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A PRAGMATIC MIXED METHODS ANALYSIS OF EXPERIENCES, BEHAVIOURS AND PERCEPTIONS OF GAMBLERS TOWARDS THE EFFICACY OF RESPONSIBLE GAMBLING IN MINIMISING 'PROBLEM GAMBLING'

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STATEMENT:

This research was undertaken under the auspices of the University of Wales Trinity Saint David

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DECLARATION

This work has not previously been accepted in substance for any degree and is not being concurrently submitted in candidature for any degree.

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STATEMENT 1

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Abstract

The premise of this thesis is that all business is embedded in society and needs to be responsible for the socio-cultural problems it creates. This thesis examines the social responsibilities operators should have to gamblers and wider society and seeks to understand if responsible gambling can empower gamblers to minimise harms. The aim of this thesis is to evaluate critically the extent to which responsible gambling is possible in relation to the interests of society and gamblers themselves and an examination of the efficacy of responsible gambling features in the online environment. Gambling-harms have been studied by researchers from many different disciplines however few are situated from the perspective of business. There has been a dominance of quantitative gambling research but a lack of qualitative investigation into harms from the perspective of gamblers. This thesis seeks to address these issues using a pragmatic, mixed methods approach and presents empirical findings drawn from the approaches used. A group interview gathered qualitative data about the behaviour and experiences of 'problem gamblers' in the development of their problems and specifically what measures would have been useful for them in controlling their 'problem gambling.' The rich information provided by the group-interview contributed to the development of an informed online questionnaire, completed by key stakeholders in the setting which provided insights on the phenomena of 'problem gambling' and responsible gambling. The lived experience of 'problem gamblers' is at variance with key stakeholders. The findings point to a need for a new model of 'problem gambling' one which recognises how gambling activity has become normalised in modern culture. Research findings are discussed in relation to implications for key stakeholders who need to participate in the socio-cultural debate that surrounds gambling becoming directly involved in its complex moral issues. Recommendations discuss policy changes, drawing on both health and consumer protection for the market to improve gambler safety and responsibility of the industry.

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To my sons, Louis and George – I love you xx

I dedicate this thesis to my beloved brother, Christopher Carl Bevan, who sadly passed away on 16 March 2016

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Abbreviations

Anti-social behaviour orders	ASBOs
British Gambling Prevalence Survey	BGPS
British Medical Association	BMA
Corporate Citizenship	CC
Corporate Social Responsibility	CSR
Department of Culture, Media and Sports	DCMS
Difficult to control gambling	DCG
Electronic Gaming Machine	EGM
Fixed Odds Betting Terminal	FOBT
Gambling Commission	GC
Gaming Board for Great Britain	GBGB
Group interview	GI
Gambling Restraint Erosion Theory	GRET
General Betting Duty	GBT
Harm minimisation	HM
Moderator-Counsellor	MC
National Lottery	NL
Online gamblers	OGs
Online gambling	OG
Online questionnaire	OQ
Organisation for Economic Co-operation and Development	OECD
Polluter Pays Principle	PPP
Problem gamblers	PGs
Problem gambling	PG
Public Health	PH
Responsible Gambling Council	RGC
Responsibility in Gambling Trust	RiGT
Responsible gambling	RG
Responsible gambling feature	RGF
Social responsibility	SR
Video Lottery Terminal	VLT

Chapter 1

Introduction

Eadington (1976, p. 1) wrote that "the oldest profession known to civilised society may very well be prostitution, but probably just as old as a leisure activity or as a more serious endeavour is the phenomenon of gambling." Gambling is a controversial leisure activity and despite its popularity has negative social and cultural implications. Governments have recognised that gambling is an effective means of generating revenue but it also can produce harmful effects for the gambler, their family, communities and society. The industry would probably like nothing more than to be acultural, asocial and amoral; the problem is that this is simply not possible and the industry has to embrace social responsibility. Corporate social responsibility (CSR) or social responsibility (SR) is an ethical theory that business has responsibility to society. There is no single, commonly accepted definition of the concept but this thesis understands SR as every organisation having responsibility to act in a manner that is beneficial to society and not solely to the organisation and consequently, the industry must address the gambling-harms it creates in a responsible way. CSR is an increasingly important objective for organisations but the obligation to act responsibly in contentious industries is debateable.

Business is embedded in society and not separate from the socio-cultural aspects with which their business interacts. Eberstadt (1977, p. 22) wrote that "business has seldom enjoyed so much power with little responsibility" and CSR has raised the profile of responsibilities that businesses must have to society. Contentious industries have their legitimacy and CSR policies questioned (Miller and Michelson, 2012) and controversial products, services and industries have traditionally included gambling along with tobacco, alcohol and pornography (Meier, 1994). However, gambling has undergone significant changes due to liberalisation and some aspects of the changes have not been researched. Its current omnipotence has renewed interest in the sociological and cultural analysis of

gambling (McMillen, 1996; Castellani, 2000; Reith, 2002; 2003; 2007; Cosgrave, 2006).

This thesis seeks to analyse the lived experiences, the behaviour and responses of 'problem gamblers' ('PGs') and the extent to which responsible gambling (RG) and responsible gambling features (RGFs) are effective in coping with 'problem gambling' ('PG'). The term 'PG' is always in inverted commas in this thesis to indicate the lack of clarity with the term which is discussed in depth in section C. 'PGs' and key stakeholders provide expert opinion and contribute to the analysis of the efficacy of RGFs and it is necessary to listen to key stakeholders to develop a better understanding of 'PG' and harm minimisation (HM) measures.

This chapter introduces the key ideas that relate to the aim and objectives of the thesis, the multidisciplinary context of the issues and literature, the structure of the thesis and outlines the original contribution the study makes to the field.

'Problem gambling'

Gambling has been presented historically as a moral problem, a sin, vice or criminal activity condemned by society and regulated by government (Jones et al, 2013, p. 69). It was not until 1943 and the publication of Edmund Bergler's 'The Gambler: The Misunderstood Neurotic' that a shift was signalled. 'PGs' were individuals "caught in the grips of an illness that necessitated medical treatment rather than moral condemnation" (p. 69). This new construct, a medical model of gambling regarded 'PG' as psychologically abnormal and emphasised the individual's responsibility to treat their illness. There are three repercussions of this. First is the link with governmentality. This is how governments try to produce individuals best suited to fulfil their policies and by responsibilising 'PGs' the government's responsibility for intervention is reduced (Foucault, 1991). By emphasising responsibilisation government removes its burden of responsibility for the care of 'PGs.' The central aim of governmentality is to establish social conditions that produce the responsibilised individual who is morally responsible and who uses rational choice when making market decisions. Second, understanding 'PG' as an individual pathology means that the structural factors of 'PG' are under-played.

Third, individualising ‘PG’ means that behaviour change must be targeted at the individual. This narrow focus on the ‘PG’ removes attention from gambling’s impact on society and communities (Reith, 2006). Medicalisation introduced new ways of regarding ‘PG’ and turned the consumer into a new type of person – an addict (Reith, 2004). This process is related to Foucault’s (1976) ‘constitution of subjects’ where the classification of types and features of behaviour provides tools for new ways of thinking and talking about individuals. Just as there are new ways of conceptualising consumers, there are new ways of shaping and controlling patterns of consumption. The ‘PG’ would have been constructed as the outcome of dangerous and powerful substances but with the development of new forms of governance associated with the move to neo-liberal societies, ‘PGs’ came to be defined in terms of subjective, individual behaviour of loss of control. Tieu (2010) suggests that ‘PGs’ may not be in control and therefore unaccountable for their behaviour due to diminished agency. Several models are examined in this thesis to understand ‘PG’ and Reith’s cultural model aligns with the perspective that gambling can be explained as rational in a socio-economic setting. Reith (2007a) argues that ‘PG’ is the result of modern consumer societies, the decline of external forms of regulation and the rise of demands for individual self-control. The liberalisation of the industry and the expectation that gamblers govern themselves creates the conditions for the emergence of ‘PG.’ The study of ‘PG’ is dominated by medical and psychological perspectives and this narrow focus tends to draw attention from the wider effects on communities and societies which has implications for RG. Both the medical and cultural models of ‘PG’ seek to minimise it through individual interventions including responsibility to seek help in the medical model and self-restraint in the cultural model.

Responsibility is a keyword in neo-liberal modes of governance and focuses on individualised risk-management. ‘PG’ is immersed in neoliberalism; the rational, self-interested consumer is supposed to be capable of balancing costs and benefits and make choices that maximise personal welfare (Adams, 2016). The construct of the rational consumer has given rise to multidisciplines including economics, law, sociology and psychology underpinning the development of understanding normal consumer behaviour. Rational choice theory contends that it is deliberative and consistent and the consumer seeks to maximise choices in relation to resources.

Instead of examining internal concepts like needs and desires, consumer behaviour identifies external benefits and costs. There are always factors that can be applied to make a case understandable and sensible. Benefits and costs can always be used to protect rationality; in the case of 'PG' - enjoyment, illness, chasing losses and Goffman (1967) emphasised positive qualities associated with gambling like skill and courage.

Social policy

In the post-war period after the Second World War, governments had a central role in ensuring the rights of individuals to have a minimum standard of life, economic welfare and security (Kennett, 2001). This was underpinned by mass production and mass consumption and the welfare state model was seen an inevitable outcome of a modern society. In recent times, this post-war consensus and social Keynesianism has been dismissed, accompanied by increasing inequality and a different social contract between government and individual. The rights of individuals are being eroded by new economic policies that emphasise duties. This renegotiated social contract has significant application to understanding the responsibility of government, industry and gambler in this thesis.

Government is not the sole institution to provide welfare and Baldock et al (1999, p. xxi) identify families, communities, market and the third sector organisations as welfare providers. Kennett (2001) argues that in the UK, an institutionalised and established private sector has promoted and provided welfare. The morality of government has been transformed into a market, targeted at gamblers who are now increasingly expected to manage their risky business. Gambling social policy relies on responsibilisation of the gambler; 'PGs' are expected to develop and manage their 'self-control' and learn that 'PG' is their responsibility. Government and industry have designed new types of responsibility which are promoted through a largely compliant media and managed at arms-length by organisations tasked with the job of raising and distributing funds from the industry to prevent and manage harms caused by the industry. The abrogation of direct government responsibility for managing responsible gamblinG (RG) and identifying and supporting 'PG' and the polluter pays principle (PPP) has ensured a significant role for the industry in

the decision-making processes around RG, PG and the funding of research into these two important areas. Arguably a consequence of this is that rather than independent evidence-based social policy development, we have industry-compliant social policy defining RG. The endorsed philosophy holds that gamblers are capable of 'self-control' and that RG is most effective when managed and controlled by the gambler. They may just need some RG instruction and utilisation of RGFs represent ideal and balanced market behaviour. The philosophy is that gambling social policy be produced, distributed and actively realised through consumption.

PPP was first mentioned in an OECD (1972) recommendation where pollution costs should be financed by the polluters and not the public in general. PPP is a popular retrospective notion of historical responsibility. This perspective is advocated by government and industry with the aim of minimising harm funded by a contribution from operators who make their money out of gamblers themselves. However, not all the costs associated with 'PG' is borne by gamblers. Communities and society are damaged; family, work, education, health and personal relationships also suffer (Downs, 2010). Industry money is not spent on these issues and operators do not pay an additional tax to compensate for this harm. Economic theory recommends that regulation to correct these costs and usually taxes and charges on goods are used and a reliable source of government revenue (Enoch and Potter, 2003). George and Bowden-Jones (2016, p. 115) say that "the Gambling Act 2005 enshrined the principle of 'polluter pays'" regarding gambling-harms channelled through voluntary contributions to the Responsibility in Gambling Trust (RiGT) initially but now Gamble Aware. It has been argued that ,unding influences the nature of treatment and research and that research funded by the industry were 'benefit-benefit' studies rather than cost benefit studies (Passas and Goodwin, 2010). Of the eleven board members at Gamble Aware, six are from the industry and there is not an independent chair (www.gambleaware.com, 2017).

PPP rests on neoliberal economics and there a question concerning why the polluters are not responsible so that society does not suffer. There is no mandatory tax applied to address gambling-harms and this is complicated by globalised gambling and how to apply PPP equitably. Operators paying for the social costs

reflects the most fundamental principles of justice and responsibility, however the current model of voluntary contributions raises just over £7m per year whereas the government provided £650m on drug misuse services in England in 2013/14 (Crawford et al, 2015). Social policy regarding addiction to drugs is firmly in the hands of the Home Office and Department of Health and is based on independent academic research from the UK and around the world. The underpinning rationale for this, is that these are illegal drugs and this approach is needed to reduce crime and minimise harm. There is a similar picture in social policy regarding alcohol, a legal part of mainstream leisure provision and here the underpinning rationale for government-led social policy is the potential to harm others. Gambling has the potential for harm to others and to lie behind criminal activities among 'PG' but since gambling moved from the Home Office to the Department of Culture, Media and Sports (DCMS) and applied PPP, there has been no attempt to establish levels of gambling-harms to society and no government-led social policy developments to manage either RG or 'PG.'

The gambling industry

The industry dwarfs all other forms of entertainment combined and the global gambling industry has remarkable size and power (Mizerski, 2013; Markham et al, 2014) estimated to be worth more than half a trillion dollars by 2019 (Graham, 2015). The total contribution to the UK economy is 0.5% GDP, 0.3% total employment, including a significant number of unskilled jobs and £1.5 billion paid in gambling taxes annually (Deloitte, 2010). Global losses in gambling have risen from approximately $250b in 2003 to $450b in 2013 (The Economist, 2014). Gambling has changed from low profile, limited and an expression of local culture (Binde, 2005) to a globalised industry, fundamental to market liberalisation associated with the development of an international consumer society (Reith, 2013). Markham et al (ibid) say that the 'emergence of Big Gambling' (p. 1) is driven by politics and economics and that gambling has permeated vulnerable communities paralleling tobacco and alcohol with similarly harmful consequences. Economic interests have an important role in rationalising gambling and separating it from moral and cultural arguments and government.

Livingstone and Adams (2011) argue that globalised gambling has only been possible with the collusion of the state. Liberalisation was a political strategy to promote gambling (Jones et al, 2013). Liberalisation was part of the neo-liberal economic project which also emphasised free markets, fiscal austerity and privatisation (Harvey, 2005). There was pressure from operators over public policy-making (Gaming Board for Great Britain (GBGB) 1995) envious of the National Lottery's (NL) success and selective liberalisation in the industry. Liberalisation increased the industry's political power with wide scale societal acceptance that gambling is not addictive nor the cause of 'PG.' Markham et al (2014) say that liberalisation was a form of exploitation of the working-class by the elite and that the industry used its political power to fast-track liberalisation and expansion and resist 'PG' concerns. Further there was limited debate regarding gambling's social and economic desirability and without ethical debate (Black and Ramsay, 2003). Historically, governments have opposed gambling for social, moral and ethical reasons (Kearney, 2005) and though limited types of gambling have been permitted, in many jurisdictions it has been prevented from thriving as a commercially independent industry. This picture however has changed rapidly as the internet destroyed physical barriers to gambling expansion (Wiebe and Lipton, 2008).

Online gambling

Online gambling (OG) is popular due to advances in technology, penetration of high-speed broadband and liberalisation, which has led to a globalised industry. The potential for OG was harnessed when Microgaming developed gambling software in 1994/1995 and in 1995 CryptoLogic created software to process secure monetary transactions online (Wood and Williams, 2009). In 1995, Internet Casinos Inc was the first online site (Drayman, 2006). OG is an exponential sector of e-commerce which developed quickly (Gainsbury et al, 2012). It has the heaviest concentration of high-risk features for 'PG' such as 24-7 usage, access from any location, fast gambling and regambling, multiple and continuous play and credit card play. In many countries, the development of OG coincided with the relaxation of legislative control of land-based gambling and government-sponsored lotteries which proliferated since the 1990s. Increases in participation has the compound cumulative effect of removing negative stigma attributed to risky behaviour (Hagen

et al, 2005) and its justification as a socially acceptable leisure activity (LaPlante and Shaffer, 2007). Hancock (2011) goes further and suggests that the increase in OG is matched by increases in 'PG' and that RGFs should be used by regulators to prevent 'PG' to better protect online gamblers. She concludes that the Gambling Act 2005 must be amended to ensure appropriate consumer protection for online gamblers as well as a review of 'PG.'

Research aim and objectives

The presentation of gambling as exciting, harmless entertainment is the result of many overlapping media messages as well as everyday practices (Sklar and Derevensky, 2010). When governments support the development and proliferation of gambling, the implicit message is that it is acceptable. The message is reinforced at home and work, where individuals engage in gambling in popular culture where it is depicted as exciting and socially desirable in social contexts. International evidence indicates that the greater availability and accessibility of opportunities is likely to result in an increase in 'PG' with more gamblers, families and communities affected by addiction (George and Bowden-Jones, 2014). 'PG' is disproportionately represented in under-privileged groups such as the poor, low-income, working-class, women, older people and immigrants (Casey, 2008). The current situation is being overlooked and a preventable future trend in addiction that we are ill-equipped to treat is being ignored (George and Bowden-Jones, 2014). Given the gaps in the literature, it is necessary to conduct a review of the possible efficacy of RGFs and to contribute to current knowledge about RG and a better understanding of ways in which 'PG' could be minimised.

Aim and objectives

This thesis aims to evaluate critically the extent to which RG is possible in relation to the interests of society and gamblers themselves. It examines the efficacy of RGFs in the online environment. To achieve these aims, the following objectives were established;

- **Objective 1:** to explore what 'PGs' say about their gambling life-stories
- **Objective 2:** to explore what 'PGs' consider might have prevented them from experiencing 'PG'
- **Objective 3**: to analyse the opinions of stakeholders towards the efficacy of RGFs.

To achieve objectives 1 and 2, it was necessary to meet with 'PGs' to discuss the genesis of their 'PG.' The third objective was achieved through an online questionnaire (OQ).

OG has evoked the interest of the research community over concerns that its availability and accessibility will lead to an increase in the number of 'PGs' (Griffiths, 1999; Parke et al, 2004; Orford, 2005a; George and Bowden-Jones, 2014). RG is the range of policies, strategies and programmes designed to prevent or limit 'PG' and to minimise harmful societal impacts. RG may enable and support gamblers to make informed choices and to take responsibility for gambling decisions. It should inform gamblers when and where to get help if they experience 'PG' (Verlik, 2007). Campbell (2002) says it is a unifying concept bringing governments, industry and the academic community together to prevent or minimise 'PG.' However, RG re-positions social problems associated with 'PG' into individual problems and removes from them political influence or control, whereby public issues are private problems (ibid).

RG was more a result of accident than planning and consisted of self-regulation and voluntary codes of practice (Smith and Rubenstein, 2011). Helping gamblers maintain a level of control, giving options if they experience problems and preventing underage gambling is not only the right thing to do, it makes good business sense (Gambling Commission (GC) 2006; Grayson, 2006; Jawad, 2006). The initiative for RG has been held back by the disinclination of successive governments to accept the findings of empirical research, the aims of RG and the mechanisms to achieve these aims (Hing and Mackellar, 2004). Modest progress has been made (Smith and Rubenstein, 2011) but the risk of 'PG' should stimulate government and operators to be proactive in ensuring safety (Hancock et al, 2008;

Miers, 2008; Livingstone and Woolley, 2007). There is insufficient published research that provides adequate information to design an effective response to 'PG' (Smith and Rubenstein, 2011). It is critical that evidence-based recommendations are developed to assist 'PGs' or gamblers at-risk and it is a small part of this gap that this thesis intends to fill.

It is necessary to understand if RGFs can be effective. Research shows that they must be perceived as effective if gamblers are to benefit from them (Parke et al, 2007, E-Cogra; Griffiths et al, 2009 Svenska Spel; Nelson et al, 2008 Bwin). Operators legally provide gambling but gambling-harms affect some individuals and necessitates the development of effective SR to minimise risk as well as to promote a positive image for the operator. There are many factors that impact on corporate decision-making and in the case of gambling, a decision to be responsible is weighed against a range of factors including legislative necessity, shareholder demands, customer needs, the impact on operating factors and profitability.

Rationale

There are three specific points that characterise the rationale for undertaking this study. First, on a personal note, this study builds on work undertaken for an MBA award which evaluated how online operators presented responsibility on their sites. A recommendation was made by the examiners that research should be continued and specifically to explore contributions from key stakeholders about SR. Second, there is a gap in the gambling literature relating to SR from the business lens. Most of the research in this thesis has been conducted by psychologists and the research has largely been conducted in Australia, New Zealand, Canada or the US and in those countries (other than the US) 'PG' is a public health (PH) issue. A less common discipline examined in the thesis is sociology; legal experts and historians are cited. There are only a small number of business researchers including Hancock (Australia, UK) Hing (Australia) and Yani-de-Soriano (UK). There are several key researchers including Orford and Monaghan (psychologists) and Goffman and Reith (sociologists) who are key to the literature in the thesis, but they are not business specialists. Third, there is a paucity of qualitative research discussing behaviours and experiences with gamblers and a methodological tendency to focus

on quantitative accounts of 'PG' (Casey, 2008). Finally. there is limited consideration of the perceptions of gamblers particularly from a bottom-up perspective.

The number of 'PGs' are rising and social impacts are poorly understood and this study seeks to provide some input into these gaps in knowledge. We are short of a robust RG policy and so this thesis is very important.

Personal experience with gambling research

This thesis experienced certain difficulties in getting research approved and funded. The following details are set out in chronological order. The university was reluctant to use the term *gambler* in the OQ and as a result the researcher was required to use the term *user of gambling sites* when seeking to understand the participant's interest in the research. The researcher was also requested to not contact university staff and students as a group for study. This was never the intention of the researcher but the university was concerned that if staff and students participated, the findings could have implications for the university. If, for example, findings concluded that staff and students at this university have a high rate of 'PG' or the incidence of gambling-harms is significant, this would be negative to the good standing of the university. The research was monitored closely prior to the data collection stage to ensure that every step taken in the research process was approved before execution to uphold the good standing of the university. It was clear that the university was anxious about this research and its possible implications. As the university was inexperienced in conducting gambling research, it was important to have an experienced academic and researcher in the subject area in the supervisory team. A highly qualified and experienced individual was recruited to the supervisory team to contribute her wealth of knowledge to the uniqueness of conducting gambling research. This supervisory team member was a member of another university.

The researcher sought funding from the Responsibility in Gambling Trust (RGT) and completed numerous applications and submitted multiple proposals. The researcher made short-lists of six candidates and then two for funded research.

Considerable expense was involved in travelling to London on several occasions was which difficult without funding. Eventually the panel decided to fund psychology-based research which sought to examine how psychological processes affect gambling behaviour. The industry prefers psychology-based research because individuals differ in their behaviour and personal qualities and therefore problems are blamed on individual characteristics, therefore absolving the government and industry of responsibility. A positive outcome of the RGT decision was that the research in this thesis was completely independent.

As the research progressed, the Gambling Commission contacted the researcher and requested a copy of the thesis. It was a flattering request and the response has not been finalised. Conjecture could be that viewing completed PhD research studies is a measure to save expenditure on research. There are many practical questions this thesis seeks to answer including effective RGFs. The findings of this thesis therefore could have relevance and application for regulatory bodies which may be why the GC made an approach. BBC Wales also requested access to the research and again the response has not been finalised but the researcher is reluctant for journalists to use the findings for their own purposes. Using the findings of this study would save BBC Wales research costs and reflects the problems involved in conducting 'PG' research.

Thesis structure

The thesis has been structured into seven chapters. It utilises theoretically informed and related literatures that seek to establish a compelling interdisciplinary framework. Eadington (1976) and Schellink and Schrans (2005) argue that gambling is a natural interdisciplinary subject and when studied from an interdisciplinary perspective there are direct and pragmatic benefits. This thesis uses an interdisciplinary method so that when the different disciplines cross and merge, they will be synthesised to the ultimate benefit of understanding more about RG.

The business discipline in social science does not contribute significantly to the

understanding of gambling. Research that has examined SR and gambling is psychology-based and the focus is on the individual. This thesis needed to explore the role of the operator, which is why wider fields have been employed. Consequently, the research has investigated the fields of ethics, CSR, social policy, psychology and sociology.

This first chapter provides some background related to setting up the study, the resistance felt initially and the interest the study has generated. The second chapter is sub-divided into 6 sections so that the relevant material from across the multidisciplines can be appropriately set out in the literature review. Section A evaluates ethical theory seeking to understand how it can underpin the development RG. Ethical issues surround the industry because of its propensity to create gambling-harms and ethical theory explores why operators should be responsible in the development and delivery of their business model. Section B examines CSR from the main theoretical perspectives looking at the importance of theory-driven explanations of CSR. It links theory to practice and considers how a SR framework can be effective for key stakeholders. Section C examines the 'elephant in the room' and explores 'PG.' It looks at models and their implications for key stakeholders including wider society. Section D discusses regulation and liberalisation and looks at the move from minor vice status, constrained by the Home Office and forbidden from developing demand to a lightly-regulated leisure sector with unprecedented growth and a concomitant rise in 'PG.' Section E explores RG strategies that can assist gamblers and are later examined for perceived effectiveness. Finally, section F reviews literature relating to sociological perspectives of gambling. It was important to examine sociology because first gambling takes place in a social setting and second sociological approaches to gambling seek to move beyond individual-based explanations of the activity and place gambling in the context of family, community and wider society, enabling notions of problem and RG to be placed in a social context.

Following the substantial literature review, there is a chapter in which the chosen research methodology of pragmatic mixed methods was discussed. The chapter describes the research approach linking the choice with a constructivist stance and why these choices were appropriate to meeting the aim and objectives of the thesis.

The chapter looks at issues of context, access, trust and ethics. The methods of data collection are discussed and the measures taken to ensure methodological rigour.

The findings and discussion elements of the thesis are set out under three chapters, which sit in a sequential order, reflecting the chronology of the research process. At the beginning of each chapter there is a discussion of how the data was handled and analysed. The first of these findings and discussion chapters critically considers the outcomes and implications of the group interview (GI). The second details the outcomes and implications of the quantitative elements of the study and the final findings and discussion chapter describes the grounded theory arising from the analysis of the open-ended questions in the online questionnaire.

The final chapter of the thesis, offers a final conclusion and the recommendations draw out the overarching messages from the study; namely the need for a partnership approach including gamblers and arguments for government action. The thesis is concluded by discussing the implications of the research in terms of the future development of minimising 'PG.'

What follows now is an orientation to the methodology adopted for the study.

Methodology

A pragmatic mixed methods approach was adopted for the theoretical framework which allowed the use of any reasoning from qualitative and quantitative research suitable for producing defensible and usable research findings. Pragmatism allows mixed methods when social science researchers agree that neither quantitative nor qualitative research single-handedly will provide satisfactory answers for research questions (Tashakkori and Creswell, 2007). Considerable gambling research has been quantitative, so this thesis uses mixed methods and was eager to obtain rich qualitative data about the behaviours and experiences of 'PGs.' First, narrative analysis was adopted following a group interview (GI) to analyse accounts of the individual, lived experiences of 'PGs.' It is very unusual for a researcher to secure access to a group of 'PGs.' 'PG' is highly stigmatised and there are difficulties in

finding willing research participants (Scull et al, 2002). This research experienced such difficulties and is discussed in chapters 3 and 4. Second, an OQ sought to quantitatively analyse participants' opinions about RGFs using statistical applications. Third, analysis of open-ended questions in the OQ using grounded theory. They were analysed in order that the data was collected and the GI was conducted first as it was anticipated that it would inform the construction of the OQ (Harrington and Mickelson, 2009).

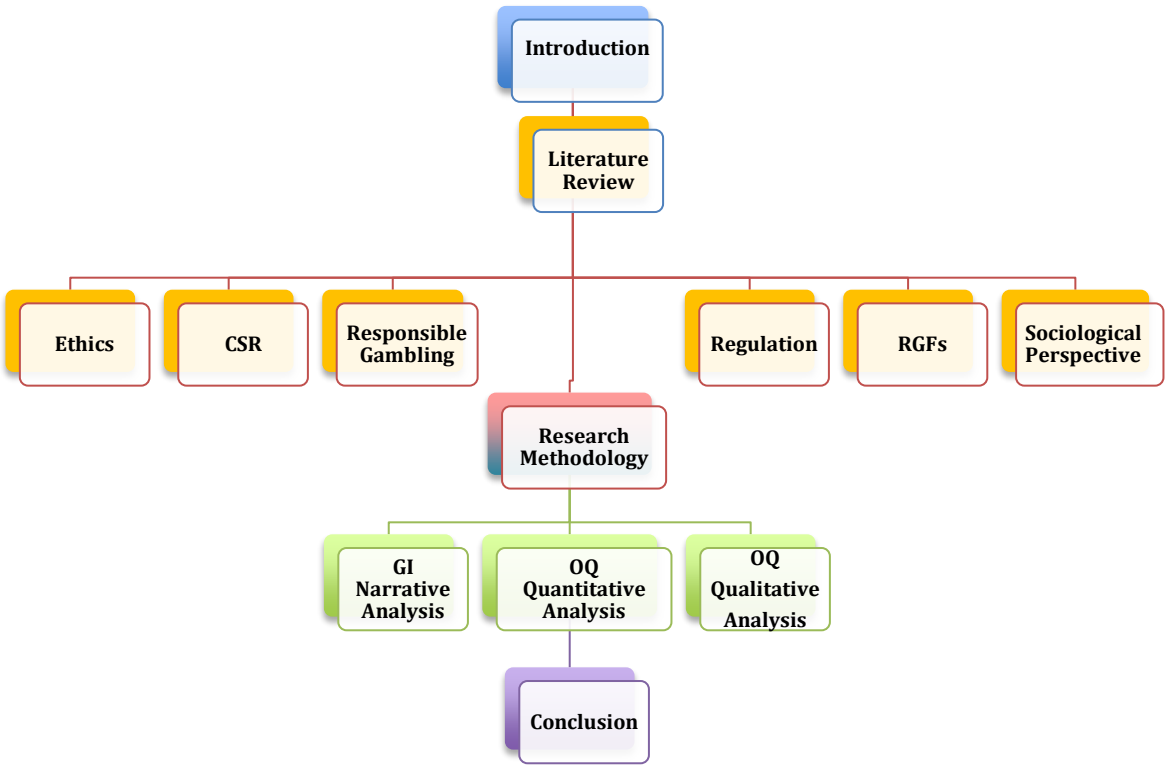


Figure 1.1 Structure of thesis

Conclusion

The liberalisation of gambling is new and there is no precedent on which regulators can base effective CSR. The thesis seeks to contribute to understanding the responsibility of operators, government and gamblers. Operators claim to promote RG but it is a market not known for high ethical standards. It will be argued that currently there is a responsibility vacuum and regulation is needed to secure responsibility.

Chapter 2: Literature review

Section A: Ethics

Introduction

Whilst gambling may be viewed as ethically or morally wrong in many situations, gambling itself is not regarded as unjust. Rawls, for example, would make no judgement about the morality of gambling but writes that the "inequalities of wealth and authority are just only if they result in compensating benefits for everyone and in particular for the least advantaged members of society" (Rawls, 2005, p. 206). Rawls would not have had a problem with the institution of gambling if it redistributed money to the poorest in society but the moral issues that surround gambling pose the question if we would be better off without it. This chapter seeks to explore the relationship between ethics and gambling.

Ethics

'Ethics' is derived from the Greek word 'ethos' meaning customs and can refer to the principles or standards upon which a group or community acts (Somerville, 2008). This is a descriptive definition of ethics and whilst useful to historians and anthropologists, it may be inappropriate for normative thinking, which is often at the heart of ethical questions, for example, 'What do I do in this situation?' (ibid). Holmes (1984) summarises that ethics is about the good which is values and virtues that must be cultivated and about the right, what our moral duties may be. Dienhart (2000) relates this to the practical question of how to apply ethics in the business world: "business ethics focuses on how we use and should use traditional ethical views to evaluate how institutions orchestrate human behaviour" (p. xvi).

Blundel et al (2008) suggest there is a link between moral philosophy and a prescription of what behaviour should be and that CSR is a term embedded in societal expectations of organisations which has wider currency in the corporate world. CSR has developed concepts derived from the main ethical doctrines and

these have influenced ethical debate since the Enlightenment of the eighteenth century. This has led to significant claims for CSR programmes. For example, organisations may argue that CSR is the fulfilment of the duties and responsibilities that they owe to the wider community or that CSR contributes to the common good by benefiting both the organisation and society (Somerville, 2008). As gambling is increasingly supported by new technologies, new variations on ethical issues have arisen and the impact on CSR is under-researched.

Moral rules

Somerville and Wood (2008) write that "societies have developed various kinds of social rules, such as legal rules and rules of etiquette, which act as a framework or guide to behaviour" (p. 144). Moral rules are social rules around which societies are structured and can be applied to criticise the social rules which guide human behaviour. Moral rules can be established through popularity and can be considered valid if supported by society, which is the case with gambling (Sheng and Sheng, 2012).

Rules and legislation have a close relationship but are not necessarily the same and there can be conflict between moral and legal rules (Somerville and Wood, 2008). Examples include previous race laws in America and apartheid laws in South Africa. These were eventually seen to be so immoral that the only moral action was to go against them. It is possible to disagree with some moral rules (abortion, capital punishment, euthanasia) and to question the likelihood that there are clear answers to ethical problems. However, in all societies most individuals recognise that some basic moral rules are essential and that breaking them can be met with sanctions ranging from disapproval to legal penalties. Moral rules underpin society and many decisions made by both individuals and organisations need to consider them. However ethical behaviour in this basic and passive sense is not what is truly meant by CSR which is based on businesses being proactive in relationships with stakeholders and doing more than just not breaking moral rules (ibid).

Virtue ethics

The application of virtue ethics to contemporary moral issues has received little attention (Austin, 2008). Virtue ethics rely on Aristotle's Nicomachean Ethics (350 BC) which examines how to achieve happiness whereby happiness depends on virtue. A virtuous person behaves right, for the right reasons and enjoys behaving right. Aristotle was one of the first philosophers to stress the importance of practical reasoning. Living one's life according to reason is vital: individuals will follow reason willingly with a rational checking of passion/s. Reason leads to a virtuous life. In virtue ethics, the role of one's character is important and performing one's duty or in a good consequential way. Virtue ethics are not based on moral laws, rules and or principles (Slote, 1977) but on inner qualities, character and motives that qualify an individual as being considered virtuous. Aristotle, a teleologist argued that all activity, including moral activity, aims at some good (Te, 2009). For instance, the end of gambling is winning or wealth. These ends are not good in themselves and are pursued not for their own sake, but for something else; winning may give satisfaction or wealth and wealth provide others benefits. There must be some good such as the enjoyment of gambling and is pursued for its own sake and therefore can be the end of all other ends. Collins (2007) supports the Aristotelian approach of virtue ethics to gambling; too much gambling may have negative consequences but in moderation may have good consequences.

> "Amusement is for the sake of relaxation and relaxation must necessarily be pleasant, since it is a kind of cure for the ills that we suffer in working hard." Aristotle (Politics, VIII 5, 1339b, pp. 15-17, trans. T.A. Sinclair).

For Aristotle, society shapes an individual's morality through its traditions and the laws of the political community. Human excellence is achieved within the political community that supports virtue. Aristotle's notion of making individuals good through public responsibility happens when responsible government acts to protect the public interest. For Aristotle, it is the government's responsibility to determine if the ends justify the means and if it is ever justified to enact laws to protect individuals. Government needs to encourage responsibility by leading by example and develop skills in individuals that are central to being virtuous and successful

(Atkinson and Butler, 2012). Moral and practical questions about how government may share from the profits of an industry that preys on greed and desperation were simply not dealt with during liberalisation and consequently RG receives inadequate government attention.

Aristotle argued that there is a means and an end to everything. The individual must use reason and if this is based on proper virtues, the individual reaches the end, which is the good life. Virtue ethics looks at reaching a 'eudemonia' in life, where life comes to the best possible outcome. This requires good character traits including personal reasoning and responsibility. Aristotle states that a person understands being happy based on the kind of life that they lead and he outlines three kinds of people. First, for most individuals, happiness equates to sensual pleasure. Second, there are individuals who equate happiness with virtue. Third, there are individuals whose happiness is synonymous with the true good, eudemonia. If an individual derives happiness from only gambling, then gambling prevents them from having a truly good life: if this individual is a 'PG' the individual is without reason and so no gambler is experiencing the good life because they are not fulfilling themselves through behaving in a virtuous way. Stanford (2007) argues that it is imperative to always behave in a virtuous manner rather than to develop specific good actions. Aristotle (like Mill who will be examined later) subscribed to higher and lower notions of pleasure and would have shunned casinos in favour of the theatre.

Aristotle defined ethics as a practical science and said that the practice of virtues can lead to a better life (Sicart, 2005). Individuals must use their judgement to evaluate situations and make choices based on being a good individual (ibid). If Aristotle's virtue ethics are applied to gambling, there are definite rules that the gambler must follow to win. In an Aristotelian sense, it is possible to argue that a good gambler obeys the rules and uses their judgement to achieve the goal (winning). However, there is more to gambling than just playing by the rules and a good gambler from an ethical perspective is one who more than follows the rules. Arguably 'PGs' want to win and are unable to play in an ethical way. Aristotle's virtue ethics may restrain or prohibit activities that are damaging to individuals and

society. Aristotle would agree with laws against gambling because he would believe gambling is destructive to individuals, families and communities.

Gambling is an interesting case for virtue ethics. Gambling can be defended on a personal rights argument if an individual is not harming anyone else directly and gambled voluntarily with their personal money. Criticism of the promotion of gambling is based on the negative externalities which affects individuals and society (the consequentialist argument) and because gambling, particularly the harder forms, is not in keeping with values which most individuals support (the values-based argument). In defining hard and soft gambling, speed of play is the main factor in determining the hardness of gambling forms (DCMS, 2012).

Regulation can stipulate behaviour and actions in certain clearly defined cases, but to make well-formed decisions in complex social environments, more guidance is required. This has been recognised in Aristotle's virtue ethics which demands that individuals must be virtuous to achieve a good life (Atkinson and Butler, 2012). Regulation however is unable to control the behaviour of all individuals. If applying Aristotelian virtue ethics to gambling, it could be argued that regulation is incapable of preventing 'PG.' Something else is needed, which is good character of the individual; the trait of responsibility is especially key. It is also important to consider virtue when trying to understand the ambitions of operators and the needs of gamblers and not the profit made. For Aristotle, gamblers were on the same level as thieves and plunderers (Ethic ad Nicomachum, lib. IV). Gandhi (trans. Vyas, 1962, p. 20) compared gambling to drinking, a destructive vice that ruins men's souls and makes them a burden on the earth. Gambling does not pre-date ethics and vice versa and the debate about the morality of gambling and balancing the individual and social costs continues.

Ethical theories

Seeking to understand good and bad morality is important. Cognitivism argues that there are known objective moral truths and therefore a statement of moral belief can be true or false (Somerville, 2008). Non-cognitivism argues that morality is subjective (or culturally relative) and moral rights and wrongs can only ever be

perceptions (ibid). Utilitarianism, Kantianism and rights theories which are cognitivist perspectives generally presume that individuals make rational decisions choosing the option that gives maximum total utility.

Cognitivist perspectives		
Virtue Ethics	**Deontology**	**Consequentialism**
Stresses moral qualities	Stresses duties/rules at the core	Stresses proper actions
Operators praised or blamed for behaving appropriately Regulation cannot prevent 'PG', good character is required	Operators have a moral duty to gamblers It is wrong to violate any gambler's right to treat them as not having inherent value	Operators should pay attention to stakeholders RG should be promoted (so that operators do not get bad publicity)
Individuals should choose to not gamble	Individuals have a moral duty to not gamble	Most gambling does not do most gamblers more harm than good

Table 2.1 Moral cognitivism and gambling

Utilitarianism

Utilitarianism is the traditional consequentialist theory and views actions as not good or bad in themselves but based on what they are good or bad for. Utilitarianism is the notion that an action is right only if it causes more good than bad to be produced. English philosophers Bentham (1748–1832) and Mill (1806–1873) identified utility with happiness (ibid). The only thing desirable as an end is happiness and all other things are only desirable as means to the end of happiness. From a utilitarian perspective, actions are right to the point that they maximise happiness or at least minimise unhappiness. Bentham however was unconcerned with the happiness or unhappiness of individuals; he was interested in the common good that is the judge of right and wrong. Bentham's greatest happiness principle

proposes that an action can be categorised as good when it gives the greatest happiness for the greatest possible number. The usual objection to utilitarianism is that it demands the maximisation of goods, including economic growth, in order to achieve utility and this allows the forfeiting of individuals and minorities for the greater good (Somerville, 2008). Donaldson (1992) suggests that whilst utilitarianism starts out with principles of benevolence, it finishes with the malevolence of the Victorian workhouse. Valued groups are protected and unvalued groups pay the price because of the inability to prevent punishment of the innocent or because of the biased application of law (Somerville, 2008).

Utilitarianism can allow telling lies, for example, to safeguard an organisation's reputation and consequently to safeguard employees' jobs. If an organisation was saved from bankruptcy due to lies told by its managers to improve its image and reputation, this would be viewed as permissible. Utilitarianism would balance the welfare of individuals whose jobs had been saved against the breaking of trust with other individuals (Somerville, 2008).

Deontology

Utilitarianism can be differentiated with the non-consequentialist ethical position that argues that motivation and not consequences is the determining factor regarding whether actions are ethical (ibid). The deontological viewpoint is based on the Greek word for duty (deon) principally associated with the German philosopher Kant (1724–1804). In Kant's view, ethics are based on the notion of duty and that some actions are morally obligatory despite the consequences. Kant adds that an act is carried out from a sense of duty when it is implemented to the categorical imperative. He defines the categorical imperative in two distinct but supportive parts.

> "I ought never to act except in such a way that I can also will (desire) that my maxim should become a universal law . . . Act in such a way that you always treat humanity . . . never simply as a means but always at the same time as an end" (Kant, 1785).

Dienhart (2000) suggests more user-friendly versions of the categorical imperative

> "Categorical imperative: Version 1: An action is only moral if you can make your reason for acting into a rule that everyone can follow. Categorical imperative: Version 2: Never use people simply to an end; always treat yourself and others as beings with infinite value" (Deinhart, 2000, pp. 117-118).

Universalising a maxim ensures that the principle acted on should be one which can be suggested everyone else act upon (Somerville, 2008). The second maxim looks at the relationship between individuals. For example, if managers of organisations consider telling lies to safeguard an organisation's reputation, deontology would argue that it is not acceptable to tell lies in this way unless one is willing to live in a world where anyone can lie if they think it is justifiable. Also for Kant, telling lies selfishly breaks the categorical imperative of treating another individual as the means to getting what you want (ibid).

The dilemma with deontology is when categorical imperatives conflict. Whilst there is a duty never to lie, it is possible that telling a lie will fulfil the duty to preserve the life of another individual. The example used to illustrate this refers to what should happen when the Gestapo ask the location of Jews hidden in your basement (Singer 1979). Kant argued that if a murderer asked you the hiding place of their intended victim, there is a duty to tell the truth so as not break the rule about telling lies. Kant argued that an individual cannot know the consequences but even if the consequences are potentially negative, one must still fulfil the duty (Somerville, 2008).

Rights theories

Deontology is similar to theories which argue every individual has rights to which they are entitled and to violate an individual's rights does not treat them an individual with inherent value (Somerville, 2008). Rights theories are broadly non-consequentialist with the standpoint that individuals cannot be sacrificed for the common good because this would contravene their human rights.

During the political unrest of the seventeenth and eighteenth centuries, intellectuals developed rights theories to transform structures of authority in society that had been maintained by perceptions of loyalty to unelected monarchs (ibid). The fundamental belief was that natural law, the objective moral order, gives limits to the power of rulers and conferred rights to the governed. Life, liberty and sometimes property were declared as natural rights conferred on individuals by natural law and could not be taken away. Governments were bound to contractually respect these basic rights. Locke (1632-1714) argued that it was not a contract between government and individuals, but it was a social contract between individuals who give power to the government. This significant concept is enshrined in several declarations including the US Declaration of Independence (1776) the French Declaration of the Rights of Man (1789) and Article 1 of the Universal Declaration of Human Rights which states that 'all human-beings are born free and equal in dignity and rights.'

Theories that promote absolute human rights have similar problems to the deontological position where individuals have duties and responsibilities that cannot be ignored under any circumstance (Somerville, 2008). Chryssides and Kaler (1993) write that;

> "The aim of serving the common good has to be tempered by the admission of rights and responsibilities. Likewise, rights and duties cannot generally be examined separately and neither can they be pursued regardless of any consideration of collective welfare" (p.103).

All ethical theories have basic problems and no theory is practical without being qualified by another.

Ethical theory applied to online gambling

Using Mill's utilitarian approach, it is possible to argue that gambling liberalisation causes more harm than good. In ethical terms, gambling is highly controversial and for the individual its only benefit is entertainment and limited by the negative

effects of losing money (Fox, 2009). It is possible to win, to increase personal wealth, leading to an improvement in wellbeing, however, the likelihood is minimal and of no significance in determining the ethical value of gambling. The chance of losing money is high and it is possible that it will negatively affect the wellbeing of the gambler and other individuals who rely on the funds they possess for their wellbeing (ibid). According to Mill's utilitarianism neither gambler nor operator can claim to act in a virtuous way or claim to follow the Kantian categorical imperative. The rights-based perspective could be applied because providing the gambler does not cheat and the operator provides an opportunity for winning, the negative and positive rights of gambler and operator are maintained. Mill argued that an ethical act does the most to increase happiness and decrease suffering and simple mathematics means the more individuals are made happy or less unhappy by the act, the more ethical the act is. Rights theories, utilitarianism and deontology give an incomplete picture of the benefits and limitations of gambling.

Some forms of gambling, like the NL may have a higher ethical value in utilitarianism because of the chances of winning. Also, money from the NL supports good causes in the community. The operator almost never gives money that offers any ethical significance, other than taxes required by law (ibid). An operator can become involved in charitable actions but it is not compulsory. 'PG' support provision is of positive ethical significance but it is unrealistic as it goes against the industry's operating principles (Yani-de-Soriano et al, 2012). Operators rely on gamblers losing to generate revenue because it lacks the other revenues such as food and beverages, available to their offline counterparts.

Operators paying taxes is not enough to justify their existence from an ethical perspective; taxation is compulsory and many offshore operators are currently exempt from taxation. Paying taxes does not take into account the motivation or outcomes of tax systems. Hypothetically, if the government used the tax raised from operators to achieve the ultimate public benefit as conceived of within utilitarianism, it still does not make gambling ethical (ibid). If gamblers believe that there are positive public impacts because of their gambling, increasing the ethical values of gambling by the increase in human happiness, they miss the point. OG

will not increase human happiness and decrease human suffering and in fact it is more likely to do the opposite and on a larger scale because access is greater.

Ethics and gambling

There is a paucity of reading material related to the ethics of gambling and limited resources were available for this thesis. The Black and Ramsay (2003) article was sponsored by Tattersalls and bias is possible. They suggest a philosophical basis for the ethical provision of gambling and four principles gamblers and operators should adopt to be ethical. The first principle is promoting the common good which is beneficial for the majority and is linked to Aristotle (Barnes, 1984, p. 6). The common good also forms part of Kant's moral vision (Humphrey, 1983, p. 381; Paton, 1985, p. 429). The individual human good refers to valuable objectives which must be pursued so that the individual can lead a fulfilled life and the common good is society's fulfilment for members (Black and Ramsay, ibid). The common good is distinct from the overall good because promoting the common good never acts against the good of any individuals whereas communities may decide to act against the good of some individuals for the benefit of the overall good (Black and Ramsay, 2003). Operators may argue that they contribute to the common good by enabling individuals to follow meaningful and fulfilling objectives, these objectives based on the reasons why people gamble are social interaction, recreation, dreaming and hoping (ibid). The primary principle is to provide gambling that promotes these objectives and control the strategy and operations of operators (ibid). An organisation with a genuine commitment to a community's common good would not intend to harm any individual and so a clear principle for an operator is not to exploit individuals for whom gambling may be problem. Operators adopting the common good will initiate dialogue about the provision of gambling especially new types. Part of the involvement of business in the community requires the paying of taxes and providing support for charities. It has been suggested that this support for charity should start with addressing the harms that the organisation may have caused as well as charitable preferences of the organisation (ibid).

The second principle is to respect the rationality of others to make responsible choices, based on the fundamental duty of fairness to treat others as you would like them to treat you, which is how Kant expresses duty. To make rational choices we need to know all the facts. Respecting rationality in the business context has two broad obligations. Firstly, gamblers need enough information to determine if the product serves its purpose and whilst a benchmark in terms of information needs to be set, it does not need to be a moral education. Second, operators must make sure that their actions in communication and practice are truthful, clear and non-manipulative, which implies several applied practices for operators including ensuring that gamblers understand the risks involved. Although Black and Ramsay apply a version of Kant's duty-based model, they do not use a categorical imperative to answer if it is right for an operator to treat gamblers as means to an end, a means to their revenues. To eliminate 'PG' by treating individuals as ends-in-themselves, or even to minimise this harm would mean turning the present business on its head.

The third principle is to respect the reason and freedom of gamblers. Freedom is not just being able to do whatever one wants; it is not possible to have freedom without 'self-control.' 'PG' is due to a lack of 'self-control' when faced with potential financial reward (ibid) which operators have been accused of exploiting (Passas and Goodwin, 2004). This shows a lack of understanding about 'PG' either from a psychological or sociological perspective. Therefore, operators should respect individual freedom and manage gambling in ways that improve 'self-control' and provide adequate warnings. There needs to be recognition that warnings have limited effect. Some gamblers will lose 'self-control' particularly online and operators have a responsibility to provide immediate and follow-up assistance (Black and Ramsay, 2003).

The fourth principle is for operators to take responsibility for the harmful impacts of gambling on the common good. Gambling's negative impact on the common good is a complex matter but most health professionals, sociologists and ethics experts agree that gambling is harmful to the community and that 'PG' is a reality for many individuals and communities (ibid). RG requires a commitment to social responsibilities and for operators to review RG strategies. Though it may never be

possible to eliminate 'PG,' the industry should take responsibility for the common good. Operators should be apologetic that 'PG' exists and should make clear they do not wish to profit from it (ibid). However, the industry-commissioned authors say that respecting freedoms and being rational to minimise 'PG' is ultimately the responsibility of the gambler (ibid).

Adams et al (2009a, 2009b) discuss some of the problems developing social policy around 'PG.' Operators' roles regarding SR and the protection of vulnerable individuals must be examined (Griffiths, 2009b). The industry has been labelled passive when it comes to 'PG' (ibid). There are two ways to deal with passivity either work with the industry to minimise 'PG' or regulate to minimise 'PG.' Whilst self-regulation does not seem to be effective in most cases of harmful or dangerous consumption (such as alcohol and tobacco) there are some proactive steps that the industry could adopt. Operators should provide and fund immediate professional support for 'PGs' (Black and Ramsay, 2003). They suggest that a responsible operator should consider that a gambler using this support is successful and that responsibility is shared between operators and gamblers. The community needs to be compensated for 'PG' which has damaged the individual's respect and participation in the common good. Family, work, education, health and personal relationships also suffer (ibid). As public resources are spent on these issues, operators should pay an additional tax in compensation for harming the community and the common good. Government and industry should be committed to considering the wider impact of gambling not just immediate commercial goals. If gambling can contribute positively it must be responsible and Black and Ramsay argue that it *could* be an ethical business (ibid). If gambling is to be responsible, operators requires a fundamental change including an ethical shift to contribute to the common good (ibid). Unethical operators are harming potential human fulfilment and not contributing to the common good.

Defending gambling

Mill's essay 'On Liberty' has been quoted to defend gambling: individuals should be free to spend their money any way they like providing it does not harm others. Mill asked questions about how gambling should be regulated one hundred and fifty

years ago (Reeves, 2007). Philosophers have always argued that certain kinds of activity should never be subject to regulation because it could prevent the development of freedom and virtue which individuals must develop themselves (Wiseman, 2000). Harm is a popular term justifying smoking-bans in public (the smoke that harms others) reducing consumerism (which in excess harms the environment) and anti-social behaviour orders (ASBOs) (which prevent harm to others) (Mayes, 2008). The harm principle is also used to attack this argument because government interference harms individual rights (ibid). Reeves (2007) argues that Mill would have approved of being cited by both sides of the debate because truth is the outcome of justifying smoking-bans and the protection individual rights. Many kinds of activity including drinking, drugs and gambling have been said to involve harm, to both the user and other individuals caught up in these activities (ibid). Regulating gambling is justifiable and necessary (Mayes, 2008). The only legitimate reason for regulation according to Mill's harm principle is to limit individual liberty to stop them directly harming the interests of another (Wiseman, 2000). Government cannot control activities that do not harm others directly (ibid). In this context gambling may not be considered morally dubious because it can be classified as a self-regarding activity, which Mill believes may or may not directly harm others. Other-regarding activities may or may not cause direct or indirect harm and can be regulated. The distinction between self-regarding and other-regarding activities is not clear (Babic, 2006). Gambling is a private activity beyond the reach of law or by other means that society can use to restrict individual liberty. Individuals are more knowledgeable than governments to know what is good for them and society. Mill also describes other-regarding activities as belonging in the public domain because they can cause direct and or indirect harm. These other-regarding activities can become a justifiable target for social and legal regulation including gambling (Wiseman, 2000). Reeves (ibid) attempts to imagine what Mill would say about the current smoking ban in public because Mill would have required a lot more evidence than the government has accepted that passive smoking was harmful to others. Mill argued for separate smoking and non-smoking rail carriages and by arguing for separate carriages Mill argued for freedom of choice (ibid). Mill's view of harm is very narrow because man was viewed as heroic and strong and by current standards today man is weak and vulnerable to the extent that everything is harmful in society (Mayes, 2008). The government may be

interpreting harm in the same narrow way as Mill, despite robust evidence of its wider social negative impact.

Conclusion

Ethical issues relating to gambling are concerned with the principle of harm. It is a conflict between individual freedom which may produce harmful consequences for the gambler and those around them versus government paternalism, protecting individuals from harm. A significant majority of gamblers experience or say they experience no harm and balancing the pleasure of the majority against the harms of the minority cannot be resolved through ethical theory. The industry is operating under few social and moral pressures and there are few concessions by industry because it is now in the interests of the common good for the industry to grow and the government to benefit from maximum revenues. Takala and Pallab (2000) argue that although an action may be legal it still may be ethically dubious.

The next chapter examines the link between SR and ethical theory. SR is built on a system of ethics in which decisions and actions must be ethically approved. If the action or decision causes harm to society then it would not be considered responsible.

Section B: Corporate Social Responsibility

Introduction

This chapter seeks to set out the importance and relevance of CSR. The chapter is based on the presumption that CSR is integrated into business practice. From a critical perspective, it seeks to understand if operators can ever really be socially responsible due to its relationship with 'PG.'

Origins of corporate social responsibility

The origins of CSR can be traced back to the Middle Ages when questions about the impact of business on society emerged for the first time due to the challenging of merchants to the power of church and state (May et al, 2007). In the nineteenth century, commercial organisations began to have significant impacts on individuals, environment and society. As a result, governments enacted legislation to curtail the power of organisations over employee protection and child labour laws (ibid). In the first half of the twentieth century, economic globalisation made CSR a global phenomenon. Post WW2, academia became interested in CSR (ibid). Bowen (1953) an economics professor coined the term CSR when he evaluated "the obligations of businessmen to pursue those policies, to make those decisions, or to follow those lines of action which are desirable in terms of the objectives and values of our society" (p. 6). This began a long period of many and varied CSR definitions.

Overlapping of corporate social responsibility concepts

The CSR concept is difficult to identify and overlaps with other models (Moon, 2004). CSR goes by many names including corporate citizenship (CC) sustainable business, environmental responsibility, the triple bottom line, social and environmental accountability, business ethics and corporate accountability. Werner and Chandler (2005) and Asongu (2007) agree that consistent definitions, language and terms are not established in the field, though many have been offered. It is not

a good sign when there is no agreement on what to call the concept particularly when it comes to its legitimacy.

An obligation by government and industry to provide good standards for accountability and SR is vital for an industry based on gambler safety and the public interest (Smith and Rubenstein, 2011). A culture of SR begins with respect for gamblers and is a precondition for a just, ethical and caring society (ibid). This is SR having priority over profit-making, though unlikely to be an organisational objective in the gambling industry because it goes against the economic premise of the operator's financial security. However, it is not clear that the industry is based on gambler safety. Griffiths and Wood (2008b) argue that industry CSR is good for business because long-term sustainability is dependent on RG initiatives. However, if the industry needs to be developed on a mass entertainment level with negative impact, then CSR must be on a minimal scale (ibid).

Theories of corporate social responsibility

Carrega and Mele (2004) say that CSR is based on four groups of theories.

Instrumental theories

The first group of theories assume that organisations are instruments for wealth creation which is their single SR. The interactions between organisations and society are economic and social activity is only permissible if it is consistent with wealth creation. These are instrumental theories and understand CSR the means to generating profits, the ends. This resonates with Friedman's (1970) stockholder theory, a narrow and traditional emphasis of CSR.

Political theories

The second group of theories emphasises the organisation's social power in its relationship with society and the political responsibility connected to this power. As a result, the organisation accepts social duties and rights and participates in some social cooperation. These are political theories and resonate with the CC approach

of Crane and Matten (2010). CC theory is based on social contract theory and generally has a strong sense of business responsibility to the community. Partnerships are specific ways of formalising the willingness to improve the community or environment. Crane and Matten (ibid) discuss three types of CC. The limited view of CC is charitable donations or philanthropy in the local community. It is about business putting something back and is fuelled by issues of organisational self-interest. The equivalent view of CC is about meeting Carroll's economic, legal, ethical and philanthropic responsibilities and Carroll will be discussed shortly. The extended view of CC defines citizenship as a set of organisations' rights. These are first, civil rights which ensure freedom from abuses, mainly government abuses and includes the right to own property. Second, social rights are about entitlement where CC goes beyond compliance which may be unrealistic for operators to go beyond complying with what they are required to do. Third, political rights are the right to participate in the process of objective-setting. This is reflected in globalisation which has reshaped demands on organisations where organisations may carry out actions from which governments have retreated.

Integrative theories

The third group of theories argue that organisations must integrate social demands and that business depends on society for its continuity and growth as well as for its very existence. These are integrative theories and include Freeman's (1984) stakeholder theory. CSR as stakeholder management happens when social concerns are not external to an organisation but are integral to its being (Freeman, 1984). CSR is essential for stakeholder identification, involvement and communication (Mitchel et al, 1997; Morsing and Beckmann, 2006; Morsing and Schultz, 2006). Stakeholder management determines how an organisation can serve its customers and be profitable as well as serving other stakeholders including suppliers, employees and communities. It is this view of stakeholder theory that has dominated the CSR debate questioning the legitimacy and authority of corporate power and forced the moral aspect of decisions made by management into the background (Hockerts and Morsing, 2008).

Carroll (1991) outlines the range of business responsibilities in the 'Pyramid of SR.' The four CSR components are structured in layers, which are built in levels from a broader base to a narrow focus. The structure and details of the pyramid can be seen in Figure 2.1.

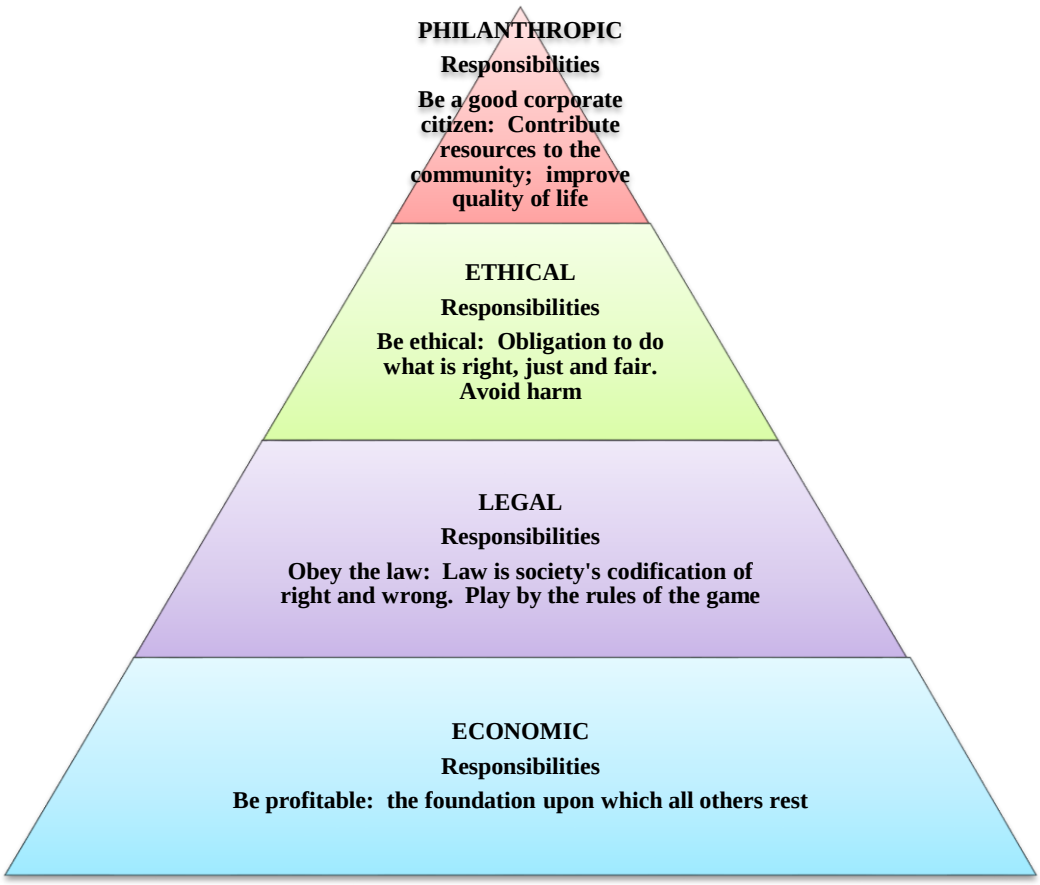


Figure 2.1 Pyramid of CSR (Carroll, 1991, p. 42)

The four categories are not mutually exclusive and it is not a choice between economic concerns or social concerns (Buchanan and Johnson, 2007). Stakeholders are included as an integral part of CSR for Carroll because stakeholders gave meaning to the social element by outlining to whom the organisation is socially responsible.

