that players may experience when using it and as such the term reflects its purpose and intention accurately. Because of all those reasons, we have decided to keep the recommended duration and the term 'panic button' in our recommendations.

2.7. Part 7 – Termination of Self – Exclusion

Termination of self – exclusion is one of the components where a lot of variations between different countries occur. Differences exist regarding process for termination, revocability of self – exclusion, and operators' obligations regarding the players upon their returns. Within the international field, two broad approaches to termination can be identified. Under the first method, self – exclusion terminates by itself upon the passage of the previously selected duration and gamblers can resume gambling automatically. Under the second approach, players only leave the programme upon undertaking 'an active step' to reinstate themselves and a mere passage of time does not suffice⁸⁶. What represents 'an active step' varies. It can be as simple as an email to an operator or the national register that specifies the intention to resume gambling or it may involve additional stages such as completion of a self – test, creation of a safer gambling plan, or an interview with a relevant professional.

For example, in England, if an individual wishes to resume online gambling after a minimum period of registration elapsed, they must actively remove themselves from the GamStop register either through their online self – exclusion account or by contacting the registry directly. Failure to do so means that their registration remains in place for further 7 years from the end of the minimum period⁸⁷. A more extensive process has been adopted in Ontario, Canada. Returning players are required to submit a request in writing to the gaming sites. Such a request is then followed by a meeting with the security staff during which the players sign a formal acknowledgement of reinstatement. They are given information on safer gambling and are signposted to relevant support services⁸⁸.

Reinstatement process received limited attention in the literature. Price recommended that for high-risk gamblers, the process should include a mandatory creation of a 'safe gambling plan, a brief educational course delivered either online or in person, or professional counselling'⁸⁹. However, how the high-risk gamblers should be identified was not articulated and the recommendation was not reviewed for practical feasibility. A partial review of the effectiveness of an educational tutorial on post self – exclusion gambling intensity and problem gambling levels was undertaken by Turner et al in their studies published in 2021⁹⁰. The interactive tutorial was developed by the OLG and the Centre for Addiction and Mental Health in Toronto and included information about safer gambling, counselling and how to stay in control. The study, which included experimental and control group, found that the tutorial itself, when controlled for other variables, had no impact at all on reducing problem gambling but no reasons

⁸⁶ N Turner et al, 'Efficacy of a Voluntary Self – Exclusion Reinstatement Tutorial for Problem Gamblers' (2021) 37 Journal of Gambling Studies 1245; M Carran, 'Consumer Protection in EU Gambling Regulations – Review of Selected Provisions of the European Commission Recommendation 2014/478/EU across EU Member States – Follow up Study', November 2021.

⁸⁷[https://info.gamstop.co.uk/hc/en-gb/articles/4404979894546-How-will-I-know-when-my-exclusion-period-has-expired-](https://info.gamstop.co.uk/hc/en-gb/articles/4404979894546-How-will-I-know-when-my-exclusion-period-has-expired)

⁸⁸ N Turner, J Shi, J Robinson, S McAvoy, S Sanchez, 'Efficacy of a Voluntary Self-Exclusion Reinstatement Tutorial for Problem Gamblers' (2021) 37 Journal of Gambling Studies 1245

⁸⁹ A Price, 'Best Practices for Self-Exclusion Reinstatement and Renewal' Paper presented at the 16th International Conference of Gambling and Risk Taking, Las Vegas, Nevada.

⁹⁰ Ibid (ref 88)

for this outcome were identified. It was suggested that a pure information-based tutorial is unlikely to be effective and instead a *'brief counselling or motivational interview of lessons in mindfulness might be a better option than a purely information tutorial'*⁹¹. However, this was not based on any specific evidence collected in the study itself.

