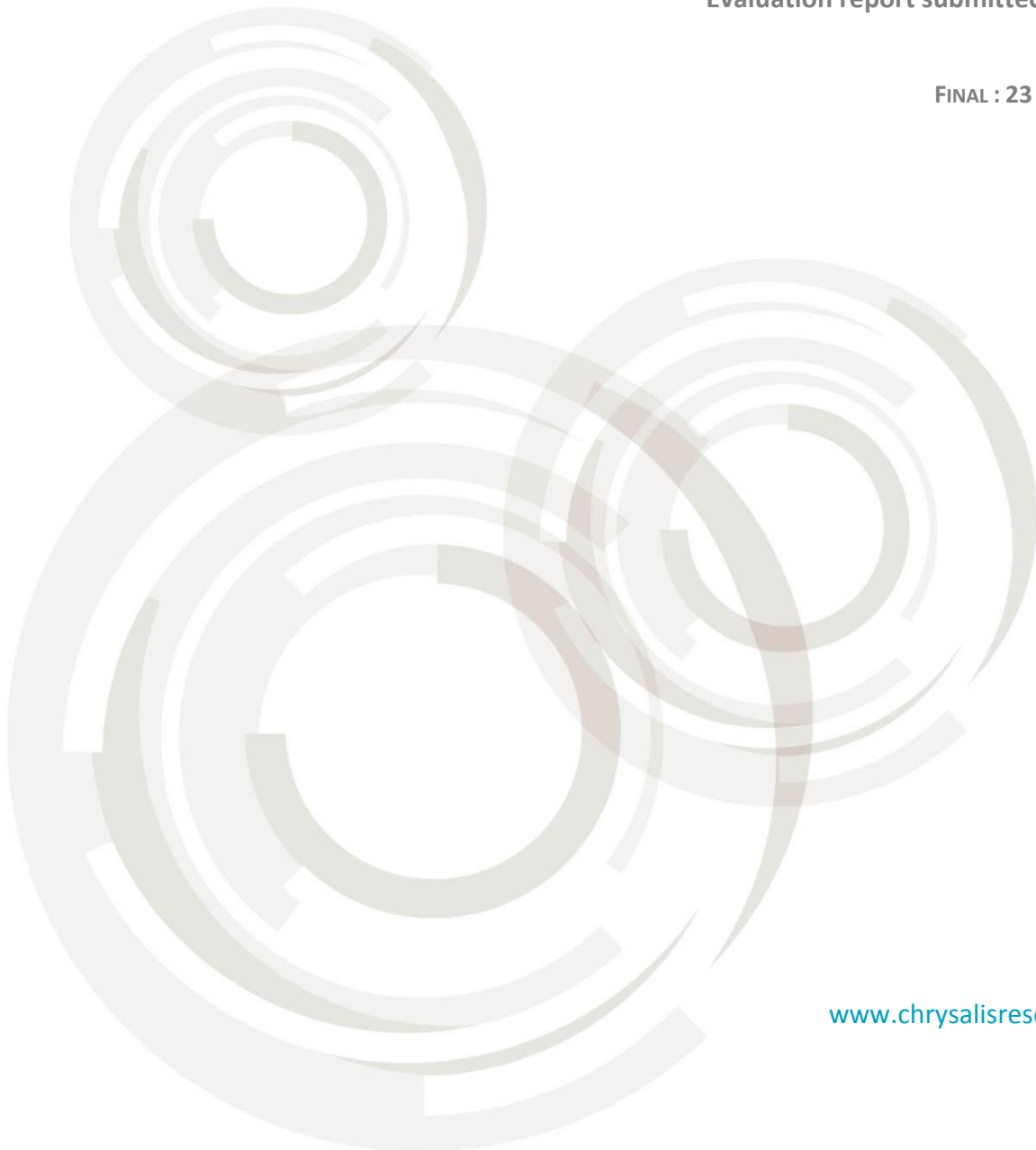


Evaluation of the Multi-Operator Self-Exclusion Scheme (MOSES)

Evaluation report submitted to MOSES

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Executive Summary

Aims and methodology

GambleAware independently commissioned Chrysalis Research to conduct an evaluation of MOSES. The aim of this evaluation was to examine the processes used within the MOSES scheme and how these processes can be improved. This included ‘front facing’ processes used to register customers and ‘internal’ processes used between MOSES and the Licensed Betting Operators (LBOs). The evaluation was also an opportunity to understand the effectiveness of MOSES in supporting customers to reduce or stop their gambling activity.

The data collection comprised quantitative and qualitative methods. There were two surveys: one with registrants of MOSES (completed either by phone or online by 196 customers) and one with LBOs (completed online by 627 managers). The sample achieved represented 6.8 per cent of all registrants at the time of the study or 19 per cent of those who had agreed to be contacted. It therefore may not be possible to generalise the findings to the total population of self-excluders.

Nine telephone depth interviews were undertaken with representatives from LBOs who were responsible for coordinating the scheme. The MOSES central team was also consulted at the beginning of the evaluation to understand more about the scheme processes and any issues arising from their perspective.

Main findings

The registration process is straightforward

Almost two-thirds of survey respondents found out about the MOSES scheme in a betting shop and many customers had also excluded from other venue types such as online betting sites, casinos, arcades and telephone betting services. Half of the respondents had also accessed other support to help them with their gambling, but not necessarily as a result of registering with MOSES.

For the majority of survey respondents, the registration process was straightforward; most were able to complete it in one phone call and found the map helpful to identify shops. The majority also submitted their photo and ID within two weeks of the call. The suggestions for improving

the registration process focused on supporting the customer to be able to register quickly and more conveniently. This could be achieved through more staff, longer opening times or online services. Some customers also suggested a blanket exclusion in certain areas to reduce the time it takes to use the map.

Most were clear on the terms of the scheme

Most customers surveyed were clear about the scheme and understood it was their responsibility to stay away from their nominated betting shops. However, a small minority indicated that they were not entirely clear about the scheme, or thought that the LBOs should take more responsibility in keeping self-excluded customers out.

LBO staff would benefit from more information

Most LBOs felt that they understood the way the scheme works however, many expressed the need for more information to explain the registration processes to the customer and what happens once a customer registers, particularly in relation to the time it takes to put the exclusion in place. They also sought reassurance that they would be notified about breaches in other branches.

Operators support the principles of the scheme

Operators were supportive of MOSES, they felt it offered convenience to customers and that it sat well alongside their own self-exclusion scheme. For most, the systems used to notify staff about exclusions were similar to their existing schemes and relied on a central coordinator to manage these. They were satisfied with the clarity of information provided about the customer and form that was used. They did not always recommend MOSES as the recommended route, but it is understood they may offer their own scheme first to help customers gain immediate exclusion from their shops.

LBOs felt there could be greater clarity about the timescales used to process the exclusion so they could help customers understand how long it would take to put it in place. This also included processes and timing for when staff are asked to verify a photo in shops. In its current delivery format, the scheme has to offer the flexibility to suit the different communication systems used by different operators i.e. electronic or paper based.

The risk of breaches

Half of LBO survey respondents indicated that as the scheme grows, the volume of registrations will prevent the self-exclusion scheme from being effective and a further third stated that staff turnover was an issue. These risks were also echoed by operators interviewed, who saw that the ability for staff to recognise individuals could weaken as the number of exclusions grows.

Some respondents claimed that they had breached the exclusion by entering the shops and placing a bet, despite systems being in place to handle breaches and notify the breach to other nominated shops. Ways to address this are to provide greater support for staff to recognise individuals or to create more stringent systems to prevent individuals from breaching.



The scheme is effective for most

The majority of customers surveyed found MOSES worked for them, 83 percent agreed that it had been effective in reducing or stopping their gambling activity and 71 percent said they had not attempted to use any of their nominated betting offices since joining. They felt the exclusion put the necessary barriers in place to stop them from gambling. The evidence from the survey revealed that self-exclusion may not be enough to prevent some customers from gambling. These customers have a stronger addiction and will find other ways to gamble. Furthermore, they thought that shop staff had to take more rigorous steps to keep them out. These customers are likely to need additional support to address their gambling activity.

Recommendations

The following recommendations would help to improve the MOSES processes and effectiveness for customers and LBOs:

- Provide more detailed information and guidance for staff to be able to explain the features of the scheme to customers, including its benefits and the steps to registering on the phone. It would be useful for them to have a quick reference guide or flow chart to show the steps during and after registration.
- Provide more information for staff about the scheme so they are aware of their role and responsibility for certain aspects e.g. verifying ID and notifying the central team about breaches.
- Customers would also benefit from having more detailed information about what happens during the registration call. The key terms of the scheme could be emphasised so they are clear on their role and responsibility during the exclusion.
- It would be useful to improve the ability for customers to register quickly and more conveniently by considering online registration methods or greater investment in the central team to offer longer opening times or more staff to respond to calls.
- Operators may wish to consider the investment in systems that will improve the management of the scheme by operators and shop staff. This includes online 'live' systems to store and update exclusions and membership systems for customers.
- There may be benefit in conducting risk assessments for customers wishing to register with MOSES to establish their level and type gambling behaviour and signpost to other support as required.

Introduction

Background

In Great Britain, the Senet Group – an independent body set up to promote responsible gambling – launched the Multi-Operator Self-Exclusion Scheme (MOSES). It began in July 2015 as a pilot in Glasgow and was rolled out nationally in March 2016. MOSES allows individuals who wish to self-exclude to nominate all Licensed Betting Offices (LBOs) that they use or are likely to use; for example, users may self-exclude from LBOs which are close to their home or work. These LBOs will be informed that the user wishes to self-exclude, giving them the ability to deny the individual the opportunity to gamble and take necessary steps to remove them from the venue if required. Since its launch in November 2015, around 3,500 individuals have registered with the MOSES exclusion scheme and, on average, customers exclude from 22 shops each.

As MOSES is in its formative stages of operation, the Senet group requested a brief, independent evaluation so it can make improvements to the scheme. In particular, it wanted to use the evaluation to focus on improvements to MOSES, from the perspective of users, LBOs and MOSES central staff. This report provides the main findings of the MOSES evaluation, carried out by Chrysalis Research and independently commissioned by GambleAware.

Context

Self-exclusion is widely accepted as an effective harm-minimisation tool for individuals who have recognised that they have a problem with their gambling and have made a commitment to deal with it. The process of self-exclusion is carried out in partnership with venues where gambling takes place. Previously, if an individual wanted to self-exclude entirely from gambling they would need to do so separately with each operator they gamble or might gamble with. The Responsible Gambling Trust's report on self-exclusion highlighted that a single operator approach is significantly flawed because of the ease with which consumers can continue to gamble at other venues, locations or sites where they haven't self-excluded.

It is recognised that the most effective approach to self-exclusion is by implementing multi-operator schemes whereby an individual can, through a single registration process, nominate a number of operators from which they would like to be refused service. This joined-up approach



overcomes the limitations of self-exclusion in single venues. The principle of the multi-operator scheme is to offer a quick and convenient method for self-excluding from a number of venues across different operators. The multi-operator approach allows someone to nominate multiple locations and operators in a 'one stop' process. This process is carried out through a phone call with a trained advisor to create a personal self-exclusion which meets the customers' needs, based on their usual gambling activity.

Research objectives

Users of the self-exclusion scheme:

- Determine how easy or difficult they found the MOSES system registration process, including the telephone number use and online, and clarity of terms and conditions
- Ascertain whether users also self-excluded from outlets other than LBOs that provide an opportunity to gamble e.g. land based outlets (casino or arcade) or online betting sites
- Identify improvements to the MOSES, specifically exploring:
 - The registration process
 - The process within the nominated LBOs and other chosen outlets i.e. improvements if the user if they attempt to use a nominated venue
- Determine any barriers that may prevent someone from self-excluding via MOSES or they feel have prevented MOSES from being more effective for them personally.