The economic responsibility of the operator is to operate in a profitable way. The profit motive is the primary force for operators and all other responsibilities are based on being profitable. Therefore, it is important for operators to commit to profit maximisation and to being competitive and efficient. The legal responsibility of the operator is to comply with regulation. Operators must obey relevant laws, be law-abiding corporate citizens and provide gambling that meets the minimum legal requirements. The operator's ethical responsibility is voluntary and concerns how to minimise harms to gamblers, to do the right thing. Operators should act in a way consistent with the expectations of societal and ethical norms and to understand that operator integrity needs to go beyond mere compliance with laws and regulations. The philanthropic responsibility is also voluntary and should reflect that the operator is a good corporate citizen. This involves the operator engaging in good will acts however operators who do not perform good acts are not regarded as unethical. If the operator's charitable contributions include donations to GamCare because this is about operators giving something back to society, giving money to the harms that it has contributed to, is not philanthropic.

There is some acceptance that the pursuit of operators' economic objectives has the potential to cause social harm which requires corrective and strategic action to re-establish stability (Hing, 2005). Increased priority given to profit maximisation is contradictory with pressure for more awareness of social principles (Hing, 2005; Turner, 2005). Hing argues that Carroll's (1979) representation of CSR can be applied to economic principles versus stakeholder expectations and to improve this comparison by re-arranging the comparative importance of Carroll's four domains to pledge to RG. Hing (2001) investigated CSR practices and principles utilised in Australian gambling clubs to manage 'PG' and assessed RG management practices. The results showed that management prioritised economic, legal, ethical and philanthropic principles (value-driven) and most preferred secondary RG practices (process-driven) followed by reactive primary intervention (Hing, 2005). Less preferred were proactive primary intervention and philanthropic practices. The practices and principles contrast greatly with those key stakeholder groups, who preferred more balanced principles and management practices that are more holistic when it comes to RG. They also validated Carroll's (1979; 1991) construct of CSR and a more holistic set of management practices in RG.

Ethical theories

Carriga and Mele (2004) argue that the fourth group of theories believes that the relationship between business and society is embedded with ethical values and leads CSR from an ethical perspective. Therefore, organisations must accept social responsibilities as an ethical duty above any other considerations. This is the naturalistic group of ethical theories where there are objective moral properties that can be determined by empirical knowledge and reducible to natural or ethical properties such as needs, wants or pleasures. Stakeholder management can be included in the integrative group of theories because it can integrate social demands (ibid). Stakeholder management however is an ethically-based theory since Freeman (1984) wrote that managers have a "fiduciary relationship to stakeholders" (p. xx) replacing the previous duties to stockholders.

Sustainable development is another values-based concept which was popularised by the Brundtland Report (1987). "Sustainable development seeks to meet the needs of the present without compromising the ability to meet the future generation to meet their own needs" (World Commission on Environment and Development, 1987, p. 8). Though the report originally only referred to the environment, the term has since been expanded to include consideration of the social dimension as being inseparable from development (Carrega and Mele, 2004).

Organisational legitimacy and corporate social responsibility

CSR incorporates the principle of organisational legitimacy based on Davis' (1973) Iron Law of Responsibility. This means that society can define the organisation's legitimate functions and under which circumstances an organisation must take responsibility for the problems it has caused or are related to their business (Preston and Post, 1975). Further to this, organisations must not misuse the power that society has given to them or they risk losing the approval of society (Hockerts and Morsing, 2008). Organisations seek legitimacy to ensure commitments and support for the organisation from internal and external stakeholders. This may be a useful strategy for organisations seeking legitimacy in controversial industries (Reast et

al, 2013). Some organisations seek to align themselves with CSR for social legitimacy (ibid) and legitimacy-seeking strategies can be exercised in the gambling industry (Han, 2014).

A review of key concepts in the CSR debate shows how it works for organisations on the following levels (Wood, 1991);

Institutional level: legitimacy

Society gives legitimacy and power to business and in the long-term, organisations who do not use it responsibly will lose it (Davis, 1973). Wood (1991) says this is supported by three theories. First, functional theory where tasks are accomplished by institutions such as government for welfare, economy for goods and services where organisations should be socially responsible because they operate in a joint environment. Second, Freeman's stakeholder theory defines stakeholders as "groups who can affect or are affected by the definition of an organisation's purpose" (1984, p. 49) makes the abstract concept of society clearer. If stakeholders lose confidence in the organisation's performance, legitimacy may be withdrawn because stakeholders refuse to give their share of benefits (Wood, 1991). Third, the argument that utilitarianism and the pursuit of self-interest leads to the most efficient allocation of society's resources and maximum well-being may be unfair and ignores basic questions of rights and justice where disfavoured groups like PGs' lose out.

Organisational level: public responsibility

Carroll (1999) examines if and how organisations are responsible for solving the problems that they have created and for helping to solve problems related to their business operations and interests. A function of management is public responsibility and there are two areas of management involvement with society (Wood, 1991). First, issues that arise directly from the organisation's role and second the impact on society that is generated by the organisation. This is specific for organisations; a gambling operator would be held responsible to help solve problems of 'PG' but it would be difficult to justify an operator's support for a charity, for example, *Help for Heroes* because the area that charity focuses on is

not related to 'PG.' Public responsibility can be explained in terms of broader relevance and operators would have to justify social involvements that were not related to 'PG.' However, if an operator is reliant, for example, on members of the armed forces as customers, it may justify taking some responsibility for the *Help for Heroes* cause. However, social responsibilities should be relevant to the operator's interests, operations and actions.

Individual level: managerial discretion

Within every organisation, managers are obliged to seek socially responsible outcomes. For Carroll, philanthropic responsibility or corporate philanthropy is illustrated in voluntary social commitments not specifically necessary because of their other responsibilities. Philanthropic responsibility is related to managerial discretion, an organisation's social responsibilities are conducted by individual actors (Wood, 1991). Managerial discretion is based first on the fact that managers have organisational and societal choices, second the idea that manager's actions are not all prescribed by organisational rules and third, that managers are moral actors and have choices about fulfilling their responsibilities.

Global level: CSR as sustainable development

In addition to Wood's institutional, organisational and individual levels, Hockerts and Morsing (2008) add a fourth, the global level. They say that sustainable development has had an impact on our understanding of CSR. They argue that the Brundtland definition of sustainable development extends the responsibility of organisations both intergenerational and intragenerational. As a result, operators are expected to bear in mind unrepresented stakeholders such as future generations.

Sustainability

CSR refers to an operator's responsibility to act ethically and to consider its effects on gamblers and the community and sustainability refers to an operator conducting its business in a way that is conducive to the long-term. Sustainability is often described as how organisations manage their financial, social, environmental risks and responsibilities. The sustainability debate is particularly relevant to gambling

because of the shift towards the focus of encouraging societal wellbeing. Dragicevic and Tsogas (2010) conducted stakeholder interviews to examine if the industry can be sustainable. In the interviews, Blaszczynski (ibid) said that gambling is like the alcohol and tobacco industries because their negative externalities are burdensome to society. From a sustainability perspective, operators are not required to do more than other industries, because organisations regardless of industry should adopt the highest levels of responsibility regardless of industry. Dragicevic and Tsogas (ibid) argue that government is becoming focused on operators maintaining socially responsible standards that protect gamblers, however, there is little evidence for this.

The sustainability of industries with social or environmental impacts depends on whether adverse impacts are being effectively addressed. The idea of a sustainable industry where gamblers gamble responsibly seems unlikely. A sustainable industry needs to empower gamblers, without limiting the appeal of the game nor limiting its contribution to government revenue. The industry is sophisticated and knows that it needs to be sustainable but that the governance of gambling probably requires a regulated environment. Hing (1999) argued that neither a purely economic nor social orientation to gambling is sustainable in the long term and that a balancing of economic, legal, ethical and philanthropic responsibilities is necessary. She concludes that the nature of operators' CSR responsibilities would be determined by the extent and nature of gambling impacts.

Sustainability does not appear to be a natural fit for gambling. Gambling been around for thousands of years and likely to be around for thousands of years more and so it is important to take a proactive position to deal with the social and psychological harms that gambling can create. This will probably require the participation of a variety of stakeholder groups and this thesis seeks to contribute to our understanding of what the different stakeholder groups say and feel about 'PG' and RG.

Corporate stakeholders

If operators want long term development, sustainable long-term businesses models are required. Freeman argued that organisations can achieve their strategic objectives when they engage with their stakeholders who have their own objectives and both sets of objectives can be merged together. Each stakeholder has its own relationship with the organisation in a hub-and-spoke format (Jonker and Foster, 2002; Steurer, 2006).



Figure 2.2 Adapted from Representation of relationship between the organisation and stakeholders (Donaldson and Preston, 1995, p. 69)

This approach allows stakeholders to contribute to an organisation's SR. A significant part of stakeholder theory is to inform management of decision-making (Donaldson and Preston, 1995; Jones and Wicks, 1999; Vilanova, 2007). Freeman has a wide understanding of stakeholders as "any group or individual who can affect or is affected by the achievement of the organisation's objectives" (1984, p. 25). This contrasts with Friedman's narrow interpretation of CSR, where stakeholders (or stockholders) have financial ownership in that organisation. The general debate over how organisations should be run may need to take on a different focus when

looking at the gambling industry because of the negative externalities of the activity.

Kant and the stakeholder approach

The stakeholder model argues that the manager's task is to balance the interests of the different groups who have a 'stake' in the organisation, including shareholders, employees, customers, suppliers and the local community (Somerville and Wood, 2008). This model requires the organisation be cognisant of its social responsibilities and to consider all stakeholders when making business decisions. Evan and Freeman (1993) argue for adoption of the stakeholder model from a Kantian perspective. Kant's categorical imperative is used to argue that all individuals have a right not to be treated as merely a means to an end but as ends in themselves and all groups affected by an organisation should have a role in making organisational decisions. The stakeholder perspective does not view CSR as an optional extra but as integral to the responsibilities of the organisation. The organisation must pay as much attention to its social duties as it does to maximising profits. Carroll's (1991) theory can be applied to introduce RG beginning with the identification of stakeholders, their stakes, opportunities and threats, CSR meanings to different stakeholders and an action plan for minimising harm. Without the co-operation of different stakeholders, the implementation of RG policy is unlikely (Blaszczynski, et al, 2004).

Carroll's moral, immoral and amoral managers

According to Carroll's CSR pyramid (1991) the ethical section comprises three descriptors immoral, amoral and moral management. Carroll considers that moral managers exemplify high ethical standards that go beyond legal requirements. CSR is the moral choice of managers who are responsible for the work environment and the moral outcomes of the choices they make (Ackermann, 1975). This view of CSR is based on business ethics literature (Jones, 1991; Donaldson and Dunfee, 1994; Crane and Matten, 2003). Wood (1991) argues that managers are essential in cultivating sustainable business practices. Hing (2001) examined CSR in New

South Wales (NSW) venues and found that managers did prioritise economic, legal, ethical and philanthropic principles relating to RG. Hing argues that the results of her study support Carroll's (1979; 1991) concept of CSR. Fallon (2008) also examined gambling venues in NSW and suggests that managers have a better understanding of the harmful impacts of gambling. He suggests that several managers could lower the reliance for income from gambling products such as Electronic Gaming Machines (EGMs). This is a significant acknowledgement of the moral choice of managers. Fallon's research emphasises that managers need to balance responsibility to the community with continuous organisational financial profitability (ibid, p. 150). The attitude of managers to CSR may be influenced by the approach of society and/or the government to responsibility for 'PG.' In an industry where CSR may be an oxymoron, one where 60% EGM revenue is derived from 'PGs' (Productivity Commission, 2010) the morality of managers and the government and industry should be questioned.

Immoral managers act, behave and make decisions in a way that suggests an active disagreement with right or ethical behaviour (Carroll, 1979; 1991). Decisions made by immoral managers are incompatible with ethical behaviour and involve active opposition to the moral position and their priority is the profitability and success of their organisation. Immoral managers overcome regulation to achieve goals and seek to exploit opportunities for personal or organisational gain.

Amoral managers are neither moral nor immoral but are insensitive to the harmful impacts their business decisions may have (ibid). They believe that the actions of their organisations do not have an ethical dimension. Amoral managers may not understand the implications of their actions on stakeholders. They comply with regulation as their ethical guide. These are 'unintentional amoral managers' and there is another group, the 'intentional amoral managers.' This group maintain that ethical choices are not for business but are for personal lives.

Ethical decision-making by managers and or employees seems to be different from the ethical decision-making of the holistic organisation. In the former situation, the individual is acting to the advantage of himself or herself and or the organisation but in the latter situation the organisation itself manifests its own unethical

behaviour for example, having no RG policies for 'PGs.' There is limited literature in this subject area but Laczniak and Inderrieden (1987) evaluated the influence of stated organisational concern for ethics on managerial behaviour. They found that when potential unlawful behaviour was tempered with a high level of organisational concern, managers were influenced to change the morality of their actions by organisational policy (in this case a code of ethics with CEO endorsement). Therefore, if there is minimal (or no) organisational concern for RG, then managers/employees may be influenced by this. This is likely because operators would be unlikely to support RG policy when its main impact would negatively affect revenue.

Corporate social responsibility dilemma

Hosmer (2006) described the tensions between an organisation's financial imperatives and its social obligations as the dilemma of management; the "conflict between an organisation's financial performance and its social performance" (p. 2). Typical CSR perspectives seek to establish the business case to show that being socially responsible is profitable (Blundel et al, 2008). Vogel (2005) argues that there is limited evidence that CSR is related to profit in a positive way and that CSR is unimportant because there is powerful evidence showing that other business processes directly affect profit (such as marketing and training). However, Orlitzky et al (2003) conducted a wide-ranging review of research and concluded that there *is* a positive link between CSR and profit. They conducted 52 studies and found that organisations' engagement in CSR can pay off.

Smith and Wynne (2002) estimated 39% of Alberta gambling revenue came from moderate and severe 'PGs' and Wood and Williams (2007) estimated a similar figure with 35% of Ontario revenue coming from severe and moderate 'PGs.' Banks (2007) argues that if 30% of revenue comes from gamblers at whom RG is aimed, the incentives for the industry to take effective actions are not strong. Further, research towards the development of effective policy is needed (ibid). The industry could lose significantly and government-funded research may be designed to avoid

sensitive questions and not to challenge the status quo (Livingstone, 2012). In 2010, the British Gambling Prevalence Survey (BGPS) was discontinued due to a lack of funding; arguably this is evidence of a lack of seriousness about research into gambling and 'PG.'

Smith and Rubenstein (2011) argue that profit maximisation taking precedence over any other goal is a significant issue; concentrating on profit may affect an operator's integrity, accountability and SR standards (Marin, 2007). SR is unlikely to be the guiding principle for operators. There may be commercial tensions between the profit motive and the protection of 'PGs' and at-risk gamblers. Further, operators may perceive RG as a threat to their revenue and autonomy. Lantos (1999, p. 224) argues that "morally upright behaviour can help fend off government regulation" which is often unwanted because "excessive government regulations increase compliance costs." Smith and Campbell (2007) argue that by 'soft-peddling' the dangers of gambling and being preoccupied with profits, governments have placed more importance on generating revenue than on the welfare of gamblers. Room (2005) and Light (2007) argue that the collaboration between governments and operators gave "gambling interests extraordinary bargaining power" (Room, 2005, p. 1226) which resulted in liberalisation.

Hing (2002) investigated how gambling venues managed 'PG' to the satisfaction of significant stakeholders. She argues that industry expansion, increased public concern, governments, operators and community and pressure groups are key in acknowledging 'PG' as a social issue. Some operators were utilising RG initiatives but these were cosmetic attempts dealing with unacceptable 'PG' levels (ibid). Pressure increased and responsibility was placed on governments and operators to stop or reduce 'PG' and find ways to advance SR in the provision of gambling. Hing (ibid) concludes that operators manage social impacts based on the environmental impacts that affect the corporate social intentions of the organisation. This is illustrated in the priority given to the economic, legal, ethical and philanthropic principles which influence the effectiveness of CSR processes used to deal with the problem and which then impacts on how the organisation implements its CSR (ibid). These responses determine the scope of the operator's social impacts.

CSR initiatives make it non-zero-sum game for operators and its environment (Lindgreen et al, 2008) because CSR has a positive influence on stakeholders (Dawkins and Lewis, 2003). Margolis and Walsh (2003) argue that an organisation's poor social performance damages its financial performance. However, there is little discussion over the measurement of social performance particularly related to gambling. Bhattacharya and Sen (2004) found that consumers behaved negatively towards organisations behaving irresponsibly or when organisations do not practise CSR or behave in a socially irresponsible way. Also, consumers were more loyal and more positive by word of mouth towards organisations who they believed to be practising CSR (ibid). Griffiths et al (2009) observed high levels of gambler loyalty in his research with a Swedish operator using PlayScan; two-thirds of gamblers were exclusive to that operator. Griffiths (2010a) say that "successful online gaming affiliates need to establish and develop user loyalty and affinity" (p. 32) because gamblers want to gamble with trustworthy operators. However more proactive gambler protection interventions are needed from government and industry or the threat of legal action may be needed (Hancock et al, 2008). It has been argued that the government has the responsibility to protect the public from harm and it should demand more accountability and responsibility from the industry (Yani-de-Soriano, 2012). Lindorff et al (2012) argue that organisations in controversial sectors can contribute to the social good with the basic intention that some social good is better than none. Orford (2010) suggests that there is a discrepancy between making a profit and reducing harmful impacts and that operators should embrace CSR to avoid tighter regulation. He refers to the conflicts of interest present in alcohol and tobacco companies over price increases, advertising and selling restrictions and happy hour or concessions for female drinkers. Critics highlight how these industries prefer reductions, which are unlikely to hugely affect demand and supply. When operators support RG education, it helps create the image of an industry keen on harm reduction. CSR practised by organisations that provide harmful products may be an attempt to prevent exposure of harm (ibid). Orford contends that democracy is at-risk, if organisations that seek to profit from a dangerous form of consumption are involved in setting the agenda for regulation. Miers (2004, p. 117) wrote "an acceptance that the promotion of RG is a better public position than one that merely seeks to exploit

the consumer (…. is due to enlightened self-interest). The operators' acceptance of responsibility for its products became, in effect, part of the price of the government's promotion of the changes."

A ***Coral*** manager discusses the reality of CSR applied to the 'pariah' business of gambling and considers CSR's feasibility. ***Coral*** has three CSR objectives; to promote and ensure RG, to continue building corporate reputation and to sustain position as an employer of choice which are based on four core areas RG, community, environment and fundraising.

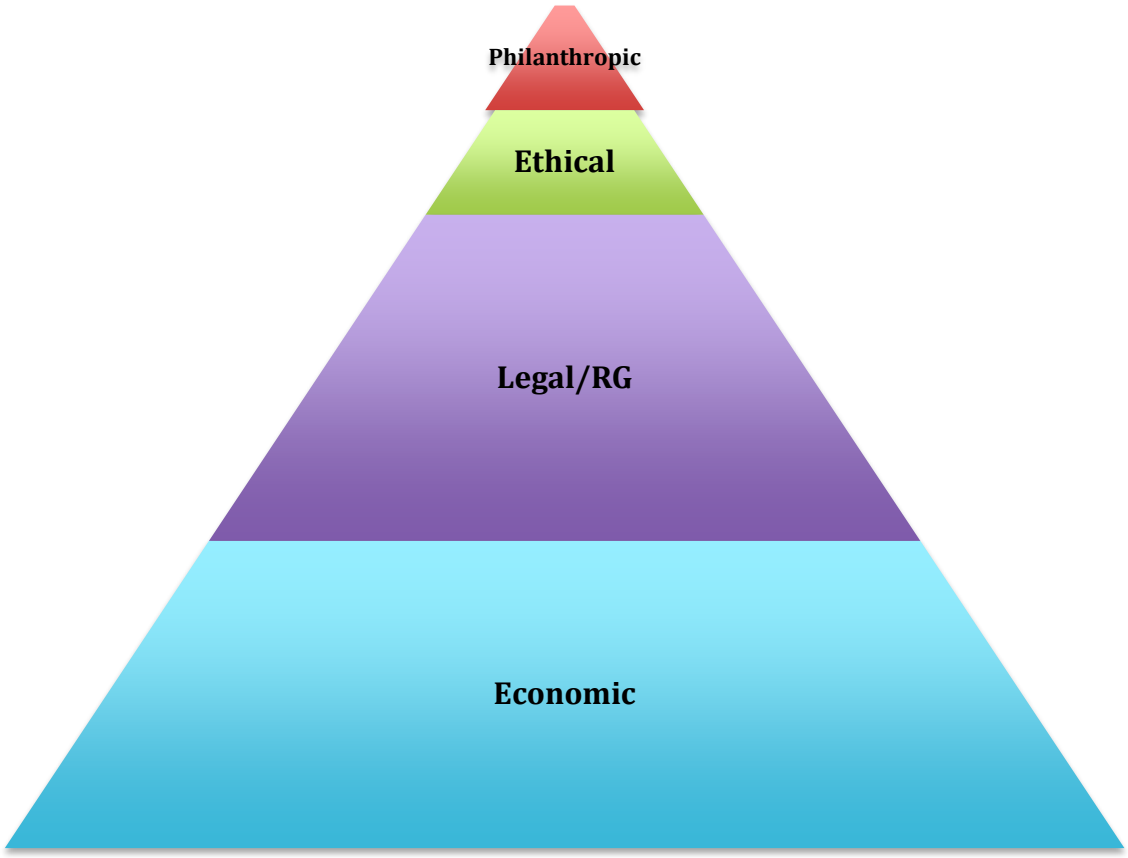


Figure 2.3 Adapted from Carroll's CSR Pyramid applied to post-Gambling Act 2005

Carroll's model assigns equal importance to the four categories but the post-liberalisation model places most emphasis on the legal category. Morgan (2009) suggests that once an element of regulatory oversight is added into the mix it can

impact on how operators view CSR. While regulation might bring less responsible operators into line it can deter or refocus the efforts of operators who do try.

Corporate social responsibility and harm

CSR seeks to minimise the harmful environmental and social impacts and maximise the positive ones (Hancock et al, 2008). Businesses can utilise CSR as a bolt-on to business operations though it has been argued that it should be built-in to business strategy (Grayson, 2006). The business and ethical case for CSR is established with some stakeholders demanding sustainability "benchmarking against international standards and a commitment to social sustainability as part of the licence to operate" (Hancock et al, 2008, p. 67).

Heugens and Dentchev (2007) argue that if organisations cause harm to individuals and or environment, a solution must be found to the problem. Coase (1960) has argued that solutions can materialise in three different ways. First, the market mechanism will punish those causing the harm. Second, business activities will be reorganised to internalise the problem and minimise the negative. Third, through regulatory action aimed at the prevention or minimisation of harmful activities by the government. The current practice is that the second solution is being adopted whereby operators say they are embracing RG as a way of minimising 'PG.' Arguably the first and third solutions are not fashionable in the regulatory climate. Davidson (1996) argues that 'sin' industries are regarded as immoral and incompatible with CSR. CSR is not rejected by operators but is diluted (Yani-de-Soriani et al, 2012) or manipulated by the industry to protect its self-interest. It does not seem that RG policies have higher priority over profit maximisation by government and operators (Smith and Rubenstein, 2009; 2011).

Yani-de-Soriano et al (2012) say that operators claim to be ethical providers, committed to CSR aimed at harm minimisation (HM) however their research suggests that 'PG' is negatively affecting the mental and physical health of gamblers, their social relationships and academic success (ibid). They continue that operators in a controversial gambling industry cannot reach a high CSR level; they merely meet their legal and ethical CSR commitments by being transparent and fair,

ensuring the integrity of the operator. Operators must be responsible for 'PG' and therefore CSR should be fully implemented, monitored and accurately reported (ibid). It is not realistic for operators to prioritise the prevention of 'PG' over profit maximisation and as a result policy-makers need to participate in the process (ibid; Massin, 2012; Hancock, 2011).

Some industries can achieve societal legitimacy through four means, which are ineffective or counter-productive in industries that are controversial (Yani-de-Soriano et al, 2012). The first means is corporate philanthropy, where operators contribute to fund gambling research and education; however, this is a licence requirement and not true altruism (ibid). This funding comes from gamblers and 'PGs' and as a result is controversial. The second means stakeholder collaboration is controversial if funding compromises the objectivity of the research (ibid; Cassidy et al, 2014). Third, CSR reporting requires transparency including CSR policy failures, which are not currently reported (Yani-de-Soriano et al, ibid). Fourth, self-regulation can help achieve societal legitimacy (as opposed to governmental mandatory regulation) but it has been ineffective in other industries.

Some operators publish CSR reports though there is no consistency or evidence that operators assess the effectiveness of their CSR (Jones et al, 2006). Monaghan (2009) argues that without external control and empirical research there can be no improvement in CSR. Yani-de-Soriano et al argue that operators are not ethical and or good corporate individuals. This does not mean however that these operators ignore CSR; instead it is integrated into the gambling environment.

Corporate social responsibility and the online gambling industry

The limited research on CSR and OG suggests that CSR is ineffective (Yani-de-Soriano et al, 2012). First, research indicates that CSR reporting is not uniform and the effectiveness of CSR policies is unknown (Jones et al, 2006). Yani-de-Soriano et al suggest that this affects fairness and transparency. Second, RGFs have the potential to enhance trust in the operators (Griffiths et al, 2009). Yani-de-Soriano et al (ibid) say that trust may be based on the perception that games are fair and not the perception that operators do not cause harm or that operators avoid or minimise

harm. Further, a minority of gamblers (25%) use RGFs (Griffiths et al, 2009) so trust and loyalty to operators is not based on their use of RGFs. Third, RGFs are imperfect, including ineffective age verification checks, with underage gambling an issue (Smeaton and Griffiths, 2004). Fourth, most of the revenue comes from 'PGs' (Hancock et al, 2008) and possibly this means they are exposed to harm and or exploitation (Yani-de-Soriano et al, 2012). Fifth, aggressive marketing techniques are controversial (Wiebe, 2006) and some are false and or misleading (Sevigny et al, 2005). Sixth, 'PG' support is ineffective and less than 20% of students were aware of it in a study investigating 'PG' in colleges and universities in Scotland (Moodie, 2008). Finally, operators place responsibility for 'PG' on the government (Euromat, 2007) but this does not appear to be treated seriously.

Corporate social responsibility and education

Other types of risky leisure have been revised or redeveloped through stakeholder engagement and education programmes, including 'stop smoking' campaigns that are supported by treatment options for individuals giving up and education campaigns. Developing a socially RG market requires gamblers to be informed and educated about 'PG.' This means understanding probabilities, how games work, understanding house edge and the consequences of gambling (RGC, 2010). GamCare (2011a) has recommended the addition of gambling to the school curriculum to raise awareness about its risks. This would include information about understanding risk and probability, gambling responsibly, similar to how young people receive advice about alcohol, drugs and smoking. Some operators provide this information but there is no research investigating the importance of *when* gamblers are informed and educated and the consequences of participation.

Gambling education has not been introduced into schools on any significant scale. Since the 1980's, the provision of sex and relationship education in primary and secondary schools has increased and obtaining contraception without parental consent has been made easier. Sex education has proved to be effective achieving high levels of condom and contraceptive use (Wight, 2011). Though teenage pregnancy rates are high, these rates are affected by poverty, education and local attitudes about child bearing (Social Exclusion Unit, 1999; Harden et al, 2009).

Research has indicated that sex education increased young people's knowledge but had no obvious effect on sexual behaviour (Henderson, 2007) but more recent research indicates that the UK's teenage pregnancy rates are the lowest since records began (Donnelly, 2015). Arguably, the drop in the numbers of teenage pregnancies is due to numerous factors including easy to access contraception, easy to use contraception and sex education. Sex and relationship education focuses on helping young people to make responsible decisions and to better understand their own physical and emotional development (NICE, 2010). Many governments have provided drug education to help young people be drug-free (Midford, 2000). Research has indicated that these initiatives may stop or delay the onset of drug use in a small percentage of young people under perfect conditions however, when delivered in normal classrooms, these have been ineffective (Gorman, 1996). It is unknown if schools can solve problems associated with sex, drugs, alcohol or gambling.

Corporate social responsibility and the tobacco industry

Massin (2012) argues that there is a contradiction when operators provide harmful goods but claim to be socially responsible. Gambling (like tobacco and alcohol) can lead some users to heavy consumption leading to physical and social problems. But gambling is treated differently from tobacco and alcohol by the government. There are considerable protective measures imposed by UK law, for example, smoking bans, warning messages on cigarette packs, the removal of cigarette displays, advertising campaigns about the harmful effects of smoking on the user and others in the media, NHS expenditure on stop-smoking campaigns and treatments. There are advertising bans for alcohol, NHS expenditure for alcohol problems, alcohol warning messages on labels and other signage, consideration to reduce the availability of cheap alcohol (HM Government, 2012).

Chapman (2007) and Turcotte (2003) say that the tobacco industry's relationship with the government was responsible for delaying effective no-smoking policies. For decades, the tobacco industry refused to accept evidence of the harmful effects smoking and the addictive nature of nicotine (Musk and De Klerk, 2003). The industry's ability to avoid regulation until recently and to use strategies designed to

avoid responsibility for its impacts can be compared to the current situation with the gambling industry.

Palazzo and Richter (2005) examined how tobacco companies tried to become good corporate citizens and suggest that CSR in controversial industries is narrow because of the harmful nature of their products. A responsible gambling industry is unlikely because of the similarities with and the distrust of alcohol and tobacco industries. Tobacco companies do not fully accept CSR and make a distinction between transactional and transformational CSR. Transactional CSR refers to the integrity of an organisation whereupon the organisation conforms with legal and moral rules in their societal context. The organisation keeps its promises and acts consistently. Transformational CSR refers to the benevolence of an organisation. This is when the organisation shows its willingness to go above its self-interest for the sake of the common good of society and contributes to its wellbeing. In the tobacco industry, CSR is based upon a more limited approach. It is probable that the gambling industry embraces this diluted version of CSR. Yani-de-Soriano et al (2012) argue that Palazzo and Richter's ideas are comparable to parts of Carroll's CSR theory. Palazzo and Richter propose a slightly skewed version to mainstream CSR. The instrumental level of Palazzo and Richter, good organisational products and services, is compared to Carroll's economic responsibilities. The transactional level of legal and moral rules compares with Carroll's legal and ethical responsibilities. The transformational level going beyond self-interest for the common good compares to Carroll's philanthropic responsibilities. The gambling industry may have embraced a diluted, transactional level of CSR, if its transactions are transparent and its behaviour is within legislated rules; potentially, CSR for online operators is even more diluted.

Corporate social responsibility and ethics

CSR is positioned in moral philosophy using normative ethics; virtue ethics, deontology and consequentialism (Hursthouse, 2010). Virtue ethics stresses moral character where responsible operators would need to be like natural persons, with moral qualities praised or criticised for their behaviour. Deontology puts duties and or rules at the core and would argue that operators have a moral duty towards

gamblers. However, gamblers are not a homogenous group and it may be possible for operators to have a moral duty to gamblers who feel their gambling is moderate and or under control, however that duty might consist of ensuring that games are fair, odds are clear and that winnings are paid out quickly. The moral duty may not extend to limiting the time or money spent online by gamblers who are experiencing 'PG.' Consequentialists pay attention to stakeholders' interests on the grounds of the consequences of the operators' actions. Therefore, RG should be promoted to ensure that the operators do not get bad publicity though it could be argued that it is a cynical position. Moral philosophies form the normative core of RG but Palazzo and Richter's (2005) diluted version of CSR is the one embraced by operators.

Corporate social responsibility and responsibilisation

Globally few governments embrace an absolute acceptance of regulation to mitigate 'PG' (Smith and Rubenstein, 2011). Semeniuk (2012) argues that business is responsive to external pressure and proactive in its SR, extending responsibilities and moving beyond legislation. However, it is sweeping to use the term business. McWilliams et al (2006) believe there is a trend in the West for business to conduct government functions, for example, environmental protection, transport and education. An example is when UK government passed the Digital Economy Act in 2010 to deal with the problem of internet piracy. It requires broadband service providers to police the problem and identify illegal downloaders and deal with this matter (Jawad, 2013). Globalisation has led to changing responsibilities between government and the market (Sassen, 1996) and the market executes ethical functions through responsibilisation (Shamir, 2008). Responsibilisation is self-regulated CSR in response to absent or ineffective regulations that should manage and control global corporate activities (Semeniuk, 2012).

Conclusion

CSR is based on a few simple premises (Ibrahim, 2010). Organisations have a duty to be responsible to individuals and customers prefer organisations with similar values to their own. CSR can help an organisation's brand much like an advertising campaign. The case against CSR is based on the argument that it is cosmetic, a mere

marketing ploy and that social objectives are best served by third sector organisations. Second, commercial organisations essentially exist to maximise profit and it is unrealistic to think that they could be as interested in helping others as they are in said profit. It is possible to argue that CSR is a secondary concern because it hinders the focus of operation. Third, it is important to organisations that CSR initiatives are implemented for the organisation's reputation. Ultimately, social outcomes can never matter to an organisation. For some companies, CSR is superficial and it has been suggested that it is hard to see how for operators it could be anything else. The most enduring CSR projects are likely to be those which support the existing values and aims of the organisation. Therefore, it seems like an oxymoron for operators to embrace the idea of helping individuals manage their gambling.

Section C: Problem Gambling and Responsible Gambling

This chapter seeks to explore insights into 'PG' and RG. Many international jurisdictions have RG programmes in place to minimise gambling-harms but RG in the UK emphasises personal responsibility rather than government efforts to regulate the gambling industry. The chapter begins with a discussion of the difficulties related to gambling research.

Gambling research

There are large knowledge gaps in the 'PG' literature and whilst traditional addictions have been researched extensively, 'PG' research has been under-researched (Black, 2016). Traditional government funding was removed for the BGPS and a vibrant, independent research environment with diverse projects is lacking. The government's policy on 'PG' research, education, prevention and treatment has been based on the PPP using industry-funding to research measures to prevent and address 'PG' (GamCare, 2011b). The RG Trust (RGT) raises money for education, treatment and research based on the priorities recommended by RG Strategy Board (RGSB). Operator contributions are voluntary though legislation provides for a levy on licensed operators. The total amount of money raised for research from 2008 to 2012 is £17 million (RGT, 2012). The RGT states that it hopes to raise £7 million annually but the published figures for 2014-2015 was £6.5 million. Whilst contributions remain voluntary it is surprising that £17 million was raised over a five-year period. Its target for 2016-2017 is £7 million (RGT, 2016).

However, the RGT focus on treatment with little expenditure on prevention and education and even less spent on research (ibid). Operators have been required to develop SR policies and procedures, train their staff and provide a kite-mark for consumers and it is possible that gamblers have benefitted from this. The focus on treatment and not prevention ensures that there is a ready supply of clients. The 2005 Act hoped to bring offshore sites within reach of contributing to funding research but this was thwarted from the beginning by the government's tax decisions. GamCare (ibid) say that gamblers using offshore sites, if they consider CSR issues at all, may assume that the sites are regulated by the UK's regulator and may believe wrongly that there a level of gambler protection in place.

Cassidy et al (2014) explored the relationship between gambling research and liberalisation and outlined some key points. First, the concept of 'PG' is politically useful because places the focus of attention on individual gamblers and not on the relationships between the industry, government, products and policies. The second point is that gambling research relies on industry support. The third key point outlines that funding programmes are predictable and much critical research remains unfunded. Fourth, there is a lack of transparency about the influence of industry on research and there is no professional code of conduct governing this relationship. The fifth point is that the industry has valuable information but is reluctant to share it with researchers. If critical research into the effects of gambling has been impacted because it is dependent on the industry for funding, it may have prevented more effective regulation. Research is needed into how government and industry benefit from liberalised gambling policies (Cassidy et al, 2014). These main findings are likely to have a significant effect on the aims of this thesis.

Orford (2014) suggests it is the government's responsibility to fund regular surveys to protect the public. Government withdrew funding for the BGPS and found a cheaper way to assess 'PG' by amending general health surveys to ask questions about gambling (ibid). There is information about gambling in reports of the Scottish Health Survey (SHeS) 2012-2014 and the Health Survey for England (HSE) 2012-2014 (Seabury and Wardle, 2014). The report 'Gambling behaviour in England and Scotland' (ibid) simply said "gambling behaviour in Wales is like levels in England and Scotland" (p. 4). Orford is critical of the new form of

assessing ‘PG’ and says that adding gambling to general health surveys is just not good enough and the comment about behaviour in Wales is completely inadequate.

This is connected to Orford’s (2012) Gambling Restraint Erosion Theory (GRET) a framework for understanding the history of gambling regulation, the prevalence of and attitudes to gambling and ‘PG’ in the UK. He says that gambling restraints were progressively changed from partial prohibition to tolerance to liberalisation. Orford suggests that consecutive BGPS results indicate that attitudes have become less negative towards gambling. ‘PG’ does not have independent research and the research agenda has been hijacked by the gambling industry which is a problem in contributing to our understanding of ‘PG.’

Adams (2008) argues that operators demand empirical research evidence to support regulatory change and even distort evidence to underplay findings. Arguably government and industry are not being held accountable for ‘PG.’ Further there are limited examples of consultative policy processes and the government’s review ‘A Bet Worth Taking’ reviewed the impact of the 2005 Act. Such consultation does not enlist appropriate non-state actors in gambling governance. Adams (ibid) is doubtful that community groups would be able to influence gambling policy that was not in accordance with the plans of government and industry. McMillen (2009) says that Adams “makes a salient point, however, about unequal power relationships and the capacity for government and industry to marginalise dissent and co-opt community representatives into a process that is directed primarily by their interests.”

This thesis argues that ‘PG’ has reached a critical stage in terms of growing prevalence. Consequences impact the gambler, communities and society and opportunities to gamble are extensive. There are questions concerning why ‘PG’ happens to some individuals and not others, the role of RG, what constitutes RG and many questions about treatment, if it helps and what it consists of. There are large knowledge gaps in ‘PG’ and RG literature particularly from the business aspect in what operators can do and from the social policy viewpoint of what government and operators must do. Unfortunately, government has shown little interest in funding gambling research since withdrawing funding for the BGPS.

This compares unfavourably with the situation in Canada where government provides support for gambling research as a priority. This has led to a vibrant research environment with numerous projects investigating aspects of 'PG' (Black, 2016). In the UK, 'PG' research has been hampered and blocked because it is dependent on industry-funding in contrast to the situation in Australia, New Zealand and Canada where gambling is a significant PH issue and their governments fund gambling research. Refusal of government and industry to accept research findings means that there is a paucity of useful evidence on which to implement gambling policy (Cassidy et al, 2014).

Defining 'problem gambling'

'PG' is a complex phenomenon and gamblers ('PGs,' positive, recreational, at-risk and pathological) are spread on continuum of harm. Griffths et al (2009) suggest that many terms are used when referring gamblers who experience 'PG;' terms include gambling-harms, addictive, at-risk, compulsive, dependent, disordered, excessive, impulsive and pathological. Wood and Griffiths' (2015) say that positive gamblers are gamblers not at risk of becoming 'PGs' and also that gamblers may prefer the term positive play to RG because RG is directed as 'PGs' rather than gamblers. This thesis will not be using the terms positive gamblers or positive play and disputes the contention that there are gamblers who are not at risk of 'PG.'

The European Commission (2011, p. 1)) concluded that a better understanding of the term 'PG' is required when referring to gambling-harms and Volberg (2002, 2004) makes the interesting point that as research advances, definitions of 'PG' will change (2002, p. 72). Arguably also perceptions of 'PG' will and have changed. A definition of 'PG' is subjective and based on individual circumstances. Neal et al (2005) suggest that a single definition of 'PG' may be inappropriate and may need to be based on objectives of gambling policy.

The World Health Organisation in 1964 replaced the term 'dependence' with the label 'addiction' in relation to substance abuse issues (Burridge and Mars, 2004). It may be necessary to find a new term or label which is more positive to stakeholders. There has been a relabelling of gambling as 'gaming' and consumers instead of

gamblers. This relabelling helps remove the powerful and stigmatising label of addiction (Sternheimer, 2012). Hing's (2000) opinion is that a redefinition of 'PG' is necessary to focus on harm and which recognises that harm extends beyond gamblers and is an issue of social concern in the public arena. This thesis takes the view that someone experiencing 'gambling-harms' is experiencing 'PG.' It includes gamblers unable to pay their rent, have reached credit card limits or are starting to experience psychological difficulties. 'PG' behaviour is dysfunctional and can disrupt personal, family and vocational life. This thesis uses the labels of gambling and gambler and uses the term 'PG' to refer to individuals who are experiencing gambling-harms and not the DSM-V definition (see Appendix 1). The term will consistently be placed in inverted commas to denote that 'PG' potentially needs a relabelling.

Dickerson and O'Connor (2006) apply the idea of a continuum of control and choice over gambling based on Heather et al's (1993) idea of impaired control over alcohol consumption. Difficult-to-control gambling (DCG) is a reality and gamblers may find it difficult to disengage from gambling behaviour despite the harms that it may be causing. It may be impossible to demarcate between 'PGs' and recreational gamblers and the concept of 'impaired control over gambling' or 'difficult to control gambling' may be helpful in discussing gamblers who do not self-identify as 'PGs' but may self-identify as experiencing DCG. Impaired control over drinking has explained alcohol dependence since the late 18th century which has been defined as "a breakdown of an intention to limit consumption in a particular situation" (ibid, p. 701) and this thesis suggests that this can be applied to 'PG.' Positive gamblers are classified as those not at risk of becoming 'PGs' (Wood and Griffiths, 2015) which this thesis cannot support and the issue will be discussed in Section C.

Ladouceur (2004) says 'PG' is an hidden addiction because there are no physical signs, nothing is ingested and overdoses are not involved. He adds 'PGs' may be overlooked and that by the time 'PG' becomes evident it may be too late to prevent the negative consequences. A contemporary understanding of 'PG' is impossible to disentangle from the political and economic environment in which gambling has been transformed (Dickerson, 1988; Borrell and Boulet, 2005) and RG has no

significant campaign, no figurehead, no press releases, no media campaigning.

Reith's cultural model of 'problem gambling'

Reith (2007a) argues that 'PG' is a result of modern consumer societies related to the decline of external forms of regulation and the rise of demands for individual self-control which are both conducted through consumption practices. She continues that liberalisation and deregulation of the industry and the expectation that individual gamblers govern themselves has created the conditions necessary for the emergence of 'PGs.' Historically gambling has been considered a problematic human activity, sinful for its non-productive nature, disruptive and immoral. It has been prohibited and regulated by governments because of its effects on the workforce and social cohesion. Gambling divorced the creation of a win from the efforts of labour that undermined the protestant work ethic and threatened the accumulation of wealth that formed the basis of the capitalist system. The stability of industrial nations depended on rational management of time and money through hard work, investment and discipline which were flouted by the actions of the gambler. In contrast to the accumulation of earned wealth, gambling was characterised by wasting time and money in unproductive activities. The bourgeoisie were behind government attempts to curb gambling, especially amongst the lower socio-economic groups. All gambling was assumed to be problematic.

Modern day problematising of gambling is linked to the undermining of the work ethic to be productive but there are new issues; the proliferation of gambling and its commercial expansion. Since the 1970's governments have legalised lotteries, sports betting, Fixed Odds Betting Terminals (FOBTs) etc. Concurrently changes in social life, the declining concern about the immorality of gambling plus the spread of consumerism, the marketing of gambling and the purchase of scratch cards at corner shops and supermarkets, has led to increasing numbers of gamblers, including the middle classes normalising the activity. Relabelling gambling as gaming, play, leisure and its links to good causes dissociates gambling from the harder notions of betting and losing money. There have also been changes in

political and fiscal policies. The rejection of Keynesian principles of market regulation is marked by less government intervention in social and economic life, decreasing responsibility to provide public services and relentless market competition. Minimal state is characterised by government unwillingness to levy unpopular taxes on voters. This loss of revenue from the electorate is extracted through gambling. The presence of government in public life is scaled back but its involvement in the business of gambling is increased. The relationship between commercial profit and state revenue has provided much of the impetus for the liberalisation and promotion of gambling. The values of risk-taking are promoted in marketing and advertising that urge gamblers to live for the present – '*It could be you'* and '*Life Changing.'*

Reith (ibid) writes that the term 'pathological gambler' was born in 1980 when the American Psychiatric Association (APA) classified it as a mental disorder and it was not classified in terms of consumer behaviour. In 1994, the APA contrasted pathological gambling with social gambling which is defined as having predetermined and acceptable losses. Professional gambling involves risks which are limited, discipline is central and the risk of loss of control. 'PG' categorised certain types of individual, with symptoms that could be measured and compared against norms. Foucault (1976) used the term 'constitution of subjects' where classifying various types of behaviour is a tool for pigeon-holing individuals in new ways, thinking of individuals in new ways and creating language with which to describe and discuss them, making individuals visible to social examination and consequently increasingly real. Reith (2007a) looks at medical explanations for rationalising 'PGs' where the pathological and 'PG' suffer from a mental disorder, a physiological syndrome which are expressed as risk factors. The medicalisation of deviant behaviour has historically been applied to drug-taking and mental illness and often associated with middle-class participation in the activity. She also argues that the problematisation of gambling occurred not when it was considered marginal or deviant but at the time it became a mainstream leisure activity. The development of a term and system for classifying the 'PG' as a distinct type of individual, with a checklist of symptoms that could be used for diagnosis is significant. This in turn makes 'PGs more visible for social research and more real (Reith, 2007b).

Reith examines the consumption ethic, where western societies are organised around consumption and the provision of goods and services. The move from the production ethic to the consumption ethic is characterised by values of self-fulfilment and desire. The emphasis is on individual 'self-control' and the demand is for individuals to govern themselves through their own consumption habits. Consumers are sovereign and shape trajectories through their own actions in the market. Self-determining individuals are responsible for their own welfare, security and future happiness which is realised through prudent decision-making and rational and controlled consumption. Freedom of the consumer is realised through the means of their regulation. To be free, the individual must be responsible and able to exert 'self-control.' As a result, consumption is the medium of 'self-control' and self-expression. Individuals on the one hand are encouraged to consume, enjoy, the pleasure of self-fulfilment but on the other hand they need to exercise 'self-control' and restraint. The paradox is self-expression versus self-restraint.

In a context of increasing consumerism, economic deregulation and emphasis on internal forms of restraint, the emergence of 'PG' as a social phenomenon becomes possible. These economic trends create an environment that demands self-regulation and RG by gamblers themselves (Reith, 2007a). It is not the responsibility of government and operators to restrict the consumption of gambling and this is up to the gambler who is responsible for him or herself. The task of the gambler is to balance their enjoyment of gambling with the risks, to 'self-control' behaviour and choices, to manage losses and to manage self-exclusion because no one else will. 'PG' becomes a problem of inappropriate consumption and the main features are a loss of control and loss of reason which undermines consumption ethics.

Models of 'problem gambling'

Since the 1990s, there has been an increase in gambling research however our understanding of 'PG' is still limited. Effective harm minimisation policy has been delayed which is particularly important for the implementation of prevention of minimisation of 'PG.' The primary models of 'PG' are herein discussed.

Psychological model of 'problem gambling'

Reith discusses how psychological research has focused on the impulsive and irrational nature of 'PGs' and their inability to overcome urges to act on impulse without concern for the long-term consequences of gambling behaviour. The psychological model presents the gamblers as out of control, chasing losses and eventually only stopping when they run out of money. Reith says that for many 'PGs' it is not just about winning money but seeking action. She quotes Dostoevsky (ibid, p. 42) "the main thing is the play itself: I swear that greed for money has nothing to do with it." Implicit in the psychological model is that 'PG' undermines gambler rationalised and responsible behaviour. The desire for thrill and excitement over profit undermines the importance of money to the gambler. Money enables the gambler self-expression, self-fulfilment and social cohesion but money should be managed with responsibility. However, in this model 'PG' is characterised by a lack of 'self-control' in the same way as problem drinking is both a physiological disorder and a moral problem.

Cognitive model of 'problem gambling'

Cognitive psychological research has investigated the irrationality of 'PG' behaviour evidenced by the distorted cognitions (and superstitions) of gamblers. These distorted cognitions include over-estimating their influence in games of chance, blaming losses on external factors and trusting luck. Therefore 'PGs' do not make informed decisions based on calculations of benefits versus risks. The cognitive model's explanation of 'PG' is that it is a disorder of cognition based on defective reasoning, ignorance and misunderstanding which can be treated through therapy and examination of the highly complex motivations to gamble. This model assumes that in general, gamblers gamble to win money, their involvement in long odd games makes their actions futile and gambling is an irrational form of economic activity (Reith, 2007b). A considerable body of research suggests that 'PGs' are not primarily motivated by money but by the compulsion for action. Reith (ibid) continues that trying to win money is classified as irrational but gambling without concern for money is pathological and therefore gamblers cannot win.

Pathological model of 'problem gambling'

This model of 'PG' provides neurological, bio-chemical and genetic explanations for the disorder. Reith says that Gamblers Anonymous (GA) support the notion of 'PG' being a mental and physiological disorder. GA also maintain that 'PG' is an emotional problem, a progressive illness which cannot be cured but can be treated. She continues that 'PG' configures as an ontological problem 'the problem of being' (p. 45) and that the 'PG' has an incurable disease characterised by irrevocable loss of control. The idea of pathology is problematic to the neoliberal ideal of consumer sovereignty. The loss of 'self-control' and reason because of disease means that 'PGs' cannot be morally nor legally responsible for their actions and therefore the sovereign consumer seeking self-fulfillment through responsible consumption is replaced by a 'PG' dependent by his disease which will lead them to self-destruction.

Pathways model of 'problem gambling'

Blaszczynski and Nower (2002) provide a theoretical model that emphasises the multidimensional nature of 'PG.' The model considers environmental factors such as availability and family background but focuses on individual psychological and physiological features including impulsivity, irrational beliefs, depression, poor coping skills, arousal and neurological problems. They argue against 'PG' as a categorical disorder or at the end of a gambling continuum and instead propose a Pathways Model. "The quest to impose one theoretical model to apply equally and validly to all pathological gamblers is a misguided venture" (ibid, p. 487). Categorising all gamblers with problems as pathological gamblers misclassifies gamblers who are experiencing problems with control and impulsivity. This confuses gambling-harms with pathological gambling and is reflected in confused approaches to treatment and best practice.

The Pathways Model which uses the term gambling disorders, suggests three distinct developmental pathways. In Pathway 1, gamblers are behaviourally conditioned without any biological predisposition and start gambling for reasons connected to excitement and socialisation. The problems associated with gambling

are related to consequences not precursors. This group is the most responsive to treatment and should be the easiest to prevent from experiencing gambling-harms. In Pathway 2, gamblers are emotionally vulnerable with probable underlying problems and gamble in response to these as a means of emotional regulation. This group is classified as more severe than Pathway 1 and are more resistant to treatment because of the reasons underlying their gambling. In Pathway 3 gamblers are biologically vulnerable with psychosocial problems but distinguished from Pathway 2 by genetic or neurological vulnerabilities. This group is the most difficult to treat and most resistant to prevention efforts.

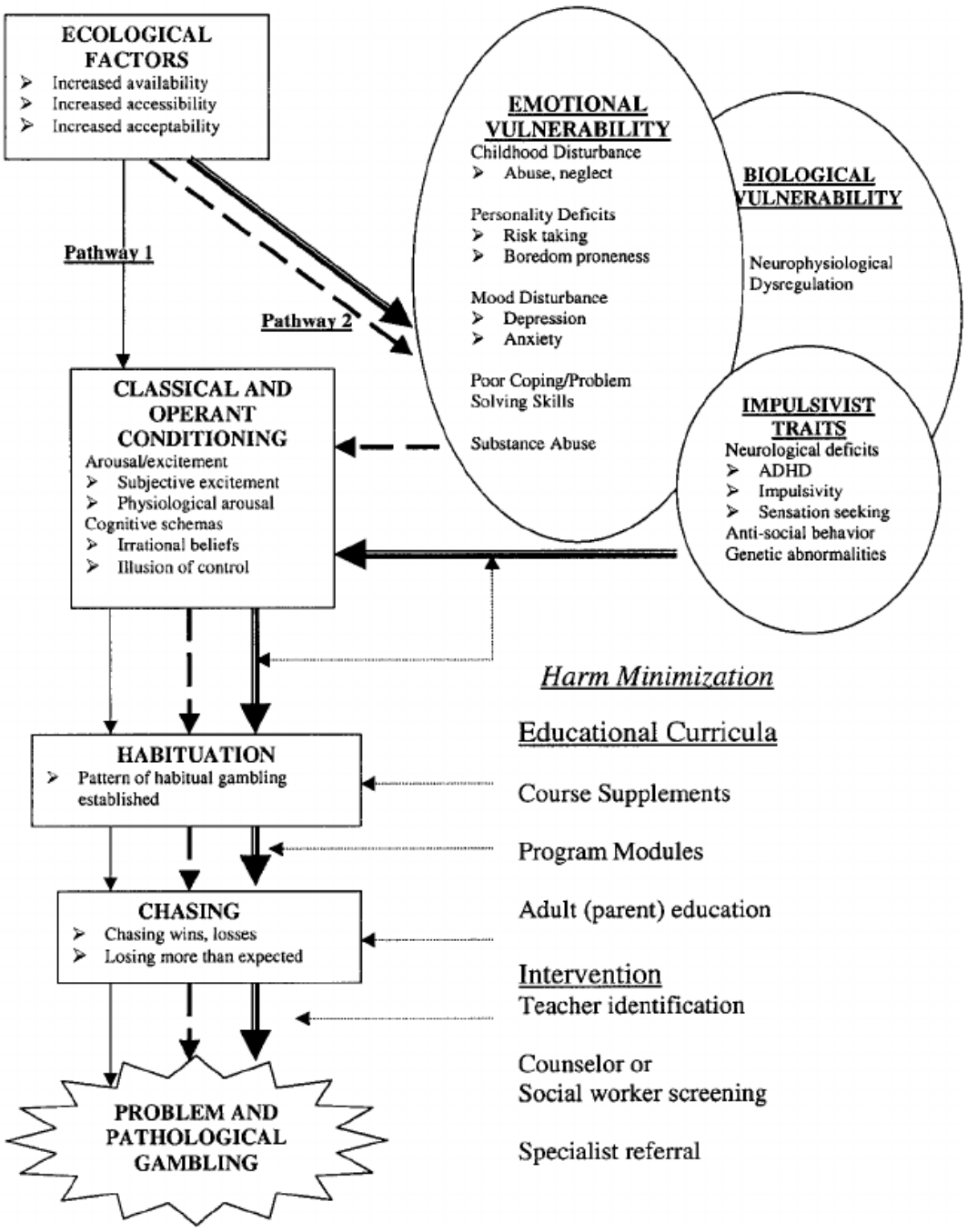


Figure 2.4 Integrated model of 'problem gambling' with harm minimisation strategies (Blaszczynski and Nower, 2002)

The Pathways Model has implications for the prevention of 'PG;' each gambler develops 'PG' for distinct reasons and therefore each pathway must be addressed in a distinct way. It was not within the scope of this thesis to apply psychological models with the competency of a skilled researcher, however this study is

recognisant of the importance of the multidisciplinary approaches that are vital to understanding the prevention of gambling-harms.

Public health model of 'problem gambling'

The PH perspective moves the focus of 'PG' away from individual pathology towards the societal level and seeks to identify 'PG' characteristics and socio-demographic patterns of risk and vulnerability (Korn and Shaffer, 1999). This allows 'PGs' to be revealed as a mixed group whose behaviour is influenced by numerous factors including type of game as well as the psychological and social characteristics of the gamblers. Relationships between gambling and environmental, social and physical factors are expressed in the concept of risk and assessed by a harm continuum of at-risk 'PGs.' It can be referred to as the agent-host-environment concept, the relationship between exposure to harmful substances, individual characteristics and experiences, in a popular setting (physical, social and cultural) accounts for influences on prevalence (Abbott, 2006). Vulnerable sub-groups are identified and young gamblers, males and those from low socio-economic status can be identified as at-risk. Types of gambling can be identified as problematic situated within other problem behaviours, for example, mental health issues and criminality (Reith, 2007b). This approach to 'PG' can utilise the technologies of PH to look for factors and relationships although she suggests that 'PGs' remain hidden (ibid). However, whether they remain unidentified due to stealth or a lack of resources to identify them needs further examination. Furthermore, if PH strategies identify 'PGs,' the funded resources need to be in place for support and treatment and this would be an enormous challenge to be met by an increasingly overstretched NHS or PH body.

Public health and gambling-harms

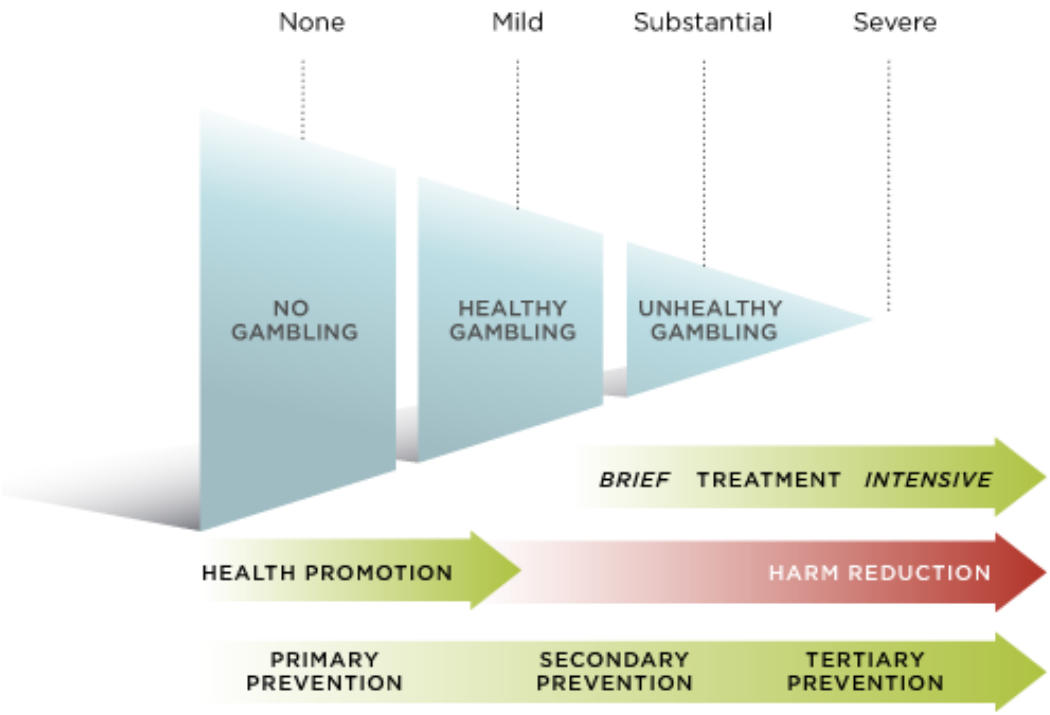


Figure 2.5 Public health framework for gambling model (Korn and Shaffer, 1999)

The Korn and Shaffer model differs from the traditional medical model of 'PG' by conceptualising gambling and gambling-harms. First, the model acknowledges at-risk gamblers. Second, the model identifies a relationship with other substance abuse issues and recommends an holistic approach with early intervention and treatment. Third, it considers the effects of 'PG' on others. Fourth, the model examines factors beyond individual ones and fifth advocates a community response to gambling-harms. The goals of Korn and Shaffer's PH approach are first to prevent gambling-harms through awareness, early identification and provision of support. Second, to promote informed attitudes and behaviours through knowledge, responsibility and community participation. Third, to protect vulnerable groups through RG programmes and the provision of support. Primary interventions to prevent gambling-harms include education and awareness programmes about potential gambling-harms, responsible advertising, marketing and safe gambling

environments. Secondary interventions include limiting access to gambling venues and RGFs. Tertiary interventions include treatment and support and target individuals experiencing gambling-harms. The model (ibid) has been adapted by successive researchers. Its flexibility is both a strength and weakness and it lacks evidence to support effective interventions.

Problem gambling and behaviour changing models

Whilst no notable behaviour changing models have been successful in minimising 'PG,' they have been used in the treatment of other substance abuse problems (Byrne et al, 2004). Substance abuse issues used models and theories to understand behaviour and effect changes, but none that refer to all aspects of behaviour which will be useful in minimising 'PG' (Korn, 2001; Perese et al, 2005). Developing a model that synthesises social, personal, economic, environmental, biological and physiological influences that can affect 'PG' needs to be given thought to so that 'PG' can be minimised (ibid). Understanding 'PG' as harm-based will have implications for policy and treatment. Severe cases of 'PG' are very difficult to treat (Volberg, 1996) but it is important to develop intervention strategies that can prevent the development of serious problems (BMA, 2007). PH education and awareness programmes are recognised as effective in treating 'PG' over the long-term and have had measured success in Australia, New Zealand and Canada (Korn and Shaffer, 1999; Abbott et al, 2004; National Gambling Impact Study Commission, 1999; BMA, 2007).

Problem gambling and accessibility

Prior to the 2005 Act, gambling was embedded socially and culturally in the UK; the removal of restrictions on advertising and a surge of gambling opportunities reinforced this acceptance (Moodie and Reith, 2009). Increased availability and accessibility has constituted an important dimension of normalisation in other areas of health, for example, drug use (Parker et al, 2002). Whilst liberalisation may be met with increased 'PG' rates, a causal relationship has not been established and is influenced by numerous mediating factors (Abbott, 2006). Research examining the relationship between the accessibility and 'PG' suggests that looking just at

accessibility is difficult and research is inconclusive (Abbott, 2006). Abbott and Clarke (2007) say that accessibility accompanies other issues that may influence the development of 'PG' including the characteristics and behaviours of gamblers, the availability and effectiveness of 'PG' support, industry behaviour, government policies, venues, game features and gambler information (Productivity Commission, 1999; Tse et al, 2005) changing attitudes and globalisation (Abbott et al, 2004; Tse et al, 2005). For Blaszczynski and Nower (2002) accessibility and availability are products of the regulatory environment and social acceptability of gambling.