The reinstatement experience and gamblers' expectation among Australian players was assessed by Pickering and Blaszczynski⁹². Their study focused on self – exclusion from land-based venues but they examined gamblers' subjective experiences, their conduct and expectations of the termination for the VSE and as such many of those findings will be equally relevant for an online environment. Their sample consisted of 85 individuals, of whom 43.5% extended their self – exclusion while 53.5% allowed it to lapse. They reported that upon completion of the self – exclusion process, gamblers expected that *'they will be able to gamble freely again'* (44.7%), that they *'will be informed prior to the end date that their VSE is due to expire so they can make an informed choice as to whether they should continue with the programme to control their gambling or whether they wish to resume their gambling activities'* (44.7% and 34% respectively) and that they will be supported in this process. 63.5% of the individuals were satisfied with either re-enrolment onto the VSE or reinstatement but at the same time a significant proportion (64.8%) did not feel adequately supported by gambling venue staff, counsellors or the self – exclusion operators and did not feel sufficiently informed. What they wanted to see was a process where *"they can re-enrol quickly and easily (57.6%), have an option to exclude permanently (49.4%) and a gambling safety plan for those returning to venue (45.9%)* (for example, money and time limits). Based on this the authors recommended that termination of self – exclusion process should include intervention and a structured safety plan as this would *"foster individual competencies and personal agency in the decision-making process and help preventing relapses of gambling disorder"*⁹³.

On another continent, Hopfgartner et al studied the impact of SE on wagering amounts among English online casino players upon their return from SE. They recommended that return from SE should follow a structured approach and could include the requirement for a gambler to *"conduct an online self – test on problem gambling"*⁹⁴. Similar recommendation was made earlier by Johnsson et al on the basis that it would force the gamblers to actively reflect on their behaviours and decide whether they should resume gambling activities or not and it would allow operators to intervene if players returning to gambling still suffered from gambling harm⁹⁵. Interestingly, the recommendations from both jurisdictions are similar despite different processes being adopted, further reinforcing that variations of standards are not necessary.

Revocation of self – exclusion is determined by individual jurisdictions. In European Union, once a player is entered onto the national self – exclusion register, they remain there for the duration that was

⁹¹ N Turner, J Shi, J Robinson, S McAvoy, S Sanchez, 'Efficacy of a Voluntary Self – Exclusion Reinstatement Tutorial for Problem Gamblers' (2021) 37 Journal of Gambling Studies 1245

⁹² D Pickering, A Blaszczynski, 'Should I Stay or Should I Go? A Comparative Exploratory Analysis of Individuals Electing to Continue or Discontinue Self – Exclusion from Land-Based Venues' (2022) 20 International Journal of Mental Health and Addiction 182

⁹³ Ibid (ref 92)

⁹⁴ N Hopfgartner, M Auer, D Helic, MD Griffiths, 'The Efficacy of Voluntary Self – Exclusion in Reducing Gambling Among a Real – World Sample of British Online Casino Players' (2023) Journal of Gambling Studies; DOI:10.2007/10899-023-10198-y

⁹⁵ J Jonsson, I Munck, R Volberg, P Carlbring, 'GamTest: Psychometric Evaluations and the Role of Emotions in an Online Self-Test for Gambling Behaviour' 33(2) Journal of Gambling Studies 505

initially selected. However, permanent exclusion can be revoked in all EU Member States provided that the minimum period has elapsed. Several countries also allow for the revocation of temporary self – exclusion but this is not permitted, for example, in Denmark, France, Italy, Lithuania or Portugal. In addition to minimum period that must pass prior to formal removal, some European states such as Belgium, France, Italy, Malta or Portugal impose further cooling-off periods, the duration of which varies⁹⁶.