The main focus of the evaluation was on the process objectives above, however, we also used the contact with customers as an opportunity to address three objectives that assessed the emerging impact of the self-exclusion:

- Explore the perceived effectiveness of self-exclusion with MOSES in addressing their gambling behaviour
- Identify any key features of MOSES that they feel have been most successful for them
- Determine whether the process of self-exclusion through MOSES prompted other actions to address gambling behaviour or reduce gambling activity e.g. accessing formal support such as counselling or treatment programmes.

Operators and LBO staff:

- Effectiveness of the notification system, particularly in relation to:
 - staff's ability to recognise individuals who self-exclude and to uphold the self-exclusion
 - perceptions about the effectiveness of response with individuals who visit nominated venues following self-exclusion
 - effectiveness of communication between LBO and MOSES central team

- Establish whether staff were equipped with the right information and knowledge in the event that an individual visits a nominated venue
- Assess the perceived effectiveness of the self-exclusion approach for users of LBOs
- Ascertain improvements to the MOSES process could be improved for staff in LBOs

MOSES central staff:

- Determine how easy or difficult they find the registration process with individuals who contact them to self-exclude
- Identify any barriers to completing a registration with those who contact MOSES e.g. are there regular points when individuals terminate the call before registration
- Determine effectiveness of the current communication methods between MOSES and LBOs
- Determine key improvements required to MOSES for it to run more smoothly and effectively, specifically in relation to:
 - the registration process
 - the communication process between MOSES and LBOs/operators (specifically communication regarding registration, notifications and breaches)
- Assess uptake of offer of counselling and other formal support methods for individuals who registers to self-exclude.

Methodology

The evaluation comprised the following four main data collection activities:

- An online and telephone survey with registrants of MOSES
- Nine telephone depth interviews with representatives from LBOs
- An online survey with LBO managers
- Discussion with the MOSES central team and manager

An online and telephone survey with registrants of MOSES

At the time of registering with MOSES, individuals were asked if they would be happy to be contacted for the evaluation. Those who agreed to be contacted expressed their preferred method of contact for the evaluation (either email, telephone or both). Those who stated email only were sent an email invitation to complete the survey online. Those who stated telephone only were contacted by phone and were also sent an SMS in advance to notify them about the call and opt out of the call if they wish. The SMS also included a link to the online survey to drive users to respond using this method if they prefer. Those who indicated no preference in method



of contact were also sent an email and/or SMS depending on the contact details they had provided.

The invitation was sent to all customers who agreed to be contacted for evaluation purposes (1,101 participants) either by email or SMS and 55 people opted out via SMS. A total of 196 registrants completed the survey; 50 completed by telephone and 146 completed online. The effective response rate was 19 per cent. This represents an overall response rate of 6.9 per cent of the entire number of registrants at the time of the study (2,854). It is acknowledged that the response rate represents a small number of the overall registrants and there are limitations in the ability to apply these findings to the entire population of customers who have self-excluded.

Differences were not assessed between customers who completed by telephone or online as the sub-samples would be small. The confidence intervals would therefore be too large to reliably report any differences.

Nine telephone depth interviews with representatives from LBOs

The telephone interviews took place with managers based in each of nine key operators' head offices. The interviewees were identified by the MOSES manager and played a key role in overseeing the scheme within each organisation, including liaising with shops and the central team. The interviewees represented a range of large and medium sized betting operators as follows:

- Betfred
- Chisholm Bookmakers
- Coral (Ladbrokes-Coral)
- Jennings Bet
- Ladbrokes
- Mark Jarvis
- Paddy Power
- Stan James
- William Hill

The interviewees were usually within a compliance department and roles included Retail Head of Compliance, Compliance Officer or Manager, Protection Adviser. One interviewee was an HR manager. Their role in relation to MOSES was usually to manage notifications from MOSES and distribute these to relevant shops. They were often responsible for overseeing the training and updates for staff in shops.

An online survey with LBO managers

An invitation to an online survey was distributed to seven of the largest operators that are using MOSES. The online survey had to be administered via the managers interviewed as this was the best way of reaching the shop managers and, for many, the links had to be approved for distribution by each operator's IT security department. The survey was completed by managers who were responsible for overseeing the scheme within the betting shops. Amongst the larger

operators, these were completed area managers, who oversaw a number of shops. It is important to note that some shops had difficulty in accessing the survey via Survey Monkey due to IT security at the operator level. We invited these operators to complete in Google forms. Unfortunately, Paddy Power were unable to access either formats. The purpose of the survey was to gather views from those who had experience of managing the scheme at a shop level. The table below shows the operators with the responses from each.

Table 1: responses to LBO survey

Operator	Number of responses
Coral (Ladbrokes-Coral)	427
William Hill	169
Betfred	25
Ladbrokes	4
Stan James	1
Chisholm	1
Paddy Power	0
Total	627

It is important to acknowledge that a large proportion of the responses represented by Coral and William Hill. The data was analysed to establish if there were any differences amongst these larger sub-samples but no difference were detected.

Discussion with the MOSES central team and manager

Chrysalis Research undertook a visit to meet with the team who run MOSES. The purpose of the visit was to understand how registration works and ascertain the different stages of registration, notification and communication with LBOs. In addition to this learning exercise it was useful to hear from the MOSES Central team about aspects of the scheme that they felt were working and some of the challenges they have experienced. Relevant findings from these discussions are also included in this report.

Registrant respondent profile

The average respondent age for the customer survey was 38 years and 84 per cent were aged 25 to 54 years. The age category breakdown is shown in Table 1 below. The third column displays how this age category is represented within the total number of MOSES registrants, which shows the sample of respondents is broadly representative of the overall base of



registrants. All but six respondents (97 per cent) were male. Again, this is broadly representative of the overall base of registrants (95 per cent are male and 5 per cent are female).

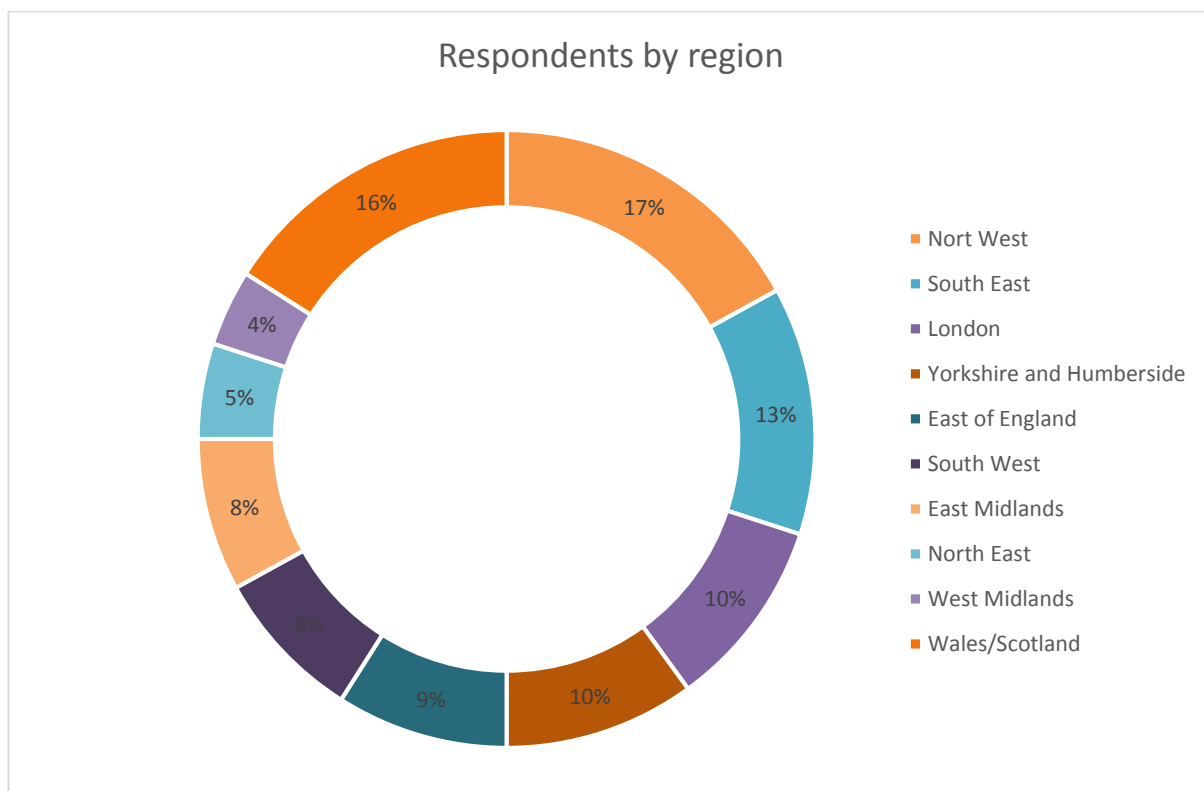
Table 2: Respondent age profile

Age	Percentage of MOSES registrants in this age category	Percentage of respondents
18-24	10%	8%
25-34	40%	38%
35-44	26%	25%
45-54	16%	21%
55-64	6%	7%
65+	2%	1%

Base (196)

84 per cent of respondents lived in England, with 13 per cent in Scotland and 3 per cent in Wales. The broad regions in which the respondents are located is shown in the chart below.

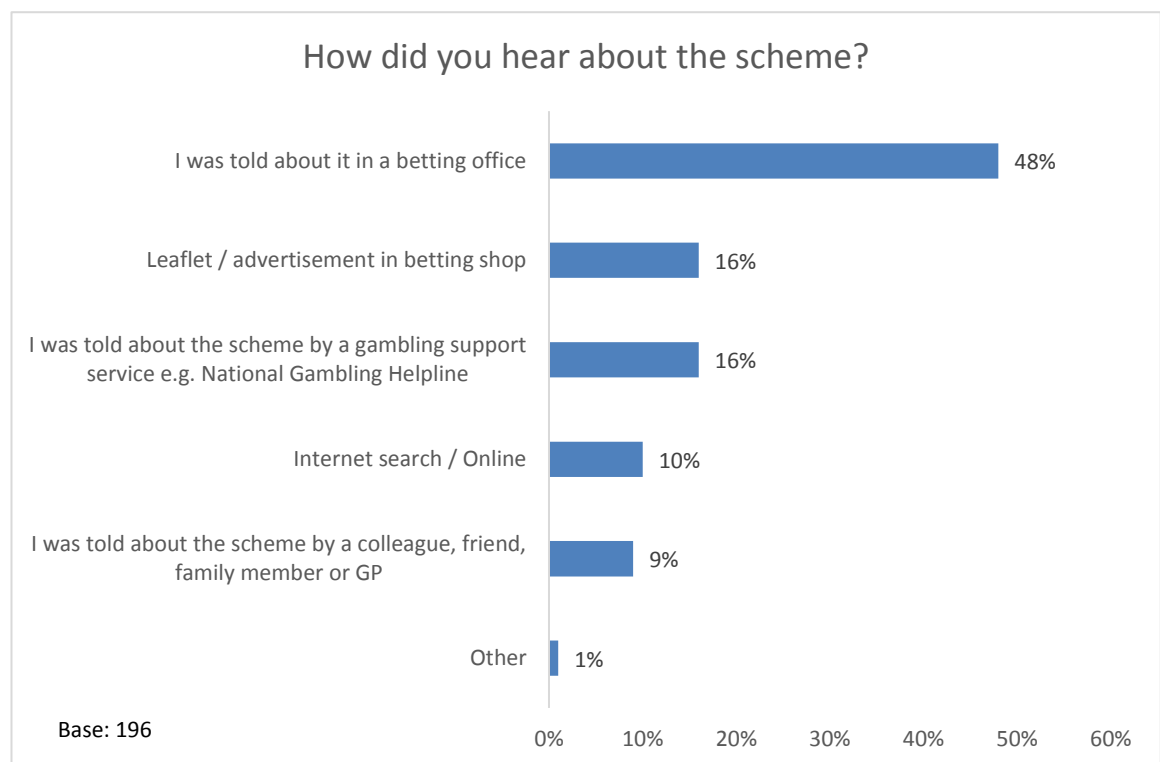
Chart 1: Breakdown of respondents by region



Drivers to registering with the scheme

The graph below shows how self-excluded customers heard about MOSES.