'Problem gambling' and exposure

It may be possible to formulate public policy based on understanding the level of accessibility where gambling moves from beneficial to risky behaviour (Shaffer, 2005). Shaffer et al (2004) conducted research to investigate exposure at the regional level. They looked at different venues, the number of employees, types of gambling available in the area and the length of time that gambling had been legal in that area. The researchers found gambling exposure was positively linked with 'PG' in the eight Nevada counties. However, when the duration of gambling exposure was more than 10 years, some resistance was developed by the population (ibid). Other issues of gambling exposure not related to accessibility were identified. These included interpersonal, societal, civic and occupational factors (ibid). Whilst this highlights the many dimensions of the relationship between access to gambling and 'PG,' it may be relevant to OG because of the accessibility component.

Reith (2006) says that proving causation is problematic but Kingma (2004, p. 47) says the situation is clearer and that liberalisation is linked to 'PG.' Kingma argues that it is a logical consequence of expanded markets. The lack of treatment, liberalisation and continuous gambling (Orford, 2005; BMA, 2007; Light, 2007; Moodie, 2008) will probably mean an increase in 'PG.' A comparison with EGM play may be useful. Moodie and Finnigan (2006) MORI/IGRU (2006) Hodgins and el-Guebaly (2004) MacCallum and Blaszczynski (2003) Pietrzak and Petry (2005) established the linked between EGMs and 'PG' in adolescents and adults. The

problem with EGMs is the mix of structural characteristics (such as high frequency) and situational characteristics (such as high availability) both which add to the potential of addiction to EGMs (Williams et al, 2007).

'Problem gambling' and online gambling

OG may be more addictive than many other forms of gambling; it may increase 'PG' and cause a worsening of existing 'PG' may worsen for some gamblers (Wood and Williams, 2007; Murray and Savage, 2011). Wood and Williams conducted research and used data collected from an OQ administered to 1920 international online gamblers. The results pointed to a relationship between OG and 'PG' and confirmed predictions of an inter-relationship. They found that 42.7% of the online gamblers in their sample could be classified as 'PGs.' A study conducted by McBride and Derevensky (2009) concluded that the rate of 'PGs' among online gamblers is nearly 15 times higher than that of a community sample. The internet facilitates greater and more convenient access of gambling, this leads to an increase in the number of 'PGs' and the extent of their addiction (McMillen and Grabosky, 1998; Parke and Griffiths, 2004). It also appears that the isolation of OG can mean that users become dissociated from those around them, further exacerbating 'PG' (Griffiths, 1999; Parke and Griffiths, 2004).

'PG' is a complex concept with limited agreement on measurement, prevention or treatment. OG has not been around long enough for a clear picture of the situation to develop. Since liberalisation there is evidence of increasing 'PG' caused by both land-based and OG. The rise in 'PG' from 0.6% to 0.9% of the UK population (British Gambling Prevalence Survey (BGPS) 2010) is significant at the .05 level (Hancock, 2011). This represents a 50% rise in 'PG' since liberalisation. Hancock (2011) argues that it was disingenuous of the GC to report the results as 'not statistically relevant' in its announcements about the study. This means around 451,000 adults aged 16 and over were experiencing serious 'PG' and even more experiencing moderate 'PG.' The full costs of 'PG' including depression, bankruptcy, suicide, crime, job loss, family violence, financial hardship and anything else is unknown as relevant data is not collected by the DCMS or the GC. Hancock concludes that the 50% leap should be a 'wake-up call' and that effort

needs to address ‘PG’ and prevention in the UK. However, research showing that ‘PG’ rises three or fourfold in liberalised markets before some stabilisation occurs could mean that recent rises in gambling prevalence are a temporary feature of the change in market conditions (Shingogle et al, 2010).

‘Problem gambling’ and government revenue

Castellani (2000) is suspicious of the motivation behind the industry’s interest in ‘PG’ because in his view the over-riding industry concerns are financial. Kindt (1998) says the industry philosophy is that everyone and everything has a price. Pavalko (in Duetsch, 2002) argues that it is in the industry’s own interest to acknowledge ‘PG’ and act in reducing its negative impacts. Government and industry would lose a significant portion of their revenues if ‘PG’ was eradicated (Campbell and Smith, 2003). A study that reviewed literature on the social costs of ‘PG,’ identified “conceptual and methodological flaws that are sufficiently serious as to call the resulting estimates into question” (Volberg et al, 1998, p. 349). They reviewed the proportion of revenues that come from ‘PGs’ and concluded that it varies according to location and activity.

“Not all forms of commercial gambling are alike in the extent of the negative externalities associated with their operation” (ibid, p. 349). Research shows a high ratio of regular EGM gamblers are ‘PGs’ and 40% of EGM revenue is from ‘PGs’ (Smith and Wynne, 2004; Doughney, 2007). Operators either choose to ignore the figures or disagree with them (Smith, 2009; Adams, 2009). Wood and Williams (2009) reported that online ‘PGs’ made up 41.3% of total gambling losses. The RG Council (RGC) (2013) estimated 4.8% ‘PGs’ made up approximately 36% of revenue in Ontario. The “proportion changed by game type, with a lower proportion for lotteries, instant win tickets, bingo and raffles and a higher proportion for horse racing and EGMs” (p.367). When government and industry is dependent on revenue, it is reassuring for them to maintain that ‘PG’ is due to a mental disorder or an individual character defect (Abbott, 2005; Room, 2005).

Each year approximately £1.5 billion is paid in gambling taxes to the UK government (www.gambleawareco.uk, 2012). Collins (in Collier, 2008) suggests

that government has a strange relationship with 'PGs' and though it could take responsibility for gambler protection, they are the beneficiaries of 'PG' money. Governments reliant on gambling revenue could face financial difficulties. If the public stopped gambling, governments would raise revenues through higher taxes and if individuals gambled less, there would be less government revenue for essential services. A necessary debate examining if the government is overlooking 'PG' costs is unlikely because of government dependency on industry revenues.

Responsible gambling

The rubric of RG has been created to prevent and minimise the harmful effects of gambling (Sadinsky, 2005). RG should ensure that gambling takes place in a responsible manner and that 'PGs' and those at-risk can be supported with the necessary help (Sadinsky, 2005). RG uses appropriate mechanisms of consumer protection, including education and awareness, techniques and treatment (Dickerson, 2003). It helps gamblers make informed choices and exercise individual control in addition to measures implemented by operators (Banks, 2002). Hancock et al (2008) argue that governments are responsible for protecting gamblers from harm and should press the industry for accountability (Hancock et al, 2008). Reith (2008, p. 149) says "responsibility is based on the possession of power and implies accountability - to another for something." Accountability in gambling has not been discussed and the nature of accountability is unclear: who (government, operator, gambler) is responsible to whom (government, operator, gambler).

If RG is effective, gamblers will spend less on gambling (Blaszczynski et al, 2001) but industry does not want this to happen and neither do many governments. 'PGs' are the life-blood of the industry and if operators turned down their money they would probably have to close. Government is reliant on gambling revenue and this is not complicated by a responsibility to minimise 'PG.' Blaszczynski et al (2001) argue that there is tension concerning the limits of responsibility and RG. Gamblers have the right to make informed choices and need to be protected from 'PG' but regulation does not protect gamblers. Blaszczynski et al (2004, p. 311) write:

> "Any RG programme rests upon two fundamental principles: (1) the ultimate decision to gamble resides with the individual and represents a choice and (2) to properly make this decision, individuals must have the opportunity to be informed. Within the context of civil liberties, external organisations cannot remove an individual's right to make decisions."

However, operators are not required by the UK government to have a duty of care to take the responsible and practical steps to protect gamblers from 'PG.' The scope and nature of RG is complex and arguably not clearly determined and articulated in law.

Responsible gambling and harm minimisation

Sadinsky (2005) recommends that RG strategies should be comprised of four components treatment, prevention and/or awareness, research and consumer protection; and RG should promote two objectives: harm minimisation (HM) and a culture of responsibility. The objective of HM implicitly accepts that gambling is part of the social fabric and that harmful effects must be minimised (Hing, 2005).

HM engages practices and policies that reduce the social, financial and emotional risks related to gambling (McMillen and McAllister, 2001). Its main aim is to lessen the negative consequences of gambling by adopting preventative measures, through RG practices in safe gambling environments (ibid). RG is a preventative policy minimising harm and maximising benefits to the community and industry by bringing its operations into line with community standards and expectations (McMillen and McAllister, 2000). Therefore, RG goes beyond minimum regulatory compliance representing evolving community values and objectives. Sadinsky (2005) argues that there is no doubt effective, developed and managed strategies for 'PG' and RG is a social necessity and vital for the long-term sustainability of an economically potent and powerful industry.

Promoting a culture of responsibility represents a change in the philosophy of government, industry and gamblers (Independent Pricing and Regulatory Tribunal of New South Wales, 2004; Albareda et al, 2006). HM by itself will be insufficient

and a culture of responsibility will induce the industry to adopt best practices (Sadinsky, 2005). There should be a wider culture of responsibility extending to treatment and prevention professionals, manufacturers and suppliers of gambling equipment. The industry should provide services and products that are safe and ensure that employees are trained to possess a responsible attitude. Gamblers must accept responsibility for their actions and choices but should be entitled to the support of others to ensure that potential harm is minimised or eliminated (Blaszczynski et al, 2004; Sadinsky, 2005; Sasso and Kalajdzic 2006).

Campbell and Smith (2003, p. 140) argue that RG is a 'motherhood,' and untouchable notion which cannot be challenged because it unifies governments, operators, counsellors and academics in addressing 'PG.' Further, if there is total opposition to gambling the notion is defunct (Campbell and Smith, 2003). The motherhood notion is incompatible with the medical understanding of 'PG' as an illness because it implies that individuals are not responsible for their 'PG' (Dickerson, 2003; Orford, 2003; Rogers, 2005; Campbell and Smith, 2003; Cameron, 2007). It has been argued that medical theory is protection for 'PGs' preventing them from being held responsible for their actions (Bybee in Campbell and Smith, 2003; Neal et al, 2005). Supporters of RG and of the medical understanding would disagree with each other (Craighead and Memeroff, 2001; Campbell and Smith, 2003). The medicalisation of 'PG' has not gone unchallenged. Behaviourists see gambling not as a sickness but as simple behavioural phenomena, resulting from conditions of learning (Custer, 1980). It has been suggested (Hankoff in Custer, 1980) that gambling as an illness is 'circular reasoning' since the presence of the symptom of gambling is the only evidence that the illness exists. Hankoff argues that the disease-model may release the gambler from responsibility for doing something about the problem and in calling it an illness, doctors were guilty of serving their own interests. Gambling as an illness has been examined and rejected as a medical problem because labelling individuals might make the problem worse (Herman, 1976). 'PG' has been variously labelled as an illness, an addiction, a learned habit, an excessive behaviour or a symptom of deeper illness (Craighead and Memeroff, 2001). Identifying 'PG' as an illness minimises and conceals the moral issues surrounding gambling (Bybee, 1988; Campbell and Smith, 2003).

Responsible gambling as a competitive feature

Gambler protection can be a competitive advantage online (Haefeli et al, 2011). Parke et al (2007) interviewed more than 10,000 gamblers and revealed a high level of approval for protective measures. Wood and Williams (2009) stated that an operator's good reputation is the prime reason that gamblers choose the operator they gamble with. Other research has found that the top rated RGFs were the display of messages, information regarding informed choice (Blaszczynski et al, 2008) self-limitation, self-exclusion and the structural design of the games (Parke and Griffiths, 2007). Although the research is insufficient, there is evidence to suggest that some strategies have the potential for modifying gambler behaviour and this is an area where further study is warranted. The features that are most effective need to be understood and developed to assist gamblers whose gambling is a problem or becoming a problem. RGFs may assist gamblers to minimise 'PG.' Gainsbury (2012) suggests that there is support for RGFs and that 63% of participants wanted improvements to RGFs (Nisbet, 2005).

Informed choice

A cornerstone of RG is informed choice which seeks offer consumer protection to all gamblers (Blaszczynski et al, 2008). Competence and disclosure are two fundamental conditions for informed choice (ibid). First, the gambler must be competent and able to make a rational decision based on information provided. Second the gambler must have enough information to be fully aware of the nature of gambling and any potential risks that may occur during consumption (IPART, 2004). Blaszczynski et al (2008, p. 105) argues that the basis for informed decision-making must be relevant, accurate, not misleading, accessible understandable, in full and timely. There is a paucity of research investigating informed choice as a concept in gambling and the sort of information necessary to assist healthy decision-making (ibid). Further there has been no research investigating the type of education necessary to facilitate healthy decision-making online.

Duty of care

The questions surrounding RG and duty of care toward gamblers are similar to how providers of alcohol are accountable to customers (Behrmann and Brown, 2002) and has yet to occur in the UK. The duty of care by operators to minimise and prevent contributing to 'PG' could be stipulated through legislation (Smith and Rubenstein, 2011). Legislating for duty of care is problematic when the industry is reliant on 'PGs.' It may be possible to legislate UK-licenced operators but it is another question to legislate offshore operators. There would be implications for operators having a duty of care towards 'PGs' (Sasso and Kalajdzic, 2006; Cameron, 2007) and could be extended to clothing shops and restaurants having duty of care to problem shoppers or eaters. Cameron evaluates operators' duty of care responsibilities. He looks at pubs selling alcohol to persons who are drunk and argues that 'PG' is unlike problem drinking because identifying the 'PG' is harder than identifying the problem drinker. However, it may not be difficult to identify 'PGs' because technology can be used to identify problem patterns of play. Cameron comments that when it comes to compensation "the approach is unworkable" [because] "careless, foolish or reckless" gamblers would "blame the house after the fact" (Cameron, 2007, pp. 557–558). Operators can monitor individuals for problem behaviour (Sasso and Kalajdzic, 2006). The motivation for monitoring, tracking and identifying a gambler's play, is unlikely to be RG. It is more likely to be monitored, tracked and identified for marketing and selling purposes. The responsibilities of business to society has had much discussion, but online casinos have not really been part of that discussion. Historically, regulation has curbed the harmful externalities that market forces and moral persuasion could not, but the reduction of regulation is an enduring legacy of the conservative political revolution.

The issue concerning operators owing duty of care to 'PGs' has received some legal attention. A successful claim could arise when the operator is aware of the 'PGs' request for help but ignores it and carries on profiting from the 'PGs' addiction. In Calvert v William Hill, the High Court stated that operators can owe duty of care to identified 'PGs' and that William Hill had breached duty of care by not implementing its self-exclusion procedures effectively. The case however was

dismissed on causation grounds because the claimant could not prove that if the self-exclusion had worked, he would not have gambled with another operator. Ultimately the court concluded that no duty of care is owed to 'PGs' in the UK (Tadman, 2011). This case involves an offline casino and it could be argued that legal redress would not occur online if the site was not licensed land-based. Kelly and Igelman (2009) say that thousands of land-based casinos have been sued for a breach of duty of care to gamblers. In Treyes v Ontario, the judge cited an article (Edmonds v Laplante et al, 2005) concluding that casinos "appear to have a duty of care" to 'PGs' (Farrow, 2014, p. 12). The judge commented that the article was likely to have influenced the settlement of a case between a 'PG' and the Ontario Lottery and Gaming Organisation (OLGO). This view is inconsistent with every other case from common law jurisdiction. Tadman (2011) argues that despite the outcome, litigation highlights the importance to all stakeholders in employing effective RG strategies. In Burrell v Metropolitan Entertainment, Burrell, a 'PG' sued the Nova Scotia Gaming Organisation and Metropolitan Entertainment Group for common law and statutory duty of care. The judge acknowledged that duty of care was owed by the regulator to the public but not to individual gamblers and therefore his judgement allows the possibility of online operators recognising this duty of care. The judge stated that a duty of care may be owed to 'PGs' in exceptional circumstances such as self-exclusion, when a request from a gambler to be banned continues to be provided with access to the venue or continues to receive active inducement from the operator. Javad (2011) argued that the Burrell decision emphasises the importance for operators to ensure that appropriate safeguards for identifying 'PGs' exist. Operators need to establish RG policies for when gamblers experience exceptional circumstances. Active inducement is extensive in the online context; pop-up ads, banner ads and marketing incentives used by operators can be interpreted as active inducement. Online search engines rank sites and could be interpreted as active inducement by courts. It is only a matter of time before litigation is initiated by online 'PGs' using the Burrell case to recover gambling losses (ibid). Operators may use the implementation of RG initiatives as their defence if courts determine that duty of care does exist (ibid). Technology can be a proactive initiative; RGFs have been described by industry experts as 'seat belts for gaming machines.' OLGO has implemented a facial recognition system that depends on bone structure and specific points on an individual's face, which

informs security when a match is made and deletes the image if there is no match. Technology has answers if we are serious about RG. The law is so far clear; the industry does not have duty of care.

Public health

There are many reasons why gambling should be considered a PH issue, especially because of the growth of gambling opportunities. GPs ask their patients about their lifestyle, drinking and smoking but gambling is not generally discussed (Setness, 1997). This should change with dedicated resources, including improved awareness irrespective of enormous pressures on the NHS (Griffiths and Wood, 2000; Korn, 2000). Government needs to take more responsibility for treatment services (George and Bowden-Jones, 2014, p. 3). 'PG' services are funded almost entirely by the industry and are "under-developed, geographically 'patchy' or simply non-existent."

Prevention of 'PG' could be added to the PH agenda to support people staying healthy and to minimise the risk and impact of issues including drug abuse, problem drinking and smoking. If 'PG' is taken seriously, then this is the path to follow. It is possible that prevention of 'PG' could be part of social regulation, protecting public interests including health, safety, the environment and social cohesion. Perhaps, when the liberalised gambling market matures more will be understood and 'PG' will receive an appropriate response. Currently in the UK, there is no PH response to gambling, designed to prevent and or minimise its harmful consequences (Reith, 2006). Some governments (for example, Canada, Australia and New Zealand) have responded to 'PG' by introducing RG strategies and HM interventions in the land-based environment (Korn and Shaffer, 1999; National Research Council, 1999; Productivity Commission, 1999). The invisible nature of 'PG' means there are implications for prevention and treatment; 'PGs' are unlikely to seek treatment (University Health Network, 2012) which is convenient without adequate support programmes. 'PG' treatment is almost absent in the NHS and in the community (BMA, 2007; Orford, 2005). Despite high prevalence rates of 'PG,' liberal legislation and a growing industry, treatment provision remains inadequate (George and Copello, 2011). If a gambler has other co-morbid disorders, the 'PG'

may get NHS treatment. The main referral for 'PGs' is delivered by the third sector and providing appropriate NHS treatment has a long way to go (Rigbye and Griffiths, 2011). The 2005 Act established the GC as the regulator to manage the industry and ensure gambler protection. It stresses that individual responsibility is required to control behaviour and this is increasingly promoted by the government in the field of PH issues (Lang and Rayner, 2010). This is not conducive to upstream PH interventions (Livingstone and Adams, 2011).

The industry has been criticised for failing to adequately address 'PG' (Campbell and Smith, 2003; Shaffer and Korn, 2003; Derevensky et al, 2005; Stinchfield et al, 2005). Derevensky et al (2005) say that 'PG' is a gateway to substance abuse and depression. Research has concluded that 'PG' has close links with substance abuse, depression, impulsivity, risk-taking and dissociation during gambling (Crockford and el-Guebaly, 1998; National Research Council, 1999; Gupta and Derevensky, 1998; Stinchfield and Winters, 1998; Vitaro et al, 1997; Volberg, 2002). Government and industry like to view gambling as individualistic behaviour explained in terms of pathology and or psychology because it allows them to blame the individual's behaviour with individual causes and individual treatments (Suissa, 2006). In the UK 'PG' does not have the status of a mental or PH issue and there is little pressure on government and industry to minimise harm. The responsibility lies with 'PGs' and government and industry show minimal concern for 'PG.' Hing (2002) suggests that pressures on operators in Australia to be socially responsible have developed through the redefinition of 'PG' as a PH issue, the organising of interest groups and in response to the decrease in social concerns in gambling for economic ends. However, this has yet to happen in the UK.

Governments and operators acknowledge that gambling can have negative consequences for individuals and communities (Azmier, 2000; Deguire, 2003; Adams, 2004; Schofield et al, 2004) but still say they are good corporate citizens (Campbell and Smith, 2003; Hing, 2005). Effective RG requires 'PG' to be regarded as a PH issue and stakeholders committed to develop innovative RG policies and practices (Campbell and Smith, ibid). A PH outlook takes a wide view of gambling in society, looking beyond individual problem and pathological gambling (Korn, 2001). It is the government's responsibility to protect and serve

the public "as a means of advancing the greater good" (Shaffer, 2005, p. 1228). In free societies, individuals can participate in activities that are not in their best interest "despite warnings from those who know better or think they know better." Education and information allows gamblers to make better choices for themselves. Governments have considered public policy issues of consumption relating to how much individuals should drink, take drugs and in the past gamble. Disproportionate behaviour has been viewed as reflecting bad personal choices or poor values. The more multifaceted interactive model of gambling moves away from the individual psychology of addiction to population-based psychology. This includes the concern of PH, behavioural economics, socio-cultural influences and new terms for what previously had been a small group social psychology (ibid).

Brown and Raeburn (2001) recognise a continuum of 'PG' whereby a single method cannot deal with the range of harms adequately. They argue that RG can be achieved through strategies to control the supply, adjust demand and limit 'PG' (ibid). RG must incorporate HM principles into legislation, with cooperation from industry and community (Queensland Treasury, 2003). The New Zealand government and the Australian States of Victoria and NSW introduced RG Acts defining frameworks for minimising 'PG' (Independent Pricing and Regulatory Tribunal of New South Wales, 2004). Adams (2009) points out that whilst gamblers are responsibilised for their actions, government and industry are responsible for minimising 'PG' and ensuring a safe gambling environment. RG including codes of practice have been implemented to govern the industry (ibid). Adams says that some operators such as lotteries have embraced RG while others have professed commitment to RG while simultaneously seeking regulation conducive to profit maximisation.

Frameworks for minimising 'problem gambling'

There are several models to minimise 'PG' which emphasise gambler responsibility and choice and three are detailed below.

The Reno Model

The Reno Model is a strategic framework that seeks to minimise 'PG' by designing an action plan to expand and harmonise policies and practices (Blaszczynski et al, 2004). It has two main goals; to shape the direction for RG and to encourage dialogue about RG concepts (ibid, p. 1). It identifies the key stakeholders as gamblers, industry, health and welfare support, community groups and governments. The model argues that RG efforts have lacked success because they have not been science-based. It discusses two problems when it comes to furthering RG initiatives. First, the lack of consensus over what constitutes 'PG.' Second, that measurements of 'PG' do not differentiate between the levels of 'PG' (Smith, 2009). The model argues that the benefits gambling provides to society must exceed costs, only a minority of gamblers suffer 'PG' and it is possible to gamble safely. 'Self-control' is important but not essential and 'PGs' can return to safe levels of gambling (Blaszczynski et al, 2004).

There are questions over the concept of abstinence and the type of gambler for which it is effective (Ferentzy and Skinner, 2002). Blaszczynski (2000) says abstinence is suitable only for 'PGs' who have no other problems; Stirpe (1995) says that abstinence is appropriate mainly for severe cases. This exemplifies the confusion over 'PG;' researchers come to opposing conclusions (Ferentzy and Skinner, 2002). Abstinence is incomplete on its own (Lesieur and Blume, 1991; Rosenthal, 1992; Petry, 2002) and must be judged in terms of how it can be effective with other interventions (Ferentzy and Skinner, 2002). Viets and Miller (1997) argue that definitions of abstinence are connected to definitions of gambling. There is a lack of consensus and research needs to be more focussed and more relevant (Ferentzy and Skinner, 2002).

The Reno Model argues that it is possible to gamble safely; if this is incorrect, the model may be void. It has been used by both the gambling industry and the tobacco and alcohol industries to transfer risk and responsibility to the individual and reduce risks of legal action (Korn and Reynolds, 2009). Consequently, government and operator provide information for informed choice about the risks and benefits of gambling: this is really a 'fig leaf' but presented as RG policy. It may comply with legal and moral rules and some perception of some fairness and corresponding with

Carroll's second and third levels in his pyramid (Yani-de-Soriano et al, 2012) but does not go further than its own self-interest for the common good.

There are problems with the Reno Model (Smith, 2009). First, different stakeholder groups have incompatible objectives and disagree with the advantages and disadvantages of gambling. Second, governments and operators are hesitant to apply RGFs due to the threat of losing revenue. Third, stakeholders have unequal power relationships which leads to limited autonomy and reliability. For example, some academics have not dealt with contentious issues related to gambling for fear of losing funding for research. Adams (2008) argues that 'PG' treatment services adopt a neutral position to appease government gambling regimes. Fourth, RG is a public relations tool for governments and industry protecting themselves from future claims of liability (Kindt, 1998). Fifth, there is a lack of research seeking to evaluate the appropriateness of regulation or checking that standards of SR are being met (Smith, 2009). Sixth, RGFs are ineffective, for example, voluntary self-exclusion programmes have limited use and a gambler can self-exclude from one site or casino but continue on to the next site or casino (el-Guebaly et al, 2005).

The Reno Model has been successful in addressing some concerns but it is unpopular with academics and policy-makers (Smith, 2009). Schellinck and Schrans (2004) suggest that the model is too narrow, dependent on medical and psychological perspectives, inattentive to consumer protection issues and subservient to governments and operators. It ignores criteria including the influence of marketing, gambling formats and structural designs that impact on the safety of gambling and increase the prevalence of 'PG.' It does not consider the conflict of the promotion of gambling *and* RG. It overlooks the complex nature of gambling and does not provide adequate information for gamblers to make informed choices.

Eadington's four-stage model

In Eadington's (2003) model the first stage is inaction with government and industry denial. Responses include: first, 'PG' does not exist and *if* it does, it is not the fault of government and industry. Second, if gamblers did not gamble, they would probably ruin their lives in another way. Third, if operators try to minimise

'PG' then less responsible operators will take advantage. The second stage involves government and industry 'lip service' with acknowledgement that 'PG' exists but not at the expense of government and industry. Responsibility is to shareholders and stakeholders, not 'PGs;' government and industry hypocritically support RG. The third stage is commitment to RG but government and industry are restricted by market forces. The fourth stage is a total acceptance of measures to help 'PGs' and an acceptance that it is necessary to do the right things even when if conflicts with other objectives.

Regulation of gambling is deep-rooted in history (Eadington, 2004) and progress through the RG stages (in the North American environment specifically) has varied by jurisdiction, government and industry. The situation in North America is between the second and third stage (Eadington, 2003) and this is most likely applicable to the UK. RG has been limited by government and industry refusal to accept empirical research (Hing and Mackellar, 2004).

The Halifax Model

Schellinck and Schrans (2005) say the Reno Model is flawed because it makes difficult assumptions, holds biases and allows government to collude with operators. Government and operators do not utilise RG and that there should be more RG strategies (ibid). The Halifax Model is an alternative that is broader in scope with fewer difficult assumptions and biases.

The Halifax Model has several assumptions. First, 'PG' has complex causes and second, government and industry can affect the prevalence of 'PG.' Third, clinical testing is unnecessary for identification of 'PGs' and fourth, 'PG' and 'PGs' should be the focus of attention. Fifth, it is not possible to reduce risk just by providing information and sixth scientific research must be complemented by field research. Finally, policy research should have utilised the literature and practice of many disciplines. Schellinck and Schrans (2005) suggest that policy research is more representative of real world situation, focuses more on PH and requires greater emphasis on consumer safety.

Conclusion

This chapter has discussed issues relating to 'PG' and RG; both concepts are growing fields in terms of research, theory and practice. Understanding both concepts is vital to informing social policy. The models of 'PG' are numerous and it is likely that the RG solutions will be equally diverse. The next chapter explores a short history of gambling legislation in the UK.

Section D: Regulation

Introduction

This chapter explores the regulation of gambling since the post-war period; from the original principle of paternalism regulating harmful consumption to the 'light touch regulation' of the twenty-first century.

A history of regulation

The history of gambling regulation in the UK is long and torturous (Dixon, 1991). Miers (2011, p. 93) examines regulation over the last century and condenses it as the "replacement of a policy of constraint, designed to inhibit any expansion in opportunities for persons to gamble, with one of competition, in which operators may, subject to a sophisticated, but essentially permissive, regulatory regime, be licensed to provide such facilities for gambling as they consider commercially viable." Throughout history, gambling has been a dubious pursuit in terms of public approval and the industry has attempted to clean up its public image (Mattingly, 1996; Adams, 2006). Proponents insist gambling is social entertainment and a right of adults in a free society. As a result, the industry tries to create more attractive gambling environments and to remodel gambling closer to other less contentious leisure activities (Light, 2007). Social regulation aims to restrict behaviours that threaten PH, safety, welfare or well-being. It seeks to fix externalities of the legal system to prevent harms or to promote positive ends (Taylor, 2001). This can include restrictions on labelling and advertising and warnings and recommendations to gamble responsibly *When the fun stops stop* (Gamble Aware, 2017).

The 1930's saw an increase in the gambling habits of the working-classes. This included the football pools which provided families with entertainment: they selected the permutations they would use whilst discussing how they would spend any winnings (Rowntree, 1941, pp. 425 to 429). The football pools allowed women to keep their respectability whilst gambling (Downs, 2011). Like OG this could be done at home or in the workplace, mailed discreetly or collected from the home by a pools' agent. Other examples of manipulating operator public image include embracing RG (Hing, 2001; Hing, 2004) marketing Las Vegas as a family vacation

destination (Schwartz, 2001; Turner et al, 2007) funding charities and gambling research foundations (Adams, 2006) sponsorship of sporting events to improve corporate image (Dolphin, 2003) sponsorship of television programmes (NetImperative, 2004) and sponsorship of football clubs (Dolphin, 2003; Oelbermann, 2007; Fry, 2008). In the 2016/17 season, 11 out of 20 premiership football clubs were sponsored by gambling operators.

Dilemma of regulation

Morality-backed regulation is a popular subject of public criticism and there is rarely consensus on its effects (Lieberman, 2012). The dilemma is regulating potentially morally objectionable and socially harmful gambling (Clark, 2011) spawning significant revenue and impossible to ban (Lycka, 2011; Massin, 2011; Van den Dobaert and Cuyvers, 2011). Loveman (2011) argues that regulation of the industry is problematic and inconsistent with the UK's liberal attitude to business, impeding growth in a recession and violating civil liberties. Mill (1859, p. 13) despising government control wrote "the sole end for which mankind are warranted in interfering with the liberty of action of any of their number is to prevent harm to others. His own good, either physical or moral, is not sufficient warrant." 'PG' costs are high but the UK loves a bet (Hey, 2008) and government wants to make gambling even more readily available (Goldstein, 1997; Crone, 1998; Sutton and Griffiths, 2008).

A history of regulation

Whilst generally legal in the nineteenth and early twentieth centuries, commercial and quasi-commercial gambling grew. This continued throughout the 1920s and 1930s. By the early 1950's, gambling was regarded as typical of ordinary life. The Home Office was responsible for anti-gambling legislation which balanced police concern over resources for enforcement and an anti-gambling public. Further, the police were being corrupted by crime gangs and enforcement of legislation was inconsistent. Manchester, for example, enforced anti-gambling legislation rigorously and other areas did not (Taylor et al, 1996, pp. 82-83). After the war, an

increase in gambling expenditure whetted the government's appetite for potential revenue (Chenery, 1963). In 1951, the Royal Commission rejected the idea that moderate gambling causes harm and the view was not to impose a moral attitude on an individual's leisure time.

> "The object of gambling legislation should be to interfere as little as possible with individual liberty to take part in the various forms of gambling but to impose such restrictions as are desirable and practicable to discourage or prevent excess" (Royal Commission, 1951, p. 185–6).

This was a milestone in the government's attitude to a socially pervasive leisure activity and characteristic of post-war regulation (Miers, 2011).

Betting and Gaming Act 1960

The Royal Commission's recommendations were enacted in the Betting and Gaming Act 1960 and described as long overdue by Harold McMillan (in Moran, 2003). It created a single regulated market responding to the principle of unstimulated demand; this is when government allows gambling that meets existing demand which would otherwise be met by an unregulated market (Miers, 2011). As a result, the economic strength of gambling was of limited significance to governments.

The 1960 Act intended to ban commercial gambling but allow private gambling under certain conditions. The Act allowed small scale gambling in members' clubs but because there was no definition of what a members' club was, many commercial clubs became members' clubs so they could operate (Murphy, 2011). The 1960 Act sought to curtail the gambling which had exploded during and after the war. There was moral panic and concerns about the impact of organised crime, bingo, casinos and the consequence of the move to legal gambling was the rapid development of gambling to the mass market (Downs, 2009).

The Conservative government determined that under the 1960 Act it was not possible for commercial gambling clubs to open and had not put in place any

controls. Consequently, crime associated with gambling grew and action was necessary (ibid). Examples included fruit machines in bingo clubs which were 'lumped' and so they did not pay-out a jackpot. Organised criminal gangs forced machines into clubs demanding large rental payments. Often these gangs owned the clubs and used them to launder money. Bingo books did not have serial numbers and without audits on how many books were sold, laundering money was easy. Cash could be taken to the bank as bingo takings and there was no way of checking attendances. Wins from the bingo were not taxed and it was possible to claim money had been won at bingo when it was the proceeds of criminal activity. Operators invested in market research and new technology to maximise efficiency; with the emergence of chains, gambling was transformed into a popular and legitimate national pastime. Since the 1960 Act had not intended to legalise commercial gambling, there were no restrictions on it. The Labour government did not have a large enough majority in 1964 to make any changes but in 1966 it was able to modify the problems with the Betting, Gaming and Lotteries Act 1963 (the 1960 Act with minor amendments). The Labour government was also interested in opportunities for taxing gambling.

Gaming Act 1968

Callaghan as Home Secretary said in 1968 (in Murphy, 2011) that the 1960 Act had 'precipitated the very evil it was meant to protect.' The 1968 Act was based on two notions of curbing the exploitation. First, regulation was necessary because of the social costs of managing its negative externalities, correcting the imbalance of information and safeguarding vulnerable gamblers including children (Miers, 2011). Second, it was necessary to allow gambling which otherwise would be met by an unregulated market. Government's role was not to stimulate the market which was not meant to be competitive. The 1968 Act was based on licensing, enforced by the police and regulated by the GBGB. Before any licence was issued, the operator had to prove a local demand for their services. This meant that to open a betting-shop, the operator had to show a demand for the service in the place where they wanted to open but they could not advertise or conduct a survey etc, to ascertain if there was a demand, as that would be stimulating demand. Consequently, most towns only had one or two betting-shops and one bingo hall at

the most.

Between 1968 and 2005

The next sections refer to events that contributed to the liberalisation of gambling legislation.

The Witney Report 1973

The Witney Report (1973) led to a significant change in government policy and it found that communities should be permitted to benefit from lotteries; this was the antecedent of the NL. Over the next three decades, gambling expansion aspirations began to grow including encouraging gambling when it came to 'good cause' lotteries (Miers, 2011).

Royal Commission 1978

Rothschild's Commission on Gambling in 1978 reconsidered the government's paternalistic approach to gambling. Whilst some measure of paternalism was retained, there was anxiety that paternalism in some cases was negating the benefits of 'self-control.' The Royal Commission produced the Willink Report which had three main principles. First, to limit government interference with individual liberty though to continue to regulate gambling because of social harms and to prevent criminal involvement in gambling. Second, to maintain the principle of unstimulated demand. Third, that gamblers should be informed about gambling risks. The Commission also recommended that a NL should be established and this was a major factor for liberalisation of the industry.

National Lottery

The principle of unstimulated demand was transformed by the NL because it was now in the public interest to encourage gambling participation. The premise of the NL was to create demand and to reap the income it generated. The NL Act 1993 stipulated that it was necessary that the NL Commission and the Secretary of State

"do their best to secure that the net proceeds of the NL are as great as possible." Aitken (2008) argued that the NL was responsible for the destigmatising of gambling. The objective of regulation to ban or limit gambling because of its social consequences came under pressure from the rest of the industry because of the freedoms of the NL (Miers, 2011). The accessibility and advertising of the NL were discriminatory, according to the rest of the industry which was still operating under strict regulation. This led to a relaxation of the rules, whereby bingo and the football pools (both technically lotteries) could advertise under the same regulations as the NL. Miers (ibid) argues that establishing a new ministry, the Department for National Heritage or as it was nicknamed 'The Ministry of Fun' to promote the NL was a clear indication that policy had changed.

Liberalisation

The industry was intent on expansion and lobbied for liberalisation persuading the government that the law was over-regulated and unworkable (Gillan, 2002). Before 2005, the industry believed it was being punished for crimes committed in the 1960's, the gangsters' paradise created by the explosion of gambling run by criminal gangs (Mathiason, 2001). Pressure from US operators was a powerful influence on policy. US operators under pressure at home saw the UK as an 'easy touch' and other European markets such as Scandinavia, France, Italy, Germany and Spain untenable due to either the mafia or the legal system (Jenkins, 2007). Blair's government (1997-2010) was regarded as vulnerable and tens of millions of pounds were spent pushing for liberalisation. Gillan (2002) argued that liberalisation was due to clever lobbying by a small group who would benefit. Home Secretary Jack Straw made some important decisions in 1998-99 (Gillan, 2002). Straw replaced Lady Littler with Peter Dean as head of the GBGB, the latter who was keen to deregulate the industry. Lady Littler urged the DCMS Secretary to keep the ban on credit cards because easy access to credit would cause many gamblers to mismanage their finances. She was further concerned with chasing losses leading to unaffordable debts. There were concerns over decreasing the psychological value of money by using credit cards (Griffiths in Gillan, 2002).

The GBGB advised the government in 1995 that liberalisation could lead to a return

to crime in the industry and recommended more 'PG' research. Despite warnings and with limited debate, the government's liberalisation went beyond the 'wildest dreams of the industry' (Gillan, 2002). Further, the government rejected Budd's attempt to restrict gambling to children by keeping small stakes slot machines in chip shops and unlicensed premises due to industry pressure (ibid). The UK is the only European country that legally allows children to gamble despite criticism based on youth gambling problems (Orford, 2003).

Liberalisation also indicated the government's acceptance that self-regulation and competition within the industry was credible.

Straw appointed a free-market advocate Sir Alan Budd to head the Gambling Review Body, overseeing liberalisation and conducting comprehensive research into industry reform. There were concerns about impacts on the industry including economic pressures, the growth of e-commerce, technology and wider leisure industry and international trends (Gambling Review Report, 2001). The Department of Customs and Excise announced a change to General Betting Duty (GBD) that made operators responsible for paying tax on wins which had previously been the responsibility of the gambler. The pressure to reduce GBD was largely due to OG which allowed UK gamblers to avoid paying tax by gambling with offshore operators. This posed a threat to government revenue (Paton and Siegel, 2002).

After the General Election 2001, the responsibility for gambling policy was transferred to the DCMS. It was a small department inexperienced to deal with the negative externalities of gambling and it was left to implement liberalised policy. Miers (2011) suggests that this departmental move reflected the change in the government's position on gambling.

The Gambling Review Body reflected on how to expand the market to the advantage of the UK economy and presented two clear recommendations; first, simplified regulation and second, more choice for gamblers. Simplifying legislation required an extensive review incorporating all gambling activities other than the NL and the creation of a new regulatory authority, the GC. Extending choice for

gamblers was to be achieved first by removing barriers to market entry and second, through competition allowing gamblers to have more choice in how and where they gambled. Further, it was argued, competition is good for gamblers because it keeps down costs and profit margins (Gambling Review Report, 2001). The Gambling Review Report was confident that competition and not regulation was the most appropriate means for securing change and a sustainable market (Miers, 2011). The report reflected that an important government role is giving gamblers greater choice in how they spend their income. Further it commented that a strong gambling market could help economic regeneration.

Legislation defined the parameters of regulation and gave the GC legal powers to enforce licence conditions and to issue codes of practice, to consult operators and other stakeholders and respond quickly to market conditions (Miers, 2011). The government did not accept all the Review's recommendations but accepted its basic stance that competition was necessary for an open sector with more choice for gamblers and more opportunities for business both in the UK and globally (DCMS, 2003, 1.78).

The Gambling Act 2005

The Gambling Act 2005 was the second chapter of the government's liberalisation of leisure legislation (Light, 2007). It followed the Licensing Act 2003 which swept away dated laws regarding alcohol, dancing and other entertainments (Light, 2005). Both Acts share numerous characteristics, most notably an important policy change from paternalistic regulatory control to market-led. The 2005 Act recognised the impacts of both OG and the NL. The 2005 Act liberalised gambling to an historic extent (Moodie and Reith, 2009). The NL and OG transported gambling beyond the mainly male-orientated casinos and betting-shops in local high streets into homes and workplaces (Light, 2007). Legislation was needed to encompass these developments and capturing gambling revenues encouraged government ambition (McIntosh, 2004 in Light, 2007). Reith (2007a) suggests that the interdependent relationship between government revenue and commercial profit, underpinned liberalisation in many countries. Light (2007, p. 644) argues that the UK was "driven by a commercial imperative masquerading as a desire to allow greater

freedom for the sensible majority."

Online gambling and regulation

Wiebe and Lipton (2009) argue that effective OG regulation would be similar to highly regulated land-based gambling: predicated on a system of licenses, operator checks and inspections. OG regulation is less straightforward and may be complex due to global and online dimensions. However, even if something is difficult to control it does not mean that governments should not try to control a potentially harmful activity; some governments do attempt to regulate OG. Even where regulation exists, some gamblers are more vulnerable to developing 'PG' and regulation may need to take this into account.

Flexible and dynamic approaches to OG could be developed to maximise benefits and minimise societal harm: co-operation between key stakeholders needs to be developed to minimise online 'PG' (Monaghan, 2009). Legislation allows offshore operators to freely market services to UK gamblers without being subject to any regulatory controls. This has created an uneven playing field and there is limited control over offshore sites that actively target UK gamblers. In 2012, the government proposed changing legislation so that OG is regulated at the point of consumption (POC). This move is primarily intended to tax offshore operators but it may enhance gambler protection. It requires all operators, onshore or offshore to be licensed by the GC (Osborne, 2012). This is an opportunity for all UK-based gamblers to be protected by RG policies. It is unlikely that the POC proposal is recognition that the long-term social costs are not worth the financial gain and it is likely that it is a case of appeal of government revenue.

"The OG industry offers a superior internet-based customer service with outstanding interfaces and a variety of games and promotional activities … people in general see the industry as a global problem and a moral hazard" (Smith and Rupp, 2005, p. 85). Monaghan (2009, p. 1) says that "current regulations must be revised and a moratorium on further expansion recommended allowing HM strategies to be introduced." Hancock et al (2008) suggest that to achieve a sustainable gambling industry government and industry must utilise more effective

policies beyond self-regulatory codes to protect 'PGs.'

Research has concluded that because of competitive markets, some operators are attempting to regulate themselves using independent associations to provide a fair and safe gambling environment (Jawad, 2006; Monaghan, 2009). OG has the potential for a safer environment but the majority appear to make few significant attempts to provide effective RG (Monaghan, 2009) and there is a lack of OG regulation.

Social responsibility and regulation

Collins and Barr (2006) and Collins (2007) reviewed research on the impact of gambling and concluded that if a jurisdiction introduces new gambling products but does nothing else, then that jurisdiction is probably going to experience an increase in 'PG.' However if the jurisdiction introduces new forms of gambling with suitable CSR implemented, then it is likely that the increase in the number of 'PGs' will be lower. One of the conditions of a UK licence requires operators to observe SR codes of practice. However, the SR Code in Section 24 of the Gambling Act 2005 is not robust;

> "SR code, which should describe the arrangements which a person providing facilities for gambling is to make for: ensuring that gambling is conducted in a fair and open way, protecting children and other vulnerable persons from harm or exploitation and making help available to those who are, or may be, affected by problems related to gambling."

This code incorporates the objectives of the 2005 Act which specifies that 1). operators must promote the licensing objectives 2). provide information on the dangers of excessive gambling and 3). information about 'PG' support to facilitate informed choice and RG (Moodie and Reith, 2009; Rooij et al, 2010). Before 2005 the Association of British Bookmakers had a voluntary Good Practice and SR Code (GPSRC). This limited four EGMs per bookmakers and provided RG information in notices, posters and leaflets (Moodie and Reith, 2009). This is an example of industry controlling itself albeit in a limited way. Since liberalisation control of EGMs have been relaxed. More EGMs are permitted in betting-shops and the

number of Fixed Odds Betting Terminals (FOBTs) doubled between 2006 to 2011 to 32,000 (Jones et al, 2013). The reason for the proliferation of the FOBTs is based on how lucrative these machines are for the industry.

Self-regulation and 'self-control'

For clarity, whilst some authors use the term self-regulation, this thesis will refer to self-regulatory resources as 'self-control' (in inverted commas to note the difference) because the term self-regulation has been used regarding organisations. The ability to control behaviour is based on several factors including personal goal, feedback on behaviour and the level of willpower (Vohs et al 2005; Vohs et al, 2008). If an individual loses all their money on gambling, arguably this is a failure of 'self-control' (Blaszczynski and Nower, 2002). 'Self-control' concerns the ability to plan, monitor and guide behaviour in changing circumstances (Newby-Clark and Brown, 2005). There are two basic reasons why 'self-control' fails (Carver and Scheier, 1981). Under-regulation happens when the individual fails to exercise 'self-control' because they cannot be bothered or cannot control the self. Mis-regulation happens when the individual is controlling themself but the control is misdirected or counter-productive and the intended outcome is unachieved. Baumeister et al (2013, p. 13) argues that under-regulation occurs because individuals lack stable, clear, consistent standards, fail to monitor their actions, or lack the strength to override the responses they wish to control. Mis-regulation occurs because "they operate on false assumptions about themselves and about the world, because they try to control things that cannot be directly controlled, or because they give priority to emotions while neglecting more important and fundamental problems" (ibid). Effective 'self-control' allows individuals to behave appropriately. Ineffective 'self-control' can lead to problems and misfortunes. 'Self-control' is a key to success although it would not alone solve all of society's problems (ibid). Bergen et al (2014) argue that individuals have different 'self-control' capabilities and it is difficult to see how regulation can take account of this. For some, gambling does not require a significant level of 'self-control,' it is enjoyable (Gupta and Deverensky, 1998) provides an escape from day-to-day problems and can be a type of relaxation (Clarke, 2008; Gupta and Deverensky,

2008). The excitement and escape that 'PGs' often report means that 'self-control' will need to be achieved by external means.

Self-regulation

Self-regulation involves the industry establishing and enforcing standards through membership rules or a code of practice (McMillen and McAllister, 2000). It is the least restrictive method of regulation and has been called the darling of industry (Tyree, 1997). Palazzo and Richter (2005) p. 392) say "corporate self-regulation often lacks transparency, accountability and thus is deprived of any legitimacy." The Western Australia Gaming Legislation (2000) says that self-regulation has considerable defects. First, operators eliminate 'consumers' from development; second, self-regulation can generate intrinsic 'conflicts of interest' with operators developing and implementing the rules; and third operators can be reluctant to recognise that its standards are deficient. Self-regulatory codes are normally implemented by operators and can include industry sanctions for non-compliance. They are different from mandatory codes and do not have consequences for non-compliance (Delfabbro et al, 2007).

Self-regulation is most effective when there is an agreement between the operators' interests and the wider public interest. The European Commission (2004) suggests that self-regulation is most effective if self-policing increases revenue. If operators truly adopt self-regulation as an alternative to mandatory control, the industry will still be constrained in a regulatory straitjacket (Mullan, 2006).

Self-regulation is useful when organisations want to respond to consumer demand, ethical considerations or to improve industry reputation (Irving, 1997). "Every organisation has a standard of conduct, whether it knows it or not" (International Federation of Accountants, 2007, p. 2). Every organisation explicitly or implicitly communicates its values, its standards for decision-making and its basic rules for behaviour. Codes deal with an organisation's basic values, commitment to employees and or consumers, values for conducting business and for conducting a relationship with society. Gainsbury et al (2013) argue that the implementation and maintenance of codes can be useful in terms of consumer protection and fit with the

idea of a profitable business model. Stakeholders including charities, regulators and operators have designed codes that encourage operators to adopt RG policies and practices. However, Healy and Iles (2002) suggest that codes are ineffective when it comes to changing the behaviour of the end-user, in this case the gambler. Campbell (1999) concludes that self-regulation rarely lives up to its claims. This could be related to the argument of Blaszczynski et al (2004, p. 306) where they state "there is no clear operational definition or consensus as to what 'responsible gaming practices' or 'responsible code of conduct' actually means."

Codes of Practice

A code of practice is constructed to control behaviour including RG (McMillen and McAllister, 2000; Dickerson, 2003; Delfabbro et al, 2007). They require adherence to principles, compliance of individual and or operator and should be administered consistently to achieve consistent outcomes (Webb, 2004). Codes can vary in their development, application and enforcement and can be mandatory, co-regulatory or self-regulatory (Delfabbro et al, 2007). Moore (1999) supports the value of organisations having ethical codes for all levels within the organisation. Moore (ibid) stresses the importance of adopting a code of ethics, which can help businesses make ethical decisions and this is because governments "can't legislate moral behaviour" (p. 305).

Voluntary codes employ societal influences to affect behaviour and use industry associations to implement them (Webb, 2004). Voluntary codes are a by-product of globalisation (Webb, 2002). Consumers in the West demand organisations meet high standards of care and outline that it is unacceptable for organisations to behave well at home and then abuse consumer, environmental and community protection (Webb, 2002). Non-governmental organisations have an important role in devising voluntary codes, encouraging organisations to develop their own codes and to monitor corporate behaviour. Whilst codes can be effective in changing behaviour, they can be difficult to enforce, particularly against those who do not want to participate (ibid). Whilst it is possible for the government to monitor and dictate what goes on within the country, a commitment to online RG needs to be elaborated. Voluntary industry codes can only offer real protection when all

industry operators are guaranteed to participate. Without full participation, the mechanisms of consumer protection objectives will be undermined by refusing to be bound by them (ibid).

Mandatory codes are normally government imposed through legislation demanding industry adherence to regulation (Hing, 2000; Delfabbro et al, 2007). Webb (2004) suggested that these codes represent a 'command and control' approach to regulation in that the government establishes how the industry should operate and is enforced by government agencies and reinforced through the courts. Also, they incorporate industry views in their content (Delfabbro et al, 2007).

Co-regulatory codes are developed when government and industry work jointly in developing, evaluating and reviewing RG practices and programmes (Delfabbro et al, 2007). The European Commission (2006) argues that self-regulatory and co-regulatory models can be more attractive than traditional models. Legislation is difficult to enforce and cannot keep pace with changes in technology and society. The European Commission argued that self-regulation and co-regulation restores responsibility to society and industry; government support makes it effective. Additionally, adequate enforcement powers such as sanctions are necessary for effective co-regulation.

Conclusion

The most popular model in liberal regulatory regimes is the Ayres and Braithwaite 1992) model of industry self-regulation with RG codes of practice. This is underpinned by public choice theory and individual gambler responsibility. The perception of the business and social value of gambling transformed during the twentieth century. The liberalisation of regulation ensured that gambling became a legitimate entertainment activity. The expansion of gambling has been met with increased concern for its harmful impacts although this has not been robustly reflected in regulation as evidenced in the chapter above.

The next chapter seeks to evaluate a range of RGFs which are the tools that can be implemented by the responsibilised gambler.

Section E: Responsible Gambling Features

Introduction

This chapter seeks to identify a range of RGFs which may be effective to minimise online 'PG.' Many of the features have been evaluated in the land-based environment and it has been necessary to use subjective judgement in their application for OG.

Responsible gambling and harm minimisation

Blaszczynski (2001) discusses a three-tiered strategic approach to HM, which combines mandated, voluntary and recommended initiatives across international jurisdictions. The diagram below has adapted Blaszczynski's approach into a diagram to offer a range of RGFs suitable for OG.

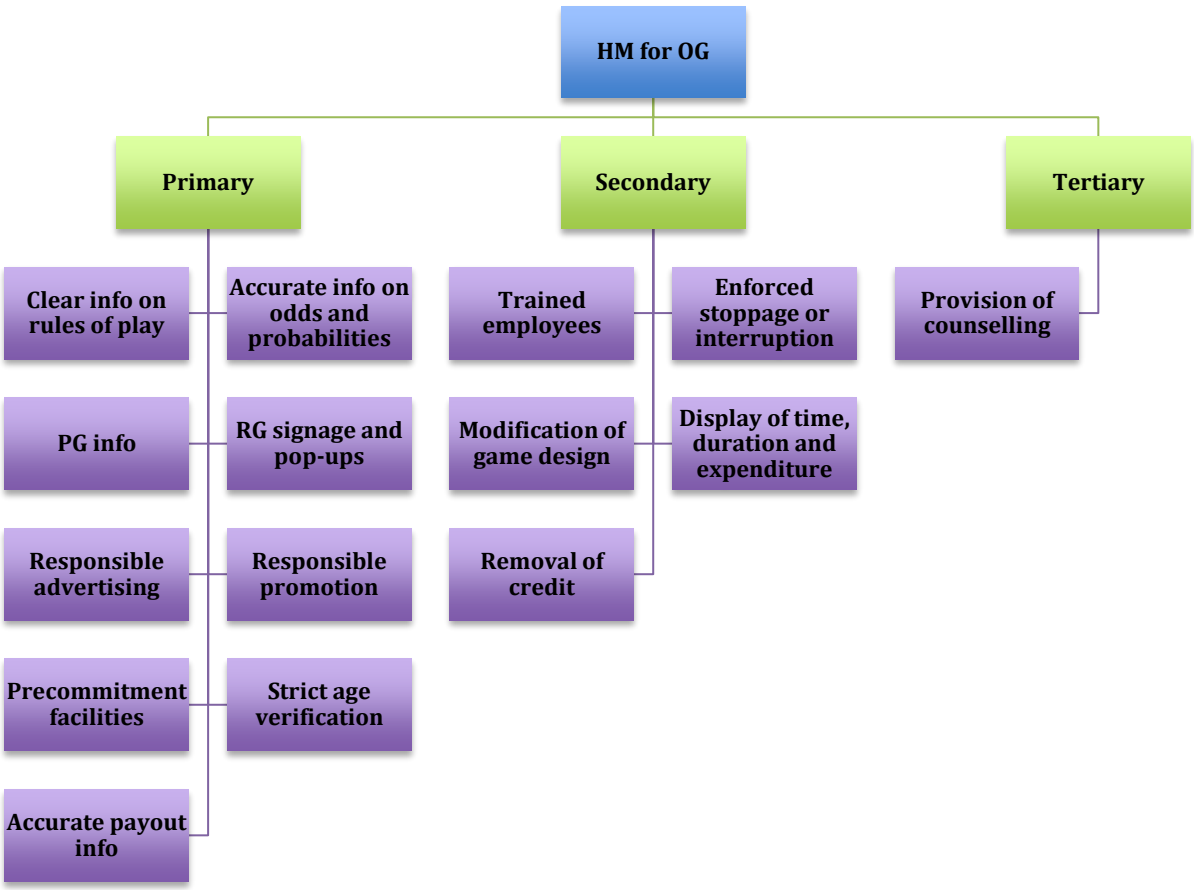


Figure 2.6 Adaptation of Blaszczynski's (2001) three-tiered approach to harm minimisation

HM measures in the Australian harm prevention model are based on a three-tiered approach. Primary interventions seek to prevent harm, secondary interventions seek to limit the potential for harm after it has started and tertiary interventions are concerned with the treatment of 'PGs' (Department of Families, Housing, Community Services and Indigenous Affairs (FAHCSIA) 2009). The model has been applied so that each intervention addresses specific threats and their progression along the harm continuum and could be applied to online and offline gambling.

Non-regulatory HM initiatives usually consist of support or information provided by community or governmental organisations (FAHCSIA, 2009). Regulation controls access to gambling and non-regulation minimises 'PG' through information and counselling (ibid). The aim is to minimise the number of at-risk gamblers from developing 'PG' and to provide support for 'PGs.' Non-regulatory measures are situated at the tertiary end of the continuum, working with 'PGs.' Support services vary including self-assessment tools, hotlines, counselling and treatment programmes and self-support guidance (Jawad, 2006). Gamblers need to self-identify that they need support; often their effectiveness is limited because gamblers may not self-identify (FAHCSIA, 2009).

Responsible gambling features

eCogra (2007) tested the perceptions of online gamblers towards RGFs which were considered useful although considered in the middle range; time limits set by the gambler and self-exclusion had the lowest level of perceived usefulness. Research conducted into the efficacy of RGFs has either been inconclusive or established some support (for example, Blaszczynski et al 2001; Loba et al, 2002; Schellinck and Schrans, 2002). The remainder of this chapter evaluates a range of RGFs and seeks to apply the features to the online environment. The RGFs explored in this chapter are later evaluated by online questionnaire participants regarding their

perceived efficacy.

Card-based technologies

Card-based technologies can empower gamblers to manage their gambling though the industry is concerned that it might encroach upon the civil freedoms of gamblers (Fischer in Holmes, 2003). In card-based systems there is less contact with other individuals which is implicated in higher levels of 'PG' (Griffiths, 2000; Clarke et al, 2006). For example, note acceptors allow gamblers to avoid the cashier and therefore circumventing possible embarrassment as being identified as a 'PG' (Blaszczynski et al, 2000). It is possible that 'PGs' may be attracted by card-based technologies for this reason of less contact with the cashier (Nisbet, 2005). The utility of card-based technologies is convergent with RG (Kelly, 2004; Bernhard et al, 2006; White et al, 2006) but there is a paucity of evidence in support of providing protection to gamblers (IPART, 2003; Nisbet, 2005). Gamblers do not consider cashless technologies useful in managing their gambling but a statement of play, credits and debits is useful feature; gamblers like card technology because of the perception of convenience.

Card-based systems may exacerbate harm because of the issues discussed above but the technology that facilitated gambling's expansion can be utilised for RG (Korn and Schaffer, 1999; Griffiths, 2000; Nisbet, 2005). Technology can be proactive, highlighting patterns and problems before they become more serious. As part of responsibilisation, gamblers are given information and their behaviour therefore becomes their own responsibility.

Slowing play

Easily accessible, continuous forms of gambling have been linked to 'PG' (Blaszczynski et al, 2003; Abbott et al, 2004; Volberg et al, 2006; Neal et al, 2005; Orford, 2005; Ladouceur and Sévigny, 2006). According to Blaszczynski et al (2001) faster speeds are more enjoyable. Ladouceur and Sévigny (2006) state that making the games faster is a way for industry to make more money. One effect of card-based technologies is to increase the rate of gambling by up to 15% (Palmeri,

2003 in Nisbet; Schull, 2005). Features that decrease the speed of play including reel spin and limiting maximum bet size have been examined for their effect on gamblers (Blaszczynski et al, 2001; Loba et al, 2001; Ladouceur and Sévigny, 2006). In a study of the impact of slowing the rate of play, it was concluded that whilst it did not decrease the amount of money lost it did result in less enjoyment (Blaszczynski et al, 2001). They found that slowing down the speed of a game does not seem to be a critical feature that needs to be targeted mainly because RG should instead advance the initiatives that will be successful in the reduction or elimination of 'PG.' This argument is supported by Ladoucer and Sévigny (2006) who agreed that speed is not a significant variable to promote HM.

Real money balances

Kogan and Wallach (1967) and Slovic (1969) found that gamblers made more careful choices when they gambled with real money compared to when they gambled with credits. Operators should emphasise the real value of credit or chips because the psychological value of the electronic amount is less than the psychological value of real cash (Griffiths, 2008). Gambling with electronic amounts may lead to a suspension of judgement due to the idea that they are easily regambled as electronic value is less than the real value (Griffiths, 1993). In a typical situation, individuals will spend more using 'plastic' debit and credit cards because it is easier (Griffiths, 2008). For most gamblers, the psychological value using a card is less than when using 'real' cash, in the same way as the use of chips or tokens. Chips and tokens are regambled with little or no hesitation because their psychological value is much less.

Remove or reduce the cash dispensing machines in and around the casino

Karlins (2003, p. 1) writes that cash-dispensing machines are the life-blood of casinos and gamblers "end up on the giving end of the transfusion" and can withdraw more money than they would have used without access to the cash-dispenser. Casinos could allow transactions only on a cash basis as part of its RG policy (Quinn, 2001). In various jurisdictions such as Manitoba, Canada and all states and territories in Australia, cash-dispensing machines are banned from the

casino because they provide easy access to cash for vulnerable customers (KPMG Consulting, 2002; Eadington, 2005). Sadinsky (2005) argues that whilst there is no obvious need to have cash-dispensers in the casino, making the gambler leave the table or machine results in a pause that gives gamblers an opportunity to reflect on their play. Cash-dispensers contribute to continuous gambling (Griffiths and Parke, 2003). Easy access to money is tested to the extreme online with multiple payment facilities including credit/debit cards, personal cheques, banker's check/draft, wire transfer (Smeaton and Griffiths, 2004). Gainsbury et al (2012) found 217 different methods of payment. Easy access can disrupt the gambler's financial value system and lead to more gambling.

Self-exclusion facilities

Nevada is famous for its 'black book' of gamblers who have been excluded from casinos because of their disagreeable nature and the harm they can cause its reputation (Karlins, 2003). Exclusion can be a two-way process initiated either by the gambler or the operator (Townsend, 2007). It can be voluntary or involuntary and temporary or permanent (Blaszczynski, 2001) and is a relatively new initiative (Dulmus and Rapp-Paglicci, 2005). Blaszczynski et al (2007) argue that self-exclusion is used by the industry to limit opportunities for 'PGs' and is based on four principles. The first principle is that the industry recognises that some gamblers have difficulties controlling their behaviour. Second, it is the industry's responsibility to provide a safe environment and to minimise 'PG.' Third, gamblers must take responsibility to gamble within their means. Fourth, the recognition that self-exclusion does not deal with psychological issues. 'PG' information is provided and gamblers can decide if they want to self-exclude but this self-diagnosis can be problematic: research has indicated that 'PGs' are often unable to self-identify (Senate Select Committee on Information Technologies, 2000).