The project team identified this as an area that would benefit from material improvements as the level of inconsistencies are not truly justifiable and some of the current practices can arguably be considered to represent material weaknesses. In particular, we consider the ability to revoke a temporary self – exclusion as an example of poor practice unless such exclusion was carried out by third parties without the affected player's authorisation. The underlying ethos of our recommendations is based on balance between the need to minimise gambling related harm in a proportionate manner and giving players sufficient flexibility to encourage them to engage with the safer gambling tools that are offered. However, it is well known that many players who self – exclude may find it difficult to adhere to their self – imposed commitment and may try to re-instate themselves not because they are ready but because they find it frustrating and challenging not to gamble. Despite the existence of safer gambling teams, operators do not typically have suitable means to determine properly on an individual basis whether players should or should not be capable to return to gambling safely and it would not be feasible to expect them to develop such processes. Premature termination leads to complaints⁹⁷ and litigations⁹⁸ and vulnerable individuals are not necessarily able to determine whether they are ready to return to the activity that caused them harm or not. Therefore, those circumstances should be avoided in the first place. This is why our recommendation does not allow for termination of temporary self – exclusion with the only exception to this being exclusion that was fraudulently made by third parties without the affected player's permission.

The above considerations are significantly less powerful in the context of indefinite exclusion as individuals' situation and levels of vulnerability is more likely to change over a longer period. Irrevocability in those circumstances would be disproportionate to the aims and would impose undue restrictions on individual freedoms. This is why we recommend that only indefinite exclusion could be terminated. However, our recommendation differs from most common national provisions in the sense that we recommend that the minimum period after which indefinite exclusion can be revoked should be the maximum of 5 years rather than the minimum of 3 months. The main reason behind it is to prevent players from being able to 'game' the system and because it recognises that those who initially opted for indefinite self- exclusion were likely to be on the more severe spectrum of gambling disorder.

Respondents to our consultation were largely supportive of the recommendation that temporary self – exclusion should not be revocable. 42 respondents agreed that this should be the position and only 8 disagreed. A substantially larger number of respondents (17) disagreed with our proposition that

⁹⁶ M Carran, 'Review of the Implementation of Selected Provisions of European Union Commission Recommendation 2014/478/EU across EU States' (2021)

⁹⁷ Casino Guru complaints' analysis / consultation feedback

⁹⁸ See e.g., Ritz Hotel Casino Ltd v Al Geabury [2015] EWHC 2297

indefinite self – exclusion should only be revocable after a minimum period of 5 years but, for the large part, the reasons for their objections were not stated. It may be speculated that, as this goes against typical national provisions, it may be deemed too long. Currently not all countries have 5 years as the maximum period and some having higher limits and some lower.

We also recommend that self – exclusion should not terminate automatically but should require specific action by the player and that players should not be reminded that the SE period is about to expire or has already elapsed. The need to undertake an active step introduces a subtle but important friction that forces players to consciously consider whether they wish to return to gambling or not. This facilitates reflection that automatic termination would never be able to achieve and further places emphasis on parties' conscious autonomy and choice. The project team was also strongly of the view that reminding individuals that they can resume gambling create a very high risk of commercial providers using this process to incentivise players to return to gambling regardless of whether they may be ready or not. It could also act as a trigger that may be premature and may reach the players when they are still vulnerable and as such represent an example of poor practice. We retain this view even though some studies indicate that players in some jurisdictions would like such reminders to be sent. Lack of it does not prevent players, for whom self – exclusion has ended, from re-engaging with gambling, but it removes a potentially unnecessary or harmful reminder.

In our consultation, the inclusion of an active step in the re-instatement process received strong support of 45 respondents. 41 respondents further agreed that players should not be reminded that the VSE is about to expire. While negative comments focused on the right of the gamblers to be adequately informed, we feel that the risks outweigh the benefits and retained the wording of our recommendation. Players should indeed be able to make an informed decision whether to return to gambling or not, but this should be initiated by the players themselves without any advanced incentives or commercial inducements. Those who wish to return will do so anyway, and the avoidance of potentially premature triggers should be prioritised.

Table F – sample of consultation feedback on termination.

On whether the exclusion should or should not terminate automatically:

“Many players who self – exclude take comfort in knowing that the exclusion is simply there. Part of their recovery is rooted in the acceptance that this block exists, and they simply cannot access gambling. The inconvenience of those who want to re-access gambling of having to ask to do is far smaller than the potential harm to those who are not ready to access gambling again of simply lifting the restrictions”.