Chart 2: Source of awareness of MOSES

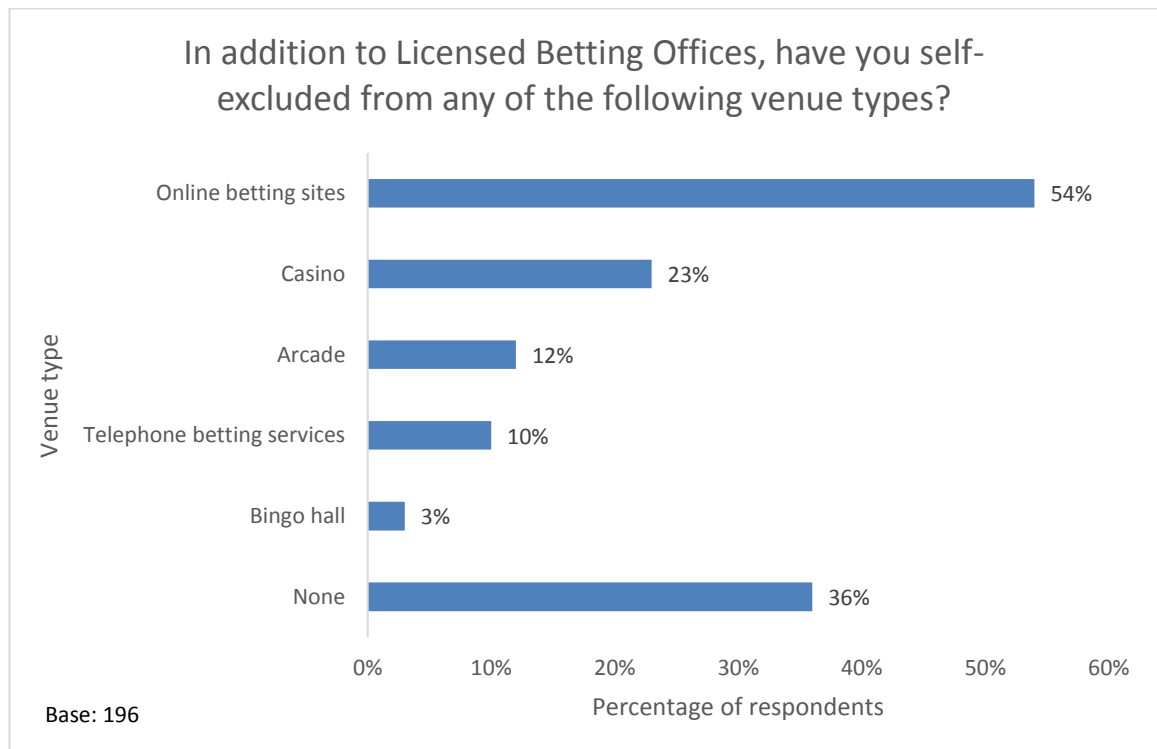


Almost two-thirds of registrants surveyed found out about the scheme while in a betting shop, either by being signposted to it by betting shop staff (48 per cent) or seeing a leaflet/advert about it (16 per cent). The same percentage were told about the scheme having contacted a gambling support service or during counselling and one in ten had found out about it via an internet search. This may indicate that these individuals were actively looking for support, or had already sought formal help to address their gambling before registering with the scheme. Few respondents had heard about the scheme in the press or news.



In addition to LBOs, almost two-thirds of customers surveyed (64 per cent) stated that they had excluded from other venues. Online betting sites were the most common other 'venue' with around half (54 per cent) stating they had also excluded from these services. Smaller number of respondents had excluded from a casino (23 per cent), an arcade (12 per cent) or telephone betting service (10 per cent). This is shown in the graph below. A total of 40 per cent of respondents excluded from one other venue, 13 per cent had excluded from two other venues and 10 per cent from three or more other venues.

Chart 3: Self-exclusion from other venues

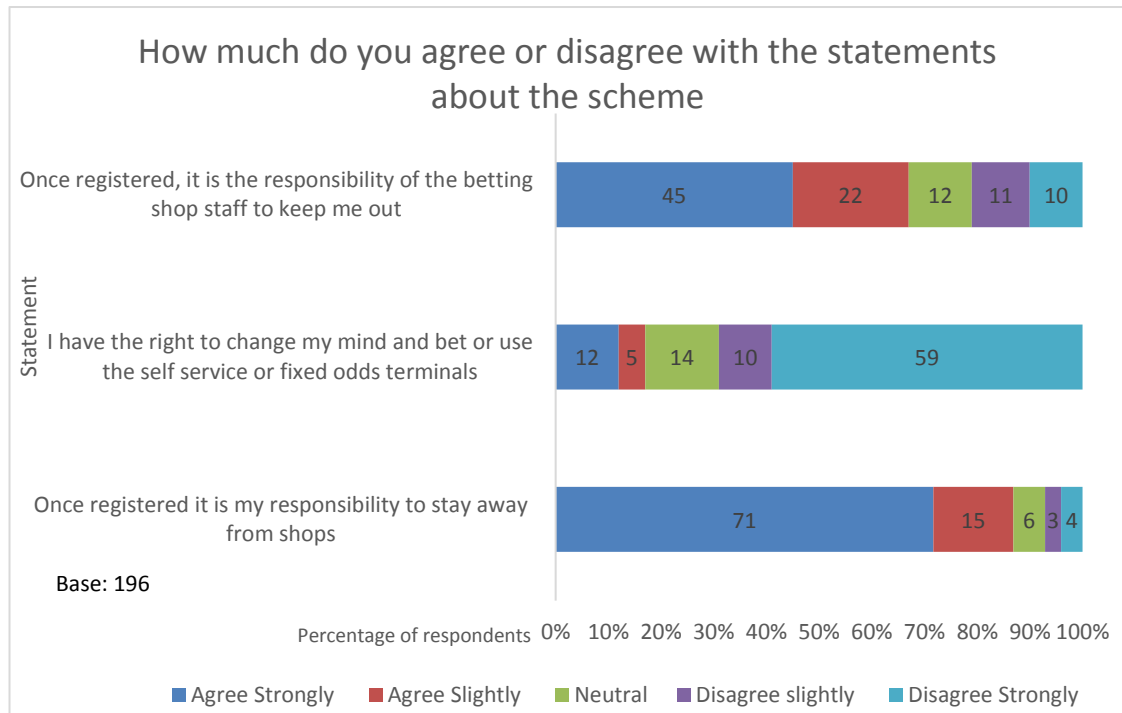


Understanding of the scheme

Most survey respondents (86 per cent) appeared to understand that it is their responsibility to stay away from betting shops during the exclusion period and all but two respondents stated that they understood the terms and conditions of the scheme. However, but there still remained a small minority (7 per cent) who disagreed that it was their responsibility to stay away and when asked further about their views on the scheme rules, the findings indicate there may be a need to clarify the terms and conditions of exclusion.

For example, around a fifth of survey respondents (21 per cent) disagreed that it is the responsibility of the betting shop staff to keep them out and 17 per cent thought that they have a right to change their mind about using the in-shop betting terminals. This is shown in the graph below.

Chart 4: Respondents' understanding of the scheme conditions (Base: 196)



The LBO survey indicated that most were clear about how the scheme worked and stated the information they had been given about the scheme was very clear (34 per cent) or clear (56 per cent). When LBOs were asked about additional information that would help staff to understand more about how the scheme works, many would like:

- Information and tools for LBO staff to help describe the scheme and the registration steps to customers. The types of tools suggested included step by step guides, fact sheets and typical timescales for putting the exclusion in place.
- Guidance to help them to manage scheme and processes e.g. information they could refer to about different aspects of the scheme, so they understand their role once a customer has registered, how to verify photo and ID in the shop, how to notify about breaches and what happens when the exclusion expires.
- More information about the process in relation to breaches; many wanted reassurance that they will definitely be notified if a breach has taken place in another shop, including their competitors.

LBOs also suggested information that would help customers understand more about the scheme. They felt the following would be useful for customers:

- More information about how the scheme works, the registration process, the operators involved.
- Information on what happens if calling to register out of hours
- Opening times which match those of the shops

Leaflets in different languages.

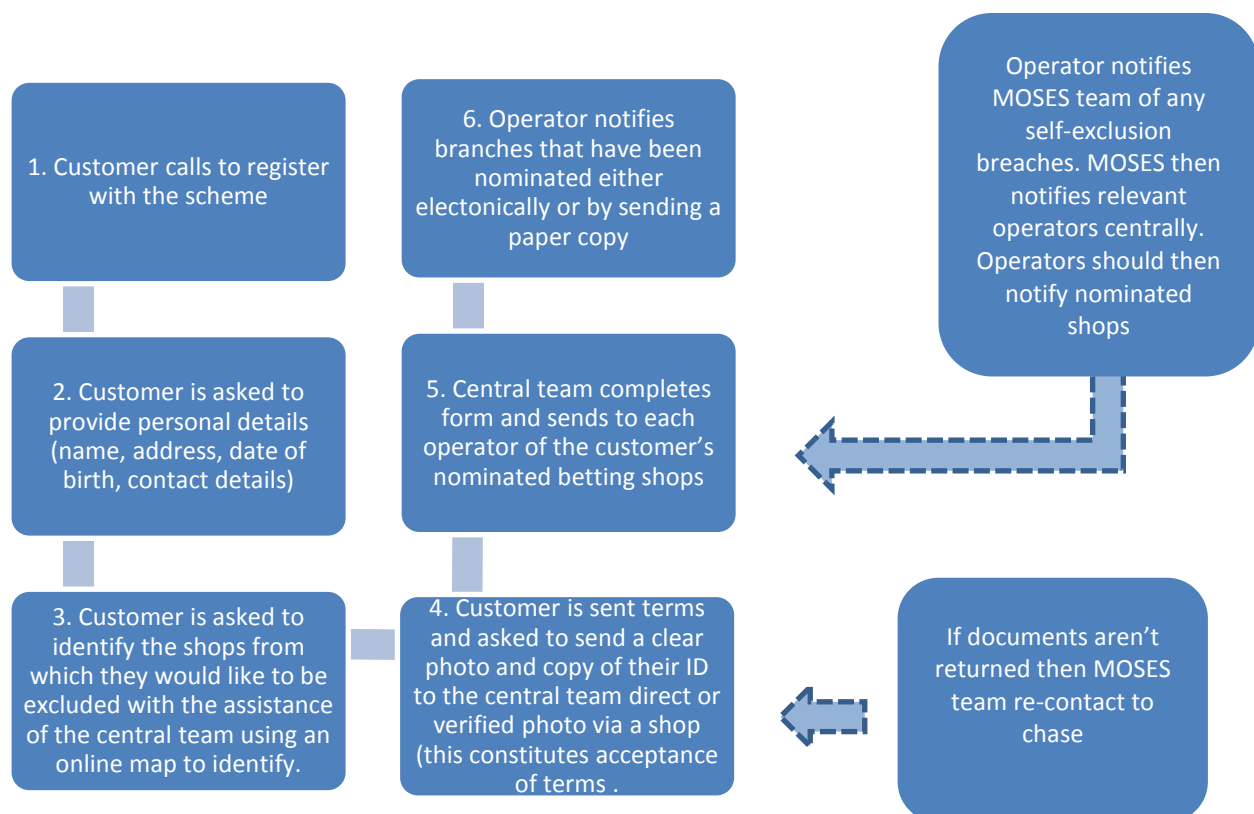


Registering with MOSES

This section outlines the findings from the surveys and interviews about the registration process for customers as well as suggestions for improving this.