Self-exclusion lets gamblers be responsible for their actions (Karlins, 2003). It is a non-intrusive intervention and a 'self-control' procedure. Gamblers may self-exclude because they are experiencing gambling-harms but may not be ready to seek help (Dulmus and Rapp-Pagliaaci, 2005). When gamblers self-exclude, operators should meet it with enthusiasm because gamblers have accepted

responsibility in dealing with 'PG.' Operators who do not support self-excluded gamblers reflect industry greed that does not embrace SR (Karlins, 2003).

Exclusion can be an effective means of protection but few self-exclusion programmes have been evaluated and their long-term impact remains unknown (Ladouceur et al, 2007). One study claimed that 30% of gamblers completely stopped once enrolled in a self-exclusion programme. This is a significant finding especially compared with other types of intervention (Ladouceur et al, 2000).

Nowatzki and Williams (2002) provide a series of recommendations to improve the efficacy of self-exclusion. First, self-exclusion should be visibly promoted and advertised widely and clearly because many gamblers are unaware of this option. Online gamblers should be able to self-exclude with ease (Smeaton and Griffiths, 2004). Research has suggested however that self-exclusion options tend to be difficult to access within some sites and only the most determined gambler can utilise them effectively (Jawad, 2006; Monaghan, 2009). Second, the minimum period of exclusion should be five years, comparative to success rates of abstinence with other substance abuse literature. Smeaton and Griffiths (2004) say that self-exclusion options should be flexible, allowing a return to gambling at the gambler's convenience, for example, end of the month, before or after payday, after six months or even longer. Third, a uniformity of exclusion that bans gamblers from all casinos meaning 'PGs' would only have to sign up for exclusion once. Fourth, a global database should be established to prevent excluded gamblers from further play. Fifth, penalties for violation by both operator and gambler where both take responsibility for their actions. Sixth, counselling and education, although individual willingness is necessary for recovery. Finally, more training and education of staff to identify 'PGs' in a proactive manner because many 'PGs' refuse to accept that they have a problem. This is supported by Schrans et al's (2004) argument that self-exclusion programmes depend on the ability of operators to accurately identify 'PGs.'

For OG, self-exclusion or mandatory exclusion can be effective for protecting the gambler (Meyer and Hayer, 2010). Self-exclusion online is usually a preventive measure for at-risk gamblers (ibid). It may be more effective online because it is

easily implemented without face-to-face contact (Wood and Griffiths, 2007). The operator could implement the self-exclusion request, close the current account and prevent the gambler from re-registering for a different account (TÜV, 2009). Further, there are ways to ensure that self-exclusion is effective by implementing biometrics though such steps may reduce revenues (Smith, 2009).

'Problem gambler' identification

Identification of 'PGs' is difficult because there are few symptoms and they can be ashamed to seek help (Tolchard et al, 2007). There is no definitive standard or comprehensive research that facilitates identifying 'PGs.' This may be due to the dominant view that only a small number develop 'PG' (Ferris and Wynne, 2001; Blaszszynski, 2002; Brown, 2003; EGBA, 2007). There are observable signs of 'PG' which can be recognised by operators; re-visiting cash-dispensers or attempts at cashing cheques are most frequently cited (Brown, 2003). Another sign is gamblers requesting to borrow money, though many may be secretive about this. Disorderly behaviour and or agitation is another sign of 'PG,' although this behaviour can be caused by other reasons. Length of play can be indicative of 'PG:' sessions for about one hour are not a problem but five or six hours of gambling is an observable sign. This simple categorisation of time does not account for gamblers who lose quickly with maximum bets or who gamble on many products concurrently. However, any of these observable signs could be due to other non-gambling stresses (Blaszczynski, 2002).

LaBrie et al (2007) conducted the first empirical study of real OG behaviour, examining the behaviour of 40,000 online gamblers over a period of eight months. They found that online sports gamblers usually place small bets every few days and that gamblers who bet the largest wagers were not always the biggest losers. The study determined that the identification of 'PGs' requires understanding more about unusual patterns of gambling behaviour as opposed to understanding more about their usual behaviour. Most gamblers changed their behaviour by reducing their participation, bet frequency and bet size however big gamblers did not change and kept to their normal behaviour (ibid). LaBrie et al (2007) suggest that one way to identify 'PGs' is to study gamblers who request treatment or use self-help RGFs.

The identification of 'PG' is laden with complexity and can involve issues related to invasions of privacy. Other than responding to direct approaches, it is beyond the expertise of gambling staff to identify 'PGs' (Blaszczynski, 2002). However, operators can use technology to identify 'PGs' and could be proactive in encouraging an atmosphere of RG, acting responsively and sympathetically to approaches for help or more information.

Deposit limits

A joint study between Division on Addictions and Bwin examined a precommitment programme. When the study was conducted, Bwin had limits on deposits of 5,000€ in a 30-day period and 1,000€ in a 24-hour period. Gamblers could give themselves lower limits and Bwin's computer system enforced the limits. Nelson et al (2008) argue that at-risk gamblers impose self-limits on the assumption that it is a possible marker of 'PG.' Online gamblers who place limits on their accounts may believe that they are capable of gambling more than they intend, are unable to control their gambling involvement without help and are at-risk of 'PG.' It is likely that these gamblers have experienced 'PG.' Looking at how behaviour changes when they have adopted lower limits would measure the efficacy of a self-limit strategy. Facilitating online gamblers to set loss limits, bet limits and deposit limits is realisable. Some jurisdictions require that online gamblers do this. The Netherlands has proactive RG practices. The Holland Casino which has a legal monopoly and profits going directly to the Treasury (www.hollandcasino.com, 2015) has maximum spend limits of 100€ for gamblers aged between 18 to 23, permits gamblers to place limits on frequency of attendance and will intercede with gamblers who exhibit unusual increases in gambling expenditure or frequency (Holland Casino, 2006; Williams et al, 2007).

Research has found that almost one in two EGM gamblers describe overspending regardless of setting time and money limits (Dickerson, 2003; 2004). The 'erosion of control' that happens during gambling is a natural outcome of regular play and responsible for the excess losses of EGM gamblers (Dickerson, 2003). Some countries, for example, New Zealand, require pop-up windows informing the

gambler of the duration of play, wins and losses during the session and requests for continuing or cessation of play (Hauraki District Council, 2014). In some jurisdictions, restrictions on the placement and size of bets and the requirement to prominently display the odds serve to indirectly provide a measure of RG (Global Gambling Guidance Focus Group, 2006; Jones et al, 2006).

The RG Council of Canada (2006) conducted a 'PG' questionnaire and concluded that adjustments aimed at limiting the amount of money spent as well as restricting payment methods could minimise the risk of 'PG.' The speed of play and near-misses were also ranked as important contributors to 'PG' but the participants did not consider slowing the speed of play or near-misses as useful in reducing spending too much money.

Griffiths et al (2009b) looked at gamblers' attitudes and behaviour toward PlayScan, a tool that lets gamblers utilise RGFs. More than half of the gamblers (52%) agreed that it was useful; 70% said limit setting was useful; 49% said viewing their gambling profile was useful; 42% said self-exclusion was useful; 46% said self-administered tests for 'PG' were useful; 40% said information and support for 'PG' was useful and 36% said gambling profile predictions were useful. When it comes to real as opposed to theoretical use, 56% of PlayScan gamblers had established spending limits, 40% had taken the self-administered test for 'PG' and 17% had self-excluded. Griffiths et al (2011) say 'PGs' should use behavioural tracking software such as PlayScan or Mentor to minimise gambling-harms. Mentor has been created by Griffiths and therefore he is biased to an extent: if operators incorporate it into games there will be financial and reputational benefits for Griffiths and it is likely that he may promote software for his personal gain.

Clocks and timers

On-screen clocks may make gamblers aware how long they have been gambling and hence capable of controlling the amount of time and money they spend (Blaszczynski et al, 2003). Williams (2010) argues that precommitment to a time limit could be successful in limiting 'PG.' Clocks should display the time of day, duration of play and incorporate a 'time out' that makes the gambler cash out before

resuming play (James, 2003). The 2005 Act requires operators to display clocks and timers showing the current time, time in play and amount of money being bet, won and lost in pounds and pence (Monaghan, 2009). The results of a Canadian study found that an on-screen clock did not influence the length of the session or the expenditure for both non-problem and 'PGs;' 65% of gamblers stated they wore a watch and 44% stated that there was a visible clock present (Blaszczynski et al, 2003). The study found that having the access to the time, irrespective of a clock display on the screen did not affect gambling. It is important to note however, that having access to and being reminded of, are not the same thing.

The justification for on-screen clocks is based on the concept of dissociation, either by itself or in combination with environmental factors (Blaszczynski et al, 2003). Casinos are designed to have an absence of clocks; in addition to this ambient lighting and other design features confuse the gambler over how long they have been gambling for. During the 1980's there was a series of studies indicating that there was a relationship between gambling behaviour and dissociation (Anderson and Brown, 1984; Jacobs 1986; 1988). Later studies have endorsed this finding that gamblers lose track of the time and enter a dissociative state, often using this state to escape from emotional pressures (Diskin and Hodgins, 1999; Gupta and Derevensky, 1998). The phenomenon of dissociation is not unique to 'PGs' and is prevalent in sports and recreational gamblers although not to the same degree (Wanner et al, 2006). Despite some evidence supporting dissociation, there is no evidence that dissociative states or losing track of time contribute to 'PG' (Blaszczynski et al, 2003). To be contributory to a loss of control over excessive gambling, it would be necessary to prove that losing track of time leads to longer than planned gambling sessions. Dissociation to escape from the pressures of life may encourage gamblers to gamble more, but providing clocks is not likely to affect this motivation (ibid). There are no published studies specifically investigating the relationship between dissociation and duration of gambling. It is unlikely that basic knowledge of time or duration will increase 'PG' control.

'PGs' admit to losing track of time particularly when it came to over-extending their gambling instead of returning to work or collecting children from school (ibid). It is possible that some gamblers lose track of time and over-extend but these

gamblers are relatively few. A clock display as has been discussed will not make any difference because the gambler is more likely to concentrate on their gambling rather than looking at the clock. A complete evaluation of the effectiveness of time limits and possible side effects is necessary (Bernhard and Preston, 2004). There is a suggestion some kinds of time limitation may trigger 'frenzied behaviour' that is linked with a countdown timer (ibid).

Inducements to gamble

Free-play is a major inducement to gamble online (Griffiths and Parke, 2004) and has the potential to be as addictive as real play (FAHCSIA, 2009). Many young gamblers have their first experience of gambling with free-play (Lambos et al, 2007). It allows gamblers to practice behaviour and then when they transfer to a real play environment, behaviour is established and repeated with real money (Jolley et al 2005, p.206) but where the chances of winning are decreased (BMA, 2007). The Responsibility in Gambling Trust (2006) say there should be no incentives to gamble for free, for training and practice purposes and though gamblers may enjoy free opportunities, they are dangerous and RG should eliminate them.

Some operators use questionable strategies to tempt potential gamblers (Sevigny et al, 2005). Research showed that 39% of 117 sites offer higher pay-out rates (more than 100%) in free-play mode which were not maintained when playing for real money (ibid). Griffiths (2008) endorses Sevigny et al (2005) and suggests that free-play must be accompanied by RG information. When gamblers use free-play, operators need to provide RGFs because they are spending significant periods of time in this mode which may have harmful impacts in other life areas (Monaghan, 2009). Free-play has been identified as risky for 'PG' and playing without money makes gambling attractive, removes barriers and may affect efforts to quit (Blaszczynski et al, 2001). There are no age verification processes for free-play and as a result they are accessed by underage gamblers (Jawad, 2006). McBride (2006) reports that free-play is used by more than 50% of the high school students he surveyed. The popularity of free-play sites amongst youths is concerning because it may lead young persons particularly those who are used to winning to real

gambling. Moses (2006) refers to this as a 'Trojan Horse strategy' a strategy utilised by operators to recruit gamblers who will eventually move to sites gambling with real money.

On-screen warning messages

Many gamblers have faulty perceptions concerning the extent to which they are in command of or can predict outcomes (Fernandez-Alba Luengo et al, 2000; Steenbergh et al, 2002) or can lose track of how much time and money they have spent (Schellinck and Schrans, 1998). Messages which make gamblers more aware of time and money expenditure should be provided by operators (White et al, 2006). The American Gaming Associations' Code of Conduct for Responsible Gaming (2003) recommends messages to inform gamblers when they have been playing non-stop for 60 minutes. These messages are useful but there are nuisance issues regarding their value. Pop-up messages encourage gamblers to be aware of their behaviour and can remind gamblers of appropriate time and money limits (Monaghan, 2009). This is supported by evidence of messages in promoting RG on EGMs. Floyd et al (2006) assessed the effectiveness of warning messages intended to manage gambling with 120 university students who had previous gambling experience. All the students played a computerised roulette game with fake money and received education about gamblers' irrational beliefs. The students in the experimental group viewed short messages regarding irrational beliefs about gambling while playing the game. The students in the control group had the educational module but no messages. Results showed that students who received the warning messages reported significantly less irrational beliefs and spent much less money than the students in the control group (ibid).

Another study examined the effectiveness of ten RG messages with regular gamblers and 'PGs' using questionnaires and interviews (Riley-Smith and Binder, 2003). Three messages had the most effect on gamblers; '*Have you spent more money on gambling than intended?' 'Are you gambling longer than planned?' 'Have you felt bad or guilty about your gambling?'* (Dickson-Gillespie et al, 2008). The study also noted that the message lost impact when it was related to calling 'PG' helplines and recommended separate RG and helpline messages. It is

necessary to differentiate between gamblers and 'PGs' when developing strategies for RG so that the messages can be useful for each specific gambler group (ibid).

Gamblers are aware of RG messages displayed on EGMs (Hing, 2003; 2004). Research designed to estimate gambler awareness and perceived adequacy and effectiveness of RG strategies in venues in Sydney clubs, found that more than 67% of participants observed signage relating to the odds of winning large amounts on EGMs. Messages may be ineffective because results showed change occurred in just 44% of gamblers' thinking patterns and 12% of gamblers' emotions regarding gambling, with 18% of gamblers decreasing the frequency of gambling, 17% decreasing the length of gambling sessions and 19% decreasing the amount of money spent (Hing, 2003; 2004).

> "The quantitative results indicate that clubs' RG practices have had little effect on the way the clear majority of participants think about their gambling, feel about their gambling, how often they are gambling, how long they gamble for and how much they spend … RG practices cannot be considered as being very effective for most 'PGs' or for most of those who are at-risk." Hing (2004, p. 1844).

The scope and accuracy of the messages did not evaluate if gamblers were aware of them without being fully aware of their explicit content (Monaghan and Blaszczynski, 2007). The results show that mandated messages have limited effect on changing gambling behaviour. Hing (2004) concludes that for messages to be implemented, regulation is necessary. Hing's research and other studies including Breen et al (2003) show that some land-based venues follow only mandatory RG regulation. Voluntary measures are less widely practised and some venues do not comply with regulation. OG is largely unregulated and so neither mandatory or voluntary measures will be practised. Hing (2004) says that without regulation, RG is unlikely and if government and industry are serious about RG, then regulation is required.

Information must be provided for gamblers to manage their behaviour (Griffiths, 2008). This should be accessible, cautionary and relating to risks as opposed to health warnings; gamblers should be given adequate information to make an

informed choice including the probability of winning, payout ratios and prize structures of the game (ibid). This is important because gamblers think they can win based on faulty belief systems (Griffiths, 1994; Parke et al, 2007).

Research on the effectiveness of pop-up messages has found that they can promote RG (Monaghan, 2009). Pop-up messages may help online gamblers break from their dissociation, refocus their behaviour and manage the time and money they spend. This will enable gamblers to play more responsibly and to play within their means. The content of pop-up messages should facilitate self-awareness and suitable behavioural modification so gamblers can control their behaviour. There is some empirical support for the use of messages to encourage self-awareness to facilitate RG. Monaghan and Blaszczynski (2007) conducted a study that involved student EGM gamblers. They were exposed to signs during a simulated gambling session asking them to consider how much time or money spent during a session and whether they should take a break from play *'Do you know how long you have been playing? Do you need to take a break?'* The signs affected their behaviour and thoughts during the session. The self-appraisal messages created an awareness of the time they had been playing and their opportunities to take a break. The students also said that messages would have a similar effect if they were displayed on EGMs. Messages encouraging self-awareness appeared to encourage RG (Monaghan, 2009).

The use of a self-awareness strategy is key in treatment for 'PG' (Monaghan, 2009). Therapeutic strategies, including cognitive behavioural therapy, mindfulness and motivational interviewing, have been shown to minimise 'PG' (Hodgins et al, 2001; Ladouceur et al, 2001; Toneatto et al, 2007). 'PG' may be related to losing track of time and money being spent, experiencing dissociation and immersion in the game, helping gamblers to be more aware of their behaviour may enable them to implement control over their gambling. Pop-up messages may minimise 'PG' and encourage gamblers to change their behaviour. These types of questions are different from telling them how long they have been gambling because it encourages reflection and mental processing. However, pop-ups should not negatively impact recreational gamblers without problems (Monaghan, 2009). Monaghan and Blaszczynski (2010) found messages that promoted self-appraisal

(for example, *'Have you spent more money that you wanted to?' 'What about a short break'?' Do you need to think about taking a break?')* produce more behavioural change than informative messages (for example, '*Your chance of winning the big prize today is approximately one in a million*'). The timing of the pop-up messages could be important. Jardin and Wulfert (2009) found that basic informative pop-up messages can affect a gambler's behaviour when displayed during the session as opposed to displaying the message at the beginning. This may be significant but needs to be weighed with the annoyance factor of pop-ups. Gamblers can install software to block all pop-ups and pop-ups have been voted the most annoying site feature. Research concluded that 36% of visitors may stop using a site because of pop-ups (Singer, 2008). There is no specific research examining any annoyance factors of pop-ups and OG and therefore this is a potential area for further research.

Personalised feedback on gambling behaviour is preferable (Auer and Griffiths, 2015). Personalised feedback has been studied in non-gambling situations such as cigarette smoking and findings support using messages to deliver potentially effective behavioural interventions (Obermeyer et al, 2004; Stotts et al, 2009). Personalised gambler feedback could be presented in a non-judgemental and motivational way to encourage RG. Operators have the technology to provide personalised feedback and research should focus on message content and when gamblers should receive messages to optimise change (Auer and Griffiths, ibid).

Another study examined the influence of warning and intervention messages on the awareness of risk, irrational beliefs and behaviour by comparing a control group with a group who had brief audio-visual messages before a session which explained the odds of winning roulette as well as the risks of gambling (Steenbergh et al, 2004). Audio-visual messages increased the participants' ability to select the right answer from a choice of possible answers about the odds and risks associated with gambling when questioned immediately after gambling. However, audio visual messages did not generate considerable cognitive or behavioural changes. Audio may be more annoying and easier to turn off than to block messages. There is some support for using messages, but more research is necessary. The optimal mode of delivery must be examined (Monaghan and Blaszczynski, 2007). There are many

possible ways of doing this; static messages, pop-up dialogue boxes, or semi-transparent messages that move across the screen. There has been limited research on the successful design for warning labels. To have impact, messages must attract attention, be resistant to the effects of habituation, relevant to the targeted activity and comprehensible (Malouff et al, 1993 in Monaghan and Blaszczynski 2007; Stewart and Martin, 1994 in Monaghan and Blaszczynski, 2007).

Monaghan and Blaszczynski (2007) examined differences in the recall rates for messages displayed in either static or dynamic mode. The static mode involved a government mandated message fixed onto the framework of the EGM. The dynamic mode presented the same message in a translucent display that scrolled across the screen during play. Gamblers recalled more information given in the dynamic mode compared with the static mode. Therefore, how messages are displayed influences awareness and recall of messages (ibid).

Advertising

Griffiths (2008) says it is appropriate for the OG industry to market its products. Legislation allows operators to advertise in the UK if they adhere to industry regulated standards (GC, 2015a). Operators must apply to the GC for a licence and offshore operators based in jurisdictions approved by the GC (said to be on the white list) can also advertise however, gamblers in the UK can access gambling sites from all over the world that are both licensed and unlicensed. There has been considerable growth in gambling advertising which will lead to greater participation and subsequently an increase in 'PG' and addiction (Gainsbury, 2012).

Advertisements and promotions should not appeal to vulnerable members of society, including individuals who are underage, who have learning difficulties or 'PGs' (Griffiths, 2008). Monaghan (2009) suggests that advertising must be accurate, fair, responsible, not target vulnerable groups and that RG statements must be included in all promotional material. Wood and Williams (2007) argue that strict controls over advertising and promotion should be utilised, making a

comparison with tobacco and alcohol. However, controlling online advertising is difficult, perhaps even impossible and research is needed to overcome these obstacles.

Attracting gamblers can be exploitative, for example, through big jackpots, attractive allowances, expensive consumer goods, luxury holidays, easy wins and prizes, showcasing big winners, celebrities, bonus options, commissions, guarantees, free games that facilitate socialising and representations of winning (McMullan and Kervin, 2010). Binde (2009) concludes in a study of 25 'PGs' no one said advertising was the main cause of their 'PG.' Further some messages of advertising are designed to be sub-conscious (Hejase et al, 2013) and this is another field of research that deserves more attention.

Links to 'PG' information and support

Wood and Williams (2007) recommend online support for 'PG.' First, to provide feedback about gambling behaviour and links to assess the problem. Feedback will make gamblers more knowledgeable about their behaviour and may lead to behaviour change. Second, development of treatment and prevention programmes should be easily accessible online. Initiatives could include information on counselling and support groups. The type and extent of 'PG' information varies considerably online (Jawad, 2006). 'PGs' may reject RG (Blaszczynski and Nower, 2008) and change operator to avoid RGFs (Wood and Griffiths, 2007; Meyer and Hayer, 2010) but information should be clear and easily accessible.

Education/Information/Awareness campaigns

There has been increasing use of the term *responsible gaming* replacing RG. This is problematic because gambling is portrayed as less harmful. The objective of informing gamblers of the harmful nature of participation is removed. Messages on

cigarettes packaging have become more powerful: '*Smoking kills'* but the standard message for the minimisation of 'PG' is a blander '*When the fun stops stop*.'

'PG' prevention campaigns using mass media or social marketing to raise awareness, usually containing information about gambling responsibly, warnings about 'PG' including signs/symptoms, information, 'PG' help, odds and faulty belief systems. Information and awareness campaigns can deliver preventive health messages to significant numbers of individuals at little cost (Williams and Wood, 2007). Informing young people is important because they may be more vulnerable to marketing, particularly as gambling is marketed heavily (Atkin, 1995; Strasburger, 1995). There is limited research on the impact of information campaigns in preventing 'PG' (Auckland University of Technology, 2005). Ladouceur et al (2000) found that a 'PG' leaflet communicated useful information effectively when it was shown to the Quebec public. Ladouceur et al (2005) found that informative videos improved understanding about gambling with Grade 11 and 12 Quebec students. Similar videos have been successful with children in elementary schools (Ferland et al, 2003; Ladouceur, 2004). However, information campaigns have limited impact if the individuals are not specifically asked to pay attention to the information, or if the individuals are not interested in the issues. The US state of Indiana implemented a campaign to promote RG awareness and used a comprehensive range of marketing processes including 'PG' support meetings. 8% of the public recalled seeing or hearing RG marketing and 72% (of the 8%) reported that the marketing had increased their understanding of 'PG' (Najavits et al, 2003). Similar unimpressive findings occurred in Canada. Turner et al (2005) found that 66% of the Ontario public was unaware of any RG programmes. It is important to note that Ontario spends significant amounts on 'PG' prevention, treatment and research compared to other jurisdictions globally (Sadinsky, 2005) and so Turner's findings were surprising. EGM and scratch card gamblers were more likely to report knowing about RG strategies which may be due to clear messages on machines and scratch cards (Turner et al, 2005). Australian research examined a multi-lingual, multi-media 'PG' awareness programme that took place over two years. Jackson et al (2002) concluded that the programme led to a rise in the number of gamblers who called the helpline and a rise in the number of new 'PGs' entering treatment. The State of Victoria also ran an informational campaign which resulted in a 70%

increase in calls to the helpline and a 118% rise in 'PGs' entering treatment (Victoria Department of Human Services, 2002).

Providing support for 'PGs' or getting them into treatment is less satisfactory than preventing 'PG.' There is no direct evidence on the effectiveness of awareness campaigns as a primary prevention tool. The lack of awareness of RG initiatives is disappointing (Williams et al, 2007). There is significant literature relating to health behaviours that may contain lessons for the prevention of 'PG' (Byrne et al, 2005) which requires serious consideration. Research has found that continuous information and awareness initiatives are potentially significant for improving an individual's understanding and or to change their attitudes (Duperrex et al, 2006 (road traffic accidents) Grilli et al, 2004 (stroke awareness) Sowden and Arblaster, 2005 (alcohol abuse).

Chapman and Lupton (1994) found that population surveys show how mass media is the leading supply of information about health issues including obesity, HIV/AIDS, drug abuse, asthma, contraception and mammography. While knowledge and behavioural changes have been evaluated, the ability of awareness campaigns to produce a change in behaviour has been less evaluated (Duperrex et al, 2006; Grilli et al, 2004; Sowden and Arblaster, 2005). When information is understood as personally relevant, behaviour change is possible especially when the consequences of not changing behaviour are significant (Janz et al, 2002). Media reports linking heart disease with foods that affect cholesterol have led to a decline in the consumption of beef, egg and milk products with a high fat content in America (Williams et al, 2007). Reports on the risks of a high salt diet have led to increased use of low-salt or salt-free food products. A reduction in the use of the contraceptive pill and IUDs between 1970 and 1975 was linked to publicity campaigns about possible side effects of use (Jones et al, 1980). Mass media campaigns promoting HIV testing have also had immediate effects (Vidanapathirana et al, 2004).

Reduction of new games

It has been suggested that new types of gambling should not be introduced without effective HM measures (Responsible Gaming Strategy, 2011). OG has distinctive features that may facilitate or worsen 'PG' (Gainsbury et al, 2015). Online gamblers have higher rates of 'PG' compared to land-based gamblers; though research investigation of online 'PGs' as a distinct sub-group is limited. Regulators need to carefully review how the features of OG specifically contribute to 'PG' and this would require the implementation of evidence-based RG strategies.

Enforced stoppage

Schellinck and Schrans (2002) found that information pop-ups after gambling sessions that asked gamblers if they wanted to continue had a small effect on decreasing the amount of time and money spent, however this was only for the sub-group of high-risk gamblers. It is possible for automated pop-up messages to provide RG information which could either encourage stoppage or messages about imminent stoppage (Haefeli et al, 2011). Whilst it is possible to enforce stoppage, it is unlikely that operators will have any motivation to execute this strategy.

Conclusion

This chapter outlined the various RG strategies that have been implemented in land-based and online venues and evidence to support their effectiveness. These RGFs will be evaluated by a range of stakeholders in Chapter 10 regarding their perceived effectiveness.

Section F: Sociological Perspectives

Introduction

This chapter seeks to examine a range of relevant sociological theories that assist in developing the data collection and analysis of this thesis. Characteristics of gambling are that it is nerve-racking and exhilarating, scary yet exciting, enjoyable but addicting; gambling is dangerous. Several key sociological theories have been discussed and applied to these characteristics and the central questions within this thesis. This thesis applies theories from the discipline of sociology including Goffman's theory of action, Sykes and Matza's theory of neutralisation, Lyng's theory of liminality. Also, a goal of this chapter is to enrich the CSR literature by integrating the sociological theory of Goffman.

The sociology of gambling

Sociology contributes to understanding 'PG' from the perspectives of theory, research and practice. The critical role of sociology in addressing 'PG' is vital as opportunities for gambling have expanded and the scientific understanding of gambling behaviour has grown.

Durkheim (1895) argues that gambling has a function whereby small amounts of deviance can benefit society. Parsons (1951) argues that gambling relieves strains on society by allowing deviant behaviour and when kept within boundaries, it is not overly disruptive. Both view gambling as a safety valve that contributes to the stability of society (Levy, 2010). Neither Durkheim nor Parsons considered the proliferation of gambling which has an impact on both Durkheim's small amounts of deviance and Parsons' reference to boundaries. Gambling is not *small* and online the boundaries are ill-defined. Zola (1967) and Herman (1967) say that by fulfilling personal needs such as success, self-reliance, control, gambling can ease tension within the social system. For Zola (ibid) gambling is a lower-class behaviour and a feature of deviant functionalism, whereby all aspects of society have a use and are necessary for the survival of that society. Herman (ibid) focuses on the gambling arena as a site in which qualities and abilities not normally used in the outside world have free rein. Gambling could ease the stress and frustration that could harm the stability of the state and the power of the ruling class (Kaplan, 1984; Neary and Taylor, 2006; Nibert, 2006).

Gambling as action

Goffman had a positive perspective on gambling and lifted it "out of the moral abyss into which successive generations of commentators and reformers have consigned, rendering possible a consideration of its meaning which is freed from a prior association of a negative kind" (Downes et al, 1976, p.17). Gambling is a form of consumption, where gamblers have the inclination "to pleasure, desire and leisure in the 'consumer society'" (Cosgrave, 2010, p. 1; Reith, 2007a). Goffman's (1967) essay "Where The Action Is" explores individuals who seek action and can be used to examine the gambling environment and the analysis of consumption and risk. Goffman's action uses a framework from game theory which evaluates "gamblers whose task it is to select from a possible set of moves" (Hendricks, 2006,

p. 152). Whilst game theory looks at the rules of the game, good and bad plans and results, Goffman is interested in the interaction among gamblers.

Goffman's view of gambling is epitomised by Lansky (2014):

> **When you lose your money, you lose nothing**
> **When you lose your health, you lose something**
> **When you lose your character, you lose everything**

Goffman takes the term 'action' from the criminal world (*You want a piece of the action?*) referring to extraordinary or illicit activity and distinguishes action in the sense of the gambler. His analyses of action can be used as a resource for the sociological analysis of the micro-social aspects of gambling, shaped by the expansion and commercialisation of gambling opportunities. Goffman contributes to the sociological understanding of the processes of becoming a pathological gambler (Castellani, 2000). Action refers to "activities that are consequential, problematic and undertaken for what is felt to be their own sake" (Goffman, 1967, p. 185) which involve "the wilful undertaking of serious chances" (ibid, p. 181). Three-quarters of Goffman's essay describes gambling and the remaining quarter is conceptual and abstract. He refers to male and masculine behaviours, for example, duelling, where character contests are a central concern. Action allows the display of character displaying courage, gameness, integrity and composure. He gives a lot of attention to composure, calmness, poise and control over emotions. Character contests are competitions in which risk are taken to determine which actor has the most character, particularly with regards to control over emotions.

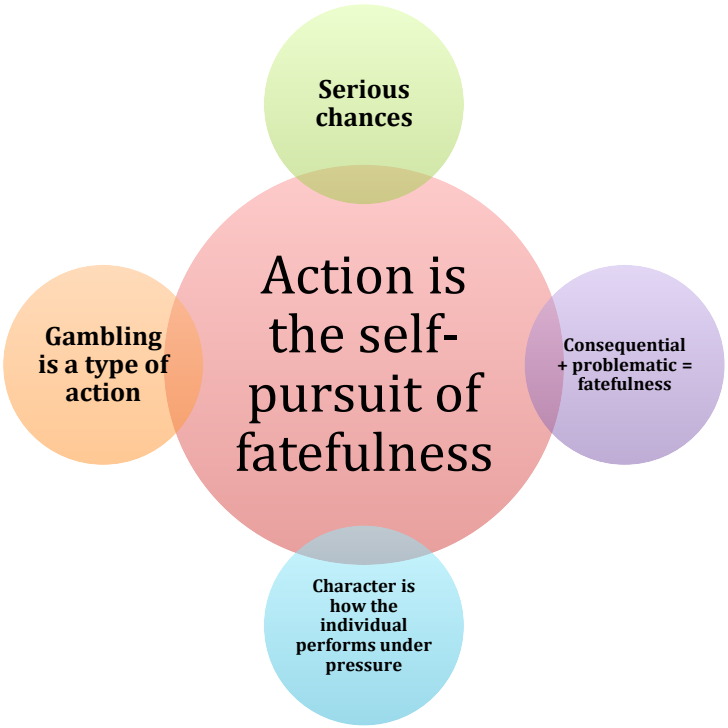


Figure 2.7 Goffman's action

Goffman identifies three patterns in social life. First: problematic and inconsequential; second: unproblematic and consequential; and third: problematic and consequential, which for Goffman is 'fateful action.' Consequential activities may have delayed effects: the capacity for payoff goes beyond the occasion, problematic activities have unknown outcomes and presents risks. Consequential and problematic activities are undertaken for what is felt to be their own sake. A characteristic aspect of action is that there is a short period of time between initiation and resolution (Handler, 2012). Gamblers are serious risk-takers and reject a normal, secure life. They show willingness to submit to fate to show character. Character is the highest challenge to the self and is the ability to maintain command in difficult situations.

The concept of fatefulness is fundamental to Goffman's analysis, in addition to action and character. Fateful activities and situations are both problematic and consequential. Some individuals may face dangers at work and some will

participate in fateful activities for their own sake. They choose to engage in action. Gambling is the prototype of action, which is the self-conscious pursuit of fatefulness. To cope with fatefulness, the individual must the knowledge and skills that are necessary to achieve the task. In applying the concept of action to the case of the gambler, the knowledge and tasks need to be identified. They include the knowledge of risks, RG awareness and skills relating to mathematical understanding of liability. Character involves how the individual behaves while using these capacities and especially how the individual performs under pressure. Action and fatefulness are a test of character. It could be argued there is a difference between action and character for recreational gamblers and 'PGs.' For Goffman, a weak character is unable to behave effectively in fateful situations while strong characters have full control. The gambler who is weak or strong, in fateful situations, is based on individual factors. More clarity is required however; if the active orientation and prior commitment to risk-taking is considered, then this only applies to the 'PG,' due to the social and ontological significance for the actor.

The activities and choices of individuals may or may not have serious consequences and the outcome may be certain or uncertain (Handler, 2012). Goffman distinguishes action from routine activities and leisure activities are structured to be inconsequential though they may be problematic. In the serious activities of life, many decisions have consequences for the individual and for others. Daily life, including work, is routinised to foresee and manage the consequences of actions and much daily life is structured to create security not risk. Goffman's serious chance-takers, including gamblers, criminals and spies, are on the edges of society because they reject a normal 'secure' life. They reject routinised work and display a fearlessness that does not fit into ordinary life. Action seekers have self-determination and a willingness to submit themselves to fate, allowing individuals to show 'character.' Handler (ibid) says that action is made up of fateful activities and that an individual is under no obligation to pursue them before and not during participation.

Goffman (1967, p. 149). argued that action has become commercialised: action has moved from the gambling community into American society and the wider world. Gamblers can purchase action online and offline. The gambling environment has

considerably changed since Goffman wrote. Action was commercialised in the casino and the consequences of action was manageable compared to everyday decisions. The growth of gambling and its transmutation into entertainment may affect our understanding of the notions of character and fatefulness (Cosgrave and Klassen 2001). Modern commercialisation of gambling demonstrates a form of 'McDonaldisation,' exhibiting standardisation (Hannigan 1998; Ritzer 1993). OG has undergone the 'McDonaldisation' process, where operators have adopted technology to make methods work faster and more efficiently. Just as some casinos are physically located within the shopping and entertainment experience, OG operates in a similar environment.

Vicarious action needs the real thing for its model and gambling can provide it. For individuals on the fringes of society, criminal action occurs online. Downes et al (2013, p. 107) wrote "those who never risk never avail themselves of the opportunity to gain or lose 'character' in this way, they thereby lose direct connection with some of the values of society, though they may vicariously experience them via the mass media." For Goffman, the fringe has an important function in society, maintaining the sanctity of true character. He argues that gambling venues are de facto places of worship where society's moral compass may be more alive than in churches.

There is a difference between the ethical, almost teleological view of the importance of character and the deontological assumption of a social order based on moral obligation to norms and rules, which are present in other Goffman writings (Burns, 2006, p. 237) "it is during moment of action that the individual has the risk and opportunity of displaying to himself and sometimes others his style of conduct when the chips are down. Character is gambled." For Goffman, the individual is freely self-determining in Western moral tradition. Doran (2011, p. 22) writes "self-determining agents are responsible for their own welfare, security and future happiness independent of wider systems of support." Further Goffman discusses action from the perspectives of the individual and society. Action can bring out socially valued qualities of character such as integrity, confidence and composure. For Goffman, high-risk forms of action are usually tightly regulated in modern

society but OG is the archetype of high-risk action operates in a largely unregulated and expanded environment (Cosgrave, 2008).

Goffman's contribution to the sociology of gambling

Goffman contributed to changing attitudes to gambling in two ways. First, he put forward a positive view of gambling, that it was not deviant behaviour: it gives individuals opportunities to show a strength of character and commitment to important social, personal codes including risk-taking, courage and honesty. Second, he recognised that gambling can contribute to moral and practical regulation of society by reaffirming conventional values. Goffman concludes that gambling has a civilising function of both socialisation and social control (McMillen, 1996, p. 15). However, the sociology of gambling post-Goffman continues to be under developed and the psychology of gambling has become dominant with considerable focus on its pathology. If sociology had developed further, it may have provided different treatment and regulation approaches. Sociology views gambling as a legitimate leisure pursuit where gambling is experienced and enjoyed for its own sake, as a leisure activity which compensates for the dysfunctional and unfulfilling aspects of modern life (ibid). Gambling as a leisure activity is juxtaposed to work and other social obligations, it is essential to the preservation and balance of the social structure and is vital because of the pressures of modern life. Therefore, although gambling is different from other leisure activities due to potential social stigma, it is normal and integrated with other practices and societal institutions (McMillen, 2005). McMillen (1996) says that the growth of gambling is linked to changing attitudes about its respectability and is not seen as a social disease leading to moral decay and crime.

Liminality

Gambling provides an experience of risk, excitement and difference and is an example of both Turner's theory of liminality (1969, 1982) and Lyng's (1990, 2005) theory of edgework. Turner's liminality is a leisure type that transfers the individual from everyday experiences into new ones, via physical, mental or drug-induced experiences. Liminal leisure is a different set of behaviours that varies

between cultures and sub-cultures. “In liminality new ways of acting, new combinations of symbols, are tried out, to be discarded or rejected” (Turner, 1982, p. 27). OG provides such an experience. The online gambler can use a debit or credit card to gamble with funds, in some cases, yet to be earned, in an exciting and potentially dangerous activity (the loss of income yet to be earned). This occurs in the fast-paced OG environment, which allows gamblers to show others from within their online (as well as offline) community their willingness to partake in a risky pursuit as well as allowing other online gamblers to conduct their gambling in secrecy. OG facilitates a liminal leisure experience. Sites provide an audio-visual extravaganza, free-play experience with easy access requiring only registration of debit or credit card details. As as discussed earlier, some sites do not display timers or clocks, provide 24 7 access 365 days a year, wherever the gambler happens to be. Loss of time is found to be a significant element in liminal leisure experiences and research has shown how easy it is for gamblers to lose all sense of time (Wood et al, 2007a).

Turner’s liminality taking the individual from everyday experiences into new ones through leisure and Goffman’s action allowing character contests whereby gamblers can demonstrate their courage, integrity and composure under pressure, is different today. Today, our anxieties are different when individuals gamble they are seeking a sense of safety and routine, the opposite of what Goffman proposed. Gambling has been normalised through liberalisation and the marketing as harmless fun and now is a mainstream leisure entertainment and not the liminal leisure experience it once was, marketed as being safe and routine. Turner’s liminality derives from the Latin ‘limen’ which means threshold (La Shure, 2005) and refers to the threshold of liminal experiences between chaos and order. Liminality can involve a ritual process, a rite of passage and though the process may be uncomfortable, once completed the individual has a new status in society. Turner defines individuals as “neither here nor there; they are betwixt and between the positions assigned and arrayed by law, custom, convention and ceremony” (Turner, 1969, p. 95). La Shure (2005) says that liminality lies between the starting and end points: is a temporary state where it is possible to move back and forth between these points. The gambler would travel from point to point but could not stay in the new experience; now the gambler is encouraged to stay in the new experience

through the gambling's increased accessibility, availability and normalisation. Nowadays there is no need to choose to be 'betwixt or between' where it used to mean that an individual did not belong; the 'betwixt or between' has disappeared and gambling is not the liminal experience but the everyday experience.

Edgework

Lyng (1990) says there is agreement in modern society about the benefits of the reduction of threats to individual wellbeing. Government-sponsored education or regulation manages this in certain industries. Many individuals actively seek risky experiences and there are inconsistencies between the public agenda to limit risk and the personal or private agenda to increase risk. Some individuals give a greater value to the experience of voluntary risk-taking than to the consequences of risk-taking.

The concept of edgework is valuable for understanding risk-taking in general, activities that involve an obvious risk to the individual's physical or mental health or just an ordered existence. The 'edge' is a metaphor defined as life versus death, order versus disorder or consciousness versus unconsciousness. An example is alcohol use; where use is consumption and the edge is the choice to move from consciousness to unconsciousness. Edgeworkers who take risks as part of leisure activities, use certain skills to test the performance capabilities of technology and this use of skills is the most enjoyable part of the experience. Edgeworkers claim that they possess a special ability; which is to sustain their control in a situation that borders on complete chaos, often in a situation most individuals would see as entirely out of control. Also involved is the skill of avoiding being paralysed by fear and to focus on actions essential for survival. The experience gives edgeworkers a magnified sense of self, going through a range of emotions; from initial fear to final exhilaration (or omnipotence). The edgework experience is highly focused and background factors fade as edgeworkers focus only on what determines success or failure; time may appear to pass faster or slower than usual. There is the feeling of 'oneness' with the object, for example, racing drivers feel oneness with their machine. It is also an experience of hyper-reality and more real than day-to-day experiences, taking the edgeworker into another dimension.

Control

Although edgework and action are different dimensions of the same general phenomenon, there is a difference between Lyng's edgework and Goffman's action, because edgeworkers do not like to be in situations they cannot control. Whilst edgeworkers see their activities as being different to gambling because of the emphasis they place on the element of skill necessary to perform close to the edge, many gamblers would assert that skill is necessary to win and research has shown that even where the game being played is one of chance, gamblers will still assert they are using skill. Martinez et al (2011) conducted two experiments investigating the relationships between knowing that a gambler had won and the illusion of risk-taking and control. In the first experiment, a simulated routlette wheel was played and some participants were told that an individual had won a large amount of money. The findings show that knowing that another person had won increased the illusion of control and this encouraged risk-taking. In the second experiment individuals were told that the previous winner said the win was based on luck and this resulted in less risk-taking behaviour. It is suggested that increased risk-taking was not based on the knowledge of another person's win but the belief that the winner had control over the outcome.

This line of reasoning is based on the idea that society understands the nature of risks and control in a way that is different to 'PGs.' Non 'PGs' might conceptualise risk and control differently to 'PGs' though research has not been conducted to have a baseline upon which to make these comparisons.

The need to seek out the edges to test social boundaries and even psychological boundaries is more pronounced in 'PGs:' they will push themselves over the edge; they see it is there but keep going despite the warnings and seem unable to stop. Just as base-jumpers take precautions which, to them, seem adequate even, if to outsiders they do not, 'PGs' take what they see as adequate precautions. They ignore the official guidelines '*When the fun stops stop'* (as do base-jumpers, for it is against the law everywhere) and adopt their own internal mechanisms for protection. This might include adopting neutralisation techniques (Sykes and

Matza, 1957) but also such things as securing a supply of money from sources they do not feel obligations to, for example, credit card providers. It has been suggested that money is the enabler and the supplier of money is enabling the addiction (Downs and Woolrych, 2009, 2010). Downs and Woolrych (2010) discuss the difficulties of 'PGs' control of money, which is characterised by a lack of discipline and control;

> "I think I am going to pay off my bills, I am going to go shopping and do this and that and at the time all good intention and there is that little ping and I think I will just go to the betting-shop, I will just have one bet. Then one goes two. (Older male gambler." (ibid, p. 320)

> "It is weird because when I have money I spend it, but when I have got none I am alright and I can do without it. It is like a part of my brain that wakes up when I have money and then when I have no money it goes to sleep. ('PG', male late teens)." (ibid, p. 324)

Chance and lack of control, while accepted as inevitable at times, are not constitutive parts of the experience of edgework as they are parts of games but there is also the need to recognise that 'PGs' may conceptualise their behaviour as skilled and as taking place under conditions which they control.

Action, liminality and edgework and online gambling

Action, liminality and edgework theories were written prior to the development of OG. OG is associated with greater risk for 'PG' compared to offline (McMillen and Grabosky, 1998; Parke and Griffiths, 2004) and it is important to consider if these theories can be applied online.

The industry has normalised gambling as an everyday activity (Korn et al, 2005; Meerkamper, 2006). Meerkamper's research showed that young people do not perceive gambling as risky behaviour, ranking it safer than hitch-hiking alone, shop-lifting, smoking, cheating in a test, skipping work and online dating. Derevensky et al (2007) argues that OG is marketed as safe and risky fun and Banks (2014) concludes that the safe and risky fun theme is likely to impact on how gamblers perceive and use online sites. OGs can behave more intensely or in a

riskier way. The disinhibition effect is described as online behaviour fuelled by anonymity (Littler et al, 2011). This effect has two types; benign disinhibition, where individuals are more open and or generous than in real life and toxic disinhibition, where individuals engage in behaviour they would not normally do, including watching pornography and gambling. Arguably, risk may be magnififed for certain individuals, particularly at-risk gamblers and 'PGs.'

Concepts of Goffman's action and Lyng's edgework are approaches to voluntary risk-taking and examine the broad implications of risk-taking within specified societal context in history (Brunschot, 2009). For Raylu and Oei (2004) many studies of gambling and risk, reflect Western assumptions. With OG being a relatively new phenomenon, it may be that it has its own online societal context, which may be communicated in the meanings behind the numerous risky activities online. The cultural values and beliefs, the role of acculturation and help-seeking behaviours that are determined culturally, must be understood as culturally specific parameters (ibid). This supports the contention that online gamblers are not like offline gamblers and perhaps they have specific parameters that need to be identified and investigated.

In the online environment, gamblers construct a heightened version of themselves and taking a risk, at that time, is the only thing that matters. OG environments offer on the one hand, safe and silent places (like the home and the workplace) and on the other hand, allows gamblers to demonstrate risk and action, letting gamblers put themselves on the line. Goffman argued that gambling allows gamblers to prove poise, composure, keeping one's cool; action allows the demonstration of our natural character or what others think is natural. OG now is a controlled way to take risks, including with identity and allows opportunities for gamblers to establish themselves as poised and composed. When Goffman was writing in the late sixties, he was almost talking about the online environment, where gamblers can be who they want to be. This is an under-researched area from the perspective of the research disciplines in this thesis.

Gambling careers

Reith (2010) says that the study of gambling through psychological and medical perspectives largely divorces 'PG' from its social context. 'Gambling careers' introduces a sociological perspective into the study of gambling and 'PG' and is well-established in the sociological literature on deviance. Reith conducted a study which determined the social activity of gambling; individuals are not born gamblers but 'become' gamblers due to a combination of observation, facilitation and learning. Gamblers are introduced to it when they are growing up and through social interaction embedded in certain social, cultural and geographic environments (ibid). The family is a key gambling environment, where individuals experience gambling for the first time enabling an inheritance of gambling attitudes and competencies. Family is also the environment for the development of problems; individuals who start gambling in this environment tend to be younger and from lower socio-economic groups (Reith and Dobbie, 2011). This environment is central to learning getting pleasure from gambling, the 'sequences of social experiences' (Becker, 1953, p. 235). Gambling can be a rite of passage, associated with growing up and the development of social networks, work-based roles and identities (Reith and Dobbie, 2011).

The location of gambling is also important and dependent on the social environment. Venues are in local communities and woven into the everyday. Homes, workplaces, pubs and clubs are environments in which individuals can easily participate in gambling and social relations are created through it. Whilst technology has facilitated gambling, enabling global gambling and revolutionising how gamblers access and experience gambling, it has not made the local environment redundant.

In their five-year study of gambling careers, examining how individuals move in and out of 'PG' over time, Reith and Dobbie (2013) found individuals whose gambling developed into 'PG' started as recreational gamblers and that 'PGs' achieved becoming problem-free through abstinence. This is contrary to many studies that suggest natural recovery amongst 'PGs' is widespread (Slutske, 2006

in Reith and Dobbie, 2013) or that 'PGs' can return to 'normal' gambling (Blaszczynski et al, 1991).

Factors explaining behaviour were often inter-related, making it difficult to isolate distinct influences. Different factors at different times for different people that can impact gambling behaviour negatively or positively (Reith and Dobbie, 2013). Significant factors related to behaviour include unstable jobs (possibly financial hardship) and social support to maintain regular behaviour but also escapism to avoid stress, trauma or boredom. Gambling's social aspects include spending time with others and participating in leisure and status activities; there were important factors in maintaining controlled behaviour. It is hoped that by understanding more about gambling behaviour, it may be possible to understand more about controlling said behaviour. Individual characteristics remain important but different individuals behave differently in similar social environments. From their study, it appears that 'PG' is neither a categorical nor continuum-based disorder and cannot be characterised by sub-groups or pathways. The conclusion is that 'PG' is complex and fluid (ibid).

Casey's (2008) research focuses on normative and everyday gambling to examine the intersections of significant practices and behaviour. Casey uses the qualitative method of mass observation to explore mainstream, popular everyday activities. She is concerned with the importance of gender and how gambling offers women the chance of improving their own lives and that of their families, particularly on personal and emotional levels. Women gamble to escape poverty; neo-liberal legacies have intensified fiscal austerity and narratives of personal betterment and enhancement of self are reflected in gambling discourses. However, Casey did not write about gambling as deviant, problematic and causing unhappiness. The women proved to be insightful, informed and self-critical. They demonstrated gambling techniques aimed at protecting their family whilst using the lottery in the hope of improving their family and sought value and capital within a limited set of available opportunities. Casey adopts Bourdieu's (1986) capitals as resources to acquire social positioning; capitals themselves replicate social forms of domination including gender and class. Her research establishes first, economic capital where women are more likely to frame their gambling as a serious attempt to improve the

wealth of the family. Second, social capital that concerns contacts, connections and seeking social networks; lower levels of social capital may be more vulnerable, such as those who gamble alone. Third, the cultural capital is appreciation and engagement with cultural goods and to recognise when goods do not hold value. Forms of low levels of gambling like the lottery and amusement arcade may be tacky. Fourth, emotional capital explores moral vulnerability and the creation of self in relation to others. She concludes that austerity has left people in the UK with little choice for mobile and self-improvement and the motivation for gambling is found in the four capitals. Through gambling, class position is reproduced and merged.

Developing an understanding of the culture of gambling and consumption practices is vital for developing our subjective realities of gambling and 'PG.' Both gambling careers and capitals can contribute to our knowledge of how to minimise gambling-harms. Focusing on understanding the roles of social relationships and environments and their complexities will contribute to understanding any efficacious gambling behaviour changes.

Risk society

The term risk society was coined in the 1980's and is closely associated with Beck (1992) and Giddens (1991). It looks at how modern societies organise their response to risk. In the risk society individuals do not know what is going to happen and do not know how to behave nor can they predict the outcome of their actions but prefer to know what they should do and its repercussions. Beck (1994) says that the main problem is the prevention of risk when individuals are aware of risks, deal with risks every day and are sensitive to what they define as risks; they accept they now live in a more complex and less controllable world than before. Giddens (1999) says that the meaning of risk has changed with the rise of modernity and knowledge confirmed through scientific and rational thinking. It assumes that social and natural worlds can be measured, calculated and predicted (Swingewood, 2000). Beck (1995) suggests that we are obsessed with risk and worry about topics from global warming to terrorism every day. He argues that modern harms are more difficult to

assess and prevent, so the risks of modern society are not easily measured. The ability of individuals to understand and manage risks makes them suitable for gambling where those skills are vital for success.

Gambling, for Goffman, represents a risk-taking activity, that lets gamblers demonstrate character, courage, gallantry and gameness. Gambling is attractive to gamblers because of the lack of opportunity to demonstrate these characteristics elsewhere in everyday modern society (Levy, 2010). The dynamic nature of risk regulation in modern market economies has received significant attention (Adam et al, 2000; Mohun 2013). Bedford (2014) states that gambling takes a significant role whether framed as harmful and unproductive risk-taking (Strange 1986) or used to research the regulation of risk and speculation (Reith, 2007; Cosgrave, 2006; Kingma, 2010; Cassidy, 2009).

Regulation of risk

Reith (2007a) looks at the regulation of risk and how risk-taking is promoted in the NL through the concept of embracing risk and dreaming of a life of leisure. She talks about social gambling where risk is limited and discipline central, where the managing of risk is through individual self-control. The rejection of Keynesian principles of market regulation leads to government's reduced intervention in social and economic life, with decreasing responsibility for the provision of public services and the promotion of competitive enterprise. The minimum state is characterised by an increasing willingness to levy unpopular taxation on the voting public in the revenue vacuum. The revenue from the involvement in gambling, for example, the NL, funds public services. Governments scale back the regulation of gambling but the involvement in the business of gambling increases.

Cosgrave (2006) looks at the regulation of risk through the gambler's own actions. Government has stripped away socialised risk management, making the individual sovereign. He talks about the neo-liberal era where individuals deal with risk and government concerns about risk using Foucault's governmentality and responsibilisation. Risk strategies make uncertainty more controllable through rationalisation and calculation with more reliance on the individual and minimum

state intervention. This is the risk society and how individuals must conduct themselves in relation to government.

The dynamic nature of risk regulation in modern market economics has received significant attention. Kingma (2010) says that gambling organisations offer risks for consumption and operators project risk onto the environment because of the potential dangers of gambling related to both crime and addiction. Gambling organisations give the promise of financial gain to government, operators, communities and gamblers but the negative consequences of financial losses, corruption, disruption of families and lives are the responsibility of the gambler. Gambling organisations are increasingly associated with regulation and risk management. Typical features of the risk model include, first, liberal and political consensus on the legitimacy of gambling as commercial entertainment, second, acknowledgement of the economic importance of gambling and third, control of gambling markets to control risks of crime and addiction. This reflects a paradigm shift in regulation with pleasure as a primary motive in gambling. Gambling organisations who give the promise of financial gain do not for obvious reasons, promote the negative consequences of 'PG.'

Cassidy (2009) discusses 'casino capitalism' and whilst the term is a subversive way of describing recent financial disasters, she looks at international finance and compares it with gambling and compares traders with gamblers. Cassidy interest is anthropological and she discusses the precultural instinct to trade and barter. Cassidy refers to Professor Susan Strange's book 'Casino Capitalism,' where the main idea is that the global, financial disasters are brought about by government decisions to not interfere in the market. Risk and uncertainty are part of casino capitalism, for example, the information on odds, rules of the game, licensing regimes, and risk is about self-control or a lack of interference.

Reiner et al (2011) argue that society has moved from a riskophobic to a riskophiliac casino culture where personalised risks in gambling, display how risk is hated, feared, celebrated and embraced ('*We all love a winner'*) (Banks, 2012, p. 2). The risk society fosters an environment in which chance is produced and consumed (ibid). Downs (2010) argues that individuals need the opportunity to

experience risk, in a physical or virtual form. She suggests that individuals in the developed world do not experience risk in their daily lives and instead experience risk through leisure offers such as gambling (ibid). When gambling is experienced in a safe space such as the home, there may be greater risk because individuals will not perceive such a risk in the safety of their own home.

Lyng (2005) develops the idea of edgework where risk is an escape from the every day (in the style of Goffman) and or a "pure expression of the central institutional and cultural imperatives of the emerging social order" (p. 5). In this case, risk-taking is characteristic of late modern society where globalised gambling is a form of McDonaldisation, exhibiting rationalisation and standardisation (Hannigan 1998; Ritzer 1993).

CSR and Goffman

Goffman (1959) identified how individuals give dramatic performances to enhance and maintain their reputations. He compared front-stage and back-stage behaviour and examined how social meaning is attributed to everyday action. CSR is the front-stage of an industry that arguably suffers from a negative image and a bad reputation (Hashimoto (2008, p. 525). The industry is blamed for a myriad of social problems including higher crime rates (Grinols and Mustard, 2006) personal bankruptcy (Nichols et al, 2000) suicides (Nichols et al, 2004) and addiction (Hashimoto, 2008). Smith and Rupp (2005, p. 85) write that even though "the OG industry offers a superior internet-based customer service with outstanding interfaces and a variety of games and promotional activities…. people in general see the industry as a global problem and a moral hazard." Further, it is necessary to consider if RGFs are a collective attempt by operators to attribute socially responsible meanings to gamblers' every day actions.

Kraemer and Whiteman (2009) apply Goffman's theory to CSR in the oil and gas industry, critically analysing the industry's CSR display. They are particularly interested in the front-stage and the darker, more realistic back-stage behaviours. This thesis uses the same argument as Kraemer and Whiteman (ibid) of an industry with a negative image using CSR to its benefit. For example, websites, advertising

campaigns, codes of conduct and annual reports issued by operators give the impression that CSR is a core business value embraced by the industry. This is merely Goffman's front-stage of an industry that suffers from a bad reputation because of 'PG.'

Goffman says that individuals communicate in ways out of character and back-stage, individuals prepare these communications. Goffman's theory is also applied to the reputation of the organisation (White and Hanson, 2002). They analyse corporate reputation through annual reports using five of Goffman's processual categories. These include defining the situation, holding secrets, invoking tact, passing the discreditable and covering dirty work. Framing is used by organisations to communicate how a situation can be positively discussed. Framing is linked to holding secrets and means not discussing the issues that would not be beneficial to the development and maintenance of a positive reputation (Kraemer and Whiteman, 2009). This has special reference to how operators discuss 'PG;'

> (*Coral) would like you to enjoy your gambling experience and recommend you follow guidelines for safe play; (Ladbrokes) We don't close our eyes or ears to the problems that gambling can cause some people; (bet365) Whilst the vast majority of our customers enjoy gambling in a safe and responsible manner, for a small number of people gambling can have a harmful impact.*

Framing presents an acceptable account of 'PG' and the issue of 'PG' is narrowed down and contained to select a small or very small number that may be affected. Using this framing, the industry avoids discussions of its own responsibility and this is a problem. In terms of CSR, the industry sets its own boundaries with manageable concepts of gambler and no industry responsibility, which is indicative of the responsibilisation of the gambler. Further, this is not challenged by government, society or gambler and attention is shifted to the gambler, typical behaviour of the government and industry regarding 'PG.'

There are few if any studies in CSR literature applying Goffman's conceptual approach to organisational communication. Goffman's notion of framing, the process by which organisations recognise the externalities their operations create has potential for understanding more about operator behaviour. For externalities to

be framed, the organisation must engage in dialogue with those who consider themselves affected by the organisation's activities. A full debate with all stakeholders who are impacted by 'PG' has yet to be conducted. Further research is needed on the analysis of the framing of the organisational-self and the combination of Goffman's theoretical contribution with the reputation of operators and CSR literature.

Framing norm-breaking behaviours

The techniques of neutralisation were first identified by Sykes and Matza (1957). Neutralisation theory provides a framework for understanding how individuals justify the impact that norm-violating behaviour may have on their own self-concept and social relationships (Vitell and Grove, 1987). It seeks to justify the unethical behaviour that deflects personal responsibility for their actions away from them and toward other individuals or contextual factors beyond their control.

Neutralisation is not a complete rejection of conventional norms, however and individuals do not feel that the norms that are being violated should be replaced (Sykes and Matza, 1957). Neutralisation has been used to explain how some individuals may justify negative consumer behaviour (Grove et al, 1989) or how they might justify themselves from self-humiliation (Strutton et al, 1994).

Sykes and Matza discuss five neutralisation techniques and this thesis applies them to 'PG.' Using neutralisation techniques 'PGs' seek to justify their behaviour as normal. First, denial of responsibility happens when the individual argues that they are not responsible for their deviant behaviour because of factors beyond their control were in place, for example, *'I just can't stop myself from gambling.'* Second, denial of injury happens when the individual argues that 'PG' is not serious because nobody suffered because of it, for example, *'Gambling is not a problem for me, I enjoy it.'* Third, denial of victim happens when the individual neutralises the responsibility for personal actions by arguing that the 'PG' deserved what happened, for example, *'Individuals should control themselves and stop blaming others,' 'If individuals can't control themselves it's their problem, the rest of us shouldn't be made to suffer for their weaknesses.'* Fourth, condemnation of

condemners happens when the individual deflects criticism by highlighting other disapproved activities, for example, *'A lot of things are addictive.'* Fifth, appeal to higher loyalty happens when the individual argues that gambling tries to achieve a higher order ideal or value, for example, *'I can control my gambling. It is like the stock market if you think about it.'* Heath (2008) added two more techniques, '*Everyone else is doing it'* is an appeal to the legitimacy of gambling and '*Claim to entitlement'* is the idea that the gambler is acting within the law.

Pomering (2012) looks at neutralisation techniques that can be utilised from the perspective of the operator. First, denial of responsibility happens when the gambler cannot be responsible for their actions and so operators or others should not be responsible for him or her. Second, denial of injury happens when the gambler feels their behaviour is not causing harm, but the behaviour may be contrary to law. This would be applicable to self-excluded or underage gamblers. Third, denial of the victim happens when the operator could say that the gambler got what they deserved. Pomering cites Samuel Johnson: 'Gambling is a tax on stupidity' and 'PGs' are the transgressors. Fourth, condemnation of condemners happens when the gambler shifts the focus from their behaviour to those who disapprove of it. This can be applied to the operator who has framed the situation to suit *its* agenda and by attacking the 'PGs.' The wrongfulness of the operators' behaviour is blurred and shifted to the 'PG.' Fifth, appeal to higher loyalties happens when the operator says this business is just like any other business if you think about it. Internal and external social controls are neutralised by sacrificing the demands of society for the demands of the industry. Sixth, '*Everyone else is doing it'* is an appeal to the legitimacy of the industry. Seventh, '*Claim to entitlement*' is the idea that the operator is acting within the law.

Neutralisation theory can be used to defend operators and is used by operators when they are dealing with a mix of social criticism and greater regulatory risk (Fooks et al, 2012). In the first stage, psychological framing, there is a denial of responsibility and no acceptance of conduct and 'PG.' In the second stage, organisational framing, operators blame 'PGs' and manufacture CSR to mediate their impact. In the third stage, ideological framing, operators claim their behaviour is not harmful to prevent regulatory change.