“VSE should run until the customer has requested to come off it. To automatically remove them after the selected period may result in them being able to gamble with unresolved issues”.

"If a player wishes to return to services after a period of 6 months or more then intervention and interviews should be conducted (alar the [name of a country] license) to ensure cover for both the user and the operator. In [name of a country] self-exclusions are now lifted automatically and such a shift has given rise to a significant amount of people being reinstated who should not have been. Need to check customer is OK to return to play, set limits and put monitoring in place for products and session length".

"A VSE should not be terminated without a positive interaction. In an AI world, where we have forms, I am confident that we can develop some type of sort form that will allow operators to qualify the player risk and even create insights to when the player should be contacted again".

"I believe that (should the customer wish to reactivate their account/s) a carefully considered selection of questions, tailored to the individual as opposed to a 'blanketed approach' & encompassing their activity leading up to the exclusion, the nature of their decisions to exclude and their present mindset / financial position (i.e., if they excluded to recover financial losses) should be conducted and the responses assessed by an experienced RG officer prior to resuming the business relationship".

"It seems to be pragmatic that individuals should request termination of SE via an email or call - this introduces some element of friction but also means that the individual can make their own choice".

On whether the players should not be reminded that their VSE is about to expire:

Supportive of our recommendation:

"Prompting any former addict that the activity they were addicted to is accessible again is substantially detrimental in both clinical and ethical manner. Common decorum would preclude offering to buy a pint for a former alcoholic. The same principle should apply here".

"This is marketing to someone that choose to self – exclude most likely because they have a problem so this should be forbidden".

"For someone reminding them can be treated as invitation to come back to gambling".

"An active, intrinsic decision-making process should take place. It should not be triggered from the outside".

"I believe that it is entirely inappropriate to make such a form of contact while they are excluded".

Against our recommendation:

"I believe that a carefully worded reminder would be helpful as there might be players who will have recovered and the best way of preventing a relapse is by means of low stakes playing".

“An info could be useful for the user”.

“No but a soft no. I don’t think it matters much to send an email out informing a customer about exclusion expiring, especially as we do not have the reasons for the exclusion”.

“This is pro and con question. On the pro side, I think the message may alert them to extend their VSE duration. On the con side, the message may become some kind of mental hint that trigger them to participate in gambling again”.

We also recognise that, in some jurisdictions, there is a visible disproportionality between gambling operators’ obligations towards players during self-exclusion and afterwards. Gamblers do not necessarily stop being vulnerable because their period of self – exclusion ended and if they choose to re-engage with gambling, they should be offered additional protection. This should not be optional and should not be determined by the operators themselves but should be imposed automatically to prevent players from forming the view that they are being specifically and negatively singled out. Those requirements already exist in some countries but should be extended to all to make them more universal.

This part also received support from most of our consultation respondents who made further suggestions with regards to other forms of support that should also be offered. In addition to what we have included, respondents recommended to add: *“monthly check-in regarding the health of a player”*; *“general reminders of tools available as well as tips and advice on sustainable play”*, *“customised gaming experience to both help the player manage their activity in a way that suits them but also to separate them from their competitors in which is a vastly crowded marketplace”*, *“product specific restrictions, sessions length, marketing and bonuses limitations”*, *“a low-threshold counselling sessions to reflect on the motives for the former VSE and the current reasons for lifting VSE (tertiary prevention)”*, and similar.

2.8. Part 8 – Organisational Culture

Our final section of the Code relates to the overall culture within gambling organisations and within gambling industry overall. It stems from the recognition that the awareness and understanding of the function of self – exclusion schemes require further improvements (as already discussed earlier in this report) and from the ongoing negative perceptions (irrespective of whether those perceptions are correct or not) that gambling industry does not sufficiently care about their customers.

The project team strongly advocates that everyone should have an understanding and awareness of safer gambling initiatives, including self – exclusion. We feel that educating the public overall is an important step in any strategy that focuses on protecting not only gamblers but also their families and the society and this has to start from within the industry itself.