The registration and notification process comprises a number of steps, depicted in the diagram below:

Diagram 1: MOSES registration and notification process



Overall the evidence from the customer survey shows that registration to the scheme is easy. Most respondents stated that were able to complete self-registration to the MOSES scheme in a single call, submitted a photo and identification documentation within two weeks and found the map to select LBOs useful.

I thought the process was perfect, can't fault it.

Customer

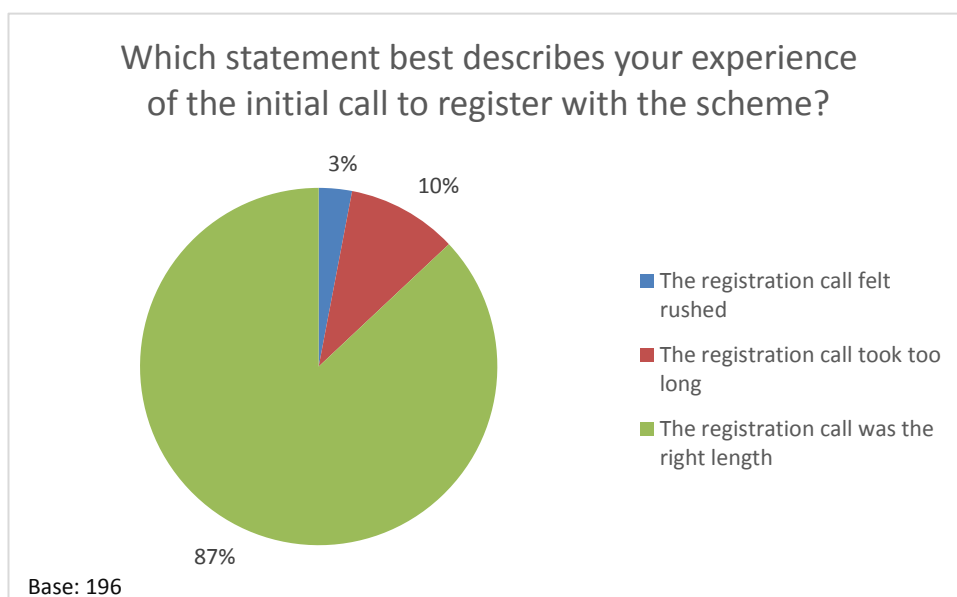
The feedback from customers and LBOs about the specific elements of the exclusion registration and notification process is now described.

Registration process

Registration telephone call

The registration call appeared to be straightforward for those who had decided to self-exclude; 71 per cent of survey respondents who completed the registration said they completed it in a single phone call and a further quarter (24 per cent) received a call back from the team to complete the registration. In only a very small number of cases (5 per cent) did the customer call the central team back to complete the registration. 87 per cent of customers surveyed thought that the registration call was the right duration. Those who were unhappy with the length of the call (13 per cent) mostly thought that it was too long (10 per cent).

Chart 5: Experience of the registration call





It was all done pretty quick from when I got the phone to sending the photos back - it must have been about 3 weeks - I was happy with that.

Customer

Some customers reported that it had taken some time to have their call taken to register. However, as one customer pointed out, the fact that staff are careful to hide the purpose of the call in their voicemail messages is tactful, and appreciated by customers who may wish to hide their gambling habits from friends, family or colleagues.

I initially phoned and left a message and there was about five days of calls/messages being left as there was either no answer when I called or I was out when they returned my call. But a message was always left on my phone and I liked how there was no content in message relating to reason (not that it mattered in my situation).

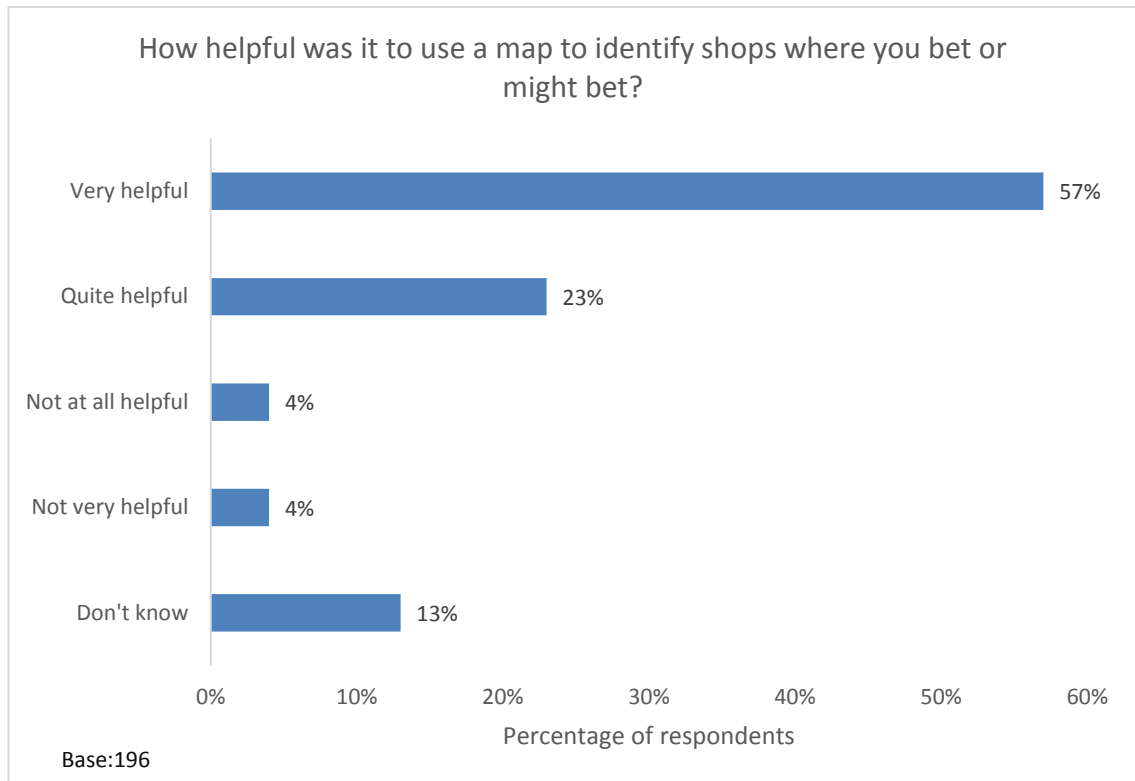
Customer

92 per cent of LBOs surveyed would feel able to use a terminal in the shop for customers to register with the central scheme. However, given that some customers preferred to do it privately it would be useful to be able to offer the option of a call or online.

Identifying shops during the call

During the registration call, the central team use an online map to help identify the shops the customer wishes to nominate. The use of the map helps guide the conversation about which shops the customer wishes to include in the exclusion and shops that they may not usually go in but located in the same street or area, for example. The central team felt the map helps to focus the customer on the shops they are likely to go into and allows them to explain the purpose of nominating shops based on location rather than applying a blanket exclusion. 80 per cent of customers surveyed found the map to be helpful or very helpful in identifying shops from which they would like to self-exclude. Only 8 per cent of customers surveyed thought that the map was not helpful.

Chart 6: Helpfulness of using the map to identify shops



A few customers complained that the person who took their call did not have sufficient knowledge of their local area to be able to easily identify the betting shops.

Some customers found the map less helpful and would have liked the option to include or exclude shops within a certain radius of their home or work. They felt this would make the registration process simpler and quicker.

Should be able to just say all betting shops in a 30 mile radius of your address, instead of trying to explain to someone on the phone various addresses when they don't live in your area.

Customer

Providing a photo and ID

94 per cent of respondents said they submitted a photo and identification documentation within two weeks of the registration call. 93 per cent of customers surveyed said it was useful or very useful to be able to send the photo and ID electronically.

Customers have the option to have their photo verified by LBO staff if they do not have passport or driving licence. The comments from the LBO survey and some of the operator interviews indicate that staff are not always clear on how this process works and would like more information to ensure this is done properly and the correct information is sent to the central team. This is to avoid any risk of the exclusion not being completed.



Improving the registration process for customers

A small proportion of customers surveyed (7 per cent) had suggestions to make the registration process easier. The most popular suggestions from this group included:

- Improving the response to calls e.g. by having more staff or longer opening times
- Provision of online registration and services e.g. website or app to register and add more shops when needed
- Making the registration quicker and easier by including shops within a specific area and/or the ability to include all shops nationally.

These are discussed in more detail below.

Improving response to calls

A small number of customers indicated that they did not get an immediate response to calling to register. This is an important point to highlight as, for some, the decision to call to register may be a big step and it is unknown how many did not call again or follow through with the registration if the initial call wasn't answered. These customers suggested more staff to respond to calls as they found the lines were busy when they called.

If someone was available to answer the phone straight away and do the big call immediately, that would be better. I rang loads of times over a number of days and getting the answer phone, before I thought I better leave a message instead. I thought there was a chance someone would answer straight away and do it all in the first phone call.

I rang the helpline over 30 times to register but each time went to answerphone. More staff would be useful.

More staff to answer calls. I called 3/4 times and didn't get to speak to someone until they called me.

Customers

It may be useful to publicise the opening times on the MOSES leaflet and that, if calling out of opening hours, a message will be responded to the following working day. The central team acknowledged that they respond to all messages left out of hours and on weekends. This is where online facilities may help, at least for individuals to register their interest and request to be contacted. This is so they have a way of starting the registration process at the precise point that they acknowledge they need help and want to take action.

Provision of online registration and services

A total of 10 per cent of respondents had ideas for improving the support for registration. Some considered that permitting online registration would obviate the need for more people operating the phone lines, and would allow them to upload a photograph and add more shops

easily. A couple of customers suggested that an app would make this even easier to do while on the move. Another individual thought that allowing customers to text their ID and a shop number would be a good way to facilitate the registration and update process.

Maybe you could complete it online yourself - all the relevant details and application online and send it through - that would be more helpful - if you could add as many shops as you like - including online and all of that.

Possibly have an app to do it on and you can add stores through the app based on your location so if you're travelling a lot you can still ban yourself.

If you could log on online - if there was a portal - to be able to modify or add shops. I understand that you wouldn't be able to remove shops. If you could text in your ID and a shop number - via text message.

Customers

As one customer pointed out, any obstacles to registration may deter people from using the service who need help. Making these small adjustments could help even more people to benefit from MOSES.

Some people do not like to have to make a call, so an online service may be useful. A phone line is limited in terms of opening times and call handler availability - two things that initially hindered my registration. And hindrance could mean those really needing the service are put off.

Customer

Offering exclusions in more shops

Some customers felt it would be easier to exclude from all shops either nationally or within a specific radius of a home or work. This would remove the need for customers to explain addresses over the phone, which was sometimes problematic, as this customer noted.

Maybe an automatic barring system from a postcode - maybe just provide your details and a radius of how far from your home - automatic barring so you don't need to do it for each bookie.

Customer

MOSES and LBO staff acknowledged that offering this option using the current method of registration and identification system would make it too unwieldy to manage. If this was offered, other systems would ideally need to be in place such as use of an ID or membership card or a system for staff which indicates the likelihood of that individual coming into the shop. Otherwise, it would be too difficult for shop staff to work through and remember all the excluded individuals, even those who would be unlikely to come into the shop.