Counter-neutralisation

Neutralisation can be expanded to include counter-arguments or counter-neutralisation. Zamoon and Curley (2009) discuss counter-neutralisation techniques which this research will now apply to 'PG.' First, accepting accountability, where counter-neutralisation for denial of responsibility occurs, where the individual challenges the suggestion of unintentional negative behaviour based on choice and available alternatives; '*I am responsible and it is my fault I am a 'PG.'* Second, in expectation of injury, where counter-neutralisation for denial of injury occurs, the individual understands the foreseeable consequences of their behaviour; '*I have lost all my money and now I have problems.'* Third, in fairness of system, which involves counter-neutralisation for denial of victim, the individual challenges the correctness of the system so retributive action is unnecessary; '*The rules are fair and legal.'* Fourth, in equality of condemnation, where counter-neutralisation for condemnation of the condemner occurs, the individual challenges equal application of the system; '*Everyone is treated the same but not everyone is a 'PG.'* Fifth, in reduction of self-interest, where counter-neutralisation for appeal to higher loyalty occurs, the individual challenges that they are selfish, making others worse off; '*I did this for my own pleasure and now other people are worse off because of my behaviour.'*

To sum up, neutralisations and counter-neutralisation are arguments that lessen the urge to use ethical decision processes to defend deviant behaviour (ibid). However, both neutralisations and counter-neutralisations do not consider situational and individual differences or what leads a 'PG' to use neutralisation or counter-neutralisation techniques and this area requires research to address this issue. Further, 'PG' might invoke certain types of neutralisation (denial of injury) or counter-neutralisation (accepted accountability) techniques over others.

Neutralisation theory and research

Neutralisation has been applied to activities including shoplifting (Strutton et al, 1994; Cromwell and Thurman, 2003) abortion (Brennan, 1974) genocide (Alvarez,

1997) cheating in exams (Smith et al, 2004, Atmeh and Al-Khadash, 2008) and music piracy (Cohn and Vaccaro, 2006; Ingram and Hinduja, 2008). Sykes and Matza (1957, p. 666) argue that techniques of neutralisation can be used to absolve the individual from self-blame and that it enables individuals engaging in dysfunctional behaviour to excuse their misconduct in their own eyes and those of others. Most empirical studies apply neutralisation theory in consumer ethics contexts like shoplifting (Strutton et al, 1994; Strutton et al, 1997) and software piracy (Hinduja, 2007). McDonald and Pak (1996) and Vitell and Grove (1987) look at the business and marketing ethics environment. Limited research covers other contexts of ethical consumerism. Chatzidakis et al (2007) examine the failed intention to purchase ethically regarding the lack of commitment to purchase fair trade goods. Neutralisation theory needs to be further investigated in the case of gambling because there are limited empirical research findings. Neutralisation and counter-neutralisation theories may provide useful perspectives from which to understand gambler and industry justifications for 'PG' which in turn may help identify effective RG strategies.

Corporate social responsibility and neutralisation theory

CSR is mainly a voluntary and defensive practice aimed at preventing formal government intervention (Fooks et al, 2012). This may be based on neutralisation techniques in response to some issues but not others and is used to manage regulatory risk. Neutralisaton has been linked to CSR practices in other industrial sectors (Baumberg, 2009). Legal claims against organisations in other sectors include mining (Rosner and Markowitz, 1994) pharmaceuticals (Abraham and Davis, 2006) asbestos (Tweedale, 2000) chemicals (Pearce and Tombs, 2008) and oil (Rosner and Markowitz, 2006). In these examples, research has shown that organisations deliberately underestimated and/or lied, about the level of harm their products caused.

Pomering (2012) suggests that organisations particularly in controversial industries may use CSR for two reasons. First, to manage the impression that the organisation meets societal expectations. Second, that CSR allows an organisation to argue its legitimacy. Operators use CSR to manage gambler expectations and use

neutralisation to justify 'PG' in the knowledge that government is not going to backtrack on regulation. Techniques of neutralisation are juxtaposed with theories of legitimacy and sites seeking societal legitimacy. Pomering uses the idea of 'double standards,' to contribute to understanding the neutralisation concept. Operators gain legitimacy on CSR engagement by fulfilling their legal and ethical commitments and acting in a transparent and fair manner, so the integrity of the organisation can be safeguarded.

Fooks et al (2012) concluded that if managers start with the belief that an organisation is socially responsible and that any criticism is not justified or politically motivated, they will be more likely to view CSR as a public relations tool to manage the regulatory environment. They will be more likely to see CSR as a public relations tools rather than as a process for meaningful change. It is necessary for research to be conducted into the political strategies used by the gambling industry particularly the use of public relations marketing.

Unethical online behaviour

Freestone and Mitchell (2004, p. 126) say that the internet is the new environment for unethical behaviour enabling "the proliferation of various ethically questionable consumer activities" Chatzidakis and Mitussis (2007, p. 306). Norm-breaking is when an individual does not conform to social expectations, a behaviour that is non-normative across cultures. Technology has developed too fast for social norms to keep pace with and this pace means there is ambiguity as to whether decisions have ethical considerations (Zamoon and Curley, 2009). Though they do not discuss gambling, they continue that many online operations have not yet developed usage norms.

Unethical behaviour may have legal and moral consequences. Chatzidakis and Mitussis (2007) emphasise that the internet allows anonymous deviant consumer behaviour and makes it difficult to identify unethical activities. Individuals can be faceless online and engaging in deviant behaviour is easier (Freestone and Mitchell, 2004; Rombel, 2004). The impersonal situation online lessens any guilt created by the misbehaviour for the individual (Logsdon et al, 1994). Reynolds and Harris

(2005, p. 328) conducted the first research into fraudulent customer complaints and the impersonal situation is illustrated in one participant's statement "There is no face-to-face contact so you don't feel guilty … it definitely gives me more nerve."

It is interesting to consider if unethical behaviour equates to norm-breaking. Meisel and Goodie (2014) say that there is limited research examining norms and gambling. Their study found that gambling behaviour is influenced by a perception of the gambling behaviour of others, particularly 'PGs.' If norms are the expected behaviours of individuals in society, where the majority value certain principles, they are the norms and others abide by them. If a principle loses general acceptance, it needs to be changed by general consent.

Principles relating to human behaviour are more enduring because they are inherited and 'hard-wired' in our psyche, they reflect the norms expected by the rest of society. Rules are not usually part of human psyche but can regulate conduct at a certain place in time (Mill, 1869). Rules are a deterrent (and/or protective) as opposed to facilitating and they tend to use negative rather than positive terms. In addition, rules tend to change over time. McGowan (1994) suggests that regulators face a conflict between rules for the public good and rules supporting the rights of the individual. Basham and Luik (2011) say that an important prohibitionist argument in gambling and freedom is that individuals are not always rational. Sometimes individuals are unable to cope with the consequences of their actions and may not be accountable when things go wrong. It may be in the public interest for government to make rules for individuals who are vulnerable, irrational or at-risk of becoming irrational (ibid). Mill argued that the individual is sovereign and society should seek to stand firm against government paternalism. Individuals who are not capable of acting rationally, being controlled by external forces with respectful treatment may apply appropriately to 'PGs.' It is possible that individuals may be more capable of acting irrationally online due to dissociation and disinhibition factors. Over a period of time, behaviour may develop to be more responsible and this may be facilitated through awareness and education of RG.

Detecting unethical online behaviour

Freestone and Mitchell, 2004 say that deviant online behaviour is hard to detect and more likely to go unpunished. It is not hard to detect because individuals feel anonymous but because it is easier to hide identity online. The behaviour might not be deviant in terms of the internet (OG is legal) but in terms of the social constructs of the gambler. It is becoming easier to detect misconduct online using Reidenberg (1998) and Lessig's (2006) Lex informatica. Reidenberg argues that computer network protocols regulate more effectively than state-based laws. Reidenberg's concept of control was developed by Lessig's book "Code and Other Concepts of Cyberspace," which identifies four types of online regulation laws, norms, markets and architecture and each one can control behaviour. Laws regulate behaviour by threatening sanctions, norms regulate behaviour through conforming to community standards, markets regulate through price and architecture regulates the internet through code such as access. All four together control the individual and Lessig argues that the online environment is both capable of regulating behaviour and has the potential of being the most tightly regulated environment. If Lessig's theories are applied to gambling, liberalisation makes it easier to gamble. Regarding norms, gambling is a popular leisure pursuit and it is easy to gamble in terms of conforming to community standards. The gambling market is competitive and the gambler has plenty of choice and the government does not prevent access to online sites.

Neutralisation and rationalisation

Gamblers may believe that their actions are ethically correct, which suggests the following. First, gamblers have rationalised or neutralised their behaviour so any ethical issues that initially were present have been resolved and neutralisation has occurred. Second, the social costs of norm-breaking are so low that it is worth the risks which require some neutralisation. Third, self-reports that gambling is ethically acceptable is a neutralisation technique. Fourth, public support for an ethical norm does not mean active acceptance, which would lead to the need for neutralisation or justification. Fifthly, gambling is ethically unproblematic and no neutralisation is necessary. The first four scenarios are consistent with a laissez-faire attitude to gambling and so it is likely to be the fifth.

Sykes and Matza (1957) suggest that norms are not to be conceived as categorical imperatives but guidelines for acceptable behaviour. They suggest neutralisation is not carried out by individuals in a deviant subculture but by normal individuals who use neutralisation techniques to escape from duties and obligations. Research shows that neutralisation techniques are a vital process in deviant consumption practices. Piacentini et al (ibid) examined the way that students neutralise potential feelings of guilt and stigmatisation regarding drinking alcohol. They found that heavy drinkers mainly employ techniques of neutralisation as a way of rationalising the harmful impacts of their drinking and that abstainers and near-abstainers mainly use counter-neutralisation techniques to support their commitment to lifestyles which are not similar to student life expectations. Neutralisation theory is a suitable framework for justifying gambling. Whilst neutralisation techniques can remove any ethical restraints (Matza, 1964) it does not clarify why norm-breaking is attractive in the first place (Minor, 1981).

Sykes and Matza (1957) argue that neutralisation is used by norm-violating individuals to protect themselves from self-blame and the blame of others. Piacentini et al (2012 suggest that neutralisation is similar to Mills' (1940) notion of 'vocabulary of motives:' it is not fixed and changes across contexts. Different 'vocabularies of motives' depend on a particular situation. They continue that neutralisation is also like Sutherland's (1947) 'definitions favourable to the violation of law' where definitions of favourable or unfavourable behaviour are learned through social interaction. Sutherland's learning includes motives, explanations and attitudes regarding whether rules should be observed or broken.

No research has been undertaken to establish a relationship between neutralisation and norm-violating behaviours (Piacentini et al, 2012) nor if neutralisation contributes to our understanding of 'PG.' Sykes and Matza (1957) argued that 'delinquents' are committed to conventional values but learn how to rationalise them. In the context of 'PG' it is necessary to understand if neutralisation techniques are utilised to rationalise behaviour or neutralise their commitment to conventional norms and values against 'PG.' However, if gamblers become fully socialised into 'PG' social groups neutralisation may be unnecessary because the group norms of 'PG' dominate and individuals are not sensitive to the typical norms

that surround gambling. It could be suggested that the difference with 'PG' is that 'PG' is not a social group behaviour but an individual one.

Ethical decision-making and neutralisation

The market for ethical products is low (approximately 2%) and consumers seem to oppose the attitude of behaving ethically (Devinney et al, 2006). Research about ethical decision-making therefore focuses mainly on attitude and theories which assume that certain knowledge forms attitudes that, in turn, forms intentions and finally behaviour (Vermeir and Verbeke, 2006). There is limited research examining coping strategies of consumers dealing with unethical practices (for example, Strutton et al, 1994; 1997). Strutton et al (1994) argued that in order for neutralisation techniques to assist unethical consumer behaviour, individuals must first, evaluate that one or more of the techniques are acceptable and second, consider if they are in a situation where the use of one or more neutralisation techniques are suitable. Further research is need to examine this phenomenon by looking at which indivduals are more likely to use neutralisation, to what extent and under which situations.

Globalisation

Globalisation has powerful economic, political, cultural and social dimensions and two themes are related to this thesis. First, delocalisation means gamblers deal with distant systems and technologies involving no face-to-face interaction. Distance and territory moves into a new realm for gamblers and activity and communication can be truly global. OG allows individuals to develop a different sense of place and community. Delocalisation also can apply to neighbourhoods which are increasingly influenced by individuals and systems operating in other parts of the world. Second, new technologies combined with the passion for profit and global reach, brings with it risks, particularly relevant to OG. Beck (1992, p. 13) has argued that power gains from technological and economic progress are being overshadowed by harm arising from this change. This can be seen in Hancock's

(2011) concerns about significant increases in the rates of 'PG' and that risk has been globalised.

Globalisation can be a synonym for market liberalisation, where the power has moved to markets away from governments. Globalisation may be defined in many ways but central is the withdrawal of governments (Mikler, 2008). There are other implications that stem from the assertion that markets are now "the masters over the governments of states" (Strange, 1996, p. 4). Gambling is an archetypal example of an industry which, by its nature challenges governments (Strange, 1997). Mikler (2008) argues that governments have the issue of economic gain (employment, revenue) provided by global markets in return for liberalisation. If governments are unable to effectively regulate organisations, then organisations take their role and accept responsibility for their actions due to the withdrawal of government (Korten quoted in Lawrence et al, 2005, p. 47). However, it has been argued by Strange that there has been an ebbing of authority away from governments leading, to a situation of non-authority. When it comes to the gambling industry arguably the operators are the masters of the governments.

The internet facilitated globalisation (Dicken, 2003, p. 85). OG drove technological innovation for secure payments and interactive services and massively multiplayer online role-playing games (MMORPG) drove improvements in graphics. National regulations may have been ineffective controlling an online industry and Strange's assertion of government non-authority fits in well with an industry using the internet to deliver gambling to consumers.

There are implications for the globalisation of gambling. McMillen (1996, p. 11) wrote that "the shift in gambling development from local-national to international levels has resulted in a shift in power to the global or supranational level. It has also shifted policy emphasis from social to economic imperatives. Gambling is no longer a social activity shaped primarily by community needs and values. Gambling has become big business, reclassified as part of the entertainment sector and integrated into mainstream economic development. What was once a cultural and social expression characterised by diversity and localised control is now a highly competitive global industry."

Globalisation is an undertaking to make markets and politics the same throughout the world, a process whereby organisations develop influence on an international level aided by technology and transformed gambling. Governments embraced globalised gambling but failed to legislate despite the risks of 'PG.' Gainsbury et al (2014) argue that because of these changes, jurisdictions need to harmonise PH policies. However, the UK does not have an appropriate policy to deal with 'PG,' however PH strategy similar to ones for alcoholism or drug abuse is required (Davies, 2016).

Rationalisation

Cosgrave and Klassen (2001) and McMillen (1996, 2003) argue that Weber's political sociology puts gambling in a framework of an increasingly deregulated and global economy. This leads to the formation of legitimising regimes that epitomise the continuous process passing over religious ethics and the adoption of a pragmatic perspective, where moral considerations are replaced by technical and economic concerns (Cosgrave and Klassen, 2001; Kingma, 2004). Some studies use Beck's (1992) notion of the risk society applied to gambling, where rational and technical control is carried out by industry and gamblers (Kingma, 2004). This is a product of rationalisation where gambling markets tackle risks of crime and addiction with various means of rational control.

Max Weber's theory of the rationalisation explains how modern society has become concerned with efficiency, calcubility, predictability and control. Weber identified a one-way change in the modern world towards rationalisation of all parts of social life and how and why Western organisations have become increasingly rational (Kalberg, 1980; 1990; 1994). Weber (1968, p. 30) considered that the process of rationalisation is linked to the inability of value rationality (the means) to control actions in different life spheres. Formal rationality is concerned with means and aims. It is where choices are made in accordance with rules, regulations and laws. When value rationality diminished the importance of instrumental rationality (the ends) grew and stressed the importance of benefit, exact calculations and logical means. Rationalisation explains the change from actions based on values to actions

where their only significance is reaching goals in the most efficient way, without consideration to the ethical and moral nature of the action (Habermas, 1984, pp. 332-333).

McDonaldisation

Ritzer's theory of McDonaldisation, is a modern version of rationalisation. McDonaldisation is when a society adopts the characteristics of a fast food restaurant. First, efficiency with an optimum method for completing a task. Second, calcubility with assessment by quantifiable rather than subjective criteria. Third, predictability with standardised outcomes. Fourth, control with the deskilling or automation of the workforce. Gambling has been McDonaldised and operators have adopted technology to make gambling faster and more efficient. Gamblers manage their behaviour in a calculated, non-random way. The significance of increasing modern consumption makes it easier to consume and in excess. This is especially apparent online where many immaterial products such as gambling, gaming and pornography can be purchased more easily than they would offline. Consumption or 'hyperconsumption' encourages individuals to consume more and to consume more like Americans (Ritzer and Malone, 2000, p. 110). There is more mass consumption, spending most if not all their available resources even going into debt. It is not just how much individuals consume that is being changed; it is also the ways in which individuals consume; and this applies to gambling also.

Gambling and sociology

The sociology of gambling is vital for understanding the place of gambling in everyday life and its positive value. The universal human need for excitement and freedom in the face of routine or the Marxist theoretical framework that gambling is an oppressive practice serving powerful parts of society is built on the faulty premise that societies are homogeneous in a political, social and economic sense (McMillen, 1996). McMillen (1996) focused on the individual level of gambling and used ideas from Weberian thought with special attention to Weber's contributions in two areas (i) the sociology of politics and the state and (ii) the interpretive sociology of culture.

Gambling has been examined as a cultural phenomenon where the modern consumer, in the postmodern or risk society maintains certain cultural qualities that form attitudes and meanings with respect to gambling and its social organisation (Binde, 2009, pp. 56-57). Reith analyses the cultural meaning of gambling in societies in the West and argues that in modern society, gambling has new and existential importance that goes beyond the game being played.

> "In an Age of Chance, surrounded by a multitude of risks and existing precariously in a general climate of ontological insecurity, the actions of the gambler have implications for existence that extend far beyond the individual game being played" (p. 184).

Gambling has been explored in the consumer society with the cultural shift from gambling as a sin towards gambling as the consumption of leisure and described as risky consumption that could lead to crime and 'PG' (Cosgrave, 2006). To control risky consumption, 'PG' research, market research and political debates form new kinds of knowledge that considers 'PG' as an individual and medical problem (Castellani, 2000; Cosgrave and Klassen, 2001). Some works utilise Weber's concepts of the consumer society and Foucauldian perspectives position gambling in a new rational environment that disregards the values of the Protestant ethics (Cosgrave, 2006).

Conclusion

This chapter has examined a range of sociological theories seeking to understand gambling and 'PG' in the postmodern society. It sought to present a sociological analysis of 'PG' that takes into consideration social factors missing from the earlier chapter on 'PG' and RG. An important conclusion is that 'PG' is linked to social constructions in addition to personal dysfunctions. Due to the liberalisation of gambling and its approval and status in society, to understand 'PG' it must be examined within the context of social norms and rational behaviour.

Chapter 3

Introduction

After completing a review of the literature, this chapter outlines the research methodology that underpins and justifies the methods and approaches to the data collection and analysis that have been utilised in this thesis. It begins with restating the aims and objectives of the study. The chapter examines the selection of mixed methods and issues of access as well as the measures taken to ensure rigour. It also details the difficulties of conducting gambling research. The chapter shows how research must follow clear principles, procedures and guidelines and the thesis consistently respected university recommendations.

Aim and objectives

The aim of this thesis was to evaluate the extent to which RG is possible in relation to the interests of society and gamblers themselves and examines the efficacy of RGFs in the online environment. It looks at what 'PGs' and key stakeholders feel and say about 'PG' and RG and this incorporates how the researcher (the knower) seeks what is to be known from those who have the knowledge that is being sought (Guba and Lincoln, 1998). To achieve these aims the following research objectives were set:

- To explore what 'PGs' say about their gambling life-stories
- To explore what 'PGs' consider might have prevented them from experiencing 'PG'
- To analyse the opinions of stakeholders towards the efficacy of RGFs.

Research context

Researchers are required to tailor data collection methods to both the sensitivity of the research and vulnerability of participants when studying non-mainstream groups including marginalised and stigmatised individuals (Goffman, 1963). Although many social and cultural phenomena may be considered sensitive, sensitive research is the study of "secretive, stigmatised or deviant human activity and behaviour involving vulnerable research subjects" (Li, 2008, p. 102). Gambling research is sensitive because it is characterised by a combination of secrecy, stigma and popularity in its current context (ibid). Its popularity was outlined in the

introductory chapter but 'PG' is poorly understood due to its sensitivity, the vulnerability of 'PGs' and limited alternative paradigms and methodologies in gambling research (Cassidy et al, 2013). It was vital that this research adapted data collection methods with the vulnerability of the participants in mind. 'PGs' are systematically marginalised and stigmatised and are given labels that make them voiceless and invisible in our society (Foucault, 1976; Reith, 2007; Li, 2008). Fieldwork showed how gamblers were reluctant to seek help or participate in research for reasons including fear of both publicity and moral judgement. The researcher had to adjust her level of contribution and participation to the point where involvement in the GI was peripheral. Also, it was not possible to recruit 'PGs' individually because establishing trust and understanding in their social setting was minimal if not impossible and consequently the use of a moderator-counsellor (MC) was part of how the research had to be adjusted. By tailoring the methods to suit the sensitivity of gambling research including vulnerability of participants, the thesis collected data to best understand the research problem. The remainder of this chapter details and examines the approaches used and provides rationales wherever appropriate.

Epistemology

It is necessary to elaborate on the meaning of epistemology. A popular division of modern epistemology argues that knowledge results from the construction of fundamental models of reality to solve problems. The validity of knowledge comes from its usefulness for problem solving (Rubels, 2006). This approach is sufficient to assist the aims and objectives. The thesis is not concerned with the validity of knowledge in an absolute sense but instead with the practical utility of knowledge that came from 'PGs' and key stakeholders relative to the concept of RG. The premise that valid knowledge is useful for problem solving presupposes that the environment can be shaped by decisions. If the environment is impressionable, there are 'right' and 'wrong' decisions. An informed decision-maker is an individual who has valid and useful knowledge about the environment and the potential consequences of alternative choices (ibid). But life is influenced by many circumstances that are out of the control of individual decision makers and the right

decisions do not assure success. If they did, RG would not be necessary. Therefore, although valid knowledge is inherently predictive, RG can never be truly predictive.

It has been stated that this study is not concerned with the validity of knowledge in an absolute sense and in pragmatism although there is a reality, it is dynamic and based on actions. Actions have outcomes that can be predictable, and lives are built around experiences that link actions and their outcomes. Therefore, the epistemology and pragmatic paradigm are suited to the purposes of this thesis.

The epistemology of this thesis is social constructionism but prior to discussing this, it is useful to to examine the broader context of constructionism.

Constructionism

Coutas (2009) suggests that constructivism and constructionism are two words that can be used interchangeably. Constructivism foregrounds the individual in the social setting whereas constructionism foregrounds the social setting (Vygotsky and Leontiev in Robbins, 2003). In constructivism, there is more emphasis on the meaning-making of the individual mind in relation to the environment; individuals actively construct new knowledge as they interact with the environment (Coutas, 2009). In constructionism, there is more emphasis on the production of knowledge, the construction of something; there are useful, liberating, fulfilling and rewarding interpretations but there are no true interpretations. The constructionism is a paradigm where meaning-making is constructed by individuals in an environment rather than reality being seen as an objective truth waiting to be discovered. Both constructivist and constructionist paradigms move away from the positivist view of objective truth to a view where reality is multiple. Both constructivism and constructionism view reality constructed by individuals and therefore there is an interpretive emphasis. The individual's views, cognitive processes and reality in the constructionist paradigm are constructed through interaction and language (Denzin and Lincoln, 2005).

Social constructionism

The thesis used social constructionism as an epistemological stance which allowed the researcher to engage with the social world of the 'PGs' trying to understand and construct reality from the perspective of the range of stakeholders who experienced or lived the phenomenon of 'PG.'

Constructionism understands that there are multiple realities and that knowledge is constructed by people (individually or socially) rather than being received from an instructor or another source (Schwandt, 1998; Saunders et al, 2012). Individuals interact with society and the world around them giving meanings to otherwise worthless things and creating the reality of society (Coutas, 2009). Social constructionists dispute narratives that tend to dictate single accounts of reality and constructions are present in the minds of participants. Reality is multiple and complex and people's stories are often marginalised and denied in favour of the dominant belief system. Social constructionists prefer stories based on a person's lived experience and not on expert knowledge (Etherington, 2004). Social constructionism is interested in accounts that honour and respect the community of choices and how those voices can be respected (Doan, 1997). There are many ways to understand our world and the message of postmodernism is that we should be wary of any one interpretation because many meanings may be probable (ibid).

The role of the researcher is to analyse, reconstruct, understand and evaluate participants' views in a way that leads to the construction of meaningful findings and outcomes (Guba and Lincoln, 1989). Crotty (1998) suggests that individuals construct meanings in different ways even when they are looking at the same phenomenon. Therefore, the constructionist paradigm is "a perspective that emphasises how different stakeholders in social settings construct their beliefs" (Schutt, 2006, p. 6). Constructions can be open to re-interpretations as new information increases (Carr and Kemmis, 1986).

Social constructionism is a useful vantage point for understanding 'PG.' Gamblers' experiences largely depend on personally and socially constructed meanings. This study engaged with the world of 'PG' to try to understand and construct knowledge from the perspectives of individuals who had experienced 'PG.' Everyone sees and interprets the world and their experiences through personal belief systems and

social constructionism provided the researcher with a set of lenses that demands an awareness of the context of 'PGs' as well as the way in which the researcher experiences the 'PGs.'

Theoretical perspective

The theoretical perspective is a framework that supports or guides the building of something useful; concepts, models, technologies and methodologies can be clarified. The choice of methodology needs to be based on its suitability to answer the research questions (Bryman, 1998). A paradigm is a framework or set of assumptions to explain how the world is understood "the paradigm of a science includes its basic assumptions, the important questions to be answered or puzzles to be solved, the research techniques to be used and examples of what scientific research looks like' (Neuman, 1991, p. 57). It is critical when considering research methods that they are based on the requirements and objectives of the research (Cassell and Johnson, 2006). The theoretical perspective used in this thesis is a pragmatic mixed methods approach which is discussed next.

Pragmatic mixed methods approach with a social constructionist stance

Pragmatic mixed methods approach uses any reasoning from qualitative or quantitative research suitable for producing research findings which are both defensible and usable (Burke Johnson et al, 2007). Pragmatic mixed methods are the third major research paradigm and can supply superior research findings and outcomes (ibid). The approach emerges as a suitable paradigm for social research when it is not possible to operate in exclusively a theory or data-driven manner during the design, data collection and data analysis (Morgan, 2007). It has developed practices and ideas that are reliable and distinctive (Denscombe, 2008). Mixed methods design is a suitable paradigm for social research and has developed practices and ideas that are reliable and distinctive and can accommodate the social factors that impact on methodological decisions (Denscombe, 2008).

Pragmatism is the philosophical partner for mixed methods which allows constructivism and interpretivism (Teddlie and Johnson, 2009). Mixed methods can

accommodate the social factors that impact on methodological decisions. It provides several advantages for researchers and its use can compensate for the disadvantage of a single method and use the strengths of many (Bryman, 2008; Bhargava, 2010). A mixed methods social constructionist approach can provide a more complete picture from complementary sources (Denscombe, 2008). The bottom-line is that research approaches should be mixed up in ways that offer the best opportunities for answering questions. Pragmatism is adaptable and creative and therefore a valid method because collecting the most pertinent information offsets any concerns over methodological purity (Patton, 2002). It is pluralist accepting opposing interests and forms of knowledge and allows knowledge to be considered based on whether it works in relation to a goal (Cornish and Gillespie, 2009). The approach also allows a deeper, richer understanding of the information-seeking process to be achieved "a powerful third paradigm choice that often will provide the most informative, complete, balanced and useful research results" (Burke Johnson et al, 2007, p. 129).

Pragmatism is at the core of mixed methods, rejecting concepts of truth and reality and the choice of methods depends on the purpose of research and that pragmatism gives freedom to "study what interests and is of value to you, study it in the different ways that you deem appropriate and utilised the results in ways that can bring about positive consequences within your value system" (Tashakkori and Teddlie, 2003, p. 21).

Denzin and Lincoln (1998) asserted that qualitative research stresses the process of finding how social meaning is constructed. It stresses the relationship between the researcher and the topic studied and the objective to make connections between events, perceptions and actions so that their analyses are holistic and contextual. Quantitative research is based on the quantity of measurement or amount (Kothari, 2004). Questionnaires can be used in quantitative research in the social sciences to reflect participant attitudes, opinions and perceptions (Black, 1999). The quantifiable data was used in this study to provide information about the perceptions of key stakeholders. This study has embraced mixed methods and combined data collection techniques and analytical approaches to produce creative ways of researching and generating information to answer the research aims and

objectives; moreover, it suits the focus of this gambling research. Mixed methods can lead to greater validity and a comprehensive approach to research, where one method may explain the findings of another or examine if unexpected results occur (Tashakkori and Teddlie, 2003; Bryman, 2008). Bryman (ibid) suggests that there are limitations with mixed methods. Conflicting results between the two methods may change the results in a significant or insignificant manner and this will depend on interpretation. Interpretation may be a challenge with difficulties in assimilating different types of data. Finally, bias may affect the researcher's interpretation particularly in a sequential design, where the results of one method are available before conducting the other (Creswell and Plano Clark, 2007; Bryman, 2008).

It was important for the researcher to conduct mixed methods research; her previous research had been limited by a lack of engagement with key stakeholders and quantitative or qualitative methodologies on their own have limits. The quantitative method in this thesis is based on the positivist approach to knowledge and data is normally collected through large-scale surveys with standard fixed response questions. It was anticipated that this would provide useful information based largely on numerical data and analysed through appropriate statistical tests but it would not divulge the complexity behind the concepts of 'PG' and RG. The qualitative methodology sought to supply meaning that explores the lived experience of 'PGs.' Very few studies have sought to explore the life-stories of 'PGs' providing rich insights into behaviour. The qualitative dimension to the thesis sought to provide an understanding of behaviours and experiences of 'PGs' and the combination of methodologies set out to provide multidimensional analysis to the aim of this thesis.

In line with the social constructionist epistemology, the analysis of all data sets are understood to be a construction, made through vigorous use of data collection and analytic strategies.

There were three methods of data collection in this study. First, a GI within which 'PGs' told brief life-stories and narrative analysis was used to analyse the data. Second an OQ collected data and quantitative analysis was used to understand the

efficacy of RG and RGFs as perceived by key stakeholders. Third qualitative analysis was used to understand the open-ended responses.

Matching research objectives with mixed methods

The table shows each method used to answer the research objective.

Aim	Objective	Stage	Method	
Evaluate the extent to which RG is possible in relation to the interests of society and gamblers themselves and examine the efficacy of RGFs in the online environment	To explore what 'PGs' say about their gambling life-stories	1	Qualitative	GI
	To explore what 'PGs' consider might have prevented them from experiencing 'PG'	2	Qualitative	GI
	To analyse the opinions of stakeholders towards the efficacy of RGFs	3	Quantitative	OQ
		4	Qualitative	

Table 3.1 Matching of research objectives with research approaches

Rejection of triangulation

Denzin (1978, p. 291) broadly defined triangulation as "the combination of methodologies in the study of the same phenomenon." This definition conceives triangulation is a strategy of validation. Denzin's (1970; 1978) model of triangulation assumed a single model of reality; a single model of reality ignores much of the foundation of qualitative work which proposes that different methods, researcher and participants will view the object of the research in different ways (Bazeley, 2002). Bryman says that because quantitative and qualitative research has different preoccupations, it is highly questionable that they are tapping into the same things even when they are examining apparently similar issues and therefore, mixed methods rejects triangulation.

Pragmatic mixed methods approach applied to this study

This three-part study is a sequential design of an exploratory nature. Social research should always be exploratory research where discovery is expansive and feasible (Stebbens, 2001). To plan the tactics ahead instead of allowing them to unravel or to separate out the research process into the elements of more conventional studies would have been inconsistent and misleading with the methodological paradigms (Gabriel, 2003, p. 181). The research needed to work within a methodological approach that was sensitive to the different world views that featured during interactions with 'PGs.' There is an inconsistency when trying to develop a conceptual framework that is based on different world views. In the postmodern paradigm, systems of truth are examined and may have been disrespectful to the 'PGs' to whom the research was seeking to value and respect and their rationalisations of truth may be modernist (Robinson-Pant, 2005). But the researcher did not write as the "disembodied omniscient narrator claiming universal and temporal general knowledge" (Richardson and St. Pierre, 2005, p. 961). The advantage of using a sequential design as explained by Creswell and Clark (2007) was that the research is easier to execute when only one kind of data is collected and analysed at a time. They argue that adequate time must be given especially to the qualitative phase because it is very time consuming.

The reason for using this design was the assumption that qualitative results of the GI would help inform the OQ which produced quantitative data and/or expanded the qualitative data collected (Tashakkori and Teddlie, 2003; Mertens, 2005; Creswell and Clark, 2007). The GI was exploratory and served to generate practical information about RG that might be effective in assisting individuals experiencing 'PG.' The initial phases consisted of a GI to gather qualitative data about the experiences of 'PGs' in the development of their problems and specifically what measure or measures would have been useful for them in controlling their 'PG.' It was hoped that the rich experience of the participants would inform the OQ results and present a complete view of the phenomenon studied. Also, the GI was necessary to find out what it is like to be a 'PG.' One of the purposes of this thesis was to look at how to protect individuals from 'PG' and it was necessary to know what it is like to be a person in that situation. The GI participants chose what they wanted

to talk about around the open-ended questions posed and the GI provided an insight into their lived-experiences. Participants had the opportunity to explain how they got to where they did in their lives and giving pictures of their lives. It was hoped that the comments and stories of the GI would contribute to the development of an informed OQ. The qualitative approach of the GI had a subjective perspective provided important insights on the phenomenon of 'PG' and RG.

Group interview methodology

Narrative analysis was used to understand the behaviours and experiences of 'PGs' from their perspectives by listening to their personal stories and interpretations. The value of narrative analysis as a therapeutic and healing tool is recognised (McGowan, 2003). Narrative analysis as a research methodology is a valuable technique for qualitative enquiry and paid off with rich and informative data (Mishler, 1995; Riessman, 2002). However, there were distressing emotions relating to their personal experiences and in preparing the thesis, not all information is discussed. When studying atypical groups such as 'PGs,' it has been argued that researchers should modify the methods of collection of data bearing in mind the sensitivity of the topic and the vulnerability of 'PGs' as research participants (Goffman, 1963; Hobbs, 2002). Details about the narrative analysis methods adopted follows in Chapter 4.

The MC conducted the GI discussion. He maintained an objective viewpoint although the dual position as a 'leader' was acknowledged and may be regarded by as a position of power. One purpose of the GI was for the participants to 'tell their stories' and the MC understood the intention of the research, which was to gain an understanding of their life-stories and the influences on their gambling. During the GI, some 'PGs' went into considerable detail in recalling their experiences; sometimes, the level of detail given in their accounts was brief. It was understood that this was not the first time the 'PGs' had discussed their behaviour and experience because they were in treatment. Listening to detailed personal accounts was immensely rewarding and the researcher felt privileged that 'PGs' trusted her enough to provide such a personal insight into the nature of their problems.

Sampling and gatekeepers

Research must follow clear principles, procedures and guidelines and this study consistently respected university recommendations. In practical terms, researchers need access to their field of study. This is usually accessed via gatekeepers who are defined as "individuals who have the power or influence to grant or refuse access to a field or research setting" (Berg and Lune, 2004). The role of the gatekeeper can be influenced by several possible factors and the figure below has been adapted to understand the potential motivating factors for participation in this research:

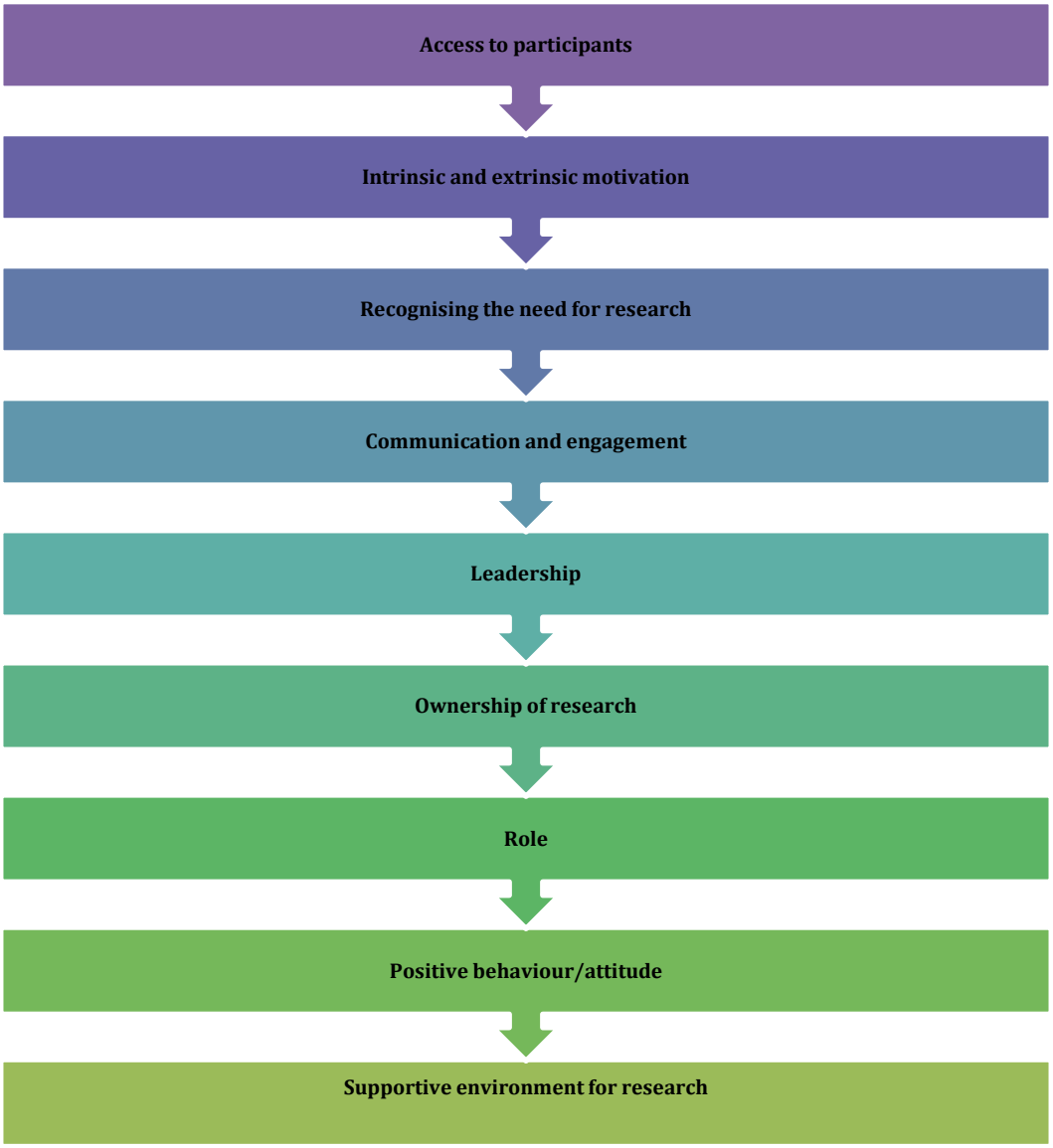


Figure 3.1 Adapted from McFadyen and Rankin (2016) Access participants with influencing factors

The influencing factors identified by McFayden and Rankin (2016) have been adapted for the gatekeeper in this study. The gatekeeper was the MC and his intrinsic motivations to participate may include a sense of achievement, personal satisfaction and ownership in the process. Extrinsic factors refer to a supportive working environment for the study. The researcher and MC worked closely to achieve a productive and supportive working environment and both were keen to contribute to this research area. Therefore, participating in the process, the awareness of the need for research and the MC gaining recognition from the researcher and GI participants probably contributed to the MC's positive attitude and behaviour. The MC was a forward-thinking individual; access to 'PGs' is very difficult to secure and their participation enriched the understanding of the thesis. The MC possessed good leadership skills and was an effective communicator with both researcher, GI participants and within the broader external research environment.

Moderator-Counsellor

The gatekeeper facilitated access to the participants and became involved in managing the GI. This strategy is unusual and conducting research to identify literature relating to using moderators as mouthpieces returns no results. The MC had an established relationship with the 'PGs' based on mutual trust and understanding with respect for and from the group members. This was utilitarian for gaining open communication with vulnerable persons engaged in discussing sensitive issues relating to 'PG.' It would have taken the researcher many sessions to gain a similar level of trust with the group members but there is another factor to consider: the MC. The MC himself was a 'PG.' Possibly the researcher could role play that position but it is unlikely that someone without a personal life history of 'PG' could understand what a 'PG' feels and has experienced and continues to experience.

The MC led the GI and his role was to conduct the group and not to analyse the data. This took advantage of the MC's specific skills and recognises that the task of making sense of the data is best handled by the researcher who will ultimately be responsible for its use. The MC being in control was part of the access agreement. The researcher handed over control to him. He had an established relationship with the group and facilitated the narratives whilst maintaining the safety of the participants. This was valid because the researcher and the MC had engaged in discussions which helped him to develop an in-depth understanding of the research aims and its importance. The MC cannot be named to protect the anonymity of the group.

There were advantages in using the MC. First, he was familiar with the group and there was a strong relationship with trust already in place. Second, the MC was familiar with the research of this thesis and had gained the trust of the researcher. Third, the MC was an 'expert' in 'PG' with personal experience and practice of working with and supporting others with a similar problem. Fourth, the environment was already established and the only aspect that was new was an extra person sitting in with the group. Fifth, the MC had given the researcher a 'guarantee of approval' that if the MC was happy, the group accepted his judgement. Sixth, the MC never spoke on the participants' behalf; he never summed up their life-stories or drew conclusions. The MC served only as the 'question-asker' and the 'response-prompter.' All the data collected was from the words of the 'PGs.' Finally, it is not possible that the MC miscommunicated any information, because the researcher was present for the entire session.

There were disadvantages. First, the researcher had given up a degree of control and ownership of the session. Second, the range of issues that could be discussed were finalised before the session had begun. Third, the MC was in receipt of more information than the researcher had about the participant members. Fourth, the MC did have the opportunity to prepare or rehearse the session and responses. However, it is not suggested that this happened as both the MC and researcher had worked very hard to develop a favourable and constructive relationship, based on trust and a mutual respect as well as a joint desire to hear the life-stories of the participants in the hope of possibly achieving a positive outcome.

Sampling and group interview 'problem gambler' selection

'PG' is highly stigmatised and there are difficulties in finding willing research participants (Scull et al, 2002) and this research experienced such difficulties. 'PG' research has considerable methodological barriers including the problem of gaining access to individuals and communities (Scull, 2003). Additionally, time limitations exacerbate the challenge to get insider knowledge, insights of acceptable gambling behaviour and representation of 'PG' (McMillen et al (2004). It was of paramount importance to involve 'PGs' in the research because they were expert, knowledgeable and had personal experience. Their willingness to participate was established through verbal responses given to the MC. The need to establish trust and understanding between researcher and participant is a significant challenge for 'PG' research and the researcher gained trust by being endorsed by the MC. The researcher was introduced to the gatekeeper who became MC at a gambling conference. This was a combination of purposive and opportunistic sampling. Purposive sample is typical of qualitative research and its "logic and power …. lies in selecting *information-rich cases* for study in depth" (Patton, 1990, p. 169 original emphasis). Information-rich cases provide a significant contribution about the central issues of importance to the purpose of the research, hence the term purposeful/purposive. 'On-the-spot' decision-making about sampling to utilise new opportunities occurs during fieldwork (ibid, p. 179). Qualitative research can include new sampling strategies after fieldwork has begun to take advantage of unforeseen opportunities. In fact, it is a strength of qualitative strategy in research to follow a data lead and this allows the sample to emerge during fieldwork (ibid).

Dialogue with MC was developed over a period of 6 months. He was interested in the objectives of the research and sympathetic to the difficulties in securing access to 'PGs' to listen to their life-stories and what they understood about RG. The MC agreed to discuss the possibility of the researcher attending the 'PG' group. During the dialogue many issues were discussed, assurances given and trust developed. The MC gave an outline of the research, its main aim and objectives to the group members and proposed that the researcher be allowed to attend a group meeting.

The researcher was not present when the MC put the proposal to the group members and she was informed that the group had unanimously agreed to her attendance.

The following characteristics about the GI participants are noted below;

No	Approx Age	Gender	Marital Status	Employment Status	Time attending group	Product	Urge to gamble
1	60's	Male	Married	Retired	7 years	Bookmakers/ Casino	Yes
2	40's	Male	Separated	Unemployed	4 years	Bookmakers	Yes
3	30's	Male	Single	Unemployed	4 years	FOBT's	Yes
4	40's	Male	Divorced	Unemployed	4 years	Scratch cards	Yes
5	50's	Male	Married	Employed	4 years	Bookmakers/ Casino	Yes
6	50's	Female	Divorced	Unemployed	4 years	Slots	Yes
7	20's	Male	Married	Employed	2 years	Bookmakers	Yes

Table 3.2 Basic information about GI participants

Access to individual data was limited due to the ethical guidelines constructed and placed upon the research to ensure and maintain anonymity and confidentiality. Information in the matrix above was provided orally by the MC at an early point in the session.

Participants

The pool of willing participants was small but it was important to gain extensive and quality information. There were seven 'PGs,' 6 male and 1 female, age range between mid-twenties to mid-sixties. As research participants, they all had the

opportunity to not attend the session and it was pleasing that seven out of the usual eight group members did attend. The individual who did not attend gave work commitments as his reason for absence. The GI took place in their usual environment, the participants were familiar with the sessions and each other. It was anticipated that the group were likely to be candid about their behaviour and experiences due to assurances from the MC and assurances of confidentiality and anonymity which extended to keeping the location of the meeting anonymous. The support group is usually reluctant to work with researchers and the researcher laboured diligently over a period of more than six-months to gain the trust of the leader of the group. The participants self-identified as 'PGs' on the basis that their gambling was causing or had caused considerable problems to themselves and or others. A diagnostic screen was not used because if the 'PGs' believed that they had a problem then it was more than likely that they did. Hodgins and Makarchuk (2003) examined trusting 'PGs' in terms of reliability and validity and their conclusion was generally encouraging about the use of self-reported gambling. At the end of the session the 'PGs' were advised that it was possible to contact the researcher again through the MC if they wanted to provide additional information or make any comments.

Group interview method

Interviewing enables researchers to study areas of individuals' experiences that no other research approach facilitates (Brinkmann, 2013). Asking individuals questions about their lives, experiences and perceptions whilst giving them complete freedom of expression in their storytelling is a powerful method (Kvale and Brinkmann, 2009). The GI is a successful method of data collection in the social sciences (Greenbaum, 1993). Its synergistic effects can help produce data that would not come from one-on-one discussions and it is likely that the data collected would not have materialised in one-to-one discussions (Stewart and Shamdasani, 1990). The GI allowed the researcher to gain insight, depth and perspective on 'PG' which can be difficult to gauge through other kinds of research methods. The GI is different from other discussions because the participants have a very specific shared experience and belong to an exclusive category of individuals that perceives a situation based on membership in that strata (Merton et al, 1990). It was hoped that

GI rather than individual discussion would facilitate debate and achieve consensus within the group. Open-ended questions were asked and it was possible to follow up on comments with supplementary questions which allowed the researcher to observe communication between participants. The GI was core to the qualitative dimension of this thesis.

In qualitative research, the overall question relates to the purpose statement and the sub-questions are additional questions that relate to the central question. The GI participants were asked **What if anything, would have prevented your gambling from becoming a problem?** The GI was semi-structured and following the discussion with the MC a single question was developed to explore the views of a small group of 'PGs.'

'PG' is a sensitive research topic (McMillen et al, 2004; Li, 2008) with serious implications for how research is conducted, the methodology used and interpretation and validity of results (ibid). The first action was to collect information from knowledgeable individuals who have sought help for their 'PG.' Participants were able to discuss any issues they felt were pertinent and the discussion centred on their experiences and perceptions of RG and RGFs. They were asked to tell their story with questions aimed at clarification or elaboration and asked by the MC. The issues that were generally discussed were first the nature of their gambling behaviour, experiences and problems. Second, how, why and when their gambling began to cause problems. Third, factors that may have minimised their 'PG.' Fourth, the strategies they used to minimise or deal with 'PG.' The supplementary questions were asked by the MC:

> C*an you tell us a little bit more about ……?*
> *What do you mean by ….?*
> *What happened next?*
> *Is there anything else you would like to add?*

The rationale for including the GI was based on a constructivist stance, exploring what 'PGs' say about their gambling life-stories and what might have prevented them from experiencing 'PG.' It was likely that these objectives could only be

achieved through talking to 'PGs' and listening to their lived experiences. Returning to the epistemology of the thesis, qualitative interviews provide an insight into a participant's understanding of their experiences and constructions of their knowledge.

Group interview procedures

The GI was designed to present the most ethical and favourable circumstances possible for both the researcher and participants and a significant effort was made to ensure the wellbeing of the participants. First, a short explanation of the background, aims and objectives of the research was provided, including the research's self-funding arrangements. Second, an assurance to the 'PGs' concerning anonymity and confidentiality including the assurance that location details would be withheld from any published material arising from the study. Third, an assurance that participants could terminate the discussion at any time without any further contact. Fourth, the GI included the MC, who was able to intervene should a participant become concerned, anxious or distressed. The GI duration was approximately three hours. To guarantee that participants would talk as openly as possible and to protect identity, the GI was not recorded on tape and shorthand was taken with notes; transcription began after the session. The participants were concerned about the sensitivity of the research. They had experienced serious problems with their gambling and were conscious of the sensitive information being supplied as it related not only to themselves but also to important people in their lives; family, friends, community members, employers and other professionals including the police and social services.

There was follow-up feedback from the MC. The GI participants were hopeful that they had assisted the research in understanding more about RG and that they had enjoyed meeting a researcher who was interested in understanding more about their experiences.

Shorthand

It is worthy to note at this point, that the researcher is proficient in shorthand at 120 words per minute as certified by the London Chamber of Commerce (1982). This was a powerful research tool and enabled prompt and accurate notetaking as well as enabling a precise and honest transcription of shorthand into written comments.

Online questionnaire methodology

The second and third phases of the research collected data with an OQ. It was appropriate to analyse the OQ closed-questions quantitatively using statistical tests and the open-ended questions qualitatively using grounded theory. Overall the OQ sought to establish key stakeholder perceptions of the effectiveness of RG and RGFs.

A questionnaire is a predetermined set of questions that are designed to gather data from participants about an aspect of a topic to which participants are asked to respond (Hair et al, 2003). The OQ was based on RG themes that had been discussed in the literature review but specifically referred to in section E. The OQ was piloted to test ease of use, understanding and to minimise any tendency for misinterpretation. It was self-administered online, each participant read and answered the same set of questions in a pre-determined manner. The researcher secured subscription to Survey Monkey to which only she had access. Links were posted online on several sites: Poker News Daily, GamCare, German Gaming Law, Poker Moments, Effective RGFs. To maximise response rates the researcher created an awareness of the OQ before it went live by participating in interviews to promote participation and establish an awareness of the survey online. Prior to posting details about and links to OQs, site moderators were contacted. It is the same as contacting an organisation prior to contacting its members (Griffiths and Whitty, 2010). Griffiths (2010b) suggests online forums are suitable for communicating information about OQ but they are busy environments and older messages are moved to the back. To keep the postings visible, the links must be re-posted. The researcher ensured that posts were refreshed to maximise publicity of the OQ.

The OQ consisted of 58 questions, combining both open-ended (two) and closed (56) questions. The open-ended questions gave participants the opportunity to disclose more detailed information (Saunders et al, 2012). The first section provided participants with information about the research. The second section gained participants' consent. The third part collected demographic information and the fourth part collected details of gambling habits. The fifth section asked about perceptions towards RGFs attitudes towards gambling. The last section asked two open-ended questions: *'What RGFs do you think would be most effective and why?'* and *'Do you have any other comments?'*

The OQ closed thanking the participants for their time and provided a link and further information for any participant who needed help with their gambling or had experienced distress during participation in the survey. Research looking at sensitive issues such as 'PG,' may cause unintentional distress to a participant and safeguards are necessary if psychological distress is caused (Griffiths and Whitty, 2010). The final page of the survey provided GamCare contact information.

Justification for data collection via online questionnaires

An OQ was justified in part because previous OG research has used this method successfully (Wood et al, 2007b; Griffiths et al, 2009a). It was hoped that the OQ would identify similarities and differences between the key stakeholders. OG is driven by technology and online research methods can provide useful and appropriate ways of examining it. For the discussion of sensitive issues, questionnaires are valuable (Warren and Tweedale, 2002). OQs are useful for 'PG' because it is a sensitive issue and participants may be embarrassed in a face-to-face situation (Griffiths, 2010b). The internet creates a relatively high amount of anonymity and gamblers may be more comfortable answering questions which are personal or sensitive online rather than offline.

An important factor is that many gamblers may be apprehensive of requests to take part in research and Griffiths (2010b) suggests that it may be necessary for the researcher to participate in online discussions before potential participants feel

comfortable enough to take part. The researcher was involved in online discussion in forum communities with the aim of increasing online participation.

The advantages for online addiction research has been outlined by Griffiths and colleagues (Griffiths, 2003; Wood et al, 2004; Wood and Griffiths, 2007; King et al, 2009). First, the internet is useful for gathering good data in sensitive areas like gambling addictions. Second, it has a disinhibiting effect and it is possible that it will lead to increased levels of honesty and greater validity. Research suggests that online communication can lead to more honest responses than in settings which are face-to-face (Griffiths, 2010b). Disadvantages include issues including reliability, validity and generalisability, however these issues can occur offline as well (Wood et al, 2004). It may also be problematic to establish that the participants are who they say they are (ibid).

Suggested good practice for design of the OQ can be found in Appendix 4.

Likert Scale

The Likert Scale is used commonly in question format when assessing research participants' 'opinions of usability' (Dumas, 1999). The wording of statements, for example, negative, positive, approval, disapproval, allows researchers to use low mean scores to connect with either negative or positive attitudes and use high mean scores to reflect the opposed attitude (McNabb, 2004). It has been argued that the Likert Scale is easy to use and understand by both participants and researcher. Further coding and interpretation is easy (Guyatt et al, 1987; Jaeschke et al, 1990). Likert Scales are more responsive than other scales and useful if research is concerned with a programme of change or improvement to evaluate the usefulness of the efforts (Prakashan, 1990). It is possible to correlate scores on the Likert Scale for different measurements without reference for the absolute value or what is favourable or unfavourable. Arguably these reasons account for the popularity of Likert Scales in social studies when measuring attitudes. The Likert Scale has several limitations. It only examines whether participants are favourable to a statement but does not indicate how favourable they are (Prakashan, 1990). The Likert Scale is difficult to get right; the wording of statements may influence

responses and might be unsuitable to explain complex phenomenon (Foye, 1997). Prakashan (1990) says that there is no basis for the idea that the five positions on the Likert Scale are equally spaced apart. The interval between strongly agree and agree may be different to the interval between agree and neither agree nor disagree and consequently it can be categorised as an ordinal scale (Prakashan, 1990). Participants may respond according to how they think they should reply rather than how they really feel (Best and Kahn, 1986). Too many response categories may cause problems in deciding and too few categories may not provide enough choice or sensitivity and as a result, participants may choose a response that does not represent their real feeling (Birkett, 1986).

Informed consent

This can easily be obtained for OQs. Withdrawal of consent is more complex because the motivation of why a participant does not complete a survey is unknown (Whitty, 2004; Buchanan and Williams, 2010; Griffiths and Whitty, 2010). Due to a variety of ethical dilemmas including lurking and deception, informed consent needs researchers to be direct about the aims and purpose of the research (Griffiths and Whitty, 2010). Not securing informed consent can be damaging particularly if uninformed participants find out that their data has been used without their consent (Sixsmith and Murray, 2001). OQ participants were provided with information detailing the purpose of the study, the procedures, the ethics involved and the researcher's contact details. To ensure confidentiality, personal details were not recorded. The OQ software automatically recorded IP addresses but no research was conducted using this information. A site was established and details provided to participants for accessing the findings of the survey. It was hoped that this may have been an incentive for some individuals to participate.

Online questionnaire participants

The research participants are made up of key stakeholders as recommended in the Reno Model (Blaszczynski et al, 2004). Operators were recruited in one of three ways. First, a small number agreed to participate when details of the research were given to members of the Responsibility in Gambling Trust's (RIGT) SR committee,

which met in May 2008. Gala, SkyBet and William Hill agreed to become involved and specific contact details were provided by RIGT. Second, links to the OQ were posted on forums, for example, CasinoMeister, which hosted a thread about the research for the attention of key stakeholders. Third, operators were recruited by direct emails using a mailing list that had been developed during the fieldwork period. Academics and researchers were contacted and given information about participation in the research. Fieldwork had identified many academics (and others) whose participation was desired. Academics may have been recruited through postings on forums. Additionally, some academics forwarded on details of the research to other academics that they believed would be interested in the study. Counsellors were contacted directly in a similar way or, through their work with GamCare, they may have used a link hosted by GamCare trying to encourage recruitment. Gamblers were recruited from a variety of sources. It is difficult to identify participants and even more difficult to persuade them to participate (Griffiths, 2015). With the help of numerous online sites, the OQ was promoted and discussed and it is anticipated that recruitment came through this promotion. The *Other* category was intentionally designed for individuals who perhaps did not fit into any of the other categories. The researcher used subjective judgement to categorise the many types of respondents in this group, but it was too diverse to be useful.

Methodological issues in online gambling research

The internet is suitable for conducting OG research for several reasons. The internet ubiquitous and accessed by online gamblers who are adept at using it and it is suitable for large studies to be quickly and efficiently administered (Buchanan, 2000, 2007; Wood et al, 2004). Automatic data input of large samples can be administered cheaply and automatically transcribed (Buchanan, 2007; Griffiths, 2010b). The internet can increase honesty levels and in the case of self-report, greater validity, as the disinhibition effect reduces social desirability (Joinson et al, 2008). Shaffer et al (2010) suggest that information based on self-reports of past behaviour may be biased due to poor memory. Participants may provide responses which they think are more socially desirable than the real answer and the setting in which the research is conducted can be a contributing factor to this (Parkes, 1980).

It has been suggested that gamblers may lie or misrepresent the truth when completing OQs (Griffiths, 2001). Therefore, self-report research demands that the researcher values the data and is aware of other factors such as social desirability and motivational distortion that can misrepresent the situation, for example, that the internet gives access to the individuals who would not have participated if it was offline (Wood et al, 2004; Wood and Griffiths, 2007) and that recruitment of participants using numerous sites is possible (Wysocki, 1998).

There are problems with online research including self-selecting samples and reliability and validity issues although these problems occur with traditional offline research as well (Griffiths and Whitty, 2010). Online methodologies may lead to different types of problems compared to offline research, for example, the lack of researcher control, lack of knowledge about participant behaviour and issues with software and hardware (ibid).

There were early concerns that the results from online research would be invalid (Buchanan and Smith, 1999; Davies, 1999). Buchanan (2007) argued that validity was problematic because researchers cannot be sure that online and offline scales are the same. There is concern of sampling bias where online samples recruited are different to offline ones (ibid). Although, even with online and offline participants, results can be different (Griffiths and Whitty, 2010). In a study examining social desirability, OQ participants scored lower than those who completed an offline version (Joinson, 1999). Buchanan (2007) argues the differences in online versus offline research could be because researchers may be present for offline research which can affect participant responses. Griffiths and Whitty (2003) argue that even when taking such factors into consideration, OQs give different results to offline ones. Buchanan (2007) calls this the 'internet mediation' effect.

Ethical considerations of the online questionnaire

The researcher was introduced to online communities in numerous ways and either introduced herself or the research was introduced by journalists or site moderators. Before any data was collected, the research intentions were made clear. The researcher answered several questions about the study through the forums. This

period lasted for about 42 weeks before the study began to collect data, to ensure that members of the forum were adequately and appropriately informed. No objections about the research taking place were registered. To ensure informed consent, the participants were given details about the nature of the study and the subsequent use of findings. Participants were advised that they were free to withdraw their involvement at any time during the OQ if they so wished. For any follow-up questions, contact details were provided.

In addition to university guidelines, the British Psychological Society Code of Conduct, Ethical Practices and Guidelines were followed during the design of the study. Participants were required to confirm that they were under or over the age of 18 as part of the informed consent procedure. It was important to measure the number of self-reported underage persons participating in OG. However, there were no independent means of verifying the age of the participants. On the internet, individuals largely label who they are through text and consequently, the study relied on individuals being honest about who they really were.

Gambling research methodological concerns

There are two important methodological issues concerning gambling research and most areas of social sciences; external or ecological validity and biased sampling (Walker, 1992). Gambling comes in many forms and occurs in different environments including land-based and at home, via the telephone, television and internet, a diverse range of gamblers participate with different attitudes and experiences related to gambling. Research with students in simulated environments with fake money or small prizes is irrelevant for gamblers not in their preferred settings. Whilst many studies have investigated certain characteristics they have questionable external validity, due partly because they use limited or biased sampling. Research that uses retrospective accounts from gamblers in treatment or in support groups, relies on participants who may not have gambled for a considerable time which involves two kinds of risk: errors of memory and interpretation, such as distortion of recall of the past (ibid). This has been identified in misleading accounts of alcohol dependence with negative consequences for an improved understanding of alcoholism and its treatment (Abbott and Volberg,

1991). Walker (1992) argues that research should be based on field studies with 'real' gamblers rather than simulated studies using students, non-gamblers or retrospective studies of 'PGs' in treatment. This study recognises that the GI participants were in a support group setting who provided retrospective accounts, however the OQ participants who said they were gamblers were active. The inclusion of 'PGs' in support groups and a range of active gamblers supported the gambling-harms continuum examined in the Korn and Shaffer model (1999).