We recognise that not everyone agrees. Two consultation responses expressly stated that this should not be recommended: *“I don’t think everyone should have awareness of this [self – exclusion]. [Only] people with direct links to customer should have this training”*; *“Some companies have 1,000 employees, some of whom may never be involved in any customer relevant role. It seems overly draconian to mandate training for all employees. Perhaps it could be part of general SG training which employees to undertake on joining a company”*.

We disagree. As has been seen throughout the whole of this project, there is a clear need to enhance awareness of safer gambling tools among the wider population, and this can only be achieved if all individuals irrespective of whether their job description necessitates it or not are exposed to the relevant information on a regular basis. Those should not be confined to safer gambling teams but should extend more generically to everyone else. In a similar manner that equity, sustainability, inclusion, data protection or cyber security should be at the forefront of everyone’s mind, so should the measures that can be taken to protect individuals, who may find themselves in a vulnerable situation, from gambling – related harms. We also feel that this recommendation does not impose undue burden on the operators. Existing technology and AI software allows for the creation of interactive, responsive and engaging training to be developed in a very cost-effective manner and require relatively short time commitment from staff. It may increase curiosity among employees to find out more and may facilitate more regular discussions about the issues. This, in turn, could help everyone gain a better understanding of gambling disorder and how the risks can be minimised.

The project team further recognised that despite many regulatory efforts, there are still gambling providers that prioritise commercial interests over safer gambling measures and that in many places a rebalancing exercise would bring long – term benefits to the organisations. The prioritisation of commercial aspects needs to change if the industry wants to be seen as taking safer gambling seriously. We want to emphasise to operators that, in the long term, processes that look after the wellbeing of their customers do not hinder but improve profitability. Those help build sustainable brand that is trusted by the consumers and causes them to be more loyal. Genuinely looking after one’s customers is only likely to promote the commercial viability of the operations in the long term and the provision of services in a safe manner should be seen as a core principle of sustainable business practice. This can only be achieved if companies invest in ensuring not only that they employ designated individuals who will take responsibility for their safer gambling strategies but also that they are given the same respect, status and authority as those who manage the commercial side of the business.

The project team was somewhat concerned whether this section fits into the scope of the code but considering the importance of those principles we decided to include it regardless. Overall, most of our respondents (48 in total) agreed to our recommendations contained in this section. Respondents focused on the need for the industry to adhere to the spirit rather than the letter of safer gambling provisions and highlighted the importance of further awareness raising.

Table G – sample of consultation feedback on operational culture.

"The industry needs to step up and address that problem gambling is destroying lives. They have a moral responsibility to do more to address this for obvious reasons".

"The obvious reasons – your team is correct that commercial priorities regularly trump harm minimisation in a large proportion of gambling operators. The only way this culture will change is if more senior positions are created within gambling operator businesses to balance the commercial positions".

"Operators do not want harmful gambling. It is not needed for business and continues the stigma on gambling that is bad. There are plenty of people who gamble within their means".

"Operators should ensure that all aspects are given the same weighting to ensure transparency and knowledge sharing. This will ensure that the operators are leading from a clear playing field putting customers and business requirements on the same level."

"Safer gambling is as important for the business, as is the commercial aspects of it".

"If safer gambling is going to be taken seriously – if it is to be meaningful – it has significant implications for the way that gambling business operate and the way that gambling industries may be perceived. If that work has lower status than promotional activity, the safer gambling schemes have their credibility undermined and sometimes well-meaning activity can end up an own goal, untrusted by the wider world yet still adversely impacting the business short term bottom line. An effective safer gambling policy should be materially positive for a business, particularly from a sustainability perspective. It should be treated with respect".

"Sustainability needs to be as important as the commercial side of things while respecting the fact that all businesses are designed to make money".

"Safer gambling is closely aligned with the commercial operation. SG teams should have input into any commercial decision such as marketing and sales".

"I think that this is very important part of gambling business, and it has to be taken seriously. That can be guaranteed by putting safer (responsible) gaming under BoD and have the team reporting directly to the Board".