Furthermore, the identification of shops was useful for operators since it meant that they did not have to unnecessarily burden shops with details of self-excluded customers who would be highly unlikely to visit particular shops. Staff could then focus only on customers who had been in before or more likely to use their shop.

Operators also commented that having nominated shops meant that when an individual breaches, other shops nominated by that individual are notified about the breach. They found this was useful in targeting their communication to shops that could be affected.

Recommendations for improving the registration process

Based on the findings from the surveys and interviews, the following recommendations for improving the registration process for customers and LBO staff.

- Help customers to understand the overall scheme and registration process by providing more information for about the steps, timescales and the scheme's key features such as the ability to nominate more shops
- Equip staff to be able to describe the registration process more effectively and promote the scheme to customers
- Ensure staff are clear on their role in each step of the registration process e.g. if they are asked to verify a photo
- Offer greater clarity to customers and LBOs about the purpose of nominating shops
- Improve the ability for customers to register quickly and more conveniently by considering:
 - Online registration/ability to submit information online
 - Longer opening times
 - More staff to be able to respond to calls
- Consider the option of a wider exclusion area for customers who need it, for example those with more serious addiction (by using a possible initial risk assessment).

Managing the self-exclusion scheme

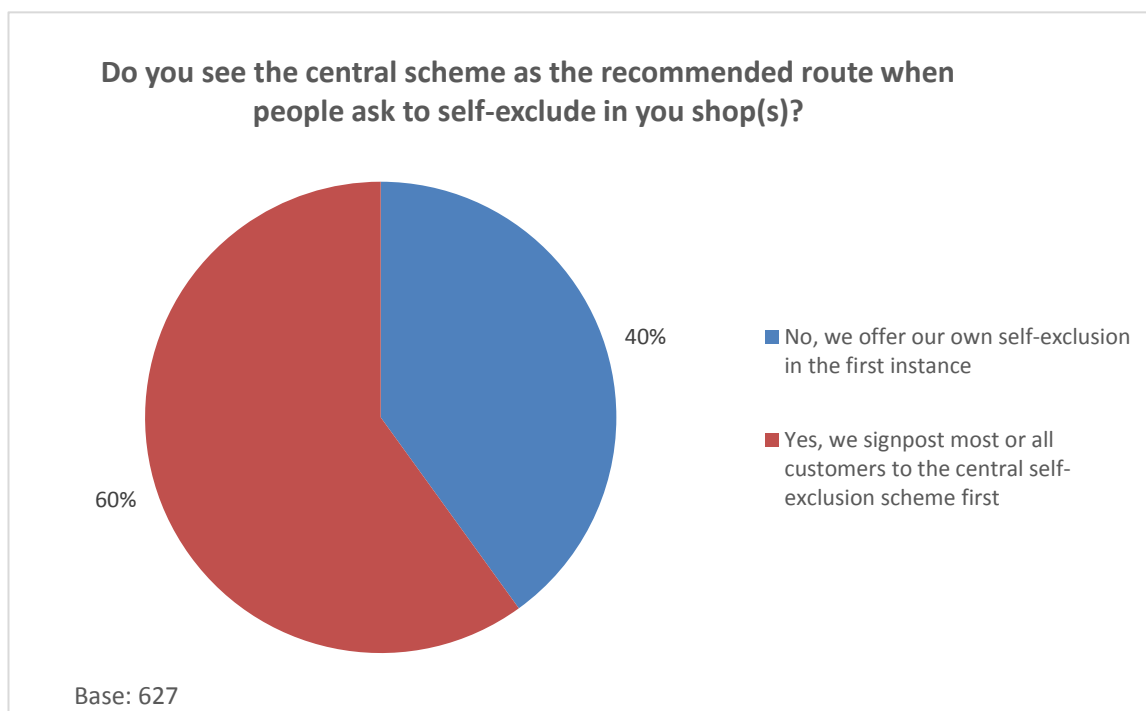
This section provides information about how MOSES is positioned and managed by operators. It includes suggestions for improving the management of the scheme, to make it easier for LBO staff to support customers and uphold exclusions.

Positioning of MOSES

The central scheme was felt to sit well alongside operators' own self-exclusion scheme and 90 per cent of LBO survey respondents felt clear about how the central scheme works alongside their own scheme. For 60 per cent of the LBOs surveyed, MOSES was seen as the recommended route when people ask in their shop, as shown in the chart below.



Chart 7: Signposting customers to the scheme (LBO survey)



While it was useful to have MOSES available, the operators interviewed still liked having the option of offering both to customers, depending on their requirements. Indeed, 40 per cent of LBOs said they offer their own scheme in the first instance. The central team advised that this a suitable approach for customers who want/need to carry out an immediate exclusion; they can exclude from that particular shop or chain of shops and then follow-up with the MOSES scheme later.

The operators with branches in quieter areas tended to say they had a loyal customer base and customers preferred to self-exclude only from those shops without having to contact someone they don't know at MOSES. It is therefore useful to have both schemes running alongside one another to suit customers' preferences and support requirements for self-exclusion.

Some operators interviewed commented that the central self-exclusion scheme was often viewed by customers as taking a more concerted step to addressing their gambling than simply excluding from just the shops' own schemes.

Customers take it more seriously. MOSES take the time to speak to customers about the exclusion. If it's done over the phone [the registration] than the post, it's more likely to be completed.

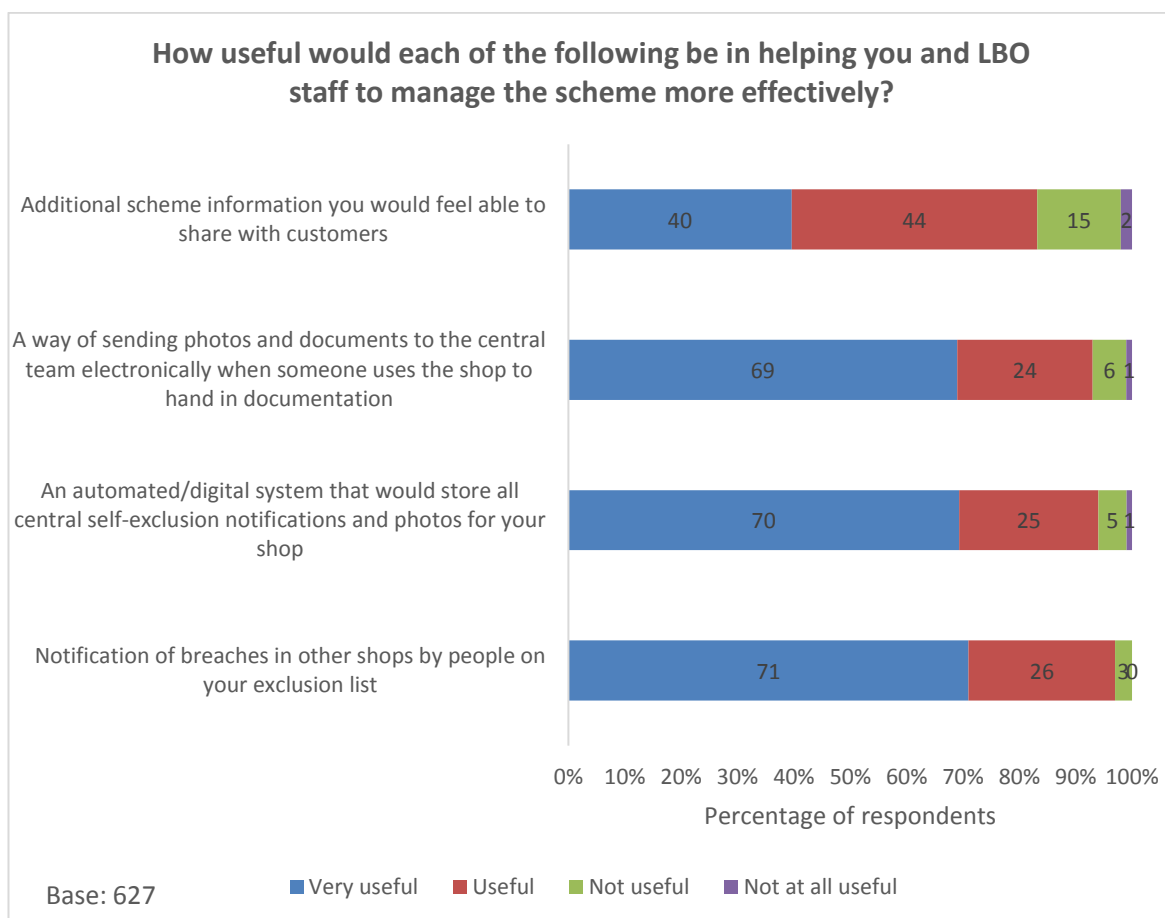
Operator

Also, some operators found they had seen a reduction in registrations for their own scheme and an increase in registrations for MOSES. This may indicate that some customers are opting for the central scheme rather than an operator's own scheme.

Management of the scheme

The chart below shows LBOs responses to different proposals to help them to manage the scheme more effectively. With the exception of additional information for customers about the scheme, all options appeared to have similar appeal; most would find each very or quite useful. Interestingly, comments relating to all of these steps were raised in the interviews and surveys.

Chart 8: Support needed by LBOs to manage MOSES more effectively (LBO survey)



These support needs are discussed in the subsequent sections which cover the management of the scheme.

Notification process

The LBO survey revealed that 83 per cent of operators surveyed found it very or quite useful to have a photo and form from the central team. Indeed, some operators who were interviewed noted that the form they received from the MOSES central team had the customers' details presented clearly and completely. Many contrasted the clarity of the MOSES form to their own self-exclusion form, which was usually hand written and often incomplete. They like the



uniformity of the MOSES form and the reassurance that all the information was accurate and had been checked by the MOSES central team.

It's definitely better, the customer's details are clear, the image is clear and it has all the information on it and their name.

It's [the MOSES form] more helpful. Some customers' writing is not legible. No disrespect to the customer but they like to scribble or they don't want to share their personal details, which is completely understandable.

Operators

A small number of operators identified the issue regarding the turnaround time from the point of registration and the exclusion being put into place. They were worried that even small numbers of customers being at risk if the information isn't processed quickly. This appeared to be more related to cases where customers take their ID in to a shop to be verified. The MOSES team were praised for processing exclusions efficiently but one or two examples were cited where forms were not processed in time or mislaid by shop staff, and LBOs worried about even small numbers of customers being at risk.

If we take it to a consumer perspective, it would be very unfortunate if a problem gambler, having gone through that difficult step of admitting they have a problem, saying 'I'm an addict and I need help' and then us letting them down...it's making sure that the customer has adequate protection.

I would be more concerned just really with the timescale of an individual first making contact with the self-exclusion team and then having to go into the shop, to the time the shop gets the information that they need to send off.

Operators

Having a central coordinator at the operator level helps to mitigate against the risk of the information not being processed. However, it would be useful to clearly communicate to customers the agreed timescale for processing the registration. If staff are clear on the process and understand each step, as recommended in the first section then this should address this issue.

For all operators, there was a member of staff who coordinated and oversaw the notifications to and from MOSES, usually within the compliance department. This central point appeared to be important so shops, and similarly the central team, had one single point of contact.

Information was sent either sent electronically or by post, depending on the IT available in shops. The variation in systems across operators makes it difficult to have a single process for notifying shops about communications and updates about customers details and can only be resolved by creating a shared system across all participating operators.

The central team appeared to be working hard to distribute the information to suit each operators internal systems. In all cases, even if the information is sent electronically, the self-exclusion records are stored in the shop on paper for staff to review.

Upholding self-exclusions

Upholding the self-exclusions is heavily reliant on a member of staff in remembering individuals on the forms kept in the shop. When interviewed, operators did not currently feel this was a particular problem, but acknowledged that, as more people register with the scheme, it may be harder to spot people.