Methodological rigour

Hamberg et al (1994) argue that whilst quantitative research has established criteria for scientific rigour in conducting research, the same cannot be said of qualitative studies. Several key strategies to ensure the trustworthiness of qualitative research have been developed since the 1980s and are discussed and applied regarding this study.

Key strategies for rigour				
Quantitative	**Qualitative**			
	Guba and Lincoln (1985)	**Sandelowski (1986)**	**Lincoln (1995)**	**Creswell (2007)**
Internal validity	Credibility	Truth value		
Reliability	Dependability	Applicability		
Objectivity	Confirmability	Consistency		
Generalisability	Transferability	Neutrality		
			Prolonged engagement	Prolonged engagement
			Persistent observation	Persistent observation
			Triangulation	Triangulation
			Peer debriefing	Peer review or debriefing

		Negative case analysis	Negative case analysis
		Member-checking	Member-checking
			Reflexivity
			Thick description
			External audits

Table 3.3 Key strategies for rigour in research

Lincoln and Guba (1985) suggest the criteria of credibility, dependability, confirmability and transferability as key strategies for rigour in qualitative research. The criteria correspond with the traditional quantitative criteria of internal validity, reliability, objectivity and generalisability. Credibility is the confidence in the truth of their findings, in their value and trustworthiness (ibid). Dependability is whether the findings are consistent, replicable and reliable. The dependability criterion is difficult in qualitative studies, however researchers should try to ensure that the study could be repeated by another investigator (Shenton, 2004). Confirmability refers to the degree of neutrality, how the findings of the research are based on data collected, free from researcher bias, motives or interests. It is important for researchers to ensure that their findings emerge from the data and are without bias (ibid). Transferability concerns whether the findings could be transferred to a similar context or situation. Transferability is relative and interpretations cannot be fully transferable to other situations, although some transferability is possible (Tashakkori and Teddlie, 2003). It is anticipated that perceptions about RG and RGFs may be transferable across some settings (online and offline) populations ('PGs,' at-risk gamblers, recreational gamblers) but transferability cannot be guaranteed. The researcher used the conceptual elements determined by Sandelowski (1986) in response to Guba and Lincoln's (1985) call for rigour and trustworthiness in qualitative research. First, truth value in the GI was determined by accurate shorthand and the reading and re-reading of transcripts by the researcher with approval from the MC. Second, applicability was determined by each participant's involvement within the support group and that their story represented a valid representation of their life and all participants met the criteria for engagement in the project. Dependability of the method can be used to underpin

consistency (Creswell and Clark, 2007). Responsible steps were taken to ensure that the data collected was reliable. The Likert Scale related questions in the OQ included items that were all in the same direction to avoid any confusion in answering. Third, consistency was observed by the researchers' attempt to allow for replication; by transcribing each story accurately and summing up the main points in the researcher's own words for each participant. Finally, neutrality was maintained as the researcher remained true and focused to the words of the participants as the analysis is described in this chapter.

Lincoln and Guba's (1985) criteria were reviewed by Lincoln (1995) and to strengthen the credibility of research, he recommended extending the criteria to add an emphasis on prolonged engagement, persistent observation, triangulation, peer debriefing, negative case analysis and member-checking. The inability to perform triangulation in pragmatic mixed methods research has already been discussed based on how constructivism rests on the assumption of multiple realities dependent on the individual who experiences it and can be changed with upon the receipt of new information (Guba and Lincoln, 1994).

To comply with prolonged engagement, the researcher spent a significant period in the research setting seeking to understand the 'PG' culture and support settings. She attended support groups weekly in several locations over a period of three years prior to the GI session. The researcher also attended industry events to familiarise herself with key stakeholders and to forge productive research relationships; the participation of operators is considered a strength of this study. In addition to this, the researcher attended subject conferences to strengthen her network of academic contact with a similar interest in 'PG.' Dialogue was initiated and developed with key stakeholders; there were frequent emails to regulatory organisations discussing issues and asking questions. There were formal and informal communications with key stakeholders that were all conducive to developing an in-depth knowledge of the research area. The prolonged engagement criterion helped the researcher gain a practical understanding of the environment, and the multidisciplinary perspectives, a better understanding of gambling-harms and helped develop a rapport with key individuals. A relationship had been developed with the MC of the group at which

the research was conducted and there had been persistent observation of 'PGs' over the same three-year period in different locations but always a similar setting.

Persistent observation and prolonged engagement form a useful partnership, according to Henry (2015). The researcher was regularly involved with peer debriefing and discussed her work with disinterested peers. This took place in the university environment, informally at conferences and at several research events such as the university's postgraduate research seminars and festivals. The researcher was involved with engaged questioning of her work in a challenging, consistent and systemic manner. Ely et al (1991) say that it is useful to have both supportive peers providing constructive feedback and oppositional peers playing 'devil's advocate.' The researcher was frequently challenged in a supportive environment by peers from both negative and positive standpoints to satisfy the criteria of negative case analysis. The purpose of peer debriefing is to highlight characteristics of the research that are implicit in the researcher's mind (ibid). Throughout the study, the researcher met with the supervisory team regularly to discuss data collection methods, analysis and development of the thesis; and the credibility of the findings of this study is enhanced by peer debriefing.

Guba and Lincoln (1985) say that member-checking is the most important technique for supporting credibility. Member-checking involves checking with participants who provided the data, that they are satisfied with the researcher's work particularly interpretations and conclusions. To satisfy the member-checking criteria for the GI, the researcher provided a copy of all her notes and transcriptions for the MC. It is suggested that this is appropriate as the MC was in contact with the researcher but the participants were not. The MC confirmed that he was satisfied with the notes, transcriptions and the chapter that was produced and that it was an honest and accurate representation of the GI. To satisfy the member-checking criteria for the OQ, the findings were made available online. Details of where the findings would be published was publicised in the preamble to the OQ and participants were able to contact the researcher with any queries that they may have had. This did not happen and so it is anticipated that the findings were received as satisfactory. The researcher sought to increase credibility through consultation with the supervisory team regarding the statistical testing. Research seminar

environments also scrutinised the data, the statistical tests and it is suggested that this is in line with Guba and Lincoln's criteria of ensuring credibility through consultation with others.

Creswell (2007) added further criteria to ensure trustworthiness for qualitative research and recommended that researchers use at least two for rigour. Thick description is one of the most important ways of achieving credibility in qualitative research (Tracy, 2010). It requires in-depth details of the research to investigate the possibility for application to different participants, context, locations and times. The purpose of thick description is to create credibility and for the reader to have the feeling that they have experienced the events being described. It clarifies culturally situated meanings and abundant concrete details because any behaviour or communication divorced from its context could mean different things (ibid). As part of the discussion of findings and the conclusion chapter, numerous examples of empirical data are included, such as excerpts from the GI from the open-ended responses in the OQ to let the reader consider the researcher's analysis. Researchers create reports that invite transferability by writing invitationally (ibid). Consequently, the reader can decide to what extent the findings are transferable for themselves. The audit trail requires documenting all the steps taken in the research process, from the commencement to conclusion and recording the decision-making during the full research process (Creswell and Miller, 2000). Lincoln and Guba (1985) suggest that this requires peers acting as auditors to ensure proper procedures have been followed. The supervisory team monitored all aspects of the audit trail whenever possible. However, it was not possible for peer auditors or the supervisory team to have access to full records. The vulnerability of the 'PGs' meant that certain information was withheld even from the researcher. A study journal recorded different stages of the thesis including background reading, ethical procedures, data collection and decisions relating to analysis. Sandelowski (1993) advises scrupulous record-keeping to show a clear decision trail ensuring interpretations of data are consistent and transparent; every effort was made to comply with this.

Creswell (2007) adds reflexivity to ensure trustworthiness of qualitative research. In qualitative research, interpretation is arrived at through collaboration of the

subjective views of the participants and the researcher (Bhargava, 2010). The researcher's culture, gender, ethnicity and class may create bias (ibid). The researchers' past experiences and emotions may also affect interpretation (Denzin and Lincoln, 2005; Tashakkori and Teddlie, 2008). It is hoped that the researcher provided an objective view and as there is no researcher involvement with the gambling industry, therefore any interpretations should not be overshadowed.

From the commencement of this study, the researcher maintained a study journal and a reflexive journal which recorded the researcher's thoughts regarding the research process and reflections of methodological decisions, the reasons for the decisions, logistics of the study and personal reflections on the process in terms of the values and interests of the researcher. Reflexive journals are frequently maintained in qualitative research and they can illustrate how the researcher's characteristics, beliefs and biases can influence the process and outcome of research (Etherington, 2004). The reflexive journal facilitates self-scrutiny and the researcher attempted to give a fair and unbiased representation of the perspectives of key stakeholders.

Ethics

The research was approved by the university Ethics Committee and the researcher was aware of the risks involved with the GI and of researching with vulnerable participants. Working with vulnerable individuals has meant ethical research protocols have needed to be continuously reviewed throughout this thesis. Ethics can be a difficult and sensitive topic and issues can develop over the course of the research. Guidelines and a list of principles may be insufficient. To conduct face-to-face research with 'PGs,' additional consideration of both Seedhouse's Ethical Grid (2007) and Flinders Ethical Frameworks and Aspects of Research (1992) matrix was applied to the GI. It was hoped that by using two sets of ethical standards, an acceptable level of ethics was achieved. Seedhouse's Ethical Grid (2007) assists with formulating structured, coherent and recoverable/controllable research (Stutchbury and Fox, 2009).

> "The Ethical Grid is a tool and nothing more than that. Like a hammer or screwdriver used competently, it can make certain tasks easier, but it cannot direct the tasks, nor can it help decide which tasks are the most important. The Grid can enhance deliberation- it can throw light into unseen corners and can suggest new avenues of thought – but it is not a substitute for personal judgement." (Seedhouse, 2007, p.209)

Seedhouse's work is based on moral theory which helps determine what actions are right and wrong (Gray, 2010). It consists of layers, which will be discussed shortly and originally whilst designed for healthcare use, can be applied as a research tool in other disciplines (Stutchbury and Fox, 2009).

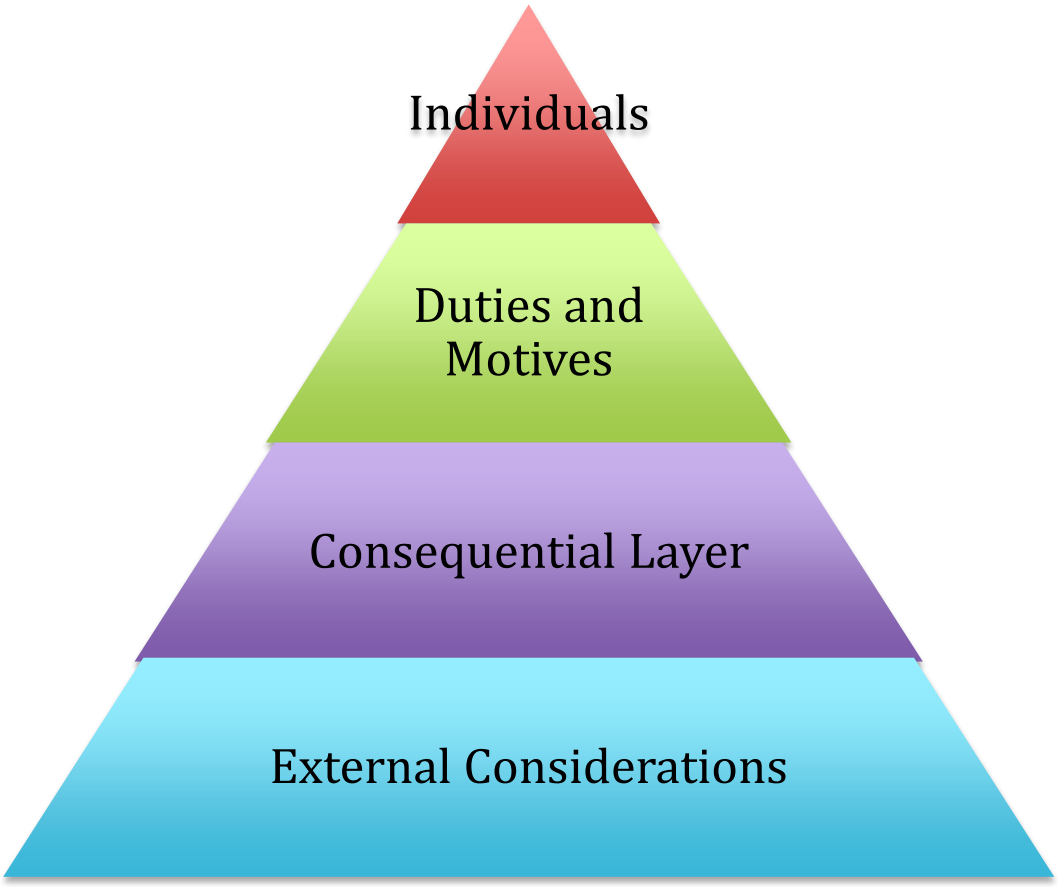


Figure 3.2 Seedhouse's Ethical Grid (2007)

The above diagram provided a checklist that was applied to the development of the discussion matrix and processes for the GI.

External considerations

External considerations refer to the laws, wishes of others, codes of practice and available resources; risk, effectiveness and efficiency of action. It also refers to the degree of uncertainty about the evidence on which the action is taken. These considerations were complied with and monitored by the researcher and supervisory process within the university.

Consequential layer

There were consequences of the research for the researcher, the key stakeholders and society. First, the research was aimed at assisting the researcher gain her PhD. Second, there were consequences for the GI participants, who did not wish to be identified, who indicated that they wanted to participate and be heard in a discussion relating to the concept of RG and finally, there were consequences for key stakeholders and society if effective RGFs could be identified.

An important consideration was if the research was likely to hurt anyone. This was realised in advance and if any interaction in the GI began to upset anybody, the MC would have immediately ceased that line of enquiry. The MC was key to the success of this thesis. There was considerable trust between the researcher and the MC and he managed the session as he thought correct and suitable. A verbal assurance was given by the MC that no participant would find the research unwelcome or a distressing experience. The OQ participants could withdraw at any time without further contact and should any participant feel distressed when completing the OQ, contact details of GamCare were provided.

Duties and motives

The researcher has a moral duty to take positive steps to lessen or prevent harm to the 'PG.' Harm can manifest in different forms including an effect on self-respect,

looking ‘bad’ in front of others and threatening the interests of the participants. At no time would the researcher profit from the participants and there was an acknowledgement of a duty of care to them. Duties and motives can be summed up as intentions. The intention of the researcher was to tell the truth to the participants, to minimise harm to the participants and to keep assurances to the participants to do the most positive good (Stutchbury, 2009). It was the intention of the researcher to be as competent as possible by taking advice from other researchers, mentors and colleagues who are familiar with research for the findings to not be subject to any research malpractice. The researcher’s conduct was in accordance with the principles of honesty and integrity.

Regarding reciprocity, the researcher sought to gain an understanding of behaviours and experiences of ‘PGs,’ perceptions of stakeholders and a PhD thesis out of the study. The participants hopefully experienced benefits including being listened to with respect and any insight into their own behaviour, experiences and or perceptions. Ties may have been strengthened in the group and all participants potentially contributed to enabling effective action on RG. There may be some inequity in the benefits to the researcher and participants however, the researcher approached the analysis with a deep sense of its implications and the understanding developed will be considerable and the benefits to the participants will be equitable.

Concern for individuals

At all times, there was concern for the participants. In the GI, the researcher let the ‘PGs’ lead the conversation concerning their individual experiences and behaviours. Autonomy was created by allowing participants to be heard individually and as a group and all were respected equally even though some participants were more vocal than others. The ethics of trust requires that relationships are formed and every effort was made during the session to ensure that this continued. Concern for participants extended to anonymity in both the GI and OQ and support details for OQ participants who felt they needed support. Some details have not been included to ensure the high level of anonymity and confidentiality promised by the researcher.

Seedhouse's Ethical Grid (ibid) is reflected in Flinder's Ethical Frameworks. Flinder's Ethical Framework addresses issues of how to behave ethically and encourages researchers to view each situation from different philosophical perspectives. Flinder's has been applied to the GI and the OQ to reflect the practical thinking and steps taken to behave ethically.

	Utilitarian	Deontological	Relational	Ecological
Recruitment	***Informed consent*** The researcher received the approval from the MC and the participants.	***Reciprocity*** It was anticipated that both researcher and participants would gain from this thesis.	***Collaboration*** The participants were already in a group support setting and familiar with each other and working together.	***Cultural sensitivity*** The GI is not representative of all 'PGs' and there are limitations of a sample.
Fieldwork	***Avoidance of harm*** The potential to inflict harm was recognised before the research was conducted; every effort was made to avoid harm.	***Avoidance of wrong*** A moral duty of care to the participants was recognised and valued.	***Avoidance of imposition*** The researcher established agreement to conduct the research after extensive discussions with the MC. All participation was voluntary.	***Avoidance of detachment*** A dialogue was established with the GI, primarily through the MC.
Reporting	***Confidentiality*** Confidentiality and anonymity were guaranteed by the researcher.	***Fairness*** Reports are honest, accurate, just and fair.	***Confirmation*** The researcher received the approval from the MC and the participants.	***Responsive communication*** Researcher discussed field notes with MC for participant validation.

Table 3.4 Adapted from Flinders' Ethical Frameworks and Aspects of Research applied to the GI (Flinders, 1992)

	Utilitarian	Deontological	Relational	Ecological
Recruitment	***Informed consent*** The key stakeholders were provided with full details about the research. The researcher required their approval on the first page of the survey.	***Reciprocity*** It was anticipated that both researcher and participants would gain from this thesis. Involvement in the research would allow all key stakeholders to participate and be heard.	***Collaboration*** Key stakeholders were identified and it was anticipated that a constructive relationship would contribute to our understanding of 'PG.'	***Cultural sensitivity*** The OQ is not representative of all key stakeholders and there are limitations of an opportunistic sample. However, the interdependence of all key stakeholders is recognised.
Fieldwork	***Avoidance of harm*** The potential to inflict harm was recognised before the research was conducted; every effort was made to avoid harm. Details of GamCare (with their approval) were provided for any key stakeholders who felt they had experienced distress.	***Avoidance of wrong*** A moral duty of care to the key stakeholders was recognised and valued. Researcher was open and honest in the information about the research.	***Avoidance of imposition*** The key stakeholders could participate or withdraw at any time without further contact. All participation was voluntary.	***Avoidance of detachment*** Benefits of participation were established. No dialogue was established however the participants were provided with information about the study, contact details of the researcher and for the participants to remain anonymous, the findings were posted on a public blog established by the researcher.
Reporting	***Confidentiality*** Confidentiality and anonymity were guaranteed by the researcher and all data was stored securely.	***Fairness*** Reports are honest, accurate, just and fair.	***Confirmation*** The research had more emphasis on reflexivity than reliability and validity.	***Responsive communication*** Researcher provided her professional contact details for participant validation.

Table 3.5 Adapted from Flinders' Ethical Frameworks and Aspects of Research applied to the OQ (Flinders, 1992)

The guidance of Flinders (1992) was applied to both the GI and OQ. Utilitarian research guided the recruitment of participants via informed consent and fieldwork minimised harms to others which extended to the protection of confidentiality and anonymity in reports. Deontological research ethics are more absolutist and recruitment emphasises that both researcher and participants will benefit, fieldwork must avoid harming others and reports are honest, fair and accurate. Relational research emphasises equal-status collaboration and stresses the importance of issues of caring, attachment and respect. Fieldwork avoided as much imposition as possible and reports were just, honest and fair. Ecological ethical research stresses the impact of actions on an inter-dependent system. During the recruitment process, the researcher was sensitive to the culture of 'PGs' and aware of harm that may be caused to the environment. Reporting was responsible in making the findings public with there was special consideration to the language used and wherever possible identified in the thesis as 'usual' or 'normal.'

Conclusion

This chapter revisited the aim and objectives of the thesis before describing the constructivist perspective and a detailed account of the mixed methods employed and their applicability to the study. The issues included researching tailoring the data collection methods due to the sensitivity of gambling research, including the specific issues of gaining access and establishing trust and the methods of data collection were described. Several strategies to ensure the trustworthiness of research were discussed and this was followed by an explanation and examination of the ethical procedures that were established dealing with vulnerable participants. The methods of analysis will be described at the beginning of the next three findings chapters.

Chapter 4

Introduction

This is the first of three chapters that analyses and discusses the data collected. The chapter begins with a description of narrative analysis. Narrative analysis is suited to the theoretical perspective of this thesis because its aim was to understand how the lived-experiences of 'PGs' dealing with outcomes of gambling behaviour, in terms of the emotional, financial and social consequences, could inform the development of RG and RGFs.

Narrative analysis

This chapter seeks to achieve the first two of three objectives using narrative analysis;

- To explore what 'PGs' say about their gambling life-stories
- To explore what 'PGs' consider might have prevented them from experiencing 'PG.'

It is exceptional to find honest accounts of the behaviour, difficulties and dilemmas faced by 'PGs' and there is a lack of qualitative research in the context of talking to and understanding 'PGs.' There are few studies which have tried to understand 'PG' by talking to 'PGs' including different genders, in-treatment and none based in the UK. One of the very few studies is McGowan's (2003) who used narrative analysis to examine the context and narrative forms through which women tell the stories of their experience of 'PG' self-help groups and how these groups are valued in Western culture. McGowan's research looked at the use of online forums which places women's solutions of 'PG' in the public domain making these experiences visible, significant and transformative.

This research approach, where the researcher tells the participants' story, is not a new one (Mitchell and Egudo, 2003). Narrative analysis is concerned with how protagonists interpret things, what they mean to them and how individuals organise

their experiences into narratives and excuses (Bruner, 1990). It is a constructivist approach to world-making, a function of the human mind; stories do not happen in the real world, they 'happen in people's heads.' Narrative analysis was used to evaluate the uniqueness of individuals' understandings and has been utilised to examine the characteristic, individual and context-dependent nature of participant's sense-making (Giddens, 1994; Orbuch, 1997). Giddens (ibid) says that continuous narrative is important for self-development and Orbuch (ibid) argues that the goal is not historical truth but satisfying truth. Research has argued the important role of stories and narrative allows individuals to make the unexpected manageable (Robinson, 1981) and achieve "coherence, liveability and adequacy" (Bruner, 1990, p. 112). The GI participants lived remarkable experiences and tried to make their lives manageable to achieve liveability.

This thesis turned to narrative analysis as a mode of inquiry because social science needs "to construct a different relationship between researchers and subjects and between authors and readers" (Ellis and Bochner, 2000, p. 744). Narrative analysis and its commitment that "our constructions are the product of social forces, either structural or interactional" (Burr, 2003, p. 20) fits with how constructions have developed through social forces of the relationships between participants and researcher and between participant, reader and researcher. The researcher wanted to give "insightful accounts of processes which go beyond the particular story" (Pring, 1999, p. 6). The best way to know life-stories is to ask people (Hall and Powell, 2011) and that is what this thesis did. The narratives are presented as they were perceived and recognised situational limitations and articulated ethical complexities. Narrative analysis became the most suitable methodological approach because the thesis investigated the meanings of experiences and the research process was also a series of experiences (Trahar, 2009).

Narrative analysis is a means by which we systematically gather, analyse and represent people's stories as told by them which challenges traditional and modernist views of truth, reality and knowledge (Etherington, 2004). It is an interpretive approach and involves the storytelling methodology (Mitchell and Egudo, 2003). Narrative analysis becomes an object of study which focuses on how individuals or groups make sense of events and actions in their lives. Stories convey

tacit knowledge, sense-making and construct identity (ibid). Individuals generate order and construct content within specific contexts and narrative analysis uses the actual story as the object of the study (Mitchell and Egudo, 2003). Mitchell and Egudo's study looked at how narratives can enhance the army's understanding of knowledge acquisition in the context of battle command training. Reissman (1993) says that the focus is on how individuals or groups make sense of events and actions. To achieve objectives 1 and 2, it was necessary to meet with 'PGs' to discuss the genesis of gambling-harms. This helped give a voice to the participants and respect was important because these voices were marginalised. Whilst the researcher was not sharing with them her thoughts or experiences, she listened with respect. Narrative analysis became the most suitable methodological approach because the thesis investigated the meanings of experiences (Trahar, 2009). Trahar's research examined how narrative analysis supported and challenged participants to explore different realities and knowledge and this can be also applied to the researcher in this study.

Weick (1993, p. 635) writes that social actors tell stories about and for themselves trying "to make things rationally accountable to themselves." Narratives are a practical way of framing experiences that construct meaning that retrospectively legitimises a set of perspectives and turns narratives into words which can be springboards for action. Narrative analysis enables sense-making and helps construct identity and sense-making helps individuals make retrospective sense of what occurs (ibid). Storytelling can help transfer complex and tacit knowledge and provide a source of implicit communication (Ambrosini and Bowman, 2001). Storytelling synthesises personal stories and is a platform for further discussion and useful prior to survey development (Harrington and Mickelson, 2009) and; it was anticipated that the GI would inform the OQ in this way.

It was hoped that the narrative analysis would be sufficient for capturing the complexity of meaning embodied within the stories of 'PGs.' The stories about gambling experiences were a practical way of framing behaviours in ways that constructed meaning that retrospectively legitimised a set of perspectives. The stories represented their efforts to sum up adequately the difficulties of their gambling behaviour and problems. The narratives were important autobiographical

accounts and not just personal statements (cf. Boltanski and Thevenot, 1996). They were also narratives that allowed individuals to attach them to an end status that supported needs for independence and control (Brown et al, 2008) and endorsed emotional difficulties with gambling. In the efforts to share narratives that maintained their gambling history, the individuals each gave a version of the events that tended to point to what they considered to be the negative outcomes to the self and gambling. The reflexive monitoring of the 'PGs' (Giddens, 1984, p. 191) enabled them to deal with memories of past behaviour and events by developing stories which supported the preferred stories of their 'PG.' Concern for the self may help to account for differences in actors' sense-making as each person had their own identity to protect (Brown, et al, 2008).

Polkinghorne (1998) makes the point that there is the belief that practitioners should contribute knowledge towards epistemology or methodology and academics should facilitate improvements to a research paradigm; this has been adopted by researchers who embrace narrative analysis. A person's own narrative and understanding of their life, leads to behaviour expressive of that story and the idea that individuals construct their behaviour like a writer formulates a text. The traditional model of research has largely seen academics providing developments in research strategies with social scientists simply benefitting from them (Mitchell and Egudo, 2003). Psychotherapists and other social science practitioners have dealt with people's stories, case histories in therapy settings and this may be useful in other fields. The researcher has worked with individuals' stories and the use of narrative analysis to provide explanations for their behaviour. Understanding experience allowed the researcher to have an insider view and hence a deeper understanding of the issues that arose in the relationship between participant and researcher.

Narrative analysis in gambling research provides a way of caring about how knowledge is produced and an understanding that narrative analysis as a methodology in gambling research is exceptionally useful to uncover nuance and detail of gambling experience and behaviour.

The stories

Narrative analysis was used to understand and present real-life experience through the stories of the 'PGs' providing a rich description of their gambling experiences and an exploration of the meanings that the participants drew from their gambling experiences. Trahar (2013) says that narrative analysis amplified voices that may otherwise have remained silent. By using the narrative format to present the findings, it is hoped that understanding the rich information allows an in-depth analysis of the participants' experiences (Wang and Geale, 2015). It is hoped that the methodology illuminated the meanings of personal stories and events related to the aim and objectives of this thesis.

Recovery

The 'PGs' were in 'recovery' and though the term is disputed, being in control of behaviour is critical (Nuske and Hing, 2013). The study of recovery has changed from linear models to the perception that the stages of recovery are a set of related components and 'PGs' go through these more than once while they attempt to fully recover. This reflects the shift in gambling research which embraces dynamic models of change away from a disorder affecting a minority of individuals to more fluid models of pathways or careers (Anderson et al, 2009; Reith and Dobbie, 2011; Reith and Dobbie, 2013). Whilst the urge to gamble may continue, there is a spectrum of recovery including less time and money spent on gambling, self-discipline or limited gambling, control of symptoms without cross-addicted behaviours and improved long-term quality of life, though it is impossible to know if any 'PG' is fully recovered (Nuske and Hinge, 2013).

The GI participants had varying degrees of control of behaviour;

> *"I got a prison sentence for the crime and a life sentence with my gambling. I could start back again easily but it would hurt too many people."* P1.

> *"I don't do it but I want to. I loved the risk. It kept my blood pumping around my body. I miss it but I paid with losing my family. Nothing to stop me going back to it really. Sometimes I wish I was gambling. At least I felt alive then."* P2.

> *"Same as him.* (P2) *I'm here to see if my family will have me back and to show the family I am serious about controlling my gambling habit."* P3.
>
> *"I have the urge to gamble all the time I'm awake. I find it very hard to control with all the stuff on tv for poker and roulette and the lottery. But I come here to … resist the temptation, which I can tell you is very strong."* P4.
>
> *"I feel like a little boy the way my wife treats me, but I'm afraid of the alternative. I miss a little bet here and there, big hopes of a win, the excitement, that one big win that would change my life."* P5.
>
> *"I liked it when I was playing, I thought everyone in the arcade was my friend. I liked it a lot. But it ruined me. And it can ruin me again because if I started playing, I would start nicking again."* P6.
>
> *"I have it a bit different. I lived in the bookies because I didn't want to go home. And as much as I loved it, the high I used to get when I had a win, it reminds me of the problems that I had with my wife. But yes, I could start again. Right now."* P7.

The above comments show that the participants were abstinent from gambling and at points of recovery. Despite experiencing urges to gamble, the support group is key to their recovery. Blaszczynski et al's (2004, p. 309) Reno Model is clear that "abstinence is a viable and important, but not necessarily an essential, goal for individuals with gambling-related harm; and … for some gamblers who have developed gambling-related harm, controlled participation and a return to safe levels of play represents an achievable goal." These participants indicated that a return to gambling would be problematic. They have taken critical measures of accepting responsibility and seeking help. Gamblers have been responsibilised for control of their lives but have experienced serious losses of control. Participants 1 and 6 refer to criminal activity related to gambling problems and the other participants refer to relationship problems which will have affected their ability to deal with 'PG.' There has been loss of 'self-control' but 'PGs' are expected to make rational and controlled decisions related to their gambling at the same time and this appears to be overlooked in literature relating to 'PG.' P5 refers to his motivational model of gambling participation, the dream of hitting the jackpot and transforming his life (*that one big win would change my life)* and provides a glimpse into his 'PG' story. P6 and P7 refer to gambling as escapism to avoid stress and trauma but factors in their situations were inter-related and are developed in their stories below.

Analysis of data

The data was analysed using narrative analysis and subsequently the main findings were coded into themes and analysis involved three types of coding (Glaser and Strauss, 1967). Open coding occurred where the researcher separated the data into similar groups and formed initial categories of information about the phenomenon being examined. Axial coding occurred when the researcher brought together the categories and then identified groups. The groups make themes and can be new ways of seeing and understanding the phenomenon. Selective coding occurred when the researcher organised and integrated the categories and themes in a way that gives a sound understanding of the phenomenon of study. The themes emerged from the data, whereby the transcripts were read and re-read for the themes to emerge. Whilst the researcher was influenced by the literature, the intention was for the themes to emerge from the data rather than fit a pre-existing set of themes. These main findings are discussed below in detail.

Main findings

The meaning of responsible gambling is unclear

> *"RG? Is that just gambling responsibly? There we go, that is just common sense for Christ's sake. Like on a bottle of bleach, saying do not drink. I don't know, you people, just waste everybody's time. If only it was as simple as that. Talk about stating the obvious. Who has the responsibility? I suppose the gambler should shoulder the responsibility. You can't expect the clubs and bookies to be responsible. They want as much business as possible. They are in it the same as gamblers; everyone just wants to make as much money as possible."* P1.

P1 accepts responsibility for his gambling choices, absolving government and industry and it seems that the individual responsibility rhetoric and 'nanny state' framing used to categorise 'PGs' as 'problem people' has been successful with this gambler (and other participants in this thesis). This discourse does not impart PH information which has an important role to play in giving gamblers information about effective approaches as well as the ineffectiveness of the approaches put

forward by government and industry. A PH perspective involving gamblers getting appropriate, reliable and comprehensive information to enable them to make optimal gambling choices is not referred to by this and other participants.

P1 refers to the economic capital motive for gambling (Casey, 2008) providing an explanation of his 'PG' to himself and probably those around him, and categorised as a neutralisation technique. A diverse range of motivations may explain 'PG' though motivations are not completely understood (Flack and Morris, 2015). The main models of gambling behaviour are action and escape; ways of socialising, making money, excitement and boosting self-importance. Dostoevsky's view that '*money has nothing to do with it'* has been endorsed by studies (in Reith, 2007a) though not by the BGPSs (2007; 2010) which found that the main reason for gambling was to win money. A possibility for the inconsistency is that recreational gamblers may be motivated to win and the 'PG' experiences emotion-based motivations which can lead to more sustained behaviour. This forms part of a conclusion of the thesis that there was a spectrum of gamblers involved, made up of the GI and OQ and their perceptions appeared to be at odds with each other based on the severity of the gambling-harms they presented. It is important to understand what motivates all levels of gambling involvement; motivations could provide a practical way to understand gamblers in research and lead to effective gambling-harm initiatives.

> *"Well, I think we've got enough laws and enough government interfering in our lives, I really think that if gamblers can't help themselves and casinos and bookmakers can't help themselves, then there's no choice other than the government to watch over this."* P2.
>
> *"RG? I've never heard of it I don't think. I've wondered how I got into this mess and I got 2 sisters and they never gambled. So, I don't know if it is a man thing but at the end of the day, I've got to accept responsibility for my own actions. Over the years, I've blamed other people but it's my fault and no one else's. But RG just doesn't sound right. Is there responsible smoking? Why is there responsible drinking but no responsible smoking? Is there responsible sex? I don't understand this responsible thing. Does it mean to take your own responsibility?"* P3.
>
> *"RG got to come from the individual. The bookies and casinos and scratch cards are all legal. They're not doing anything wrong. The government allows gambling because the alternative would be for criminals to be*

> *running it and it would be even worse than it is today. You can't punish everyone because a few people have problems. But I don't think it's possible to gamble responsibly. Every few quid that's spent could be spent in a better way, new shoes for the kids or fresh food or putting it in the bank. The clubs and betting-shops, they're laughing all the way to the bank. No one tells you about how you can get sucked in and how easy it is to get into trouble. The government give messages about smoking and then it is up to the person. Maybe it should be the same gambling, to give people all the information. Though the government can't go around giving everyone advice on everything. So, it got to be left with the person. I let things get out of hand. I cannot blame anyone else."* P7.

The exposure the participants had in the past to RG information is unclear and would probably depend on their type of gambling and measures in place during the past decades. P3 and P7's comments are moral interpretations of responsibility where gamblers should be free to do what they want, provided they do not *wrongly* harm others. This view proposes that gamblers are responsible when they are free to make choices, provided their ability to make choices has not been impacted by misinformation or because they are unable to make informed decisions. P3 makes some reference to family behaviours and links to Reith's (2010) gambling careers where individuals are not born gamblers but 'become' gamblers due to a combination of observation, facilitation and learning. The family is a key environment, where individuals experience gambling for the first time and an inheritance of gambling attitudes and competencies. It is important to explore further why some family members will develop 'PG' but not others however other relevant factors pertinent to P3 are unknown in this research. Further knowledge about gambling careers could provide a practical way to understand effective gambling-harm initiatives. P2's comment is aligned with a paternalistic view of responsibility undermining the ethics associated with freedom of choice. Traditional ethical views of gambling are based on ideas of personal freedom. For Bentham, the gambler is a rational actor who considers the concept of an end and means calculation and choice, with all other things being equal is based on the maximisation of individual pleasure. An alternative ethical view is that there is something morally wrong with 'PGs' (Clark, 2011). Gamblers have a responsibility to themselves and their families to gamble within affordable limits, government has a responsibility to determine the context of gambling and operators have a responsibility to operate within the context specified by the government; at least

that is how it used to be. The political agenda has responsibilised the gambler and individualising the problem removes the focus from larger and more complex societal issues that are potential contributory factors of 'PG' (Casey, 2008). Goffman (1967) would argue that for some gamblers, the pleasure of gambling consists in some part of escaping normal obligations to be responsible. Operators need to have a moral obligation to not exploit vulnerable gamblers as well as a regulatory framework that protects the public and facilitates the demands of a liberal market economy.

The participants understood their responsibility in two ways; first becoming a 'PG' and second dealing with it.

> *"I think the only thing to do is ban it really. That would be the most responsible thing to do. Responsibility is a word I know but it's not clear who has the responsibility or why. Some people can handle it and some people cannot handle it. Although I've heard some drug users say they are in control of their drug use, but it's never that way. Maybe it's not possible to be in control of gambling either. At the end of the day, we need to know more about this before we start. And if it's that bad, that the government have got to take responsibility and ban it. They are sending our boys to Afghanistan because they say it's our business, let's start at home."* P4.

Informed gamblers do not prevent 'PG' (Williams et al, 2007) and it is possible that impaired insights are a clinical characteristic of 'PG.' Orford (2010) says that the usual pro-gambling argument is that 'PG' is largely the fault of the individual and gambling is a safe activity for most people. The fault is not with the product and attempts to restrict gambling do not help prevent or minimise 'PG' and only hinder legitimate business activity (ibid). There are choices about gambling in society and to be able to exercise choice, there needs to be an informed and critical debate which is probably different from gamblers being informed. Cassidy et al (2013) argue that because gambling research is dictated by industry interests, critical debate is not encouraged but it is vital that a wider range of social processes including gambler behaviour, gambling products and problem policies need to be examined. The current situation is a polarised debate that overlooks the complexity of 'PG' and potential RG courses of action.

> *"Responsible and gambling in the same sentence doesn't sound right at all. I suppose in a perfect world it should be banned but most people don't have a problem with their gambling. It gets out of control for some. I would like to know why it caused me so many problems but other people get away with it. I should never have started, once I started to gamble, very quickly, well over a few months, it became more and more of a problem. RG is just words, it means nothing and it doesn't make any sense. But if the casinos won't help gamblers and the gamblers have got an addiction so severe, then the government should control it more and try to make things better for people who have problems. The government should do something but I don't know what but they have got campaigns for just about everything else; Aids, Gays, smoking, drugs, drinking, pregnancy, etc but there is nothing for gamblers. All those things I just said, I've seen posters in my GP's surgery but I haven't seen posters about gambling or having a problem with your gambling, like us."* P5.

> *"It was out of my hands really. I got addicted. The only thing I've done in a responsible manner, is coming here and getting help and that was after a long time and the shoplifting and the courts. I'm so ashamed. It's still not easy to say these things. Shoplifting, stealing, I did terrible things. Coming here, that is responsible. I couldn't help myself with the slots. No one could help me either. I had to help myself. It was a very hard journey. I wish I had been responsible from the beginning. I don't think the shop had the responsibility to help me, that is just daft. But I wish the shop hadn't been there. The government should do more."* P6.

A loss of 'self-control' is referred to by P5 and P6 and expecting 'PGs' to take responsibility is somewhat illogical. Again, for Goffman (1967) some gamblers would argue that the pleasure of gambling consists in some part of escaping responsible obligations. The comments concur with Reith's (2007a) view the 'PG' is based on addiction, risk, irrationality and control and on ideals of self-actualisation, responsibility and reason. These ideals are related to the socio-economic trends where external regulation is replaced by internal self-control which is achieved through consumption; self-fulfilment realised through self-control. The meaning of RG is not understood by the participants and there was no consensus amongst them on its principles or goals. There is a lack of research on the ineffectiveness of gambler protection, probably showing that it works against the operators' objectives of making money. The intentions and functions of RG may represent new business values and norms for operators but it is uncertain if it is a strategy for dealing with 'PG' or for improving an operator's reputation (Kingma, 2010).

The medicalisation of 'PG' which removes the problem from its socio-political context releases the government from any accountability and therefore there is an erosion of SR and democratic principles. The government's dependence on revenue is not measured against the costs of 'PG,' at least not yet. The highest estimate of 'PG' costs at £1.2b compares with the £2.6b gambling contributes to the government annually (Davies, 2016) which does not include costs that are impossible to calculate such as loss of character and self-respect, dishonesty and concealment. Further, there are costs to family members which are substantial and far-reaching including financial and emotional impacts that are devastating and can lead to the loss of self-identity, of family members creating additional conflicts leading to separation and or divorce for some participants. There is a need for greater understanding of the experiences of those affected by a 'PGs' behaviour and potentially PH initiatives that protect others from gambling-harms need to be developed.

'Problem gambling' is a complex issue that affects gamblers and others

> *"I got nothing you get me? I got absolutely nothing left. I can't explain how it got me. When I went to prison, the people where we lived gave my wife a hard time. When I did the post office, there was people in there and I terrified them. My wife paid a price for something I did. She had to move away because the neighbourhood had no look on us as decent people again."* P1.

> *"No one understands what it's like. I loved the chance of maybe having a big win, making big bucks easy. I loved that rush when nothing was going wrong. I would go up to the table with 50, 60 or 70 quid, the lights would be flashing, the table was like a magnet to me. First time I went into the casino with like 50 quid and came out with £230. That feeling was a good feeling. It didn't last. I was a fool to think my luck would continue. Beginner's luck perhaps? But further on I've ruined my life and the life of my wife and two kids. We've been separated for a while now and I miss my children. She won't have me back and my children despise me. Sometimes I feel there is nothing to go on for."* P2.

> *"My family don't speak to me. I broke my mam's heart with the debt I was in. She did cleaning jobs to help me but she didn't understand how much I debt I was in. I'm ashamed of myself. I don't know how I got in this mess. I'm lonely and I'm afraid I'm going to start it again. I don't know why I was so stupid to let it go so far."* P3.

"I come here every week, it's really the only time I go out. I do my shopping on the way back and pay my bills in the post office. If I go to Tesco, it's hard not to spend the shopping money on scratch cards so I try to go in shops without the lottery. It's like being an alcoholic and going to a bar me for. But most shops do it now even where I buy the paper. So, I'm better off staying in. I can understand how paedophiles feel if they can't help it. I can't control myself only this is over a legal thing. It doesn't make any sense why I can't control myself." P4.

"Staying in don't help me with the bingo online, all of the adverts on tv it's hard, I'd love to do it. I come here so I can keep going without gambling again. Coming here gives me the strength to go one more week. And if I don't come here for help, I'm out of the house, if my wife catches me not coming, I'd be out on the road. I'd deserve it too. I've given my wife hell in the marriage. She's could never trust me, not with other women like, but with gambling the money. I don't feel like a man no more mind. If I'm honest, she can't put her purse down, well before like, I'd go into it and take out money and I'd know the money was for the kid's tea. But I didn't care. Now every night she sleeps with her purse under her pillow and she always got the purse in her pocket. She can't trust me. I don't know why she stays with me to be honest. She's probably just too old to look for someone new." P5.

"When my husband left me, I'd go into the shop on the slot machines. I'd find the machines that took the smallest coins so I could play for longer with copper, you know 1p and 2p a game not like £1 coins. I loved it. I was in there for hours. Everyone in there knew me. They must have loved me I was literally paying their wages I was in there so much. Then it sort of took over. All my money went on the slots. Then I hated it." P6.

"I found out my wife was having an affair. We never had much money but I love her so much even after everything. She's too good for me, she's a stunner. I couldn't believe it when we started going out together. I felt I was the luckiest man alive. So, I guessed she was seeing someone on the side, she was coming home late staying out, always hid her phone. I know the signs. So, I started going to the bookies to try and forget about what she was doing, it seemed easier than to ask her why she was shagging someone else. I don't know if I thought if I was quiet, she'd stop it. Or perhaps I was afraid of the answer like she didn't love me no more, or he was better in bed. But I never asked her. The only good times I had during that part of my life was the feelings I had when I won. It used to feel so good. I got addicted to that feeling. I think looking back it was like filling a void or trying to blank out the pain with something. Instead of dealing with the problems with my wife, I replaced it with something that made me feel good especially when I'd win. I remember how I used to feel excited when a lot was on the line. I used to come so close sometimes. I was holding on to the gambling so tight, I didn't have anything else to hold on to. When I was in the bookies, I'd try and get the image out of my head of what she was doing. She wasn't doing it with me. Then she started getting close to me again, we started making love. I guessed the affair was over. But I never stopped going to the bookies. I don't

> *know if it was cos I liked the bookies or wanted to punish her by spending my money down there. I dunno. Even today, I couldn't ask her why she cheated and I don't know what that says about me as a man. If she has done it once, she will do it again more than likely. I'm pathetic, I'm a bloody joke."* P7.

The comments relate to escapism where gambling is used to numb feelings of dis-satisfaction with life and or a response to depression, anxiety or traumatic experiences (Milosevic and Ledgerwood, 2010; Hoffman, 2011). In addition to this, there are comments relating to action where gambling facilitates feelings of excitement and or a desire to impress others. The stories were complex; P7 combined escape and action gambling and P2 referred to his gambling as being about risk. P2 and P7 were explicit about the pleasure received from the experience of gambling which facilitated feelings of excitement. P2 and P7 experienced risk through gambling and enabled P7 to demonstrate a strength of character as perceived by him. For P7 a complex social situation underpinned his individual gambling behaviour. Rather than deviant behaviour, Goffman argued that gambling provides gamblers with the opportunity to display a commitment to valued social codes including risk-taking, self-realisation and courage, which arguably are referred to by P2 and P7.

The stories show how 'PG' impacted on the participants and their families; once 'PG' behaviour has been initiated, both the gambler and family members individually and collectively experience gambling-harms. The stories also represent a uniqueness to each participant and their family members which highlights the need for relational-focused 'PG' support options. The stories also refer to impacts on the wider social context of community and society.

The participants identified a separation between what was important for government and industry at central control and gamblers the end-users. The participants felt that government and academics were not in tune with their actual needs and that research and interventions were not focused on the main issues of 'PG.' This theme became a significant part of this thesis. Successive governments have moved away from a culture of regulation and it is important to consider the

experiences, behaviours and perceptions of end-users to create alternative instruments as legitimate and effective responses to 'PG.'

The participants also reflect Casey's (2008) adoption of Bourdieu's (1986) gambling capitals as resources to acquire social positioning. P7 reflects Casey's' economic and emotional capital seeking to improve his financial position and his moral vulnerability and self-worth. P6 reflects a desire for social capital seeking social networks and emotional capital again in the form of self-worth. P1, P2, P3, P4 and P5 mainly refer to economic capital as a driver to improve personal or family wealth and is a reflection of the emotional capital and gambling's impact on each participant particularly as gambling-harms developed. Casey's cultural capital facilitates membership and increased status within groups associated with gambling was not directly referred to by the participants but warrants further understanding. It is necessary to pay attention to the cultural contexts in which people gamble and the meaning of gambling (Reith and Dobbie, 2011). Focusing on how and why gamblers start and continue with their behaviour can enhance understanding of how individual gambling careers and gambling cultures evolve over time. Consequently, understanding the meaning of behaviour, experience and learning gambling will facilitate evaluation of regulatory policy by the more we understand about learning gambling (Matilainen and Raento, 2014).

Goffman's 'Where the Action Is' is a study of why individuals look for excitement, participate voluntarily in risk-taking opportunities and engage in risky behaviour for which there is no obvious reward. The above comments provide some detail about how and why the participants began gambling, why they continued and when they became dependant. Comments by P1, P2, P6 and P7 illustrate Goffman's action and voluntary risk-taking: "personal development is the process by which the individual learns to forego these opportunities voluntarily, even while his capacity to destroy the world immediately around him increases" (p. 237). The participants lacked 'self-control' and control and order were swapped for Goffman's eventful, fateful or consequential action which allows the development of important personal qualities. Gambling, which is the highest form of action, offers the *potential* of discovering and testing character, qualities of courage, self-discipline, presence of mind, gameness, poise; no one becomes a 'hero' by playing

safe. Character can only be shown during action and Goffman refers to the coolness of professional gamblers. Participants have changing-roles and gambling provides the opportunity to act with courage and each of us has a different attitude to the opportunity (Dirda, 2010). Goffman views gambling as being motivated by the desire of gamblers to make a favourable impression on others, showing skill, showing composure when winning and losing resulting in superior status. Binde (2009) observes that gamblers should be less motivated to gamble if they gamble alone and therefore Goffman's character contests become redundant. This makes Casey's gambling capitals more relevant because Goffman's focus on gambling as social contests which imply some confrontation and or aggression seems to be missing from the accounts of the GI participants and reflect the social rewards of interactions with other individuals. The social interaction involved in gambling allows common values to be created and reaffirmed and gambling has a meaning that lets it function as a group and social activity (ibid). This is demonstrated in the online setting, motivations may be, for example, aggressive social contests, passive social interactions and, gambling capitals and it is important to understand motivations in order to construct effective RG policy.

> *"So, who's paying for you to do this stuff [the PhD]? Because it's a waste of money. Is it your money? Well you're wasting your time and money. None of you lot understand. How can you understand? This is just wasting your time and mine. No one is going to listen to me. And that's the problem because I could tell the government a few home truths. Gambling is bloody lethal when it gets hold of you. There's no money about for this sort of help. The government would rather spend it on other stuff. They don't see this as a big problem. They don't see that they've created this problem. Have the government got their foot on the accelerator or their foot on the brakes? I don't think they know themselves. No one understands. Listen, until you have walked a million miles in someone else's shoes, it's impossible to understand. This is pointless because nothing is going to come out of this. The government don't care about us, the smokers they worry about, the alcoholics they worry about, the druggies get help, but we are invisible to you lot. Tell me what difference will this [thesis] make even if it is very good stuff? That's right, it won't make no difference. No one ever listens to us, it's like we are social lepers, the people the government want to brush over, pretend it's not happening."* P1.

The above comment refers to the complexity of 'PG,' the perceived futility of research and a sense of hopelessness without government accountability and how the participants managed the risk created by their gambling behaviour. Reith (2004)

says that the spread of consumerism has been accompanied by an undermining of freedom and the disordered consumer identity of the 'PG.' The 'PG' represents the conflict that exists between consumption and freedom; managing risk and problems of dependency means that the gambler might not be free at all. The emphasis on freedom is not new but what is new is that freedom is a mode of governance or control. For the 'PG' it is the freedom that causes the problem and consumer sovereignty allows 'PG' to develop. The above comment highlights the problems with the freedom to gamble; none of the participants were successfully able to manage the risk. Self-governance or bottom-up governance apparently more fully realises liberal demonstrate ideals but fails when it comes to 'PGs.' The majority interests of government and industry tramples on the minority interests of 'PGs' and therefore selective government regulation may be warranted to promote and protect liberal democratic ideals.

In response to comments about gambling research, it is necessary for participants to feel that they are helping with extending knowledge and informing policy and practice which can lead to more effective outcomes and the minimisation of gambling-harms. The participants felt that researchers have neglected the 'PGs' perspective and experiences. With greater interest in gambling amongst the general population and an increase in 'PG' this thesis took a relatively unique approach of gathering data and information from 'PGs' to determine their views and experiences on 'PG' and RG and the participants' comments provided interesting and useful stories regarding 'PG.'

The exponential growth of gambling has not been matched by critical gambling research which has instead focused on prevalence studies, the individualising of 'PG' and has ignored the socio-political dimensions of 'PG.' The implications of the current research agenda and its partnership model is that society does not adequately understand gambling-harms. Greater independence and transparency is needed in gambling research. P6 refers to government ignorance of 'PG' research but it is a rejection of research by governments as beneficiaries of gambling.

> *"What's the research for? Is it meant to offer some sort of support to generate a culture of 'PG' prevention? That will never happen. Sorry."* P2.

"A strength [of your research] is that you have got us to tell you about our experiences but at the end of the day you will never hear our voice because no one is interested in us or you, in the real world. Don't get me wrong, you seem nice and you seem genuinely interested in coming up with things to help people but you can't change this. It will never happen." P4.

"Firstly, you university people have mostly knowledge from books but people like us here understand the real situation much better." P5.

"When you've done your research, there is no feedback. It's never brought back to us or the government but we would like to know the results of the research. When you've done your research, do the government get to see it? If the government see it, do they listen? No one listens to us and no one listens to you. Seems a joke to be honest." P6.

"When you go down to the common man or woman, you ask in the local language. Then they give you their opinions and then you lot got the content but it is watered down or tarted up so you don't end up with getting what you wanted in my opinion." P7.

Different motivations were identified for 'problem gamblers' seeking help

"When I was in jail, I had this counsellor. She knew what I was in jail for and she told me I had a problem and when I was coming out, she set this place up for me. And I've been here ever since. Never miss a meeting. If you think about it, I had to go to jail to get help, now that is wrong." P1.

"I knew I had a problem because I had a quite good salary but I couldn't make it last to the end of the month. But I didn't know what to do about it. If I had a bad back I would go and see the doctor and if I had toothache I would go to the dentist. But I was never sure who to go to." P2.

"Me and the wife were rowing all the time, day-in and day-out. I knew I had a problem [with my gambling] but my wife knew before me. Anyway, next thing, she says we got this appointment with marriage guidance. ... What's that all about? I didn't want to go but she gave me an ultimatum that I had to go or she would divorce me. So, we went and then the guidance woman said that I had a problem with my gambling and that I needed help and she told me about this place." P5.

"It all came to a head when I got caught for shoplifting. One thing led to another and then I ended up here. My brief told the Magistrates that I could come here, in the hope of getting a lighter sentence. I've passed this building all my life. I never knew this group was here. And if I had, I don't know if I would have come in. It's quite embarrassing." P6.

"I didn't realise I had a problem until I started getting behind with my rent and electric and gas bills. My rent was like £75 per week but I only noticed

> *the problem when I had letters saying I owed thousands of pounds. I don't know how that happened. I had to sort things out, my marriage, my life, my money … I didn't know what to do so I ended up in the Citizens Advice and they helped me sort out my debts. It was such a bad experience, trying to sort out my mess. The Citizens Advice people told me about this group and that it would support me while I tried to sort my life out. I've had a few lapses to be honest, but I feel a bit more in control of my situation."* P7.

It is important to understand the motivations of 'PG' as discussed earlier and the issues which make 'PGs' get help. A discouraging view of help-seeking was expressed when help was sought because participants experienced extreme behaviours including psychological breakdown or financial and or personal ruin. Help was sought when participants hit 'rock bottom.' This endorses how 'PGs' move from winning, to losing and finally desperation (Lesieur and Rosenthal, 1991). The participants had reached the desperation phase, characterised by debt, social isolation and for some, criminal offending. They did not seek help after reviewing their behaviour but because they were compelled by external factors including criminal conviction, pressure from a spouse or debt agency advice.

It is essential to understand the reasons for not accessing help early in the development of 'PG.' There was some evidence that they did not seek help because of a lack of knowledge about help available as well as embarrassment and denial. The participants did not acknowledge 'PG' for some time and gambling remained invisible to people around the gambler. While invisibility is in place, it prevents support from others. This suggests that more emphasis is needed to recognise 'PG' warning signs and that support is appropriately available.

Key characteristics of 'problem gambling' are the emergence of negative consequences and a lack of self-control

> *"When I did the crime, deep down I knew I'd have to do the time. I couldn't control myself. I still to this day cannot explain the urge I had to gamble. The only thing I can say is that it was a sickness that I brought on myself. I thought my wife would leave me but it didn't matter at the time. I just needed the money. She didn't leave me but I let her down and I embarrassed her. She didn't deserve that. I regret the hurt I caused her. And she stuck by me and I didn't deserve that."* P1.

> *"Thing is, I don't feel like a man no more. Not even in the bedroom. The highs got from gambling, were never worth this."* P5.
>
> *"I can't tell you how many letters I never opened. I knew it was about all the money I owed. To cut a long story short, I was made bankrupt."* P4.
>
> *"I ran out of money and hope. I ended up not really having a life. My mind consisted of blocking things out, the bookies, my wife's affair, not going home sitting in the bookies. All could think about was how I could get money to go back to the bookies. I used to ask my mum to borrow money and I knew I would never pay it back. But as well I lost my mojo because I got into a rut. I wasn't working to live, I was living to gamble."* P7.

What started as a harmless pursuit had progressed into a harmful and risky activity for the 'PGs' and gamblers do not want to develop 'PG.' The consumption of risk is a driver of the gambling market and though operators provide RG information it is inadequate. Cosgrave (2010) says operators trivialise how gambling can become risky consumption and risk manage gambling to enable markets to grow which in turn causes difficulties for 'PGs.' Despite the high percentage of revenues generated from 'PG,' rates do not appear morally difficult for government and industry, categorising 'PGs' as a small group of damaged individuals (Cosgrave, 2010). The ways that operators manage gambling to provide a safe experience was not an area of investigation during the GI and the operators were not specifically discussed. Risky consumption is a feature of market development and though operators may claim to avoid it, their efforts need to be more robust and visible, especially if they are committed to minimising gambling-harms.

Goffman discusses individuals who seek action but not risk with a public performance implying the 'social' aspect and needing an audience (Goffman, 1959). 'PG' is a kind of self-performance where the 'PG' lacks self-discipline but needs other qualities such as courage, integrity and composure (Goffman, 1967). 'PGs' are out of control and stigmatised and represent a form of discredited identity (Goffman, 1963). The GI participants see themselves as discredited, as evidenced in their comments and had no expectations for operators to be responsible. Goffman would view RG as a fallacy because a feature of gambling is that it involves the risking of character. Goffman writes that character is gambled (1967, p. 237) and arguably the character of these participants had been gambled and lost. They had choice and embraced risk and lost. Fatefulness for Goffman (1967) is "the threshold

between retaining some control over the consequences of one's actions and their going out of control" (p. 27). Therefore, the gambler's fate is to become a 'PG.' The notion of responsibility is replaced by RG where gambling is not stigmatised (Cosgrave, 2010). In other words, gambling with responsibility shows character. It is possible that character loss was experienced by the GI participants and their gambling behaviour caused complications in their lives. Cosgrave concludes that gambling is not stigmatised but 'PG' is. It is not clear when the gambler becomes the 'PG' and this has subsequent implications for responsibility. Identification of the 'tipping point' between gambling and PG is the 'Holy Grail' and understanding risk factors better may enhance prevention and treatment approaches (Johansson et al, 2009). RG may be part of it where gamblers need to be fully informed about their needs, risks and struggles related to their gambling behaviour.

> *"It started as a bit of fun, a hobby. To see if I could win a few bob. But I should've known better because I'm a very competitive person and I can't do nothing by halves. Next thing, the bets got bigger and the losses got even bigger. Not overnight, I'd say a couple of years before it got out of hand."* P1.

> *"I've always liked to gamble but just what I could afford. I thought, one day I am going to have a big win and life was going to be so different. I wouldn't have to work, it would be easy. I thought I could build up winnings that would set me up comfortably. I had a few wins but I had many more losses."* P2.

> *"I loved going to the slots. It was always quiet when I was there. I could play on my favourite machine and the time went by so quick. I used to use the bus to get there. At first I would buy a return ticket. Then that would leave me with say £12. Then as time went on I would buy a single ticket so I'd have like a pound more to spend. Then it got to the point that I never had bus fare home. Next thing, I'd walk to town, go on the slots and I'd have to walk home because all the money was spent on slots. I never took all my money into town, I used to budget for each day. I'd spend every penny I had. I even shoplifted for food. The next thing, I got cocky and shoplifted for things to sell. Small things you know. I got caught pinching. I suppose that was inevitable." P6.*

> *"I'd do the odd bet in the big races or put a few quid on for Man United to beat Chelsea, but it was just now and again. I never felt any pull and could walk past the shop without a problem."* P7.

OG in particular is promoted by the industry as gambling with 'safe risks' where gamblers can participate in an exclusive form of edgework; however, edgework

poses threats to wellbeing (Banks, 2012). Gamblers can go from riskophobic to riskophiliac and this was referred to by the GI participants (see P6 directly above). For Lyng (2005) when individuals participate in risk-taking they explore the 'edges' and try to go as near as possible without going over. All edgework involves "a clearly observable threat to one's physical or mental wellbeing" (Lyng, 1990, p. 857). Many activities provide this threat and the GI participants referred to actual impact on their physical and mental health. Sociology provides different explanations of the social shaping and production of health issues; Marxists stress the role of class, feminists blame patriarchy and Foucault emphasises how society is managed by professionals (White, 2016). Sociology studies gambling because it helps our understanding of how society works: 'PG' is an outcome of the organisation of society and an unequal distribution of political, economic and social resources. Lyng's edgework explains gambling as an escape whether it is from work stresses, work alienation or from society preoccupied with safety and security but these are not motivations for gambling (Mascini et al, 2015). The participants did not discuss the border between order and chaos but did value 'self-control' and mental toughness.

Gamblers recognised development of their 'problem gambling'

> *"I started gambling with just a few quid. It was in the 70's and n by the end of the 70's, my smallest bet was £5. But that was each time. I could spend £200 a night, two or three nights a week. So, we're talking maybe a grand a month. And I was losing more than I was winning. But I felt I could get that big win. Then I needed that big win to cover my debt. Next thing, I needed to win £20,000 to cover my debts and that would leave me with nothing. ..... I thought I knew how to carry out the perfect crime ... I got caught and I made off with ... so I didn't even pay my debt. It was a relief in the end. I was in jail and couldn't pay my debts and my secret was out. I didn't realise how big the secret was until it was out. Overnight, I felt a different man, thirty or forty years younger."* P1.
>
> *"It started so innocently, just a few pounds every week. But when my wife found out, that is when everything fell apart. She went to the cashpoint and there was no money in the account. She couldn't go shopping for the weekly food. She left me the next day."* P2.
>
> *"I'm a roofer. I have good wages and I also did a few guvvy jobs, but I never had any money. My wife knew something was wrong, she wondered if I was spending the money on another woman or spending it on drugs. You'd think*

she'd have been happy when she found out it was just gambled away. But I know I kept her short. For 15 years, she had to have the same winter coat and then she had a new one from her sister. She was the one who put food on the table for the kids. She worked her fingers to the bone to keep the kids tidy. I have regrets and terrible guilt." P5.

"It all came to a head when I got caught for shoplifting. One thing led to another and then I ended up here." P6.

"Well there were two things, there was my wife cheating on me and then all the bills. I don't know which one was worse but probably when it all caught up with me. I thought about killing myself at one point." P7.