"Responsible gaming is a core pillar to ensuring that operators remain in business and that the vulnerable members of society are appropriately safeguarded / supported within our industry".

3. CONCLUSION

3.1. Conclusion

Our Online Voluntary Self – Exclusion – Recommended Code of Conduct has been devised by a group of international experts who were purposely drawn to represent 6 countries, 3 continents and all groups of stakeholders who are interested in or affected by gambling. As this, in our view, includes directly or indirectly everyone, one of our project group members was formally classified as a ‘member of the general public’. This stakeholder group is often forgotten but should not be because gambling implications are not confined to individuals who engage with a particular activity but extend to the whole society. The proposed recommendations are underpinned by evidence that was gathered from literature, data that is not frequently available to the public such analysis of complaints made by players against their online providers, professional views and perspectives of the project group’s stakeholders and extensive and thorough comments received through the international consultation process.

In the code we laid down our thinking on how self – exclusion scheme should be implemented in any county for the benefits of the operators and gamblers alike. We believe that players should be protected regardless of where they choose to gamble. We strongly advocate for the standardisation of safer gambling measures across different jurisdictions as we believe that this is the only way to achieve a genuine progress and genuine change in the globalised environment. The final wording of the code was very mindful of the critical balance that needs to be maintained to prevent under- as well as over-regulation as both can be equally counterproductive. This balance is very delicate, but we hope that we were able to achieve it.

In countries with existing sets of developed rules relating to self – exclusion, we hope that our recommendations will nudge the regulators / policy makers to review their specific requirements against our proposals and to see how the operational formats of the various schemes can be brought closer together. Many countries may argue that their schemes are already broadly similar but the real difference lays in the details that, despite initial appearance, still unnecessarily vary substantially. In countries where self – exclusion schemes are not required, or the rules are not yet fully developed, we hope that our code will help regulators / policy makers to expediate the process of imposing such a requirement. This off-the-shelf ready solution can easily be adopted in entirety or in parts. It may also be adapted to consider specific jurisdictional priorities although we hope that this would not be necessary.

While many recommendations that regulators can draw upon can already be found in existing literature, we believe that our Code is unique. It’s the most comprehensive outline of recommended rules that currently exists as our recommended Code addresses all aspects and all internal components of self – exclusion and provides a direct guidance on what should and should not be permitted. It offers detailed instructions in parts where it is appropriate and outlines recommended principles that should underpin regulations and operators’ activities in others. It was deliberately drafted to avoid any specific cultural undertones and was purposefully reviewed against many different jurisdictional approaches. This is especially significant as there does not appear to be any singular country that could be highlighted as a beacon of best practice but certain elements in many can be classified as such.

Furthermore, we believe that our recommendations balance the need to protect players with the need to enable the industry to thrive effectively and avoids prioritising one area over another. It is however, drafted with a clear aim of ensuring that self – exclusion, in conjunction with other safer gambling tools, is properly effective at protecting those who are vulnerable as this should remain at the forefront of all regulatory and legal activities.

4. APPENDICES

4.1. Appendix 1 - Names and contact details of the Project Working Group Members

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4. Matt Smith – **Head of External Affairs** – Betknowmore, 200A Pentonville Road, London N1 9JP, **UK**
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5. Tracy Parker – **Vice President, Policy, Standards and Accreditation** – Responsible Gambling Council, 411 Richmond St E Suite 205, Toronto, ON M5A 3S5, **Canada**
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6. Paul Dent – **Trauma and Addiction Therapist** - Thinkstrong.Solutions - c/o Somatic Therapies Centre, 81 Church Road, Hove, East Sussex, BN3 2BB, **UK**
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7. Maris Catania – **Consultant / Researcher** – SGCertified, 17 Roward House, NW3 2EY London, **UK**.
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8. Simone Vince – **Sustainable and Safer Gambling Lead** – Casino Guru – Guru Web Ops s.r.o. (Casino Guru), Krakovska 583/9, 110 00 Praha, **Czech Republic**
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10. Chiara O'Shea – **Barrister** – City, University of London, Northampton Square, London EC1V 0HB, **UK**