When speaking to operators, this appeared to be more of a problem for operators with shops that have more footfall, in busier locations. These shops were likely to have many exclusions so staff have more registrations to go through and potentially recognise if they come into the shop.

Shop teams are instructed that, at the beginning of their shift they are to review the log, to re-familiarise themselves with self-excluded customers. That's easier said than done because there might be upwards of 100 people in one particular shop's folder.

Operator

In contrast, operators with a smaller number of branches were less likely to have as many self-exclusion registrations overall. Operators with branches in quieter locations with less footfall reported that staff become familiar with the regular customers. It is therefore easier to know if any of them have self-excluded or spot someone who hasn't been in before and check if they have self-excluded.

All the customers are local to us, or 99 per cent of them are. You can set your clock by it. We're in a neighbourhood environment. We've got the odd one in a high street in a town, but most of them are in community areas. We don't have a great passing trade.

The majority of our shops are the only shops in the village, we know the customer base more.

Operators

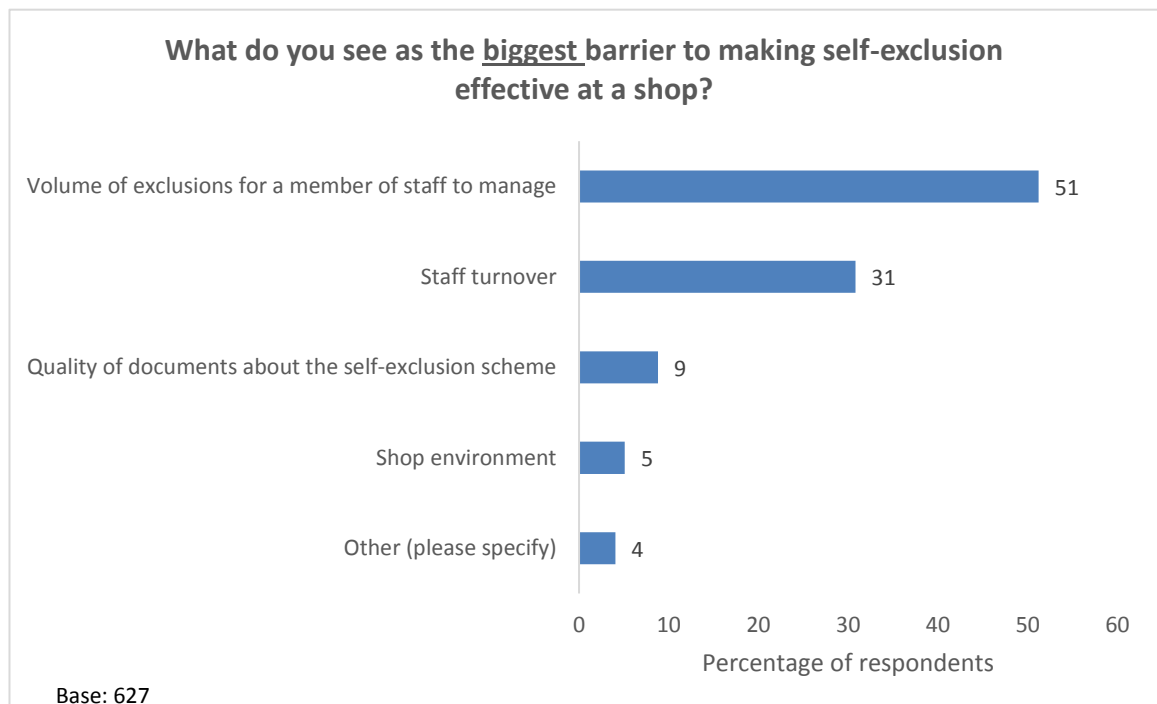
LBOs were asked about their view on the biggest barrier to making self-exclusion effective and preventing individuals from gambling. Around half (51 per cent) of the LBOs indicated that the largest barrier was the volume of exclusions for a staff member to manage. A further third (31 per cent) stated that staff turnover was an issue. This was also raised by a small number of customer respondents, who stated that if the staff member was new then they didn't recognise



them and it was easier to be able to place a bet. A total of 9 per cent stated that it was the quality of documents about the scheme i.e. to describe the scheme and 5 per cent said 'Other'. Of those who stated 'Other', the most frequently cited issues included:

- the quality of the customer's picture
- the risk of an individual being able to use the Fixed Odds Betting Terminals and not be seen by staff.

Chart 9: Main barriers to making self-exclusion effective (LBO Survey)



In shops where there is high turnover of staff, the scheme may be less successful, as new staff will not recognise banned individuals, as the customer below points out.

Say I barred myself at [operator name], if they have new staff or the staff haven't checked the self-exclusion file, then you can walk in and play the machines - if they know you they will turn you away, but [they won't] if they don't.

A minority of customers surveyed called on LBO staff to be more proactive and consistent in enforcing exclusions; 9 per cent wanted more checks from staff and 5 per cent wanted more done by the licensed betting offices. In a small minority of cases, customers claimed they tried to 'test' the system to see if they were able to gamble.

Some LBOs also mentioned that it would be useful to have more information about the customers so that profiles can be created. This may include age, times they may be likely to come in and gambling preferences i.e. whether they use the Fixed Odds Betting Machines, Self-Service Betting Machines or counter service. This is so they can be more prepared for monitoring customers if they do come in to the shop.

Breaches of the self-exclusion

The survey responses indicate that a very small number of customers (5 per cent) had been able to gamble in one of their nominated venues since registering. Of these, most had placed a bet at the counter and/or used the Fixed Odds Betting Terminal (FOBT). Fewer respondents claimed to have used the Self-Service Betting Terminal (SSBT). An even smaller proportion had placed a bet in other ways. The data shows that just under half of these customers had placed a bet using two or more of these methods.

Interestingly, LBOs indicated that there is risk in customers breaching the exclusion by using the SSBT or FOBTs machines, which they may be able to do without being seen by staff.

The volume of exclusions, all of which seem to be FOBT which makes the situation more difficult to manage due to the location of most FOBT zones in our shops.

Some operators cited examples of steps they had taken if they had been successful in identifying a customer who had breached their exclusion. All operators said they have a system in place to notify the central team if breaches take place and the MOSES team stated that they will then inform other operators centrally that the customer has nominated. However, operators were not always confident this always happens. Indeed, comments made in the LBO survey indicated that staff were not aware that this process is in place as many requested if they could be made aware when breaches happened. Operators stated the importance of being notified if a customer had breached in another shop so they can be prepared if they attempt to come in to their shop. It may be useful to ensure that all operators consistently notify relevant branches when a breach occurs.

Comments in the LBO survey revealed that shop staff felt they were sometimes held accountable by a customer if a breach had occurred. They felt it would be useful to have steps to address the breach with the customer or the customer is contacted by MOSES and reminded of the terms of the exclusion including the consequences if they attempt to breach again.

Recommendations for improving the management of MOSES for operators

- Improvements are required to ensure that, once a customer registers, their exclusion is communicated to shops swiftly and their exclusion is successfully upheld. This is down to having effective systems in place for staff, providing the ability for them to easily recognise a self-excluded customer.
- It is acknowledged that there are challenges in upholding 100 per cent of exclusions in the current scheme format, which cannot be overcome unless there are significant changes to



the systems used by operators. There is an appetite for these systems to be put in to place both to store and monitor exclusions e.g. a membership card system or electronic ID system. Such systems could then be used on the FOTBs and SSBTs.

- Within the current format, the recommendation is to ensure that staff are familiar with self-excluded customers and assisting them with this by providing as much information as possible about the customer and his or her gambling habits.
- Operators welcome being contacted if a breach has occurred in another shop by one of their customers. It would be useful to remind shops that this system is in place and they will be contacted if this happens. It may also be useful to reassure shop staff that if a breach occurs, the customer will be contacted about it.

The role of MOSES in preventing gambling

This section discusses the key benefits of MOSES as well as when and for whom the scheme appears to be effective or ineffective, and the possible reasons for this.

Operators were supportive of the central scheme. They felt that it gives the customer more choice and supports them if they are finding their gambling is becoming out of control. They reported that the central scheme is easier because customers can exclude from a number of shops under different operators rather than having to go to each shop.

It's helpful for the customer. With a single phone call, customers can self-exclude themselves from all the operators within an area, so it's quite convenient for them.

It's an important scheme for us, we've had the self-exclusion scheme for [operator] for a while now, but this makes it more convenient for the customer and could help our customers.

Operators

Customers who were surveyed appreciated the flexibility of the scheme and nearly all thought it was very (84 per cent) or quite (13 per cent) valuable to allow people to come back and add more shops after registering.

Operators also felt the scheme was useful for staff, to have something to signpost customers to if they detected that a customer needed support.



It promotes some of the tools available to customers, in terms of customers that are no longer in control. It gives customer less of an obstacle or a barrier to do that so they're more likely to be more open about their gambling.

It's better for staff, it's a reference point, they can advise customers using the form.

Operators

Operators commented that being able to contact the scheme in private rather than registering in shops was a key benefit.

They may not feel comfortable on the shop premises about sharing their details in front of other customers or staff members. At least you can share the information in private with the MOSES scheme. Customers do it in the knowledge that it's all confidential.

A telephone call keeps a certain amount of anonymity. As you don't know them, sometimes that helps customers. You're giving them another option to help themselves. It's only a good thing.

Operators

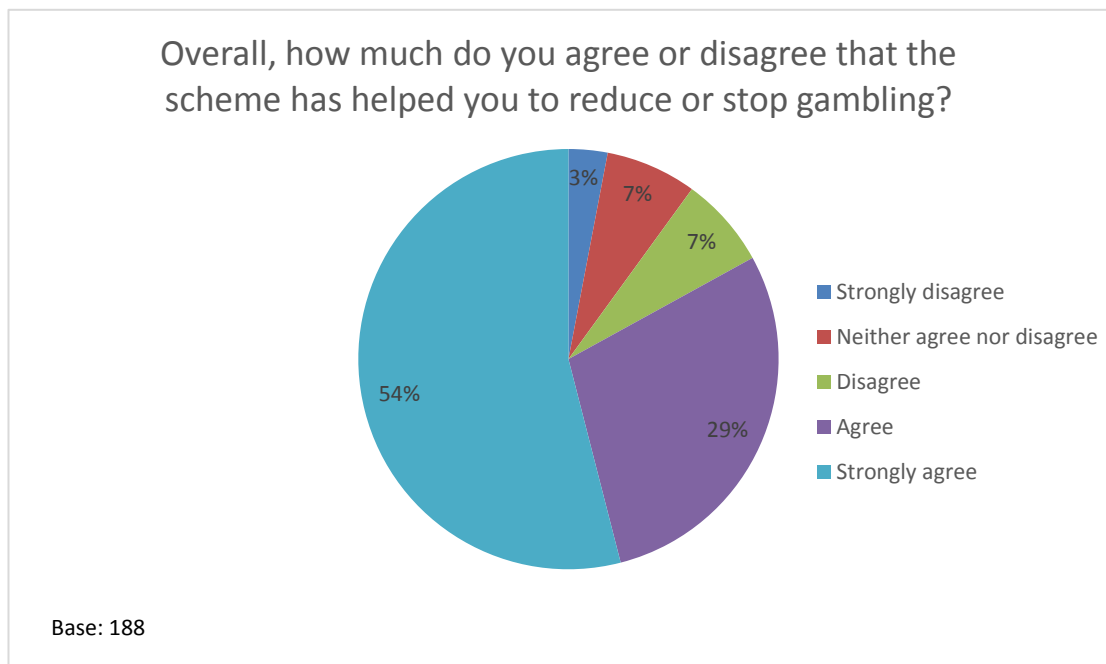
When MOSES is effective

On the evidence of this evaluation, there could be said to be two types of individuals who have registered with MOSES:

- those who are less seriously addicted to gambling and may be more likely to gamble on a whim or opportunistically e.g. if they pass a betting shop. This group appear to be more likely to benefit from MOSES scheme.
- those with a more ingrained serious addiction, for whom gambling has taken over their lives. This group find it extremely difficult to stop gambling, with only the help of the MOSES scheme.