Getting help for 'PG' starts with acknowledging its harmful impacts and then seeking help. There were some common difficulties in getting help which included not knowing where to get help, a reluctance to get help, delay in seeking help and lack of available help. There were initial problems in seeking and getting help but the participants eventually arrived at treatment. This has implications for the framework that supports RG; more 'PG' help is required and more types of help need to be explored including online support (McGowan, 2003; George and Bowden-Jones, 2014). The inclusion of sociological variables into theoretical frameworks for RG has the potential to guide prevention and treatment strategies in new and different ways.

Immediate triggers for getting help

"I lost everything, family, job, standing in the community and when I lost my freedom then I decided to try and get it under control. But I walk around with this powerful urge to gamble, to go and get that big win still. It is like a beast in me that won't die. I work hard every day to keep it under control. But I respect myself now and that means a lot to me." P1.

"I'm very lonely and bitter. I regret gambling because my marriage broke up and she took the kids and poisoned them against me. I'm on tablets for depression but I don't think they are working." P2.

"I got caught for shoplifting a few times and the police gave me cautions. That didn't put me off and then I ended up in the magistrates' court. It was in the local papers and people who knew me like my neighbours stopped talking to me. Everyone in my ex-husband's family were saying like that's why he left me because I was a thief. By this time as well, I never had any friends but even the people who used to say hello, stopped speaking to me. I did feel ashamed when I was in the local paper. I realised how low I was.

I was a thief and a gambler and like [P1} that's when I knew it had to stop." P6.

"I know I've got a problem with gambling but I know I've got other problems and I don't know which came first the chicken or the egg. I've got no confidence in myself, I can't control my gambling, I can't see the future, I can't trust anyone. I just want to change." P7.

Immediate triggers to getting help were family, personal or relationship problems linked to gambling, including identity examination whereby the participants examined themselves, financial debts impossible to manage and worries about family and friends and for the future. The motivations of 'PGs' for changing behaviour need to consider other factors to change behaviour successfully. These factors will include support mechanisms including family, friends and support groups. Social networks play an important role in provide support for the recovery journey (Lyle, 2014). The stated motivations for behaviour change were internal and external. Research has indicated that internal motivation for behaviour changed has greater chance of being successful than external motivations (Kushnir et al, 2016). It is vital that whatever the motivations are for 'PG' behaviour to change, that appropriate and adequate support is available. The types of mechanisms that are effective also need further exploration and evaluation.

Responsibility

"Listen love, ……. I needed the money for gambling debts and nothing would've stopped me. Nothing. I had to hit rock bottom before I could do anything about my gambling. ……. I knew what I was doing was wrong but I couldn't help myself." P1.

"It's too late now. I've lost everything. I suppose all I really needed was a lot more common sense." P2.

"I was so stupid. I blame myself. It was my choice, no one made me do it. My mates used to spend like a fiver or a tenner on the FOBTs but no, not me, I spent everything I had. And then I borrowed. I've heard that these machines are addictive but no one told me before I started. Why don't they put health warnings on them? Thing is, some people are more vulnerable than others. I wish I had never started playing on the FOBTs." P3.

"They've made it so easy. If I buy 5 scratch cards, no one would look at me twice. In fact, the queue is usually long, well a couple of people in it. So, it wasn't just me. If they are so addictive, why is it so easy to buy them? The government should ban them." P4.

"Going to the bookies was something I used to see my dad doing, my uncle doing, the lads from work. It never seemed a bad thing to do. My problem was I couldn't limit my gambling and maybe others could. I was never in control. The staff in the bookies were always friendly, I had a warmer welcome there more than I did at home. They knew my name, they knew my habits. I was in there every day. No one was really my friend there. No one ever asked me if I could afford it. How I managed all the losses. I don't know how the staff lived with themselves when they went home at night. After all, it was like taking candy from a baby. Then you can't expect the industry to bite the hand that feeds it. So where was the government to check on these people. I thought I was in control and I wasn't. No one wanted to know. The only one who helped me was my wife. She said for better or worse she married me. I wish someone had helped me sooner and not my wife because the marriage is not normal. There is no trust. I can't blame her." P5.

"I don't understand how the council or the government allow these shops to be open all day. I didn't realise how addictive the slot machines were. There was no warning on them. I don't understand why they're allowed when the government are trying to stop people from smoking. The council stops people from not paying for parking or paying their council tax. But they don't care about these shops. Or the people in them. If I was on drugs, I would've had help, even clean needles or methadone. I don't know why this isn't a recognised addiction. Is it a recognised addiction? So, why isn't there any help out there for people like me?" P6.

"Some people are just stupid. The clear majority of people gamble and it is just a bit of fun. I don't fancy more rules about when you can and can't have a gamble. I think if you have got a good life and things are going well, you won't be drawn into these things. You got to try and live a healthy life and this is not healthy. I think if my wife didn't have an affair, this would never have happened to me. The government can't tell people not to have an affair. I was 25 when I started to gamble and within 3 years I was almost finished. And 25 is not young, fair play." P7.

Gambling as a target of moral regulation ended with the Gambling Act 2005. The exhortation to gamble responsibly is an invitation to respectability, just as it is with *drink responsibly* (Yeomans and Critcher, 2013). Through responsibilisation, conformity and control can be achieved by giving gamblers the right to determine their own behaviour so long as they take responsibility for the consequences. The 'PGs' acknowledge Foucault's responsibilisation without referring explicitly to the term. The idea of governments creating individuals who are most suited to fulfil its policies, does not consider that 'PGs' are irrational, vulnerable and probably out of control. Therefore 'PGs' need protection from their uncontrolled and irrational

behaviour which is reflected in the comments above. RG is now operating in its own way and it defines, disseminates and justifies particular values and meanings and frames issues in a certain direction without any regulatory framework. Further, RG policy does not have categories and classifications for the spectrum of gamblers. The assumption of responsibility for an action that affects others is usually justified using a normative framework based on the government's or operator's relationship with gamblers because of the risk of gambling-harms. Responsibility for an action implies that government and operators have a duty to be responsible to gamblers and this accountability corresponds with the relevant normal leading to legal, moral, ethical or social sanctions (Miers, 2014). This duty is not recognised within the current regulatory framework and it is unlikely that this will change in the foreseeable future. However, in general, gambling public policy is shaped by the dominant moral views of society rather than consideration of empirical research and this will impede effective RG policy (Collins et al 2015). The moral views of the participants reflect acceptance of blame and responsibility, however it is questionable whether 'PGs' have the kind of agency over their actions that amount to being morally responsible. If the 'PGs' experience a lack of 'self-control' however it may not equate with a loss of agency and this was not explored with the participants but requires further investigation.

An account of sociology of gambling and the group interview

Goffman would argue that for some gamblers, the pleasure of gambling consists in some part of escaping normal obligations to be responsible. Gambling is now everywhere and individuals are subjected to it from an early age which affects how individuals feel about gambling. Gambling can be the source of problems and pleasures and the social context or culture in which gamblers find themselves contributes to understanding the gambler and the 'PG.' Gambling is tied to ways of becoming modern subjects in the West, marked by global, capitalist economies, privatisation and technology. The participants had an interest in gambling, which allowed them to experience and express a sense of freedom. The prominence of gambling in post-industrial capitalist societies has been attributed to shifts in the 'fabric of social life,' increasing secularisation, declining concerns about the immorality of gambling and the spread of consumerism, facilitated gambling as a

mainstream leisure activity (Reith, 2007, p. 35). Powers of freedom now reside with the individual (Foucault, 1997) and this shift highlights the reflexive character of power in late modernity. Gambling was framed by participants in relation to the freedom of social mobility that Reith calls the 'democracy of chance,' where winning becomes a fantasy of liberation from the problems of everyday life. Social mobility is the answer to the inequalities generated in the neo-liberal economic project and economic capital is one of several capitals including cultural, educational, social and symbolic types that are necessary to move successfully through everyday life in capitalist societies (Bourdieu, 1986; Casey, 2008). Gambling's ideological link with the freedom of social mobility has been strengthened by accessibility aided by technology. There is a dynamic between regulatory discourses producing a desire for risk and gambling within their limits; regulation is expressed by the gambler: *When the fun stops stop.* This reflects the gambler's freedom to gamble, their sovereignty as a consumer with no appeal to external authority. Gambling regulatory discourses accept that 'PGs' will be unable to exercise freedom responsibly (Redshaw and Nicoll, 2010) but authorities responsible for gambling are not charged with opposing the risk and danger promoted by operators and played out through 'PGs.'

Reith (2008a) argues that the growing centrality of the individual consumer to how operators promote and regulate gambling which has inherent potential for risk raises urgent questions about how to contain social costs for 'PGs.' The commitment to the abstract individual gambler of neo-liberal freedoms suggested that attempts to address 'PG' will be limited. To understand alternative concepts of freedom and control it is necessary to understand how gambling maintains social inequalities of neo-liberal capitalism and is responsive to social forces and the sources of domination in a particular era (Brown, 1995). Current society is characterised by risk and neo-liberal economics are free from any ethical approach. The consequence is a loss of concern about the social wellbeing of gamblers and creative and critical thinking is required to cultivate the empowerment of gamblers.

Conclusion

The chapter began with setting out the first two objectives that narrative analysis of the GI sought to research. It was hoped that the results of the GI would inform the OQ and because the research design was sequential the findings could be incorporated into the OQ. However, there was a general despondency about effective mechanisms to minimise 'PG' and instead of the researcher having a list of useful techniques to assess, the OQ was largely based on the chapter that examined RGFs. It is important to consider why they did not identify effective RGFs and it is suggested that this is an outcome of their gambling experiences and particularly the severity of the 'PG' they experienced.

Chapter 5

Data analysis online questionnaire

Introduction

This chapter will discuss and quantitatively analyse the data collected and processed from the OQ. Analysis was based on a positivist approach using two statistical tests; the independent samples t-test and the Mann Whitney U test. They were the most appropriate statistical tests to compare two populations.

Analysis of the online questionnaire

This part of the thesis utilises a positivist methodological approach in the collection and analysis of the primary data in the OQ. In the positivist approach, objective views of the world can be given and it is founded on a belief that social science should mirror procedures of the natural sciences (Collis and Hussey, 2003). The role of the researcher is limited to data collection and interpretation is through an objective approach where findings are quantifiable. The positivist approach in the social sciences allows research findings to be independent of personal value judgements. Positivists believe that this removes researcher bias and employs statistics to derive answers. As mentioned in Chapter 3 it is hoped that mixed methodologies create a more holistic picture of findings to add to our understanding of complex social problems.

It is necessary to discuss how the data was handled. There was a challenge to produce meaningful information in a convenient manner for both analysis and presentation. A basic requirement of any research is the presentation of comprehensible, reliable and valid results (Doig and Groves, 2006). Every analysis requires subjective decision-making with the intent to make analysis and presentation easier (DeCoster, 2004). Each of the questions were analysed in two ways. First, the responses of academics and counsellors were combined when applying statistical tests. Second, when utilising descriptive statistics in the analysis

of the data, the 'Agree' and 'Strongly Agree' responses and the 'Disagree' and 'Strongly Disagree' responses were added together to give a representation of the numbers and percentages of participants who had a positive or negative view of each feature. The number of operators was too small to be meaningful (39) and the category of 'others' was too diverse to be meaningful (102) and these two categories were not analysed with statistical tests. It has been recognised that what has been omitted from the analysis may have a major impact but the OQ produced an enormous amount of data and subjective decisions were necessary. All data analysis can be found in Appendix 3. The OQ can be found in Appendix 5.

Online questionnaire participants

The Reno Model (2005) stresses that key stakeholders must share the same objectives of RG which is why gamblers, operators, regulators, researchers and others were invited to participate. Participants were required to identify which category of stakeholders was most appropriate to represent their interest in the study and it was intended that the response categories were mutually exclusive so a clear choice could be made.

Stakeholder group	**Number of participants**	
Operators	39	
Academics	80	106
Counsellors	26	
Gamblers	430	
Others	102	
Total	**677**	

Table 5.1 Key stakeholders in the OQ

The participation of operators is significant and it was not within the remit of this thesis to understand their motivations to participate. Arguably they would benefit from involvement in studies that examine RG and be involved in future directions that may be identified. Further if they want to develop efficacious RG policy,

involvement in research is vital. It is important to have their voice even though it is a small sample. Thirty-nine operators who participated generally said the same thing as the gamblers. This suggests their response can be taken as truthful because if they were saying the same as academics/counsellors it would be more likely they were saying what they thought would satisfy the researcher.

Just over two-thirds were gamblers and their responses are most relevant to the aims and objectives of this study. There was some difficulty with getting the approval of the University Ethics Committee to use the term *gambler*. Due to their concerns about participants self-identifying on an emotive classification, it was decided to use an alternative form of classification: *user of gambling sites*. It was decided that it would be possible to ascertain the extent of behaviour by examining the frequency and or amount of time or money wagered. The responses of academics/counsellors frequently do not correspond to the responses of gamblers and operators but it is the former groups who are involved to some extent in formulating regulatory policy and as an example, submitted evidence for 'A Bet Worth Taking.' Three-quarters of the academics participating in that research stated that they never gamble and there is some argument supporting that they are at variance with the gamblers.

General analysis of the online questionnaire

An initial comment is the bulky nature of some of the questions and response options and to simplify this as much as possible, a Likert Scale was used so that the responses were uniform. Also, only the 'top ten' RGFs are analysed in this chapter and all the remaining analysis can be found in Appendix 2.

Rank	Responsible gambling feature	Mean	Median	Mode
1	Providing accurate information on chances of winning	2.83	3	3
2	Providing age verification controls	2.82	3	3
3	Displaying gambling activity in cash value instead of credits	2.63	3	3
4	Providing self-exclusion options	2.58	3	3
5	Requiring players to set predetermined spending limits	2.56	3	3
6	Providing regular financial statements	2.55	3	3
7	Providing PG education and awareness programmes	2.52	3	3
8	Promoting advertising standards that responsibly promote gambling with clear warnings of the dangers of winning	2.50	3	3
9	Identification of 'PGs' by operators	2.49	3	3
10	Requiring mandatory registration	2.39	3	3

Table 5.2 Top Ten Effective RGFs identified by gamblers (Percentage of stakeholders agreeing or strongly agreeing)

The RGFs in the top ten have a median of 3 and a mode of 3. The RGFs are justified for listing because the highest means, highest median and highest mode agree with each other and are a responsible choice. It is not necessarily the case that the top rated RGF is better than the second rated one; it is not statistically significant between the positions because the research has a limited sample.

Rank	Responsible gambling feature	Mean	Median	Mode
1	Providing age verification controls	3.20	3	3
2	Requiring players to set predetermined spending limits	3.07	3	3
3	Providing self-exclusion options	2.98	3	3
4	Displaying gambling activity in cash value instead of credits	2.92	3	3
5	Providing accurate information on chances of winning	2.90	3	3
6	Identification of 'PGs' by operators	2.87	3	3
7	Allowing only one credit card per account	2.86	3	3
8	Enforcing play stoppage, break or interruption	2.84	3	3
9	Requiring players to set predetermined time limits	2.83	3	3
10	Eliminating bonus rounds	2.81	3	3

Table 5.3 Top Ten Effective RGFs identified by academics/counsellors (Percentage of stakeholders agreeing or strongly agreeing)

The above table illustrates that the percentage of academics/counsellors is a higher percentage than the gamblers. The range for the gamblers is 2.39 to 2.83 and for the academics/counsellors 2.81 to 3.20. The above table is ranked by mean. The top ten RGFs have a median of 3 and a mode of 3. The RGFs are a responsible choice because the highest means, median and mode are in accord. It is not necessarily the case that the top rated RGF is better than the second one and there is not a statistically significant difference between the positions because the research pool was limited.

Statistical tests

The independent samples t-test had an independent variable with two groups (gamblers and academics/counsellors) and a dependent variable that is quantitative (RGFs). The assumptions for the test are first independence and so individuals from both groups must be independent. Second, the dependent variable must be normally distributed. Third, homoscedasticity where both groups have the same variance. If the groups do not have the same number of participants, then it is necessary to compute a non-parametric analysis using the Mann Whitney U-test. The Mann Whitney U-test is appropriate when the dependant is ordinal.

Independent Samples t-test

The research compared the responses of the two groups using an independent-samples t-test to compare their mean scores (Pallant, 2013). The variables were one categorical, independent variable (gamblers and academics/counsellors) and one continuous, dependent variable (RGFs). An independent samples t-test asks if the difference between the two groups averages is unlikely to have occurred because of a random chance in sample selection. It indicates if there is a statistically significant difference in opinions between the gamblers and academics/counsellors.

Variable	Type	Explanation of variable
Independent	Gamblers and academics/counsellors	Variable expected to explain the cause of the dependent variable
Dependent	RGFs	Variable expected to be explained

Table 5.4 Explanation of variables

The two main outputs of the independent samples t-test are effect size and statistical significance. Statistical significance indicates whether the difference between

sample averages is likely to represent an actual difference between populations (as in the example below). Effect size is a major finding of a quantitative study. It indicates whether that difference is large enough to be practically meaningful and is a simple way of quantifying the difference between two groups; 0.2 = small difference, 0.5 = a medium difference and 0.8 = a large difference.

To determine whether a result is statistically significant, a researcher calculates the p-value which is the probability that the null hypothesis is true (ibid). The null hypothesis is rejected if the p-value is less than a predetermined level, usually 5% (0.05). The p-value ranges from 0 to 1; the lower the p-value the more likely it is that a difference has occurred. When a difference is statistically significant, it does not mean that it is important or helpful in decision-making (Statpac, 2016). It simply means that you can be confident that there is a difference. To know if a difference is statistically significant, effect size must be calculated.

Standard error gives a measure of how well the sample represents the population; a small standard error is good and means the sample is representative and indicates more of an accurate reflection of population mean.

Stakeholder group	Number of Participants	Mean	Standard Deviation	Standard Error Mean
Academics/Counsellors	106	2.55	0.63	0.06
Gamblers	430	2.12	0.69	0.03

Table 5.5 Group interview statistics

In statistical terms, the researcher sought to test the probability that the two sets of scores came from the same population. The overall means for academics/counsellors was 2.55 with a standard deviation of 0.63 and 2.12 for gamblers with a standard deviation of 0.69. This difference, with an effect size of .06 is significant beyond the 0.1% level ($t = 5.93$ $p < .001$) so we assume that there

is a difference between the two groups. This is a moderate size of effect (Cohen, 1988).

Mann Whitney U-test

The Mann Whitney U-test compares differences between two independent groups when the dependent variable is either ordinal or continuous. It is a parametric test which uses data that is ordinal and does not rely on numbers. It assumes that there are independent and dependent variables (Pallant, 2013). The test determines the p-value. It can inform if the effect exists but does not reveal the size of the effect. The effect size and statistical significant and are essential rules to be reported.

Statistical analysis

RGFs will be analysed according to how effective they were rated by key stakeholders. The graphs are discussed in order of how high they were rated in terms of how effective the RGF was rated. All graphs can be found in Appendix 2.

Top ten effective responsible gambling features identified by gamblers

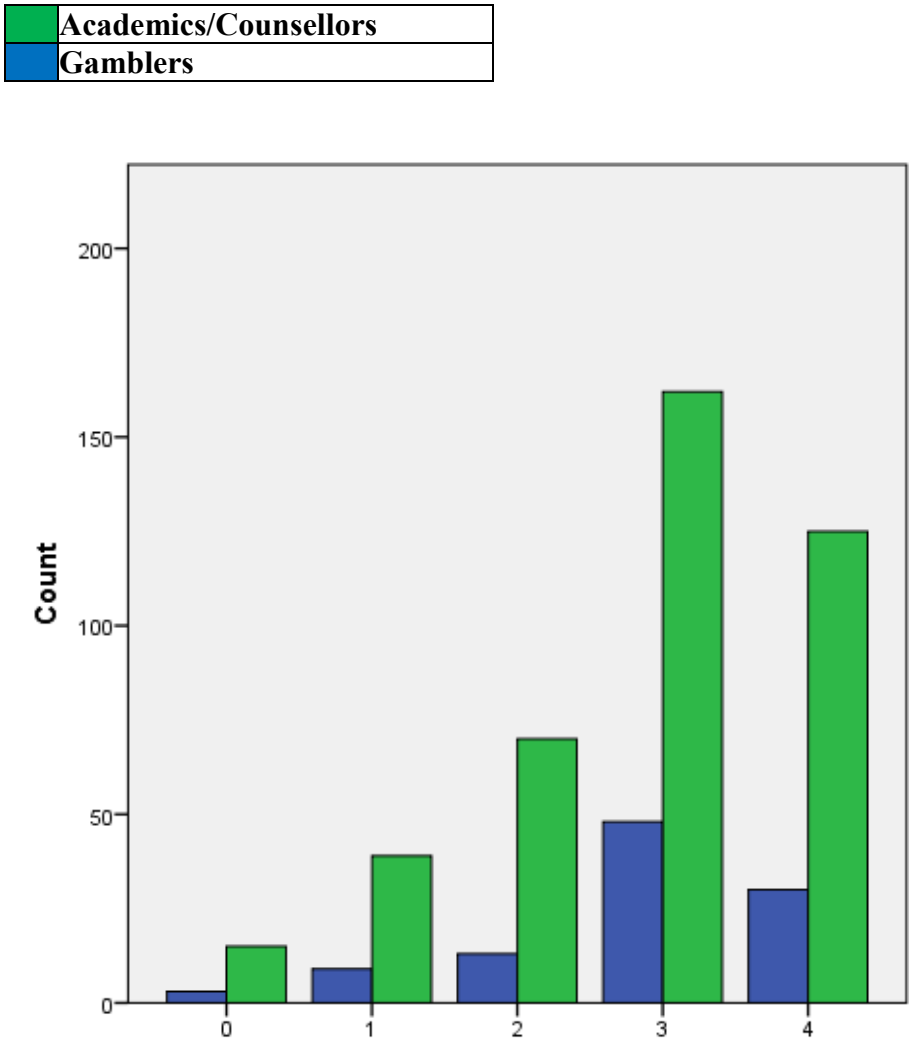


Figure 5.1 First most effective RGF: Providing accurate information on chances of winning

Both academics/counsellors and gamblers consider that providing accurate information on chances of win is effective. There is no significant difference between their responses.

The Mann Whitney U Test score = 20548, Z = 0.48 and p = 0.63. The Effect Size Pearson r = 0.0213. There is a small effect size <0.2; there is a difference but just a small difference (Coe, 2002).

All Respondents Agree or Strongly agree	Only Operators Agree or Strongly agree	Only Academics Agree or Strongly agree	Only Counsellors Agree or Strongly agree	Only gamblers Agree or Strongly agree	All Others Agree or Strongly agree
68.5% (420)	69.5% (16)	68.4% (54)	92.0% (23)	69.5% (289)	50.6% (37)

Table 5.6 Most effective RGF: Providing accurate information on chances of winning

Providing accurate information of chances of winning receives positive responses from all groups. Studies have shown that on-screen messages have corrected irrational beliefs and erroneous perceptions (Steenbergh et al, 2004; Floyd et al 2006) and there is a link between stepping out of daily life and developing states of dissociation where gamblers lose track or control of their behaviour (Blaszczynski et al, 2003). It may be important to provide this information because of its approval by two-thirds of the participants. This result supports Monaghan's (2009) argument that appropriate RGFs include information about the odds of winning. Morse (2006) suggests that frequently trust is borrowed from reputable organisations when it comes to payout rates, which can be audited by public accountants. The results may be linked to gambling careers where gambling motivations are important to understand. There may be clear differences in the responses of participants in the GI and OQ with links to gambling motivations and RG which will be explored in Chapter 7.

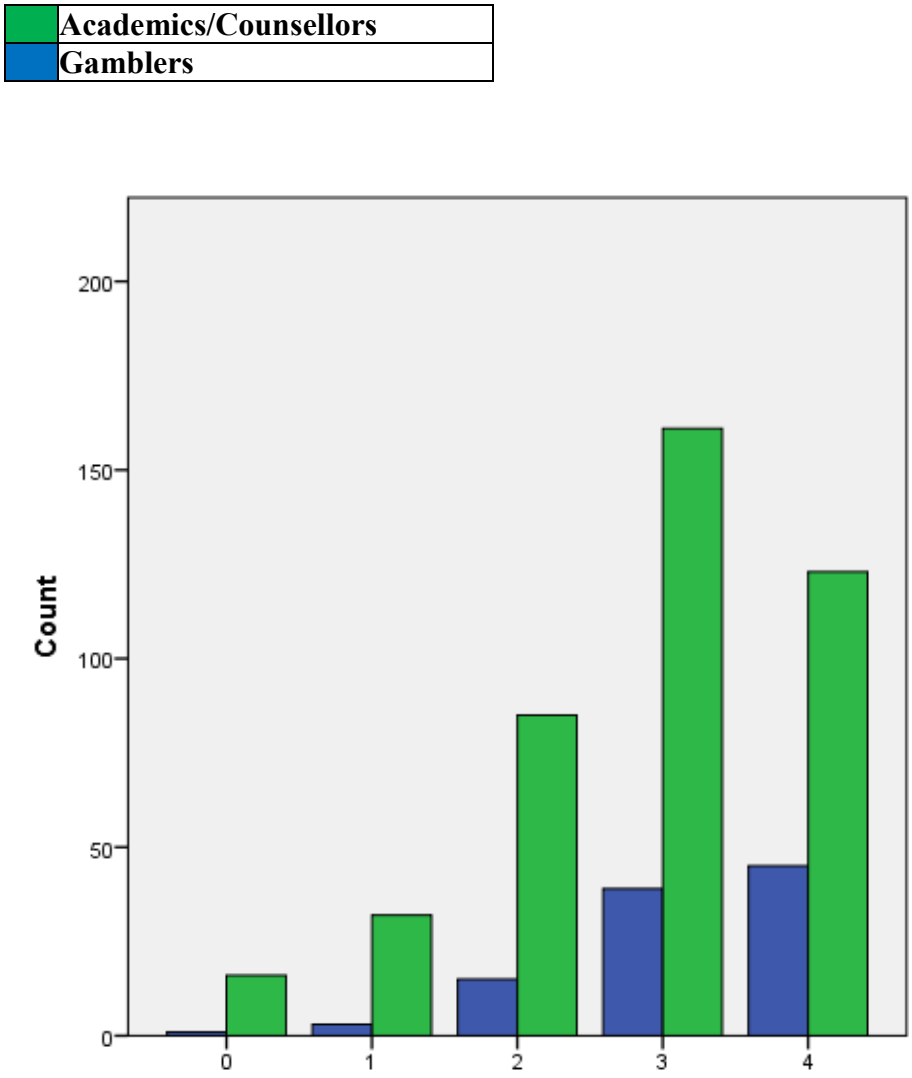


Figure 5.2 Second most effective RGF: Providing age verification controls

Although the academics/counsellors and gamblers consider providing age verification is effective, the academics/counsellors are more positive than the gamblers in this respect. This difference is significant beyond the 0.1% level.

The Mann Whitney U Test score = 17166, Z = 3.32 and p < 0.001. The Effect Size Pearson r = 0.1457. There is a small effect size <0.2; there is a difference but just a small difference (Coe, 2002). If there is a significant p-value but a small effect size, the difference between the groups is trivial.

All Respondents Agree or Strongly agree	Only Operators Agree or Strongly agree	Only Academics Agree or Strongly agree	Only Counsellors Agree or Strongly agree	Only gamblers Agree or Strongly agree	All Others Agree or Strongly agree
69.2% (431)	73.9% (17)	75.0% (60)	96.0% (24)	67.5% (285)	61.1% (44)

Table 5.7 Second most effective RGF: Providing age verification controls

It is not known why this is rated highly by all groups and there was no emphasis in the OQ on underage gambling. The links between exposure to and/or involvement in, gambling at a young age, expecting or experiencing winning and the development of underage gambling have been established (Smeaton and Griffiths 2004). The lack of safeguards for vulnerable populations such as adolescents and 'PG' is a concern (ibid). There has been a move on the part of some operators to stress on their sites the concept of responsible parenting (Jawad, 2006). Monaghan (2009) suggested codes of conduct for sites which should include age verification through electoral rolls, drivers' licences or other government-issued identification. There are few historic examples that regulators can base their policies on and there is no proven policy that has been implemented internationally (Gainsbury and Wood, 2011). The impact of legal and illegal OG on adolescents should be dealt with using a combination of specific policies focusing on education, prevention and treatment (ibid). If OG is to be properly regulated, then efforts must be made to protect this vulnerable group. It was not within the scope of the thesis to explore the motivations of underage gamblers but gambling careers are useful for understanding their motivations to participate.

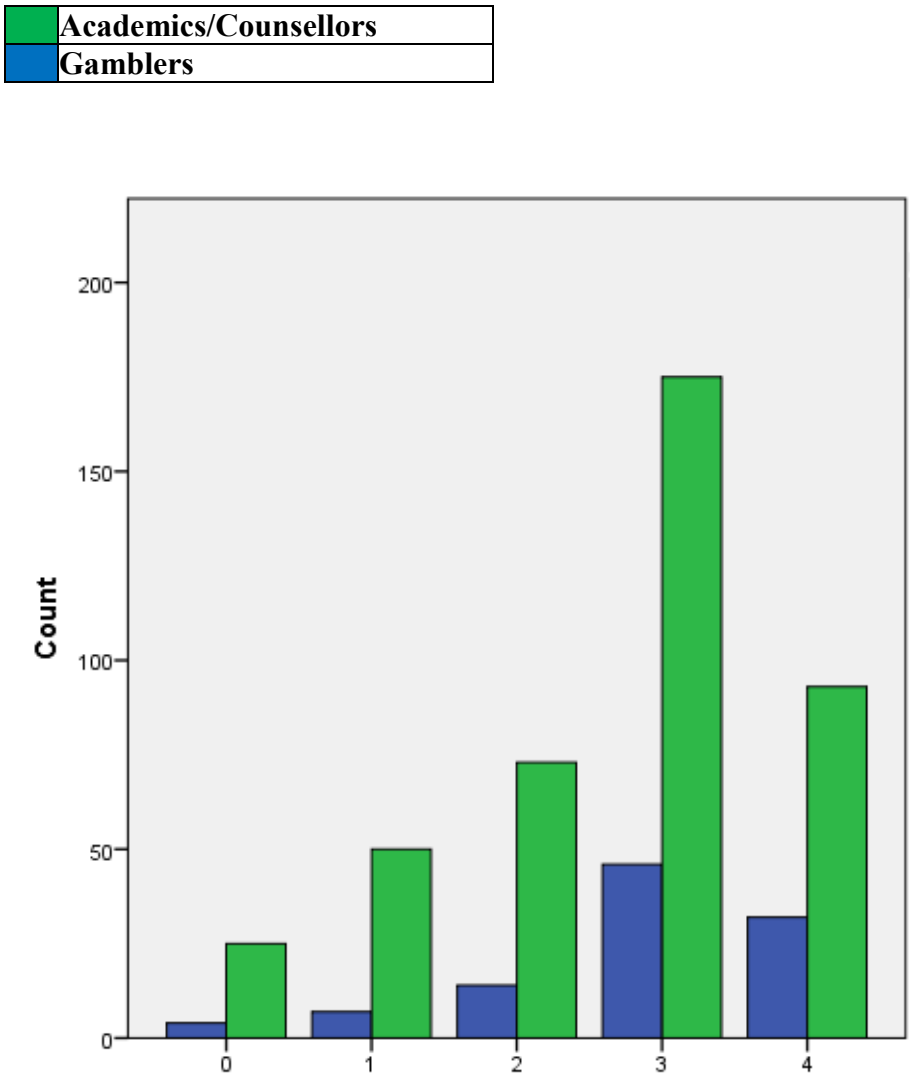


Figure 5.3 Third most effective RGF: Displaying gambling activity in cash value instead of credits

The academics/counsellors are slightly more positive than the gamblers about this RGF. This difference is significant beyond the 5% level.

The Mann Whitney U Test score = 18230, Z = 2.47 and p = 0.014. The Effect Size Pearson r = 0.1082. There is a small effect size <0.2; there is a difference but just a small difference (Coe, 2002).

All Respondents Agree or Strongly agree	Only Operators Agree or Strongly agree	Only Academics Agree or Strongly agree	Only Counsellors Agree or Strongly agree	Only gamblers Agree or Strongly agree	All Others Agree or Strongly agree
65.8% (410)	65.2% (15)	70.1% (56)	88.0% (22)	64.1% (270)	63% (46)

Table 5.8 Third most effective RGF: Displaying gambling activity in cash value instead of credits

All groups rate this as effective. Gamblers make more careful gambling decisions when they gamble with real money as opposed to when they gambled with credits (Kogan and Wallach, 1967). Schrans and Schellinck (2004) showed that cash displays of actual money gambled instead of credits is effective on VLTs and expenditure per session dropped by 16%. Cash displays help suppress excessive gambling by providing reality checks, alerting gamblers to how much time and money is being spent during a specific gambling session. Siemens and Kopp (2011) found that real money is a 'self-control' mechanism requiring mental arithmetic ability, giving cues to gamblers regarding their account balance. Online, there is an absence of real money and the situation is intensified by the faster pace of the spending decisions. An accurate monitoring of spending is necessary for 'self-control' and regulation to slow down or briefly stop behaviour would further protect gamblers (ibid). The concept of Goffman's action and Lyng's edgework operate in a superfast time frame in this environment. The concept of risk does not change but the external environment has changed which may have additional pressures for 'self-control.'

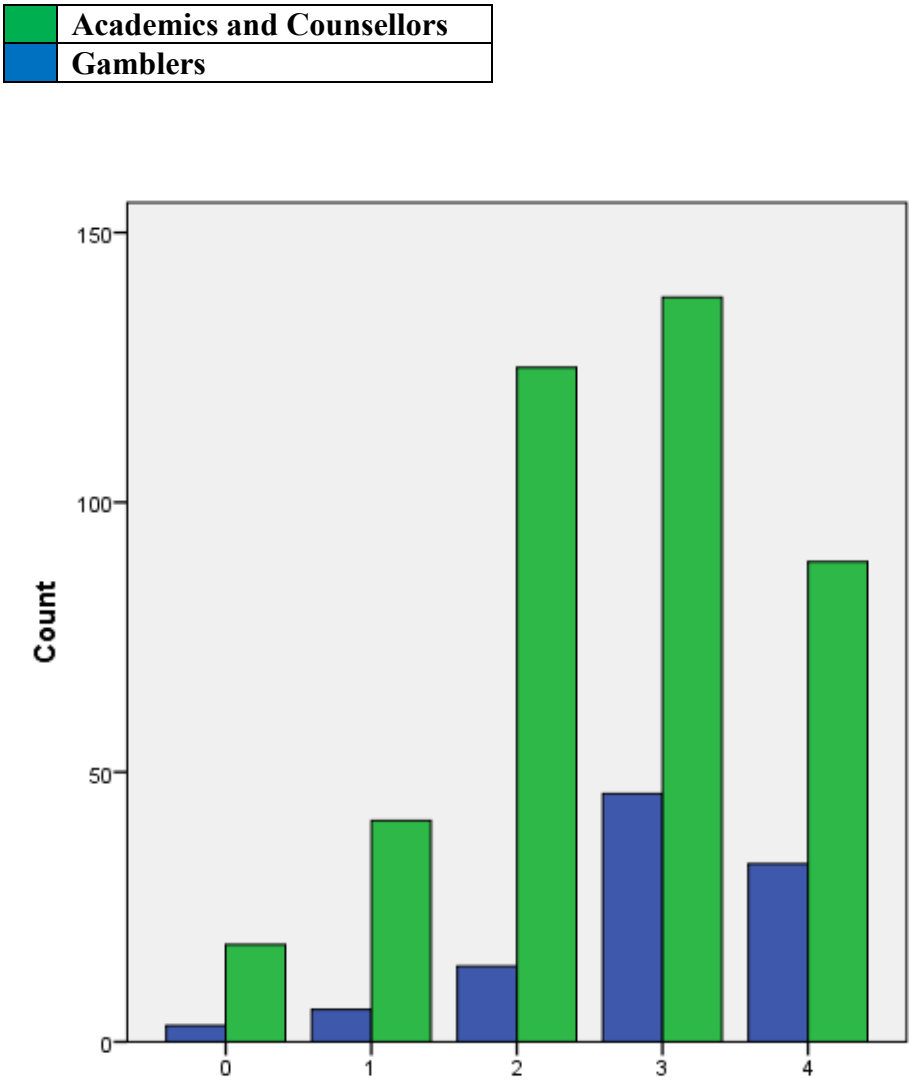


Figure 5.4 Fourth most effective RGF: Self-exclusion options

The Mann Whitney U Test score = 16231, Z = 3.68 and p < 0.001. The Effect Size Pearson r = 0.1625. There is a small effect size <0.2; there is a difference but just a small difference (Coe, 2002). There is a significant p-value but a small effect size, therefore the difference between the groups is trivial.

All Respondents Agree or Strongly agree	Only Operators Agree or Strongly agree	Only Academics Agree or Strongly agree	Only Counsellors Agree or Strongly agree	Only Gamblers Agree or Strongly agree	All Others Agree or Strongly agree
58.8% (362)	59.1% (11)	68.4% (54)	100.0% (25)	54.8% (228)	57.5% (42)

Table 5.9 Fourth most effective RGF: Providing self-exclusion options

Both academics/counsellors and gambler groups think that this is an effective feature. Hayer and Meyer (2010) suggest that voluntary or prescribed exclusion in combination with other RGFs is an effective means of gambler protection. Online, self-exclusion is more often used before the harm has occurred (ibid). This is probably because self-exclusion is easy and gamblers are less intimidated than they would be if they had to personally approach an employee (Wood and Griffiths, 2007). The high agreement from counsellors is likely to be illogical because when a gambler self-excludes online, they are not self-excluded from other sites (el-Guebaly et al, 2005). 'PGs' may experience a lack of 'self-control' and exhaust their ability for best decision-making (Siemens and Kopp, 2011). Baumeister and Mick (2002) say there are three possible causes of 'self-control' failure. First, that an individual must have values to guide behaviour; second, individuals must monitor their behaviour and third, values and monitoring presume an ability to change. The values that guide may be determined by a gambler's position on the spectrum of gambling-harms. The behaviour of a 'PG' is not rational and they may be unable to monitor their behaviour and be experiencing an inability to change.

Increasing consumerism and liberalisation are supposed to be accompanied by 'self-control' and RG (Reith, 2007a. It is the gambler's task to moderate enjoyment of gambling with an awareness to exert 'self-control,' manage losses and even exclude themselves from gambling because no one else will. Government and industry influenced by neoliberal ideas of rational and 'self-control' expect gamblers to be responsible. The possibility for regulatory controls to work in

conjunction with 'self-control,' psychological and behavioural mechanisms is not aligned with the ideology of the sovereign responsible gambler (Reith, 2013).

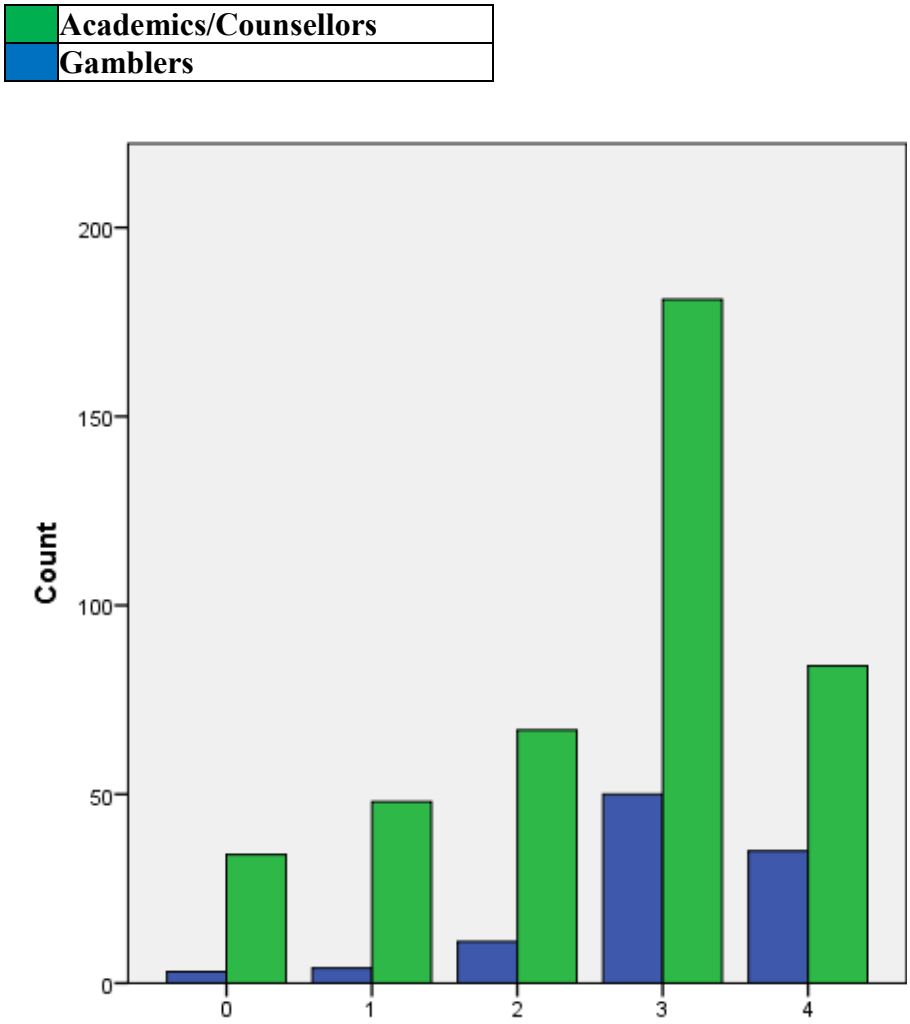


Figure 5.5 Fifth most effective RGF: Requiring gamblers to set predetermined spending limits

Both groups regard this RGF as having some value. The academics/counsellors are more positive than the gamblers, who are slightly less convinced. This difference is significant beyond the 0.1% level.

The Mann Whitney U Test score = 16094, Z = 4.07 and p < 0.001. The Effect Size Pearson r = 0.1792. There is a small effect size <0.2; there is a difference but just a small difference (Coe, 2002). There is a significant p-value but a small effect size, therefore the difference between the groups is trivial.

All Respondents Agree or Strongly agree	Only Operators Agree or Strongly agree	Only Academics Agree or Strongly agree	Only Counsellors Agree or Strongly agree	Only gamblers Agree or Strongly agree	All Others Agree or Strongly agree
65.6% (405)	52.2% (12)	77.6% (62)	92.0% (23)	63.8% (268)	57.5% (42)

Table 5.10 Fifth most effective RGF: Requiring gamblers to set predetermined spending limits

Groups rated this feature effective, though the percentages range widely from 52.2% (operators) to 92% (counsellors). Counsellors would be aware of the ease to go from site to site making this and other features unproductive. It could be implemented cost-effectively online though there is no research on effectiveness (Williams et al, 2007). The advantage of fixed limits is that they can be administered easily but does not consider that gamblers have varying amounts of disposable income (Wood and Williams, 2010). A low fixed limit may be unpopular for more affluent gamblers and not low enough to avoid harming less affluent gamblers. Fixed limits do not allow gamblers to take responsibility for being in control of their expenditure. Variable limits require that each new game is assessed independently and this might be more appropriate but require deliberation on initial set up (Wood and Williams, 2010). There is no empirical evidence to show that either higher fixed spending limits or gambler self-set limits are linked to higher levels of 'PG' (ibid). Gamblers setting their own spending limits emphasises individual responsibility but the question if 'PGs' *can* take responsibility, is avoided. It is possible that 'PGs' are incapable of self-governance and require protection from themselves (Nicol, 2010). It is also possible that responsibility is an effective long-term RG strategy (Heyer and Meyer, 2010). Social policy depends on balances between personal freedom and measures to minimise potential harm and regulation are justifiable from the point of view of efficacy. Social sciences including psychology and economics are used to responsibilise gamblers and libertarian paternalism is promoted in the UK to deal with gambling (Jones et al, 2010). However, the current model fails to appropriately consider risk and

protective factors at the level of individual, family or social, community or society which requires comprehensive and independent analysis.

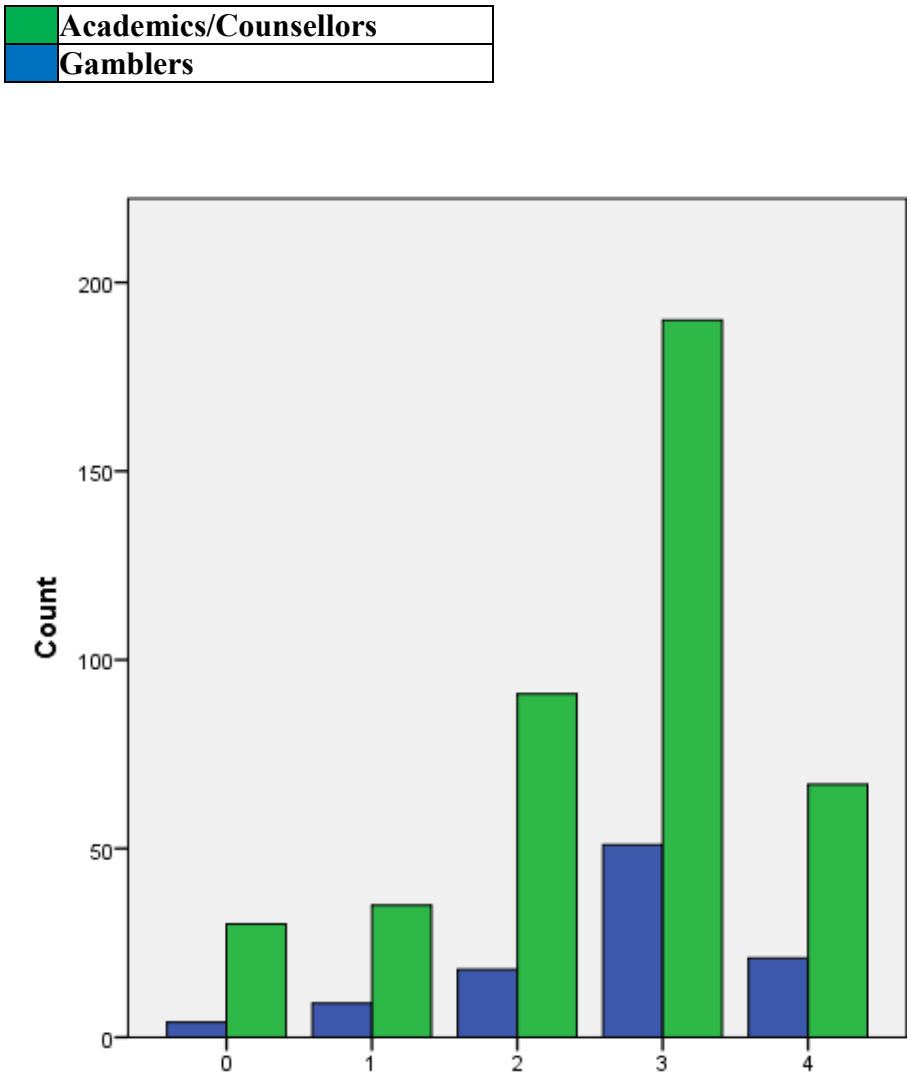


Figure 5.6 Sixth most effective RGF: Providing regular financial statements

Both groups regard this RGF as having some value. The difference between the two groups is not statistically significant.

The Mann Whitney U Test score = 19292, Z = 1.56 and p = 0.12. The Effect Size Pearson r = 0.0684. There is a small effect size <0.2; there is a difference but just a small difference (Coe, 2002).

All Respondents Agree or Strongly agree	Only Operators Agree or Strongly agree	Only Academics Agree or Strongly agree	Only Counsellors Agree or Strongly agree	Only gamblers Agree or Strongly agree	All Others Agree or Strongly agree
61.3% (380)	60.8% (14)	70.0% (56)	64.0% (16)	61.8% (258)	49.3% (36)

Table 5.11 Sixth most effective RGF: Providing regular financial statements

All groups say this is an effective feature and gets the highest rating from gamblers. Academics may be out of touch with gamblers (Griffiths 2009a) or concur with industry who may be funding their research (Griffiths, 2009a; Orford, 2010; Cassidy et al, 2013). Counsellors are professional and trained but deal with 'PGs' on an emotional level and on a more direct basis than academics. The perceived effectiveness of this feature may be a starting place. Behavioural tracking could be used, though it would need legislation. Operators could record activity at minimal expense allowing the detection of 'PG' behaviour (Braverman and Shaffer, 2010; LaBrie and Shaffer, 2010). The issue arises after 'PGs' or at-risk gamblers are identified and the infrastructure requires involving specially trained employees to support the individual. 'PGs' *throw a spanner in the works* for the government; gambling provides a significant contribution to revenues but costs to the system have not received investigation (Davies, 2016).

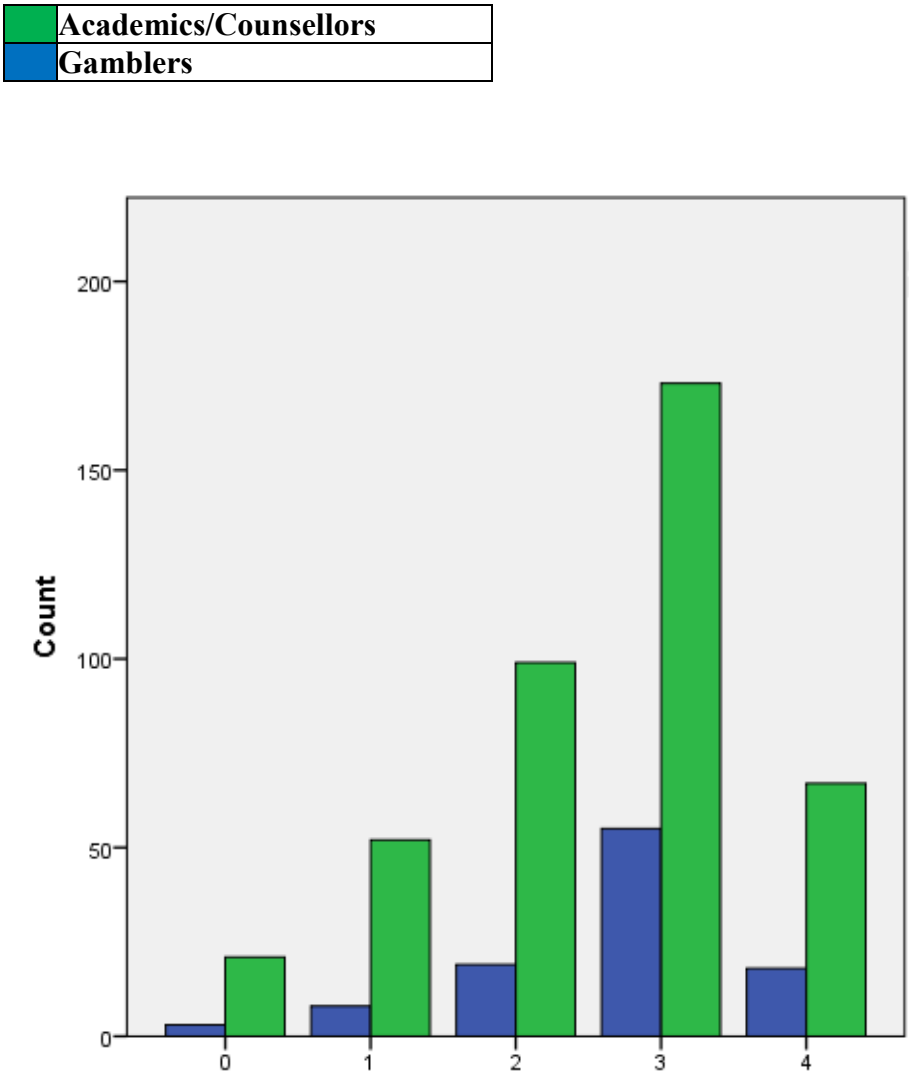


Figure 5.7 Seventh most effective RGF: Providing 'PG' education and awareness programmes

Both groups think that this is generally an effective RGF, the academics/counsellors are slightly more positive than the gamblers. This difference is significant beyond the 5% level.

The Mann Whitney U Test score = 18671, Z = 1.99 and p = 0.046. The Effect Size Pearson r = 0.0878. There is a small effect size <0.2; there is a difference but just a small difference (Coe, 2002). There is a significant p-value but a small effect size, therefore the difference between the groups is trivial.

All Respondents Agree or Strongly agree	Only Operators Agree or Strongly agree	Only Academics Agree or Strongly agree	Only Counsellors Agree or Strongly agree	Only gamblers Agree or Strongly agree	All Others Agree or Strongly agree
61.4% (379)	63.5% (14)	68.8% (55)	76.0% (19)	57.8% (241)	68.5% (50)

Table 5.12 Seventh most effective RGF: Providing 'PG' education and awareness programmes

All groups agree that this feature is effective and nearly two-thirds of gamblers agree, showing a probable demand for such programmes. Shaffer (2005) argues that education and information encourages individuals to make better choices for themselves. There is no direct evidence on the effectiveness of awareness campaigns and the lack of attentiveness of these initiatives is not encouraging (Williams et al, 2007). There is significant awareness campaign literature relating to PH behaviours that may be utilised for the prevention of 'PG' (Byrne et al, 2005). The primary intervention strategy of Korn and Shaffer's (1999) PH model is to prevent gambling-harms through education and awareness programmes and a weakness of the model is that it lacks evidence. Therefore, it is important that this feature is researched more rigorously.

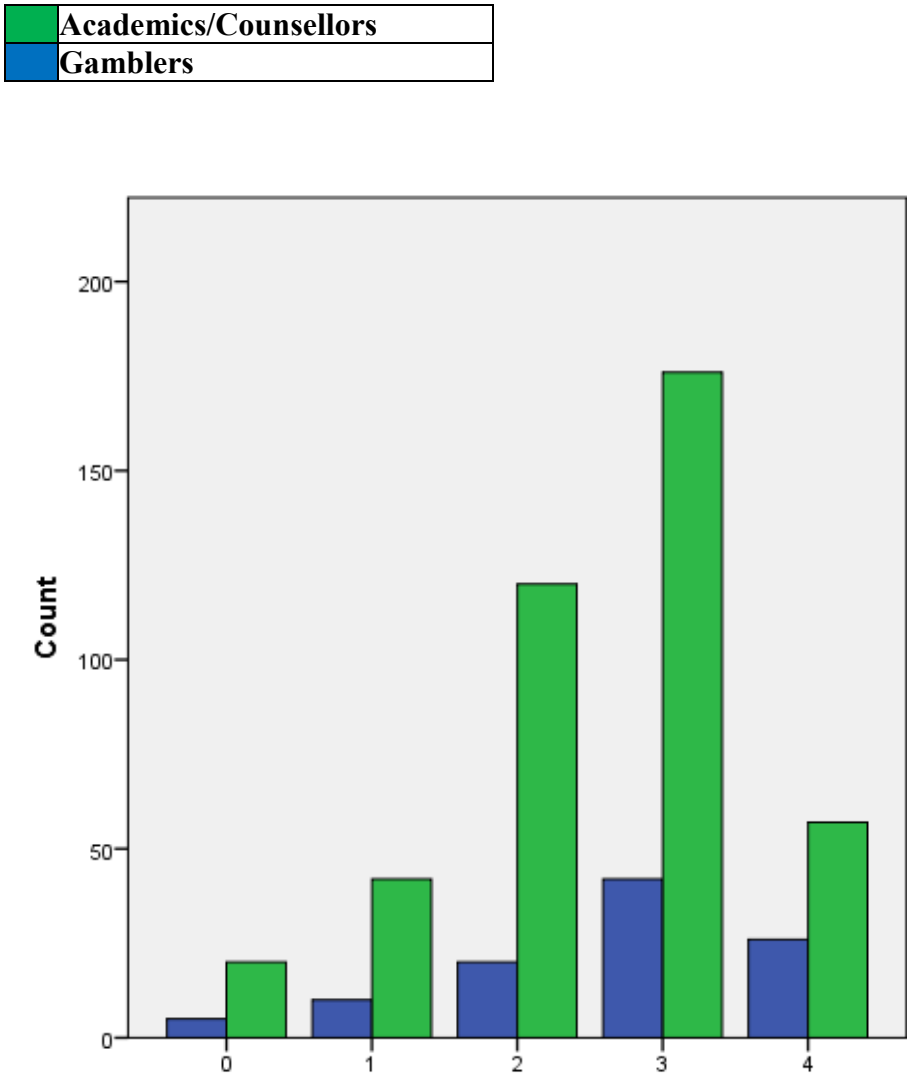


Figure 5.8 Eighth most effective RGF: Promoting advertising standards that responsibly promote gambling with clear warnings of the dangers of winning

Both groups think that this is generally an effective RGF. The difference between the two groups is not statistically significant.

The Mann Whitney U Test score = 18456, Z = 2.26 and p = 0.24. The Effect Size Pearson r = 0.0993. There is a small effect size <0.2; there is a difference but just a small difference (Coe, 2002).

All Respondents Agree or Strongly agree	Only Operators Agree or Strongly agree	Only Academics Agree or Strongly agree	Only Counsellors Agree or Strongly agree	Only gamblers Agree or Strongly agree	All Others Agree or Strongly agree
56.8% (353)	39.1% (9)	60.0% (48)	80.0% (20)	55.7% (234)	57.6% (42)

Table 5.13 Eighth most effective RGF: Promoting advertising standards that responsibly promote gambling with clear warnings of the dangers of gambling

Only two-fifths of operators agree that this feature is effective and is likely to be resisted by them. Moodie et al (2010) looked at adolescent perceptions of mandatory tobacco warnings which frequently deterred 6% of smokers. Hammond (2011, p. 1) concludes in his research that warning on cigarette packets are "among the most direct and prominent means of communicating with smokers" and larger warnings with images are significantly more effective than smaller, text-only messages. Baggott (2008) suggests that warnings on alcohol are severely limited without substantive amendment to general marketing strategies. Warnings about gambling should be part of verified strategies to attitudes, behaviour and knowledge. Current gambling warnings provided by operators may be no more than 'air cover.' If this is correct, the important question is whether operators should have a role in the development of public policy (Orford, 2010; Cassidy et al, 2013).

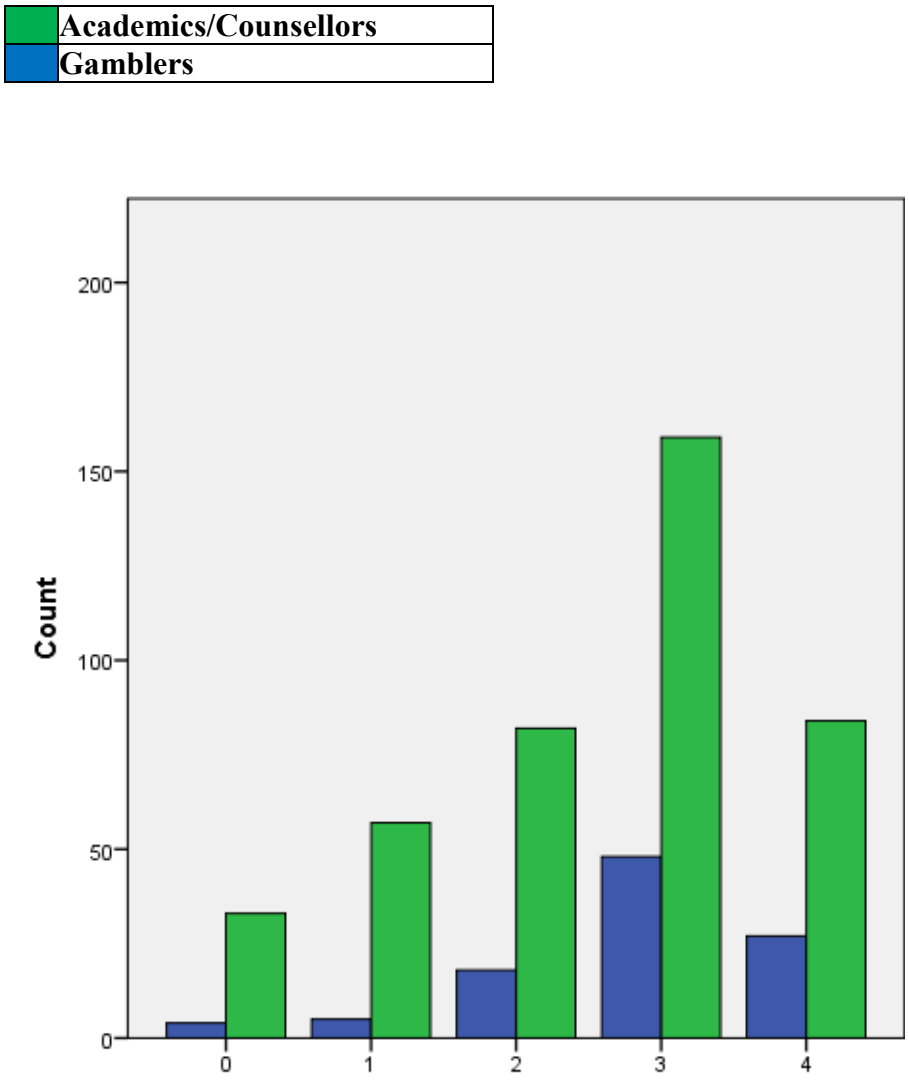


Figure 5.9 Ninth most effective RGF: Identification of 'PGs' by operators

Both groups think again that this is generally an effective RGF. The academics/counsellors are slightly more positive than the gamblers. This difference is significant beyond the 1% level.

The Mann Whitney U Test score = 17456, Z = 2.87 and p < 0.004. The Effect Size Pearson r = 0.1260. There is a small effect size <0.2; there is a difference but just a small difference (Coe, 2002). There is a significant p-value but a small effect size, therefore the difference between the groups is trivial.