4.2. Appendix 2 – Details of Consultation responders⁹⁹

| | Name | Organisation | Individual response or on behalf of organisation | Jurisdiction | Publication permission |
|----|----------------------------|--|--|---------------|---|
| 1 | Gary Morris | n/a | n/a | UK - England | Permission granted for publication with reference to the respondent's name only |
| 2 | Duncan Garvie | BetBlocker | Both | UK | Permission granted with reference to the respondent's and organisation's name |
| 3 | Kevin O'Neill | Responsible Gambling Foundation | Individual | Malta | Permission granted for publication of anonymised comments only |
| 4 | Dimitrios Papadopoulos | Hellenic Gaming Commission | Individual | Greece | Permission granted to include anonymised comments but not for publication of the respondent's name. |
| 5 | Name provided but withheld | Name of organisation provided but withheld | Individual | UK | Permission granted to include anonymised comments but not for publication of the respondent's name. |
| 6 | Terry White | Don't bet your life on it | Individual | UK - Wales | Permission granted for publication with reference to the respondent's name only. |
| 7 | Matthew Curtis | L&L Europe Ltd | Organisation's view | Malta | Permission granted for publication with reference to the respondent's and organisation's name. |
| 8 | Dan Iliovici | Rombet & Responsible Gaming Association | Individual | Romania | Permission granted for publication with reference to the respondent's name only |
| 9 | Steffen Pedersen | UK Tote Group | Individual | UK | Permission granted for publication with reference to the respondent's name only |
| 10 | Name provided but withheld | Organisation's name provided but withheld | Individual | Gibraltar | Permission granted to include anonymised comments but not for publication of the respondent's name. |
| 11 | Adrianus Van Spreeuwel | DAZN Bet & Phisana Digital Health Technologies | Individual | Spain | Permission granted for publication with reference to the respondent's name only. |
| 12 | Moreno Marasco | LOGiCo | Organisation's view | Italy | Permission granted for publication with reference to the respondent's and the organisation's name. |
| 13 | Sam Starsmore | YGAM | Individual | UK | Permission granted for publication of anonymised comments only. |
| 14 | Ciaran | Gambling Companies and Treatment Charities | Both | Ireland | Permission granted for publication with reference to the respondent's name only |
| 15 | Christina Thakor – Rankin | 1710 Gaming Limited | Both | UK | Permission granted for publication with reference to respondent's and organisation's name |
| 16 | Jadie Hutchinson | Kindred | Individual | Malta | Permission granted for publication with reference the respondent's name only |
| 17 | Martina Knezevic | Kaizen Gaming | Individual | Malta | Permission granted for publication of anonymised comments only |
| 18 | Name provided but withheld | Organisation's name provided but withheld | Individual | Matla | Permission granted to include anonymised comments but not for publication of the respondent's name. |
| 19 | Richard Hayler | IBAS | Individual | UK | Permission granted for publication of anonymised comments only |
| 20 | Lee Willows | ESG Gaming | Individual | UK | Permission granted for publication with respondent's and organisation's name |
| 21 | Luke Camilleri | Malta Gaming Authority | Individual | Malta | Permission granted for publication of anonymised comments only. |
| 22 | Martyn Lycka | n/a | Individual | United States | Permission granted for publication of anonymised comments only |
| 23 | Jay Robinson | JR Consulting | Individual | Canada | Permission granted for publication of anonymised comments only |
| 24 | Eva Heringova | Fortuna Entertainment Group | Organisation's | Czechia | Permission granted for publication with respondent's and organisation's name. |
| 25 | Sendegeya Ernest Joel | n/a | Individual | Uganda | Permission granted for publication of anonymised comments only |
| 26 | Stephen A Murchie | Bounce Interactive Ltd | Individual | UK | Permission granted for publication with the respondent's name only |
| 27 | Jeffrey Derevensky | McGill University | Organisation's | Canada | Permission granted for publication with the respondent's and organisations' name. |
| 28 | Skirmante Paukstiene | Lithuania's Gaming Control Authority | Organisation's | Lithuania | Permission granted for publication of anonymised comments only |