83 per cent of survey respondents found that MOSES worked for them and agreed that it had been effective in reducing their gambling or stopping them from gambling. Just under three-quarters (71 per cent) had not attempted to use any of their nominated betting offices since joining MOSES.

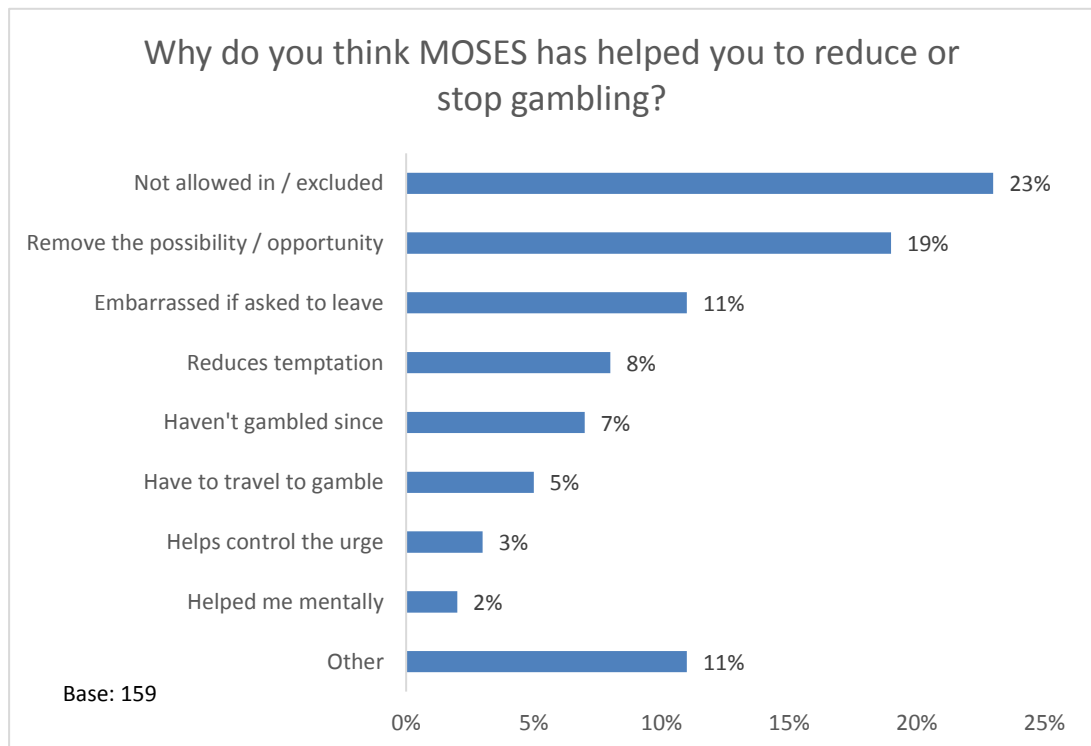
Chart 10: Do customers think MOSES helped them reduce or stop gambling? (all customer respondents excluding those who did not return photo/ID)



The most common responses given by customers for whom MOSES was effective, can be grouped into two broad categories; knowing they are excluded puts **physical barrier in place** and creates an **emotional response**. These aren't necessarily distinct and it is likely that a customer will be affected one or both types of reason, depending on their usual gambling activity. The chart below shows the frequency of the most common reasons given by customers responding to the survey.



Chart 11: Reasons why MOSES helped customers reduce or stop gambling (all those who agreed/strongly agreed)



These factors are now discussed in detail, using customers' comments to illustrate the data.

The physical barriers

- **Being prohibited from entering the shops:** Customers found that stopping using their local betting shops was an important part of the exclusion.

Because it has given me that bit of extra willpower and backbone I needed not to go in knowing I am banned from there

It has helped tremendously - basically where I live there are loads of gambling shops - I got myself barred from the local area and it is probably the best decision I made in this whole gambling issue.

Customers

- **Removing local opportunity:** For many customers, gambling appeared to be something they did impulsively, on the spur of the moment. The exclusion removed the "easy option" of going into their local shop.

Most local shops know me and respect exclusion so I can't do it on my door step.

Customer

- **Having to travel to gamble:** Under the MOSES scheme, the need to travel meant “the urge” passed, or they had time to reflect and decide against gambling, and they did not follow through by gambling.

Because it has limited the opportunity I have to bet easily and quickly. If I was to get the urge, I would have to travel a minimum of an hour to get to the nearest available shop and this often sways me to not bother.

Customer

The emotional responses

Fear of embarrassment: Many customers were able to stop themselves entering an LBO by imagining what could happen if they attempted to go in. This was enough to deter them from entering the shop. This was frequently mentioned as an important deterrent.

I have to say it makes you think before attempting to go into the shops. If you are then asked to leave how embarrassing it is for people to then know why you have been asked to leave.

I did not want to go into the shops and I knew that there was a chance they would ask me to leave. It gave me another reason to not go in.

Customer

This appeared to be a particularly effective deterrent for customers who are known by staff their local shop.

I personally know the people in the shops so I would not go in knowing that I might get asked to leave which would be an embarrassing situation - this is helpful to me because it helps the process of stopping gambling.

Changing habits: Gambling was a habitual part of daily life for some customers, linked to other activities such as enjoying an alcoholic drink, smoking or going to the shops. The MOSES ban interrupted their usual routine and this was sometimes enough to help them break free from gambling, or to reduce it.

I can't gamble while out doing daily tasks. For example, going to town to make a typical purchase such as tobacco and not being able to use the change in the bookies, which usually led to a further cash withdrawal upon losing.

When I am sitting here having a drink I get the urge sometimes - that's when I want to gamble - and now I know that I can't get into any of the bookies and [now that] I know that I just don't bother going in.

Customer



Removing temptation: Customers sometimes referred gambling as a “*temptation*”, which MOSES helped them to resist. One woman said that she felt “*protected*” by the scheme and a man visualised an “*imaginary lock*” on the doors to his local betting shops, which stopped his visits there.

It has kind of taken the temptation away because now I can't go in them [betting shops]

If I see a betting shop I go in a different direction or bypass them - it removes the temptation to go in

Customers

Impact on customers

Customers for whom MOSES had been effective praised the scheme’s positive effect on their lives. They alluded to several positive outcomes, which demonstrate how worthwhile the scheme is for those who fit a particular profile of gambling behaviour:

- They had more money - *I would estimate not being able to attend the 6 shops all within 1 mile of my home has saved me £400 weekly and enabled me to put the saved money to better use. It's great to treat my partner and pay for a few pints with the old man now.*
- It improved their relationships with family and friends - *The self-exclusion to those near my address has probably saved my marriage.*
- They adopted less risky leisure activities – *I would get bored and do that and lose money - now I do other things that don't involve losing money.*
- They were able to plan for the future and save - *It's just took that temptation away from going in any of the shops - I think it's a brilliant scheme. I have £2,500 in savings that I never had.*
- It’s helped their sense of wellbeing: *I feel great some days. Normal. Other days I want to go in and put a football bet on. But I can't. I am proud. That's what stops me from trying to enter. Thanks for helping with that*

When MOSES is less effective

Despite the positive outcomes described above, for a minority of customers (10 per cent of those surveyed), MOSES is less effective and has not deterred them from gambling or reducing their habit. This is likely to be for the group of customers who find gambling is an ingrained addiction.

Since joining MOSES, just over a quarter of customers surveyed (29 per cent) had still tried to use their nominated betting offices. These may be the group of customers for whom gambling is a more serious problem and that using MOSES alone is not an effective route to help them stop. The most frequently occurring reasons showed that customers had a **strong addiction to gambling** and **found other ways to gamble**. Others suggested that they were actually **relying more heavily on shop staff** to be vigilant and uphold the exclusion.

Strong addiction

Without interviewing customers it is not possible to say with confidence why some customers' gambling behaviour does not change after registering with MOSES. However, the comments provided in the survey indicated that for some customers their addiction to gambling was so strong they are unable to self-regulate and cease/reduce their gambling, even with the MOSES ban in force.

To be honest, the process is pointless, I used other betting shops out with the area and continue to do so as a compulsive gambler. The concept is good, the reality is a different scenario altogether.

I often work away and there's always chances to bet in other shops outside of my home city.

Customer

This was supported by the operators and central staff, who stated, in their experience, had found that this measure was not enough for some.

Other ways to gamble

Although banned from named premises via the MOSES scheme, those customers who appeared to be the most compelled to gamble still found ways to bet elsewhere. They found ways round the ban, including going to LBOs beyond their locality, gambling online, or visiting casinos or amusement arcades.

The local shops that know me I will not go in and that was the main problem so that has stopped and helped me but the shops further afield do not know who I am and I can easily go in and place a bet or play the FOBTs and that defeats the object.

I'm still gambling at times in amusement arcades and another chain that's not included which should be.

Customer



Reliance on shop staff

The perception from this small number of respondents suggested that they felt shops weren't rigorous enough in their checks. For this group of customers, it appears as though they were relying more heavily on the shop staff to uphold the exclusion:

Some shops still have let me in when they shouldn't have. I don't believe the staff are trained properly to stop problem gamblers gaining access to shops.

The shops need to be hotter and make sure to check when you come in. The scheme is amazing but I do not feel the shops want to enforce it.

Make it company policy to have staff look at all the photos submitted.

Customers

Improving the effectiveness of MOSES for customers

Customers provided suggestions which they felt would help to reduce or prevent their gambling activity once excluded. Their comments referred to a need for more support as well as tougher steps to prevent them from being able to access shops and place a bet.

Greater support from LBO staff

A small number of customers wanted MOSES scheme to include more support for customers in terms of feedback and signposting. It is understood that MOSES staff do signpost individuals to additional support if they detect they might need it. Some customers also asked for call backs to see how they were dealing with their gambling.

Perhaps a feedback to the excluded person, by means of a text or email to highlight the benefits of stopping gambling and providing further encouragement to the individual.

At the end of the call they could refer you to a Gamblers Anonymous or similar scheme in your local area - that would be good for future people calling up.

Customers

A tougher exclusion for those who need it

The more seriously addicted gamblers may need the exclusions to be tougher by including other types of gambling venues (including online) and/or have the ban applied for longer. A small minority of customers expressed more serious intervention, requesting that bank cards are blocked. Increasing the duration of the exclusion. A handful of customers wanted duration of exclusion to be extended from current period of one year to two or more years, or even for life.

They anticipated that they would relapse swiftly at the end of the one year exclusion. This illustrates the difference between the needs of heavy and habitual gamblers.

Once you have signed up you get a year but it should be for life not six months or a year. I found it very difficult [when it felt like] they were dangling the contact - for someone who has a very strong addiction to it - ... They should accept your decision and not tempt you back.

Customer

Offering different systems to prevent breaches

Some customers suggested that this could be reinforced with a membership card system, either for the premises as a whole, or for multiple premises.

The only way I think all people they enter shop they must provide photo ID and the staff they can decide after checking the computer if they can let you in or not I think this is the best and safer way.

It would be just another process that if you don't insert an active membership card before you insert money the machine will not work. It is such a simple answer to a growing widespread problem.

Allow national self-exclusion. This could be done by betting shops requiring membership or ID when a bet is placed or collected.

Customers

It may be useful to assess an individual's risk or level/type of gambling and help the central team to identify customers who would benefit from the self-exclusion scheme. There may be ways to support the central team and perhaps shop staff to recommend the appropriate type of support for individuals, particularly those who appear to be more seriously addicted. For example:

- For customers who find gambling is a severe problem, a brief assessment may show that MOSES is unlikely to work in isolation, and staff are recommended to signpost to more formal support or other tools.
- For customers who are opportunistic gamblers then the exclusion may provide enough of a barrier to prevent them from gambling.

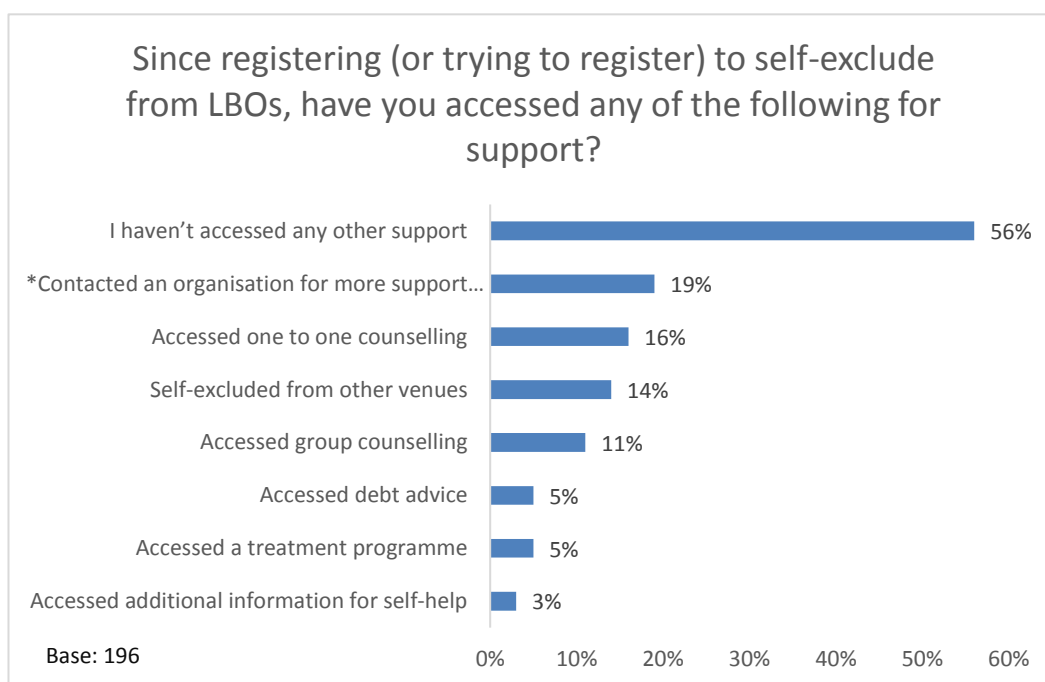
Accessing additional support

Customers were asked what support (if any) they had accessed since registering or trying to register with MOSES. While 56 per cent of those surveyed had not accessed any other support,



about a quarter had used some form of counselling (27 per cent had used some form of counselling). A smaller proportion of respondents had turned to specialist gambling charities such as National Gambling Helpline, GamCare, BigDeal or local support. Other forms of support used by small number of respondents included: self-exclusion from other venues, debt advice, a treatment programme and additional self-help information.

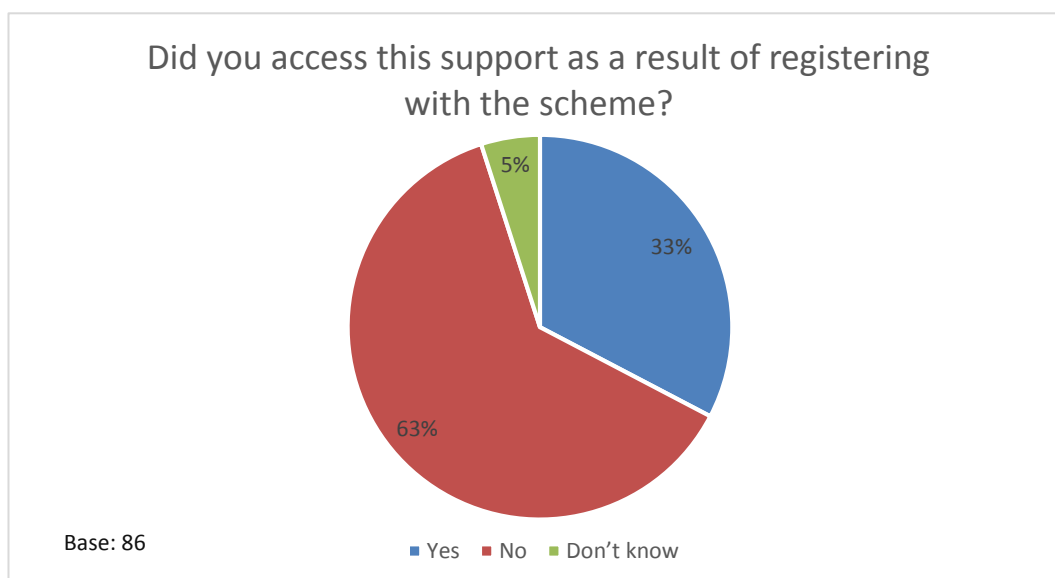
Chart 12: Other support used since registration



*e.g. National Gambling Helpline, GamCare, BigDeal or local support.

One-third of customers surveyed said they accessed the additional support as a result of registering with MOSES.

Chart 13: When support was accessed



It is understood that the central team do signpost customers to additional support but there is no formal referral pathway in place. It may be useful to assess the individuals risk or level of gambling and make more formal signposting to additional support for individuals who appear to be more seriously addicted.



Conclusions and recommendations

This section summarises the key conclusions of the evaluation, including current risks to MOSES continuing effectively. It offers recommendations for how it can become more effective for customers and operators.

Conclusions

MOSES is a useful tool for customers who need to take control of their gambling behaviour. 83 percent of registrants in our survey agreed that it had been effective in reducing or stopping their gambling activity and 71 percent said they had not attempted to use any of their nominated betting offices since joining. The scheme works best for those who want to take control of their gambling; registering with the scheme creates both physical and emotional barriers to prevent them from entering the shops to gamble. These customers generally understood that it was down to them to stay away and was not the responsibility of shop staff to keep them out of their nominated shops.

Customers felt the registration process was straightforward and were generally satisfied with it. Some commented on the length of time it took for the central team to respond to the calls and felt that the registration would be more straightforward if they could be excluded from all shops within a certain radius from home and/or work. They appreciated the flexibility the scheme offered by allowing them to add more shops at any time after the registration. Communication between the operators and the central team was felt to be effective, but relied on a central point of contact at the operator level to coordinate between the central team and shops.

MOSES does not provide sufficient restraint to prevent a small minority of more determined customers from gambling. They find other ways to gamble and are able to get around the exclusion. In contrast to the majority of our survey participants, they rely more heavily on staff to uphold the exclusion and prevent them from gambling. This type of customer may need more

stringent action such as a more widespread ban or systems to prevent them from gambling such as membership or ID cards.

The introduction of MOSES has made it easier for a customer to self-exclude from a number of different operators, rather than having to approach each individually. A key benefit is that a customer can conveniently register in their own time and in confidence over the phone, rather than in person in a betting shop. Operators felt that MOSES sat well alongside their own self-exclusion schemes and liked to be able to offer choice to the customer. It has led to customers gaining more support; around half had accessed additional support, a third of whom had accessed this support as a result of registering with MOSES. It is understood that the central team do signpost customers to formal support, if they show signs that they need this in addition to MOSES.

Risks to MOSES

While operators and shop staff are supportive of the scheme, they acknowledge that it does have flaws and will become difficult to manage as the number of registrations grows. The following specific risks need to be considered for the scheme while it is in its current format:

- The ongoing increase in the number of exclusions for each shop puts pressure both on the central team and operators. It also means shop staff have more faces to recognise, which poses a risk. This results in a greater risk of customers' exclusions not being upheld. This is more of an issue for operators with busy branches and more footfall than shops in quieter locations.
- The increase in demand placed on the central team and operators to process registrations means there is more pressure to complete the registrations within agreed timescale. There is risk that the exclusions are not put in place quickly enough to prevent a customer from being able to gamble.
- For some customers i.e. those with a more serious habit, the MOSES scheme may not be effective and they may attempt to gamble by using other venues or opportunities. The time and work put in by the team in processing the registrations of this group may be better applied handling registrations that are more likely to be effective.



Recommendations

Recommendations to support operator staff

Staff working in betting shops would benefit from more information to support them with managing the scheme. All staff should receive adequate training (and refresher training), so they are informed on the processes and have a clear reference point for how the scheme operates. For example, the information on the processes could be published as a flow chart so that staff can quickly refer to the steps required. This will help to ensure that there is consistency in the applying scheme processes across different operators. It is acknowledged that many operators have a high staff turnover or part time staff where they may not be able to build knowledge of customers who have self-excluded. It is important that all staff working in the shops are familiar with the protocols related to the scheme and understand it. Specifically, it would be useful to provide staff with the following:

- More detailed information and guidance to be able to explain the scheme to customers, including its benefits and the steps to registering when they call. This would also include information on the reasons for having a system where customers are asked to nominate shops.
- More information for staff about the scheme so they are aware of their role and responsibility for certain aspects e.g. how to verify ID and where to send this, notifying the central team about breaches.
- Information on the timeline used for processing new registrations and updating current exclusions with additional shops.
- Protocols to apply for different scenarios, for example, when a breach takes place and occasions when a customer wants to exclude immediately i.e. allow them to exclude from the shop immediately and then recommend registration to the MOSES.
- Within the current system, managers should ensure that all staff follow correct protocols at the start of every shift to ensure they are familiar with those who have excluded and regularly check the exclusions during their shift.
- Techniques to initiate a conversation with a customer about problem gambling and signpost them to other types of gambling support available.

Recommendations to support customers

As with staff, customers would benefit from greater clarity about the scheme overall. A useful place to start with this would be to provide more information on the self-exclusion website. For example information about the scheme features, its benefits, instructions on how to register, the importance of accessing additional support and links to these services.

It may also be useful to consider the reasons respondents cited why MOSES help them to stop gambling and turn these into key messages to market the scheme to others. For example,

incorporating messages reflecting the emotional barriers such as fear of embarrassment, removing the temptation and helping to break the habit.

To improve the future effectiveness of the scheme i.e. to ensure individuals are not able to bet once excluded, then it may be useful to consider different registration and notification methods, as follows:

- Improve the ability for customers to register quickly and more conveniently by considering:
 - Online registration and systems e.g. online forms provided by MOSES to allow customers to register more conveniently and reduce demand on central staff. However, this would need a clear protocol in place to verify the exclusion request.
 - Longer opening times for customers to call e.g. times which match opening of betting shops so that customers can call immediately once they have decided to self-exclude following a visit to a shop.
 - More staff to be able to respond to calls; it may be useful to assess peak times and increase ability for the service to handle demand at these times.
- Acknowledge that for some customers, MOSES may not be effective in isolation. It may be useful to establish their level and type of gambling activity so they can be signposted to more intensive support alongside exclusion.
- If it was felt to benefit the customer and their gambling habits, then it may be useful to allow them to choose to exclude from all shops within a certain mile radius from their home and/or work.

Recommendations for sustaining the scheme as it grows

Some actions will require substantial financial investment by operators to help manage and monitor the exclusions, and support customers who need more stringent measures to stop them from gambling such as:

- Creating an online 'live' system where registrations are centrally stored and notifications can be viewed by shop staff. This will mean that current exclusions, new notifications and breaches can be more effectively monitored by staff.
- Establishing ways to eliminate the risk of breaches by creating a membership card system or other electronic ID system which can prevent someone who has self-excluded from placing a bet, including the use of FOBTs and SSBTs.



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