⁹⁹ For complete list of the consultation questions, please send your request by email to the chair of the project on Margaret.Carran.1@city.ac.uk

| | | | | | |
|----|----------------------------|---|----------------|-----------------|---|
| 29 | Name provided but withheld | Name provided but withheld | Individual | UK | Permission granted to include anonymised comments but not for publication of the respondent's name. |
| 30 | Changbin Wang | Macao Polytechnic University | Individual | Macao | Permission granted for publication of anonymised comments only |
| 31 | Yu Ning Sui | Macao Polytechnic University | Individual | Macao | Permission granted for publication with respondent's and organisation's name. |
| 32 | Name provided but withheld | Organisation's name provided but withheld | Individual | Netherlands | Permission granted to include anonymised comments but not for publication of the respondent's name. |
| 33 | Carlos Siu Lam | Macao Polytechnic University | Individual | Macao | Permission granted for publication of anonymised comments only |
| 34 | Eduards Jakubovs | Bettsson Group | Individual | Malta | Permission granted for publication of anonymised comments only |
| 35 | Maria de Miguel Molina | Universitat Politècnica de Valencia | Individual | Spain | Permission granted for publication with respondent's and organisation's name |
| 36 | Steve Mees | Commission des jeux de hasard | Organisation's | Belgium | Permission granted for publication of anonymised comments only |
| 37 | Dr Anke Quack | University Medical Centre, Competence Centre for Player Protection and Prevention | Organisation's | Germany | Permission granted for publication with respondent's and organisation's name |
| 38 | Christina Theophilos | n/a | Individual | Malta | Permission granted for publication of anonymised comments only |
| 39 | Stefaan Savenberg | Belgian Gambling Commission | Individual | Belgium | Permission granted for publication of anonymised comments only |
| 40 | Name provided but withheld | Name provided but withheld | Individual | UK | Permission granted to include anonymised comments but not for publication of the respondent's name. |
| 41 | SB Viknesan | National Addictions Management Service | Individual | Singapore | Permission granted for publication with respondent's and organisation's name. |
| 42 | Pedro Romero | Betblocker | Both | Spain | Permission granted for publication of anonymised comments only |
| 43 | Petya Filipova | RGF | Individual | Bulgaria | Permission granted for publication with respondent's and organisation's name |
| 44 | Sandhya Singh | n/a | Individual | Malta | Permission granted for publication of anonymised comments only |
| 45 | Iris den Boer | Organisation's name provided but withheld | Individual | The Netherlands | Permission granted for publication of anonymised comments only |
| 46 | Name provided but withheld | Organisation provided but withheld | Individual | UK | Permission granted to include anonymised comments but not for publication of the respondent's name |
| 47 | Paul Carpenter | SG Standards | Individual | UK | Permission granted for publication of anonymised comments only |
| 48 | Francesco Rodano | Playtech / ex Italian regulator | Individual | UK / Italy | Permission granted for publication with respondent's name only |
| 49 | Rafaela Vieira | n/a | Individual | Spain | Permission granted for publication of anonymised comments only |
| 50 | Hugo Smart | n/a | Individual | UK | Permission granted for publication of anonymised comments only |
| 51 | Mark Vander Linden | Massachusetts Gaming Commission | Individual | United States | Permission granted for publication of anonymised comments only. |
| 52 | Michelle Green Hvidtfeldt | Danish Gambling Authority | Organisation's | Denmark | Permission granted for publication of anonymised comments only |
| 53 | Pieter Remmers | Assissa + G4 | Both | The Netherlands | Permission granted for publication with respondent's and organisation's name |
| 54 | Bob Michniak | Responsible Gambling Council | Individual | Canada | Permission granted for publication of anonymised comments only |

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