All Respondents Agree or Strongly agree	Only Operators Agree or Strongly agree	Only Academics Agree or Strongly agree	Only Counsellors Agree or Strongly agree	Only gamblers Agree or Strongly agree	All Others Agree or Strongly agree
59.7% (371)	43.5% (10)	70.8% (56)	76.0% (19)	58.1% (244)	56.1% (41)

Table 5.14 Ninth most effective RGF: Identification of 'PGs' by operators

Only about two-fifths of operators agree, possibly because it is their responsibility to make identifications and the ramifications post-identification including exclusion, counselling, enforced time and money limits mean less operator revenue. OG raises concerns about its potential for addiction and early intervention efforts may prevent or minimise 'PG' (Haefeli et al, 2011). The objective should be to develop standardised procedures and ensure identification and intervention (Haefeli and Schneider, 2005; Meyer and Hayer, 2008).

It is also possible to detect future 'PG' based on communication behaviour between the gambler and customer services (Haefeli et al, 2011). Training for employees is important; unmistakable 'PG' indicators are rare and relying on single risk indicators leads to a low sensitivity of detection. Combining several observations can enhance the validity of prediction (Schellinck and Schrans, 2004; Haefeli et al, 2011). The implementation of objective early detection procedures requires exact and structured details of all gambler communications, a high level of customer service expertise and operators need dedicated teams dealing with 'PG' cases.

This has implications for new 'PG' screening tests (Griffiths and Whitty, 2010). Academics and researchers are under pressure from their institutions to obtain fundings and produce research that improves the institution's financial situation. Consequently, gambling research is increasingly dependent on industry support. Academics have developed screening tests that can be sold and contribute to institution income and their work can endorse the usefulness of screening tests and consequently independence will be lost. There are no neutral funding bodies and their interests need to be protected; further, there will be conflicts of interest and ownership over research (Cassidy et al, 2013)

Gaining access to gambling environments and data is an obstacle in producing high-quality research; the industry has the most useful data but is reluctant to share it with researchers (Cassidy et al, 2013). Dragecevic et al (2011) argue that OG data can help researchers understand gambling issues. They refer to a report by McKinsey and Company (2011) suggests analysis of data can contribute beyond the traditional applications to marketing and risk management. However, the current situation is that to access industry data, researchers need to produce research that is either uncritical or economically valuable (Cassidy et al, 2013).

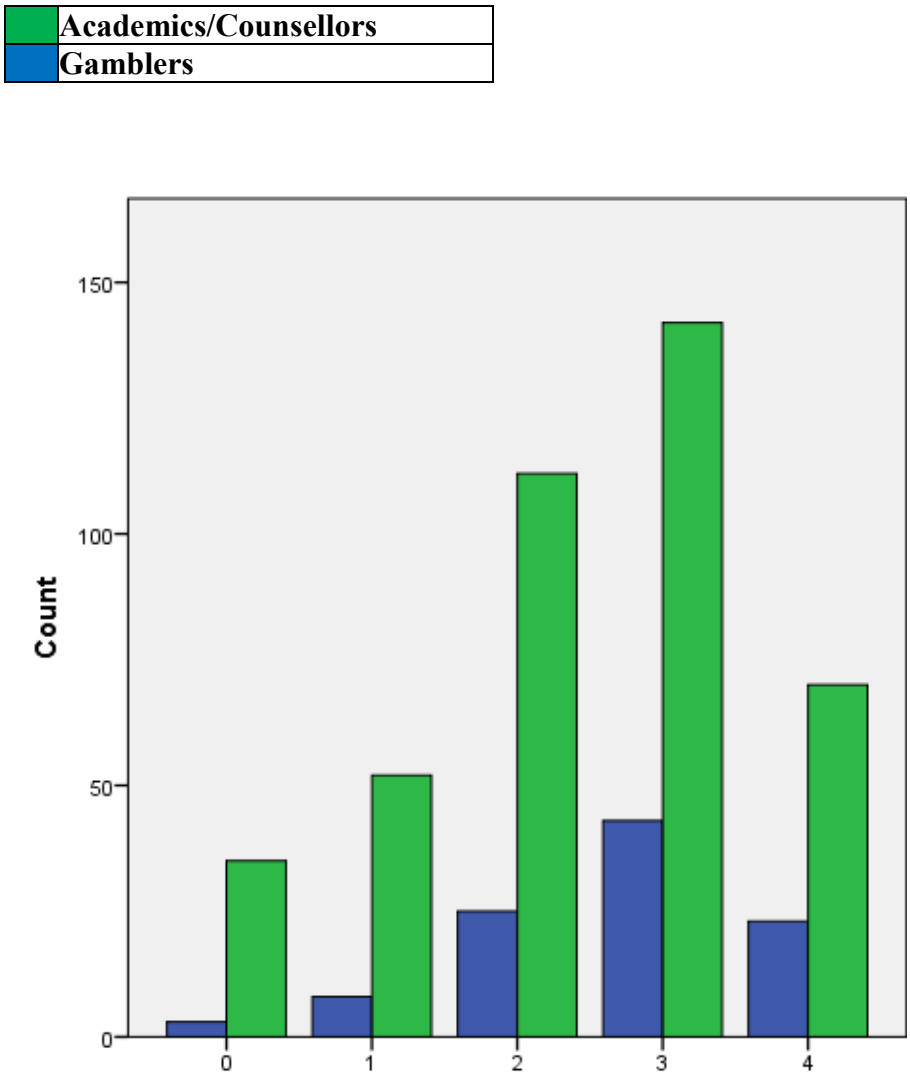


Figure 5.10 Tenth most effective RGF: Requiring mandatory registration

Both groups think that this is generally an effective RGF. The academics/ counsellors are slightly more positive than the gamblers. This difference is significant beyond the 1% level.

The Mann Whitney U Test score = 17549, Z = 2.65 and p < 0.008. The Effect Size Pearson r = 0.1168. There is a small effect size <0.2; there is a difference but just a small difference (Coe, 2002). There is a significant p-value but a small effect size, therefore the difference between the groups is trivial.

All Respondents Agree or Strongly agree	Only Operators Agree or Strongly agree	Only Academics Agree or Strongly agree	Only Counsellors Agree or Strongly agree	Only gamblers Agree or Strongly agree	All Others Agree or Strongly agree
34.4% (532)	65.2% (15)	78.8% (55)	75.0% (18)	50.9% (212)	46.6% (34)

Table 5.15 Tenth most effective RGF: Requiring mandatory registration

It is a premise of this thesis that participants had a genuine interest in its research and the assurance of confidentiality and anonymity resulted in honest answers. If operators believe that this could be an effective feature it requires further investigation. Registration could monitor behaviour and specific information could be used for RG purposes, for example, information about income could determine bet size. This would remove gambler freedom and challenge neoliberal economics based on the rational consumer; Goffman's emphasis on gambling's positive qualities associated like skill and courage would be impeded. However, this is unlikely to be the case post-liberalisation and monitoring behaviour would be unethical in determining an appropriate rate of play and illegal in terms of privacy and data protection.

Conclusion

This chapter has sought to analyse opinions of key stakeholders about the perceived efficacy of RGFs. The OQ was not designed to find out why participants answered in the way they did, not to probe if RGFs change behaviour or if gamblers must change behaviour to find RGFs. Useful though it is, this is an area that needs further research.

The next chapter seeks to understand further the opinions of stakeholders regarding RGF to develop the insights gained from the quantitative analysis.

Chapter 6

Open-ended Responses

Introduction

The pragmatic mixed methods design has allowed specific issues to be investigated sequentially. The open-ended questions provide some understanding of the thoughts of key stakeholders about the efficacy of RGFs and the open-ended questions were explored qualitatively.

Research method

Grounded Theory seeks to generate a theory from understanding the patterns, themes and categories that are identified in research (Glaser and Strauss, 1967). It encourages research procedures for theory to be backed by real data. In open coding, initial categories are identified and data was separated into similar groups and initial categories were formed about potentially effective RG measures. Axial coding involved bringing the categories together and identifying groups. Selective coding required the categories to be organised and integrated categories and theories in a way that gives a sound understanding of the opinions of key stakeholders regarding RG. Grounded Theory was used because it fitted appropriately for finding a theory and not just to simply verify one (Gibbs, 2010). It offered an opportunity for discovering answers and allowed the data collected to generate theory on its own merits (Bound and Campbell, 2011).

The analysis looks at the responses to the following question: **What RGFs do you think would be most effective and why?**

Individual responsibility

The current regulatory approaches to gambling are based on individual responsibility reflecting CSR models where operators integrate RG. 'PG' models involve gambler responsibility to seek help (Welsh et al, 2014) and is

exceptionalised against RG norm (Rosecrance, 1985). Foucault's (1991) responsibilisation, government strategy of regulating behaviour to create responsible individuals relies on technology to assist with rational choices (Welsh et al, 2013). 'PGs' are both responsible and irrational consumers at the same time, tempted by the technology that is supposed to assist them. Welsh et al argued that the 'PG' setting is an important factor in the production of that harm. Unsurprisingly, operators did not refer to this as being a contributing factor for 'PG.' 'PG' can be identified by operators and gamblers directed to RGFs but operators are not motivated to limit gambling which would reduce revenue. Gainsbury et al (2012) argue that providing RGFs may improve satisfaction levels, especially for gamblers who have gambled beyond their means. It seems governments do not yet acknowledge the costs of liberalised gambling policy. 'PG' is an invisible addiction and the harms are not properly acknowledged by governments as they increasingly rely on revenues generated by gambling in a low tax economy. This has been the case in Australia for some time and is now the case in the UK.

Operators' comments reflecting this view:

> *"Tools that enable the gambler to take full control of their gambling."* Operator Number 13.

> *"I don't want any nanny state telling me how to spend my money. Gambling is fun and RG teaches a person about their own character, always a good thing."* Operator Number 15.

> *"I believe that, as with most addictions, the affected person must first recognise, admit the problem and then seek help in overcoming it. Unless the affected person acknowledges and is willing to tackle the problem, they will find ways around most other restrictions imposed by sites eg any time or spending limits, whilst potentially useful tools for the 'non-problem' gambler, can be circumvented by simply moving to another site once the respective limit has been reached. I also believe that gambling addiction is a symptom of a deeper underlying problem and that needs to be identified too."* Operator Number 7.

Out of 21 operators who commented, 13 supported individual responsibility. Many gamblers are ill-informed without sufficient and timely information and many sites are outside the checks and controls that regulation offers (Jones, 2013).

Academics' comments reflecting individual responsibility:

> *"People who budget for their gambling and stick to their budgets, don't get into trouble."* Academic Number 14.

> *"1). Self-imposed spending limits 2). Display of time and money spent during session 3). Being able to see/track visually amount of total money lost (line graph would be best)."* Academic Number 18.

Out of 62 Academics who commented, 5 supported solely individual responsibility. However, a larger number of comments referred to individual responsibility with a duty of care, joint government and industry responsibility:

> *"For people to state their limit when registering then when that limit is reached, a block to be placed on all gambling access. The need to register and state limit before any gambling is allowed."* Academic Number 2.

> *"Maximum bet and time limits between bets."* Academic Number 20.

> *"1. Set spending limits at outset of session because a. it encourages self-regulation b. puts vendor in the position of sharing responsibility c. requires gambler to verbalise an explicit limit (which may not happen otherwise). 2. Track/identify 'PGs' and restrict a. we can identify 'PGs' statistically, therefore, we have some responsibility to do so. They, by the very nature of their addiction have limited responsibility (ability to control themselves). b. Vendors have a responsibility to help those who have lost control using a product they are profiting from."* Academic Number 39.

Of the 22 Counsellors who commented, one felt that individual responsibility may be useful when it comes to RG.

> *"Time and money limits that are pre-set. Player decides BEFORE they begin play. Can use their logic then and plan better than after play begins and impulse takes over while 'in action.'"* Counsellor Number 8.

Individual responsibility requires the co-operation of industry which will probably not be achieved without regulation.

Gamblers' comments supporting individual responsibility:

"Betting people will always bet, either on the lottery, horses, in a bookies shop, on the internet or between themselves. They are adults and should be left to do what they want without added legislation." Gambler Number 13.

"Regardless of what restrictions are introduced it is up to the individual. Man has been gambling since time began, be it horses, cards, dangers or life." Gambler Number 29.

"I think we should take responsibility for our own actions, not rely on someone else to do it for us." Gambler Number 87.

"Sorry I don't think RGFs work. I think it is up to the individual and that nothing would stop me. And if you took my computer away, I would find somewhere else even the phone. You don't understand it's like a junkie that needs a fix, you have to have it." Gambler Number 234.

"These losers will still find a way to wreck their lives and the lives of their families, regardless of what the politically correct gang do." Gambler Number 235.

"If gamblers can't handle it, it's their own problem, don't let's spoil it for the rest of us." Gambler Number 260.

"It's about your morals, really isn't it? Some people never have a gambling problem because they just don't get hooked. It depends on how strong and controlled you are, like your morals. Thing is it doesn't matter what one site does, even if it is very strict, because you can move on to the next site." Gambler Number 273.

"Gambling is addictive, but can be controlled. I have a limit and once reached, that is my lot for the day." Gambler Number 4.

"Sensible adults should be able to regulate their own use of OG." Gambler Number 12.

The above statements reflect comments made by 278 gamblers. Only 23 comments (8%) supported the individual being responsible for their 'PG.'

There are limited comments made to the morality of the gambler. There is a legal and social acceptance of gambling and participation is mainstream. Normalisation has allowed organisations including charities, churches and governmental agencies to lobby for the opportunity to offer gambling opportunities to benefit economically (Eadington, 1999) which has muddied any moral waters. The London Olympics and Paralympics received £2.2b in funding from the NL (Telegraph Sport, 2012). Community organisations (sports groups, educational and health services, arts and

cultural organisations, academic and research organisations and charities) have received funding from gambling. The scale and extent of their reliance has increased rapidly in recent years. The RG Trust provides education, prevention and treatment services and funds 'PG' research funded by the industry (www.responsiblegamblingtrust.org.uk, 2013). Charities are viewed positively by society and the numbers of charities engaging in lotteries may be damaging to the very concept of charity as well as encouraging gambling.

Government responsibility

Responses that suggested government or industry responsibility are grouped together because regulation is necessary to achieve government or operator responsibility. A regulatory framework operating to protect individuals' welfare should provide information regarding the risks (Monaghan and Blaszczynski, 2010). The primary justification for regulation is utilitarianism which should produce more positive consequences than negative ones than if there was no regulation (Lindorff et al, 2012). Whilst some groups or individuals will suffer, the intention is the best overall benefit (ibid). However, not all operators are regulated and there is limited homogeneity between the regulated ones due to diverse jurisdictional requirements.

The principles of utilitarianism, RG and benefit maximisation can be used to determine whether businesses should be banned, strictly regulated or operate without regulation (Lindorff et al, 2012). Regulated organisations in controversial industries can contribute to society by seeking to solve some social problems which would not happen if the industry was unregulated or completely banned (Lindorff et al, 2012). If society is concerned about an organisation's goods or services, government's role is to evaluate the costs and benefits and regulate if necessary (ibid). There is minimal concern about 'PG' in the UK and limited exposure of anti-gambling groups in the media. The Liberal Democrats announced plans to limit FOBT's stakes to a maximum of £2 reduced from a threshold of £100 (Pascoe, 2012). There was a 'Kill the Bill' movement led by the Daily Mail before the liberalisation of 2005. However, gambling policy issues remain relatively quiet in the media.

Operator comments supporting government regulation

Only 3 out of 21 responses suggested government regulation:

> *"Tax all forms of gambling heavily and there will be less of it."* Operator Number 6.

Offshore operators can advertise and operate in the UK and blame the high level of taxation for being offshore (DCMS, 2012). The largest operators are predominately licensed in Gibraltar, Malta, the Isle of Man and Alderney who offer a combination of low taxes, easy set-up and minimal regulation (D'Angelo and Irwin, 2012). The Treasury needs to work with stakeholders finding an appropriate level of taxation to persuade operators to accept UK regulation (DCMS, 2012). Tobacco tax encourages some smokers to quit (McGoldrick and Boonn, 2010) and research is needed to see if this can apply to gambling. It is accepted that smoking has a negative impact on the nation's health, but it is not accepted that gambling has a similar impact. Gambling is an integral part of UK culture; most gamblers do not experience 'PG' and it is not an issue that the nation equates with smoking. Collier (2013) says it is inconsistent for legislation to ban hospitals from selling tobacco, which is one potentially harmful, but legal, addictive product but allows hospitals to promote gambling (lottery) which is another potentially harmful product. Without effective regulation, operator Number 6's comment is unachievable.

> *"Ban use of credit, (use) time limits, marketing and 'PG' restriction. Most operators know that the bulk of their money comes from the few that I would classify as 'PG' or nearly 'PG' and that credit greatly assists this as well as the amount of time spent. If most operators were forced to ban their top 5% of customers who could not prove adequate income levels then 50% of them would evaporate."* Operator Number 12.

This comment is singular in its suggestion to ban the top 5% of gamblers, who by inference are at-risk or 'PGs.' There have been suggestions to ban OG (Smith and Rupp 2005) or for tighter regulation (Monaghan, 2009). It is unlikely that 'PGs' or at-risk gamblers would stop gambling if they were banned and it is possible that they would turn to unregulated OG. If regulation is too severe then 'PGs' may turn

to illegal operators. EGBA (2013) state on their site that "to be efficient, OG regulations must be competitive as the black market is only a 'click' away on the internet."

Academic comments supporting government regulation

Academics and counsellors were critical of RG and out of 62 comments made by the academics 27 suggested tighter regulation.

> *"Ban the whole lot."* Academic Number 1.

There is limited consensus on the effects of regulation. Morality-backed regulation is subject to public criticism (Lieberman, 2012). Trying to ban unethical behaviour can worsen the situation; prohibition destroyed the US brewing industry and made criminals wealthy (ibid). It is possible that this would happen to the OG industry. There are three main legal ways to regulate illegal OG. First, legislation to prohibit gamblers from playing; howeve few countries have effective endorsement and the deterrent effect is limited (Williams et al, 2012). Second, to legally prohibit financial institutions from processing payments to operators. This is ineffective because many foreign financial intermediaries can evade these rules (Wood and Williams, 2009). Third, to legally restrict access to sites via their Internet Service Provider (ISP) (Williams et al, 2012). Discussions about banning gambling are unlikely, banning a product that has become a mainstream entertainment is highly unlikely.

> *"Required breaks. Spending limits: (a) set by gamblers at least 24-hours before gambling session (if increased, at beginning of gambling session if decrease). (b) Maximum loss for the day, set by gambling authority and applying to all available online sites. Require at least 24-hours between time of deposit and time when play can start. Make gambler identity public and searchable from a central database when on any sanctioned site. Set up heuristics for identifying and automatically excluding probable 'PGs' across sites."* Academic Number 8.

The 2005 Act replaced the cooling off period as part of the relaxation of measures along with removal of the ban on advertising and the requirement of membership and it unlikely that these relaxations will be reversed.

In written evidence to the government's review of the 2005 Act (DCMS, 2012) Bwin said that "PG' is bad for business" (p. 372). They told the government that they provide a RG environment to control *gaming* and that the UK has one lowest prevalence rates of 'PG' in Europe due to the effectiveness of regulation ensuring appropriate gambler protection, including 'PG' support. They added that negative change to regulation would increase the OG black market where gamblers will be without the protections supplied by regulated operators. They would say this; it is not in their interests to have tighter regulation and the government have no appetite for it either.

Academic Number 8 suggests 'PG' identification and sharing their information as being effective. Regulators will not overturn liberalisation and the government's review of the 2005 Act recommended further liberalisation in recognition of the challenges of a globalised industry. Identifying 'PGs' may be difficult due to data protection and suitably qualified staff would need to deal with issues that would arise. Delfabbro et al (2012) suggest that multiple indicators can make dependable identifications and that indicators will be based on the mode of gambling. Hing and Nuske (2012) looked at the challenges experienced by operators identifying and dealing with 'PG,' including embarrassment for employees and 'PGs,' emotional issues, difficulties in identification, issues about invading privacy, losing custom of 'PGs,' employees fearing getting in trouble with their manager and angry responses from 'PGs.' Academic Number 8 does not raise concerns about the counselling of 'PGs,' only identifying 'PGs' and making other operators aware. This situation is fraught with difficulties and there is no regulatory mood to do anything other than further deregulate (DCMS, 2012).

> *"I think effective RGFs will ultimately revolve around limiting access and availability, especially with gambling known to be the most addictive. I think with something such as the Video Lottery Terminal (VLT) taxing pubs to maintain them at their establishment might be effective if the tax is high enough. The money from the tax could go to 'PG' related endeavours,*

> *including research. Understanding the triggers of certain types of gambling (such as the lights and the sounds) might help prevent some people from becoming addicted. Targeting certain age groups and markets might also be helpful in reducing access to gambling as a preventative measure."* Academic Number 28.

It is likely that these comments will not be taken seriously by governments who are keen to deregulate further. The comment regarding VLTs will not be probed further in this thesis. Hancock (2011) points out strong evidence of increased 'PG' and how the government is not interested in 'PG.' Liberalisation including relaxation of advertising, removal of the demand criterion and increased availability is contrary to research into 'PG' (Light, 2007). Some interesting RGFs suggested by academics and based on empirical research in some cases will not be considered by the government interested in ensuring that gambling settles into its place as a popular form of entertainment. Due to increasing 'PG,' more effective prevention and treatment strategies are urgently needed and Braithwaite continues that whilst "the UK government's Faustian pact with the gambling industry may be motivated by simple economics …. this is likely to be a costly error of judgement for UK society" (Braithwaite, 2009, p. 4).

Counsellors' comments supporting government regulation

Twenty-two counsellors commented and 18 suggested government regulation. These comments refer to RGFs, specifically advertising and marketing. A lack of 'self-control' may be the most important cause of 'PG' however environmental causes including marketing to influence behaviour may have a significant effect (Martin et al, 2012).

> *"Public relations and develop highly visible people to talk about the problem and the limits to gambling."* Counsellor Number 8.

> *"Advertising featuring celebrities who gamble online is particularly damaging to potential youth 'PGs.' Also, free sites where the odds are more in favour of the gambler (and do not represent reality) are potentially dangerous."* Counsellor Number 24.

> *"Self-exclusion and non-solicitation."* Counsellor Number 18.

> *"Enforcing breaks and money limits, as well as being able to "sign out" of online casinos. Marketing to kids/youth should be illegal."* Counsellor Number 9.

Light (2007) said that as competition for gamblers intensifies, design, marketing and operational practices will become more important for stimulating demand and making it difficult for gamblers to choose sites. It has been argued that advertising contributes to 'PG' (Korn et al, 2003; McMullan and Miller, 2009). The 2005 Act removed restrictions on advertising and redefined the lottery to exclude promotional games of chance, which had been advantageous to the industry. In the UK, advertising and marketing has contributed to its normalisation where it is now an integral part of lifestyle for gamblers. Gambling may be escapism and an outlet for coping with boredom, personal problems and creating excitement (Dyall and Hand, 2003) and advertising and marketing has assisted as a coping mechanism.

Advertising expenditure was approximately half a billion pounds between 2012 and 2016, which does not include £169m spent on NL advertising; this advertising spend coincided with a 40% rise in the amount wagered by UK gamblers (Chapman, 2016). The self-regulatory Advertising Standards Association seeks to ensure that all gambling advertisements are socially responsible, not misleading, unobjectionable with rules applicable for advertising to children. The codes state that advertising should not depict, portray, approve or encourage gambling that is socially irresponsible or lead to financial, social or emotional harm. Advertisements should not exploit the "susceptibilities, aspirations, credulity or lack of knowledge of children, young persons and other vulnerable persons" (ibid, Section 16.3.2). This could but does not apply to free-play. Ofcom (2013) found that between 2005 and 2012, the total amount of gambling advertising on television jumped from 17.4m to 34.2m spots. In 2012, there were 532,000 bingo adverts, 411,000 online casino and poker adverts, 355,000 lottery and scratch card adverts and 91,000 sports betting adverts (ibid). On average, adults saw 630 gambling adverts and children aged four to 15 saw 211. Gambling advertising may not openly target underage individuals but young people are exposed via numerous platforms (Derevensky et al, 2007). The impact of marketing on youth is acknowledged in alcohol and tobacco research and is monitored (Monaghan et al, 2009). A study by McMullan et al (2012) found that youth had considerable exposure to gambling

advertising and identified with gambling experiences before they reached adulthood. This significant level of exposure had contributed to the normalisation and glamorisation of gambling where gambling is a normal adolescent experience (Derevensky et al, 2007; Korn et al, 2003; McMullan and Miller, 2009). Lee et al (2008) identified a link between the exposure of college students to positive media representations of gambling with their gambling attitude and behaviour. Dyall et al (2009) recommend ensuring that the marketing of gambling is socially responsible and not be targeted at children or vulnerable people. However, the concept of vulnerability is not defined and therefore protecting vulnerable individuals will be difficult.

Regulation of gambling and SR is hampered by the income it generates for governments and operators. Monaghan et al (2009) conclude that gambling advertising regulations must be made compulsory and independently enforced by a body that is not connected to the income generated from gambling. They argue there is a paucity of empirical research in this area, which must be from a PH perspective to protect gamblers and particularly youths from 'PG' (Monaghan et al, 2009). High rates of gambling and other problems amongst youth shows that the issue of youth gambling needs to be addressed to minimise harms. There are demands for regulating advertising and marketing of products that may have short and/or long term risks for health and wellbeing such as unhealthy foods, tobacco and alcohol products. It is important to look at recommendations made in other PH domains including tobacco, alcohol and junk food to inform regulations for gambling advertising to minimise harms in this area also.

Gamblers' comments supporting government regulation

The largest group in the OQ self-identified as gamblers and more comments are considered to reflect this larger group.

> *"I think that all gambling should be illegal but our governments have become addicted to the revenue much as they have encouraged their constituents to become addicted to gambling."* Gambler Number 6.

Banning gambling is unlikely action. Successive UK governments have been pro-industry, promoting gambling as a typical leisure activity and extending opportunities (Powell and Tapp, 2009). OG is largely illegal in the US. It was legalised in 2013 in New Jersey, Delaware and Nevada. California, Pennsylvania, New York and Illinois are planning to legalise OG. Americans spent $2.6 billion illegally on OG in 2012 generating nearly 10% of the $33-billion worldwide OG market (RG Digest, 2013).

Giorgi (2011) discusses a ban on mobile phones. Research has examined the link between mobile phones and cancer concluding that there is either no harmful effect or more research is needed. He compares mobile phone research to smoking research. The latter identified harmful effects from the 1920's but lacked consistency until 1998. If research established a link between mobile phones and cancer there would not be a ban, instead there would be increased safety of mobile phones. He continues that mobile phones should be treated differently from tobacco because it is likely that mobile phones could be technologically improved. This thesis argues that OG has more similarities with mobile phones than tobacco and technology can make OG safer for the gambler.

Gambler Number 6 mentions the government's dependency on revenue; even the RGD highlights this. Adams (2009) says that governments have a conflict of interest, combining the roles of legislator, regulator and beneficiary. The UK's gambling industry generated a gross gambling yield (GGY) of £6.2 billion between 2011 to 2012 and jumped to £12.6 billion 2014-2015 (GC, 2016). The UK remote market increased from £2.06bn (GC, 2013) to £3.6 billion in 2015 (GC, 2016). However, negative impacts include increased 'PG,' mixed employment effects, displacement of existing businesses and spending and damage to a city's image, financial problems, family breakdown, suicide, crime, health costs to the gambler and health costs to society, work performance and so on (Harrison, 2007) but are frequently overlooked. Government will not implement RGFs because revenues will decrease.

> *"The stopping of adverts and displaying of unsound systems. When a site or systems has had complaints, kick it off the internet and stop the vendors of being able to work on the internet."* Gambler Number 24.

This comment refers to unsound systems (betting systems) and complaint mechanism to redress problems. The GC (2013) states on its site, that complaints should be made to the licence holder of the operators with which there is an issue. The GC will check that the licence provider has a complaints procedure but will not investigate and not assist in obtaining a refund of money. If a gambler has a problem with a site without a UK licence nothing will be done; how widely this is understood by gamblers is unknown. Research should examine the relationship between gamblers' negative word of mouth and operators' rectification behaviours. Consumers' negative word of mouth is seen as a form of problem solving if consumers have a negative experience with an organisation and communicate to others their dissatisfaction (Bach and Kim, 2012). CasinoMeister states that it is an 'advocate of fair play.' It was established in 1997 by Bryan Bailey who wanted a list of trustworthy casinos and another list of disreputable ones. It has developed into one of the few casino 'watchdogs' where information sharing is predominant including positive and negative word of mouth behaviours, though CasinoMeister's success rate for resolving consumer complaints is unknown. Trust may always be an important issue for OG because gamblers and operators never meet face-to-face. Trust is further heightened by the lack of any independent complaints body. If the UK government finally gets to tax OG, it will be interesting to see if there will be a domino effect and whether it will control of other aspects of OG.

> *"The problems surround addictive gamblers and as just about every human activity can be addictive, solutions must lie in treating addictive behaviour rather than focusing too intensely on the way that gambling is presented."* Gambler Number 27.

There is a limited provision of 'PG' help in the UK. The NHS has the National 'PG' Clinic in London, GamCare provides support for 'PGs,' family and friends, the Gordon Moody Association provides treatment for 'PGs,' Gamblers Anonymous have a 12-step programme and Gamanon is a group for relatives of 'PGs.' The GC (2015b) say that 'PG' is adequately understood and researched. However there needs to be more focus on the broader gambling-harms and with appropriate

resources (Wardle et al, 2011). Orford argued that in the UK "an effective PH response to 'PG' is constrained by lack of Department of Health interest and a failure to develop a research and treatment base independent of the gambling industry" (2012, p. 1).

Sites have the potential to be an effective tool for help (Blaszczynski, 2013). However, there is a lack of empirical research and comparable work evaluating online help for problem drinking and smoking indicates it may be appropriate for 'PG' (Gainsbury and Blaszczynski, 2011). Online help is useful because of its availability, convenience, flexibility, cost–effectiveness, privacy, anonymity and confidentiality (Gainsbury and Blaszczynski, 2011). This needs further investigation and if the findings are positive, resources will need to be committed, although it is unlikely that the government will finance resources. The debate examining the health costs of gambling against the benefits has not yet taken place in the UK but could have a significant role in shaping regulation. Blaszczynski (2013) argued that the way forward is regulation based on responsible and ethical provision by government and industry because it is a potentially harmful product.

> *"Stop gambling on credit and providers/operators should be made to provide detailed accounts to users."* Gambler Number 35.
>
> *"Accept only debit cards backed up by a current account that is in credit. To stop the use of using credit for betting which just makes matters worse."* Gambler Number 84.
>
> *"I think only allowing debit card deposits (no credit cards) would help greatly. Also, more stringent validity checks and physical proof of identity should be required."* Gambler Number 89.
>
> *"Funds should be through credit and not through credit or debit cards. This way credit limits can be set just the same as when you borrow a loan and this makes the punter repay before being able to gamble again. There should also be an age limit."* Gambler Number 120.
>
> *"Gambling should be financed only through use of a debit card."* Gambler Number 134.

These statements refer to the removal of credit. Smith and Rupp (2005) report that in the US, operators have banned credit cards due to the potential for fraud and financial losses. No research has investigated the use of credit cards and any

relationship with 'PG.' The use of credit has been mentioned by all categories of participants in the OQ. The responses do not mention concern about fraud and are linked to 'PG.' If a gambler does not have money in their account, they can still play using credit facilities. Most credit card companies categorise gambling as a cash advance transaction which is the most expensive way to borrow (Kukiewicz, 2012). Gambling using a credit card will add a significant amount to the bet and if there is a win, will affect winnings. Further, high interest rates on borrowing potentially will lead to debt (ibid). Gamblers identified this problem and their comments stress the need for 'someone' to do something about it.

Some of the 450,000 'PGs' have an average debt of £17,500 each (Debt Foundation Service, 2013). There are reports that 70% of Britons in debt turn to gambling in the hope of solving their problems (Robinson, 2012). The levels of gambling debt and the bigger problem of debt in the UK require further examination.

> *"Make punters aware of the statistical likelihood of their winning or losing. However, this assumes they have some grasp of probability theory."* Gambler Number 39.

The Department for Business, Innovation and Skills (2011) found that 24% of adults in England would struggle to count to 1,000. In Wales, 50% of the working-age population in Wales lack basic numeracy skills. In Wales the standards of literacy and numeracy are at alarming levels, where 20% of 16 to 19 year olds have literacy levels at or below entry level and 60% of this group have numeracy levels at or below entry level (Welsh Government, 2011). Lambos and Delfabbro (2007) suggested that 'PGs' may have poor numeracy levels which may explain why they continue to gamble despite having substantial losses. Their findings suggest that educating 'PGs' about the odds of gambling is likely to not be an effective RG measure. If individuals have poor numeracy levels and find counting to 1,000 difficult then coping with probability theory may be unlikely.

Edgeworkers emphasise the importance of methodical preparation, knowledge, control, judicious and rational action in risk-taking which would assume a competence in probability theory. It could be argued that edgeworking gamblers can align with 'PGs.' Advantage gamblers are on the spectrum too, seeking to

remove the risk intrinsic to gambling (Banks, 2012). The edge provides feelings of excitement and fear that may be experienced online (Banks, 2012). Lyng (1990, p. 872) suggested that gambling edgework involves highly developed skills which would include calculating odds. The advantage gambler, who needs the thrill of the gamble, finds the edge online (Banks, ibid). Banks says OG is 'dangerous' rather than 'safe risk;' there is some risk online that the gambler will not get paid and online is a unique opportunity for edgework. Technology allows the gambler to navigate online (Schnapp, 1999) and the advantage gambler seeks out risk to invest and turn a profit (Banks, ibid).

Another aspect is the likelihood of operators informing gamblers of their chances of winning; they are unlikely to indicate that the probability is in favour of the site. All operators must meet the Remote Gambling and Software Technical Standards under the 2005 Act and provide information on the probability of winning events occurring (Fairweather O'Donoghue, 2007). This information may not be easy to find or understand (Jawad, 2006). Gamblers often believe they can beat the odds and win. Even if there is a high numeracy level, gamblers may believe that they can beat the system. Williams and Connolly (2006) looked at how improved knowledge of probability theory affected the behaviour of university students. One group of 134 students received probability theory instruction and a second group of 138 students did not. Six months later, students receiving the probability theory were superior in calculating gambling odds and resisting gambling fallacies but there was no decrease in behaviour. The implication of the research is that improved understanding of probability theory may be insufficient to change behaviour though it does improve gamblers' understanding which must be a good thing.

> *"Education and help for those with problems. Individuals need to seek help, casinos can't impose it one them, there is another just a mouse click away."* Gambler Number 48.

> *"Advertising the fact that casino type games and slots are a quick way to the poor house and that only games of skill and sports gambling skills are a possible way to make gambling pay."* Gambler Number 75.

These two comments relate to 'RG' education. The latter part of the second comment about gambling as a way of making money is important and the BGPS

(Wardle et al, 2011) determined it is the main reason they gambled. Most schools in the UK provide drug, alcohol and sex education but the same is not true for gambling (GamCare, 2011a). Williams et al (2012) argue that interventions to support effective parenting are a powerful way to reduce problem behaviours and are likely to apply 'PG' although this has not been empirically tested. There are information and awareness campaigns in the UK restricted to 'know your limits' or 'gamble responsibly' without details of where gamblers can receive help, more information or efforts to correct any common gambling fallacies and erroneous beliefs.

Information and awareness campaigns are inexpensive ways of giving messages to many individuals (Williams et al, 2012) but considering the vast commercial efforts to promote OG, the funds required could be significant. With the withdrawal of government funding for the BGPS, it is unlikely that the money will be found for this. There is a paucity of research on the impact of information and awareness campaigns on 'PG' and generally research supports initiatives which potentially improve an individual's knowledge and/or change attitudes: (smoking) Sowden and Stead, 2003; Carson et al, 2011 (road safety) Duperrex et al, 2002; (health) Grilli et al, 2004. Research has indicated that information campaigns about issues including weight control, HIV/AIDS, drug abuse, asthma, family planning and mammography have been effective (Chapman and Lupton, 1994).

Government and industry who profit from gambling have a responsibility to provide appropriate 'PG' information (Monaghan and Blaszczynski, 2010). Information and awareness campaigns may increase gamblers' understanding of treatment, acknowledgement of a problem and reduce the stigma of getting help. GamCare provides 'PG' support, raises public awareness through education, training and research but not one participant referred to GamCare in the OQ. There were no comments about an increase of its profile or its work, simply a general request for more information.

> *"I think they should take the adverts off the television and the adverts online as it makes people think they are going to win and it's not good for someone that is a gambler that is trying to help themselves."* Gambler Number 50.

> *"Make all advertisers spend equal amounts advertising warnings."* Gambler Number 96.

High 'PG' rates are predicable due to the levels of advertising and promotion of OG (Blaszczynski, 2013). Griffiths (2013) says the most noticeable change in gambling since the 2005 Act is the increase of television gambling advertising. Ofcom (2013) found a 600% increase in gambling advertising in 2012 compared to 2006 and gambling adverts accounted for 4.1% of all television advertising. With the expansion of digital television, 1.39m gambling adverts were shown and viewed 30.9bn times in 2012. There is a small body of research investigating the relationship between 'PG' and advertising (Griffiths, 2017) but there is an active prominence of gambling advertising which needs further investigation.

Outliers

It is important to indicate that other comments were made that could be classified as 'outliers.' eg Operator Number 4 referred to tracking play:

> "*... eg showing how long someone has played, maybe their 'burn rate' would be smart to show, stuff to keep the player aware and conscious of where they are in their wallet."*

Or Gambler Number 27;

> "*The problems surround addictive gamblers and as just about every human activity can be addictive, solutions must lie in treating addictive behaviour rather than focusing too intensely on the way that gambling is presented.'*

Or Academic Number 24;

> "*It is likely that many of the features highlighted in your survey will have some effectiveness.* However, *there is currently a lack of valid empirically based data to indicate their level of effectiveness at minimising PG behaviour."*

Conclusion to analysis of the comments of gamblers

Shaffer (2005, p. 1227) says that "it is the responsibility of the government to protect and serve the public" to achieve the greater good. Education and information can allow individuals to make better choices for themselves, however the gamblers do not agree that there is adequate provision. A conservative estimate of 'PG' costs would be £1.2b including mental health, policing costs and homelessness, compared to the £2.6b gambling contributes to the Treasury. The costs are greater than the ones specified because they do not consider the wider social and economic costs and independent research is required to examine the true extent of the impact of 'PG.'

Self-regulation

OG has legislative gaps meaning that gamblers face the market condition of caveat emptor (let the buyer beware). OG extends gambling further into the realm of the everyday with increased availability, accessibility by underage gamblers and increased normalisation of gambling as entertainment (Torres and Goggin, 2014). Effective regulation requires governmental support motivated to engage in the controversial issue of 'PG' (Gainsbury and Wood, 2011). Public opinion in the UK appears to support gambling with limited expressions about negative impacts. In 2010, 73% of the adult population participated in some form of gambling (Wardle et al, 2011). There does not appear to be demand for tighter regulation and OQ participants said that no one (or regulatory body) is on their side. It is unlikely that the suggestions discussed would be adopted by industry without government enforcement and even then, it is difficult to see how offshore operators would be made to co-operate. "Corporate self-regulation often lacks transparency, accountability and thus is deprived of any legitimacy" (Palazzo and Richter, 2005, p. 392) and this is a soft form of regulation and it is unlikely that sites would harm their revenues. The question is if 'PGs' are the life-blood of the casino, who is Dracula?

It is questionable if industry can be trusted to manage the provision of services to help 'PGs' and doubtful that it will self-regulate rigorously enough to satisfy these comments:

> *"Daily/weekly or monthly agreed limits per bet and or overall. Any client who persistently and consistently loses all of his/her deposits should be advised to consider giving up or at least reducing the size of the bets."* Gambler Number 111.

> *"Automatic detection of losing streaks, preventing gamblers from playing after losing x% of their bank roll for a period. This will prevent gamblers playing in a negative emotional state, causing more loss-inducing spirals. (Known in poker as Tilt.)"* Gambler Number 3.

> *"Reminding people of their losses."* Gambler Number 18.

> *"Sharing of information and limiting people who lose consistently. Monitor the use of credit cards."* Gambler Number 30.

> *"Phone numbers prominent for those who need help with their 'PG.'"* Gambler Number 31.

All categories of participants suggest that the operators should do more but do not want to because of the impact on profits. Kohlberg has been used to suggest that new businesses are like a young child with unregulated behaviour. The child will develop and their behaviour will change; OG is relatively new and may or may not develop its behaviour, after all, gambling has not changed.

Conclusion

This chapter sought to analyse the open-ended comments in the OQ using Grounded Theory. Ideas about responsibility were discussed by key stakeholder groups around central themes of regulated RG and the development of responsible and self-regulated behaviour of gamblers. The implications for responsibility is discussed in the final chapter.

Chapter 7

Introduction

This thesis set out to understand the extent to which RG is possible in relation to the interests of society and gamblers. By utilising a pragmatic mixed methods methodology and incorporating three methods of data collection, the thesis provides rich data adding to the limited body of research that has examined both RG and 'PG' from the perspective of 'PGs' and other key stakeholders. This final chapter begins by examining the extent to which the aim and objectives were met. It seeks to provide a synthesis of the main findings and discusses the possible contribution of this thesis. This chapter outlines recommendations, includes an evaluation of the limitations of the thesis and indicates the research areas for further investigation.

Synthesis of the main findings

The aim of this thesis was to evaluate critically the extent to which RG is possible in relation to the interests of society and gamblers themselves. It examined the efficacy of RGFs in the online environment.

To achieve the aims of the research, three objectives were examined.

- Objective 1: to explore what 'PGs' say about their gambling life stories
- Objective 2: to explore what 'PGs' consider might have prevented them from experiencing 'PG'
- Objective 3: to analyse the opinions of stakeholders towards the efficacy of RGFs

It is suggested that this thesis fulfilled each of the objectives and the objectives are used to structure the following discussion.

Objective 1: to explore what 'PGs' say about their gambling life-stories

In the life-stories the GI participants identified when gambling took over and affected many aspects of their lives. Even though the participants identify as reformed 'PG,' gambling still permeates their lives:

> "*It was out of my hands really. I got addicted." P5.*

The gamblers were not engaged in gambling but were pre-occupied with thoughts about it, struggling with urges to gamble again and feelings of guilt and anxiety about the waste of time and or money spent on gambling:

> *"I have the urge to gamble all the time I am awake." P4.*

> *"All could think about was how I could get money to go back to the bookies." P7.*

Several areas in their personal lives had suffered including relationships, finances and work:

> "*I have ruined my life and the life of my wife and two children. We've been separated for a while now and I miss my children." P2.*

After the enjoyment derived from gambling had disappeared, they were unable to remove themselves from a destructive cycle until 'PG' had become critical. Further, after its development, they were unable to return to recreational gambling. None of the participants had wanted gambling to destroy their lives and they were all survivors. They discussed their individual motivations for gambling, however it has been theorised that motivations to gamble may be multifaceted with numerous factors influencing the course and development of 'PG' (Williams et al, 2015). Despite the increase in empirical studies that have sought to understand the causes of 'PG,' the exact causality of PG is unknown. This study confirms the complexity and diverse nature of the causality of 'PG'.

The participants gave reasons for starting gambling as escape, avoidance of anxiety or problems, enjoyment or the opportunity for a win and their gambling continued for the ultimately the same reasons:

"*I loved the chance of maybe having a big win." P2.*

A critical evaluation of why 'PG' developed was not within the remit of the thesis and analysing this area would require a psychologically-based research project. However, the findings are consistent with other studies that found 'PGs' can be divided into groups based on pathways (Nower et al, 2012). A1 gamblers may be more antisocial and impulsive (P6 based on her lone gambling and poor social support). BC gamblers may experience mental health issues prior to 'PG' (P7 stress/anxiety related to marriage problems) and regular exposure could explain 'PG.' C3 gamblers have no prior mental health issues or problem backgrounds and exposure to conditioning and ecological factors such as proximity to venue, contributes to the development of 'PG' (P2 attracted to the lights and the table). The findings from this study would indicate that more research is critical to understand more about Pathways Models so that specific interventions and prevention efforts can be developed and implemented in order to minimise 'PG.'

The life-stories revealed when gambling spiralled out of control for participants and when gambling became a problem. This was not necessarily the point at which they sought help and support. The APA has characterised 'PG' as being chronic and progressive if untreated; however, other research has demonstrated natural recovery amongst 'PGs,' where the majority of 'PGs' recover without seeking help from professionals or self-help groups (Slutske, 2006). The participants in this study, therefore, were unusual in seeking help. There is then, a causality dilemma for investigation: is there limited 'PG' help because so few 'PGs' present themselves for help, or do so few 'PGs' present themselves for help because there is limited 'PG' support available.

To conclude this section on what 'PGs' say about their life stories, it is important to consider that narrative inquiry is an appropriate way to disclose nuance and information about previous gambling behaviour and experiences. Narrative,

according to Wang and Geale (2015) and Orbuch (1997) is more than storytelling; stories present a satisfying truth which can ease difficulties, lessen gambling-harms, provide hope and inspiration and facilitate reflection. This appeared to be the case in this study. Narrative analysis in gambling research enables a way of caring about how knowledge is produced and the importance of the relationship between the researcher and the participant. This research may help generate models of good practice and may be used by researchers to develop 'PG' knowledge, improving research and researcher practice and encouraging shared learning. It is a key finding of this study that gambling research will benefit from understanding the continuous interaction of thoughts, behaviour and experiences of 'PGs.'

Objective 2: to explore what 'PGs' consider might have prevented them from experiencing 'PG'

Support groups with a focus on narratives are valued in western culture. The support group was run by 'PGs' for 'PGs,' offering support through talking and this requires abstinence for support to work. In this setting, 7 participants talked about being unable to control their gambling and that RGFs would not have worked for them in the past or now. There was pessimism about the potential of preventing 'PG' and this is encapsulated by P1:

> *"So, who is paying for you to do this stuff (the PhD)? Because it's a waste of money. Is it your money? Well you are wasting your time and money. None of you lot understand. How can you understand? This is just wasting your time and mine. No one is going to listen to me."*

The discussion on ways to minimise 'PG' and to assist at-risk gamblers was fruitless. The conclusion of the GI participants was that gamblers are responsible for their own gambling. However, they indicated that the lack of governmental responsibility taken for 'PG' was an enabler in their route into becoming a 'PG.' This was almost a contradiction in the narrative. The perception of the GI 'PG's was based on perceived lack of government responsibility or operator action on the issue of 'PG.' The factors that contribute to this perception related to, first, the lack of support; second, the emergence of the neo-liberal ideology of responsibilisation; third, government and operator strategies based on revenue maximisation and

fourth, the desire by the individual to be engaged in the risk-taking that gambling involves.

The participants' strategies to help themselves were, first, abstinence from all kinds of gambling activity and second, the necessity of support to abstain; some received support from family and friends and they all were supported through regular attendance at the group:

> "*Coming here gives me the strength to go one more week." P5.*

It is significant that all participants initially had to take individual responsibility for their 'PG:'

> "*The only thing I have done in a responsible manner, is coming here and getting help." P5.*

Whilst there were some comments that referred to what government responsibility should be, the participants identified that they were responsible for their 'PG:'

> "*The government should do more." P6.*

The participants did not know the term responsibilisation but verbalised the core concepts:

> *"I have got to accept responsibility for my own actions." P3.*

Participants did not suggest that operators needed to adopt a more proactive role:

> "*I really think that if gamblers cannot help themselves and casinos and bookmakers cannot help themselves, then there is no choice other than the government to watch over this." P2.*

> *"RG got to come from the individual. The bookies and casinos and scratch cards are all legal. They are not doing anything wrong." P7.*

It is not clear why the participants excused operators from responsibility. It could be because gamblers are fully responsibilised, embracing ownership of their gambling behaviour, or it could be acceptance that operators exist to profit maximise at any cost. Griffiths (2010c) said that it is not the "gaming industry's responsibility to treat gamblers" (p. 89) and participants seem to accept this. However, it may not be realistic for operators to be responsible, if it was, regulation would be unnecessary. The history of involvement with industries tells a different story. It has been argued that the tobacco industry's relationship with government delayed effective no-smoking policies (Chapman, 2007; Turcotte, 2003). Samarasinghe (2009) refers to a similar situation with the alcohol industry, linking ideas of freedom with drinking. These examples have been applied to gambling (Adams et al, 2009) though Griffiths (2009b) is confident that government relationships with operators may lead to a responsible approach that removes the need for regulation. Griffiths discusses a socially responsible environment with operators working with government and researchers to develop a range of RGFs. Griffiths' optimism may be misplaced because without regulation, measures would not be effective nor transparent (Livingstone and Woolley, 2007). Griffiths declares his conflicts of interests with funding from the RGT, numerous grants and consultancies from operators around the world and is a non-executive director of Wood's company GamRes, which has more than 20 international operators in their client base (Ovenden, 2016). This matters because these conflicts may affect his research and opinions on the issue of competing interests. Griffiths' argument that the industry can regulate itself is irresponsible, based on the history of contentious industries; for example, the government has had little success with gambling and other harmful products (Edwards, 1998 (alcohol) Munro, 2004 (alcohol) and Doughney, 2006 (gambling)). Operators cannot be blamed for their actions when these actions are supported by governments that see potential for revenue and pursue these revenue streams. Governments should weigh the financial benefits with containment of harm (Orford, 2009). Stringent regulation would risk revenues and a lack of RG measures fails to protect the weak and vulnerable (Adams et al, 2009). Self-regulation and SR is an attractive compromise for government and operators, benefitting from an impression of responsible management without affecting consumption (Orford, 2009). Griffiths promoting operator self-regulation is inconsistent with his funding from operators (Adams et al, 2009). There is a

partnership model in gambling research and it is important to consider whether research should be industry-funded or not (Cassidy et al, 2014). It is likely that priorities are set by industry-funding and industry-influenced panels but this thesis argues that research needs an independent and PH remit.

Two things are almost certain, gamblers are not going to stop and government is not going to ban gambling. Government and operators must accept that for a minority, gambling can become a serious problem that leads to addiction, financial problems, personal devastation, misfortune and even suicide. Operators have a motive to be real partners in efforts to understand 'PG' if they want to secure the long-term sustainability of the industry. If operators choose to ignore the situation or make the situation worse, then they may become the tobacco industry of this millennium (Smith and Wynne, 2000). For Mill, the main reason for government to apply power over individuals is to minimise harm. A debate must be established to determine if government's role is to protect gamblers from harm or to generate revenues despite 'PG.' RG needs a balance between letting gamblers exercise their freedom of choice versus minimising the social and economic harms that can accrue from gambling (Smith and Wynne, 2000). Small (1999) writes that the objectives of gambling policy are to choose between the harms and that policy-making becomes the matter of deciding which harms we can live with. Van Lujik and Smith (1995, p. 8) say that it is generally accepted that there is no moral ground for an absolute ban on gambling and the debate should be "about the quantity and quality of the supply." However, this study indicates that there will inevitably be serious harm for a small minority of gamblers and this moral position is therefore called into question.

Some types of gambling are more harmful than others and governments should evaluate if they should support consumer freedom by allowing all types of gambling even though some gamblers are at more risk (Binde, 2011). Smith and Wynne (2000) argue that perhaps governments should follow the greater good doctrine and offer the least harmful products, which would mean a restriction on gambler freedom to some extent. They continue that, theoretically, the public good should be the main consideration of any gambling policy. However, Abt et al (1985, p. 213) poignantly point out "this has never been the case, nor is it the case today."

There has not been a full discussion about informed gamblers being the cornerstone of CSR, where government would be responsible for establishing standards to be met by operators and where the latter are policed by regulators (eCogra, 2007; Blaszczynski et al, 2011). Informed choice requires government and industry to take a proactive approach to RG. In the case of gamblers, informed choice is problematic because much of the information is highly technical and ultimately the odds are stacked against the gambler, full transparency about the chances of winning and losing and education about probability would undermine efforts to market gambling (Orford, 2013). One of the implications of the RG discourse is that the "lion's share of the obligation" (ibid, p. 154) to be responsible lies with the gambler. The situation is paradoxical and the gambler cannot escape this cause and effect dilemma; the gambler does not make an informed choice because the operators are reluctant to provide complete information and therefore the gambler makes an uninformed choice and is an uninformed gambler who continues to make uninformed choices. There is also the issue of rational choice which assumes that gamblers are rational and seek to maximise their utility, which is based on being informed (Devenney and Kenny, 2012). Some gamblers make decisions based on irrational beliefs or misunderstood views on chance, or make decisions without the full range of necessary information, which goes beyond a gambler's cognitive abilities. Based on the findings from this study it is suggested that regulation could reflect libertarian paternalism which respects freedom of choice but places boundaries around gamblers in order to ensure their welfare.

The implication of individual responsibility is that this kind of self-regulation is perceived as credible and effective (Gainsbury et al, 2010). The responsibilisation of gamblers as a government strategy ignores the pain and suffering experienced by gamblers, their family, loved ones and the impact on others, including employers, colleagues, communities and society. The social and personal costs are immeasurable and this study indicates there may be too much emphasis on gambler responsibility and too little on operator responsibility. The social contract between operators and gamblers may have broken down or never existed. Gambling legislation in the 1960's needed review and it is possible that the 2005 legislation may also need a comprehensive review. Previous Royal Commissions on gambling

were carried out in 1933, 1951, 1978, 2001 and the next gambling review is surely due (GamblingWatchUk.com, 2017).

All the GI participants said nothing would have prevented their 'PG' behaviour, however they revealed in personal stories nadirs in their personal gambling experiences;

Participant	Nadirs in Gambling Experiences
P1	Armed robbery, prison counsellor recommended gambling support group
P2	Debt, marriage breakdown
P3	Debt
P4	Debt, Bankruptcy
P5	Debt, marriage difficulties, marriage guidance counsellor recommended gambling support group
P6	Marriage breakdown, shoplifting, Magistrates Court recommended gambling support group
P7	Marriage breakdown, debt, Citizens Advice Bureau recommended gambling support group

Table 7.1 Nadirs in Personal Gambling Experience

Debt and or relationship matters affected the participants and were critical in 'PGs' getting help. None of them said they began gambling to get out of debt and financial worries developed because of their gambling. When it comes to relationships, some deteriorated because of the participants' gambling and for some, gambling was avoidance of relationship problems. The participants paid the price for this escapism and became pre-occupied with the gambling that had started as an avoidance of personal difficulties. Consequently, life became disordered, normal life was affected and gambling became even more of an escape. Therefore, both an unaffordable amount of time, effort and money is spent by gamblers who hit 'rock-bottom;'

> "*I had to hit rock bottom before I could do anything about my gambling." P1.*

'Rock-bottom' applies to both finances and/or relationships. Chasing losses to improve the negative impact on finances and/or relationships appears to be the only course of action, for a time. There is little research on 'self-control' mechanisms or external experiences that can affect control mechanisms within gamblers (Northington et al, 2015).

In Blaszczynski and Nower's (1999) Pathways Model, chasing losses is part of each pathway to 'PG' and integral to gamblers' loss of 'self-control.' The motivations for operators to enhance gambler 'self-control' is minimal and existing research shows that gamblers often set self-imposed money and time limits but frequently gamble more than they intended (Blaszyzynski et al, 2014). This is likely due to gambling's emotional impact and dissociative states leading to a behavioural shift which manifests in a loss of 'self-control.' The GI findings show that an over-investment of time and/or money are two primary factors for gambling to become 'PG.' The over-investment is probably due to a current life situation which is driving the need for escapism (see Table 7.1);

> *"My mind consisted of blocking things out, the bookies, my wife's affair, not going home sitting in the bookies." P7.*
>
> *"When my husband left me, I would just go into the shop on the slot machines." P6.*

The results of this thesis reflect the findings of Piacentini et al (ibid) that 'PGs' use neutralisation techniques to rationalise the negative impacts of their actions and ex 'PGs' use counter-neutralisation arguments to reinforce their commitment to a gambling-free lifestyle. The contributions of the current study is that the visibility of the narratives about 'PG' behaviour will contribute to a sociological understanding of 'PG' and neutralisation. It is necessary to understand more about how CSR is used by operators to neutralise gambling-harms and meet societal expectations. Operators use neutralisation techniques to justify their continued targeting of 'PGs;' as well as averting robust industry regulation (Pomering and Frostling-Henningsson, 2013). Unfortunately, it was not possible to elucidate more on neutralising techniques by operators but RG and RGFs do form part of these techniques.

Main conclusion related to objectives 1 and 2

This thesis sought to analyse the effectiveness of RG; findings of the GI point to the ineffectiveness of RG in three ways. First, the responses indicate that the current regulatory position is insufficient for protecting 'PGs;' second, the provision of help is insufficient and finally, the GI participants expressed cynicism about the concept of RG. A main conclusion of the GI is that there was no perceived utility of RG and probable perceived utility of RG depends on the severity of the gambling-harms. 'PG' did not develop immediately and was the result of risky consumption patterns over a period of time, where 'PGs' mainly gambled for social or emotional reasons. Their perceptions of 'self-control' led them to perceive either that they were at no risk of 'PG' or could control the risks. Therefore, understanding the drivers of gambling risk is essential in developing 'RG.'

Returning to Carroll's (1979) thoughts on CSR, operators concerned only with economic ends would not be likely to embrace RG policies and practices that would negatively affect profits. Whilst operators who prioritised ethical behaviour would be more likely embrace RG, the chance of operators being ethical is unlikely. Gambling is a legal operation in the UK and though historically it was viewed as unethical or immoral, the focus now is that the industry is legitimate and entitled to the same growth as other industry sectors. "Gambling is a massive global industry and is entitled to a regulatory framework that ensures continued growth" said Culture Secretary Tessa Jowell in her response to the first Draft Gambling Bill in 2004 (Reith, 2008b). However, although operators are legitimate, they are drawn to CSR as a means of protecting themselves rather than protecting gamblers. Porter and Kramer (2011) suggest that corporations view CSR strategically and it is likely that operators take a strategic/instrumental view and CSR is a means to fulfil their business objectives. Operators do not seem to be challenged by 'PG' possibly because of its legitimacy and unlike tobacco firms, they are not fighting for their right to exist. Operators are not challenged that their interests "run counter to the social good" (Palazzo and Richter, 2005, p.397) and operators do not have to use CSR to link their interest to the common good. There is no acknowledgement that gambling damages PH and instead, gambling is promoted as enhancing the public

good. 'PGs' in the GI did not even expect operators to be interested in practices aimed at RG.

RG is not dealt with directly in the Gambling Act 2005 not in its guiding principles which seek to prevent gambling from being a source of crime or disorder, to ensure it is conducted in a fair and open way and to protect children and other vulnerable individuals from harm or exploitation (GC 2008; 2012). When it comes to RG, the 2005 Act and Code of Practice Operative, Section 2.3 requires licensees to "take all responsible steps to provide information on how to gamble responsibly and help for 'PGs'" (GC, 2007). Section 2.4 requires licensees to put "into effect policies and procedures intended to promote socially RG." This must include specific policies and procedures relating to a commitment to RG and how they will contribute to research examining the prevention and treatment of 'PG,' to educate the public on the risks of gambling, how to gamble safely and how they will contribute to the identification of 'PGs' (GC, 2007, p. 27). Whilst there is clear advice given to operators, this advice does not seem to have translated into clear practical guidance for gamblers.

The results of the GI support the findings of Hing's study in 2003. Her study had two main objectives; to examine if gamblers believed that RG strategies were appropriate for HM and to assess the perceived effectiveness of RG strategies. Hing found that the strategies were effective for approximately half of 'PGs' and at-risk gamblers on how they view 'PG' and that there was awareness of RG but it does not encourage RG. Further she concluded that operators were not proactive in promoting RG and could do more. The findings of this study show that GI participants had reservations of the likely effectiveness of RG but laid responsibility with government and but largely themselves.

Objective 3: to analyse the opinions of stakeholders towards the efficacy of RGFs.

Both quantitative and qualitative analyses were used to order to achieve this objective.

Summary of quantitative analysis

Quantitative analysis of the OQ was rigorous and produced useful and convincing findings. Gamblers identified specific RGFs as being effective; they preferred features that were a *means to an end,* practical RGFs that were perceived as effective, for example, *providing accurate information on chances of a win*. This links to the BGPS (2007; 2010) which found that the main reason given as to why participants gamble is to win money. The findings revealed that gamblers want help or support from the operators which is unlikely in the current regulatory framework. Operators frequently fail to respond to 'PG' or signs of 'PG' and instead encourage continued gambling, which contradicts their responsibilities as set out in the Code of Practice Operative Sections 2.3 and 2.4 as discussed above. Rintoul et al (2017) says that self-regulation (codes) is not an effective response to 'PG' and Selin (2016) describes RG as industry self-regulation that lacks credibility. RGFs in the OQ were identified by the participants as being effective and requiring enforcement which needs to be incentivised by government.

The RGFs identified as effective by the academics/counsellors are like those identified by the gamblers; five RGFs are agreed upon by both groups:

RGF	**Gamblers' Rating**	**Academics/Counsellors' Rating**
Providing accurate information on chances of winning	First	Fifth
Providing age verification controls	Second	First

Displaying gambling activity in cash value instead of credits	Third	Fourth
Providing self-exclusion options	Fourth	Third
Requiring players to set predetermined spending limits	Fifth	Second

Table 7.2 RGFs identified as effective by gamblers and academics/counsellors

Academics/counsellors were always more positive about the possible effectiveness of RGFs than gamblers; the counsellors tended to be even more positive than academics about the efficacy of RGFs. Whether this is because their professional livelihoods depend on working with 'PGs' is unknown and it was not within the remit of this thesis to explore the motivations of academics/counsellors. It would have been interesting to understand what the enthusiasm of this group regarding RGFs is based on, however.

To establish and maintain effective RG strategies, keys stakeholders must take responsibility and supply information to ensure RGFs that work. Government and operators have the greatest resources and could establish a review whereby all stakeholders can vocalise their thoughts. However, there is no independent agency, ideally located at an academic institution, that is concerned with monitoring and managing the impacts of gambling in the UK (Cassidy et al, 2014). An independent agency could take the opinions of gamblers into consideration; as end-users, they will have important contributions to make. Professionals that are concerned with 'PG' as an addiction, including academics and counsellors also have valid contributions and will be able to assist in the design of education, prevention and therapeutic interventions. The findings of this thesis contend that these two groups have different perceptions and it is important that both groups are heard.

These findings are significant because they draw attention to the need for more clear and detailed stakeholder responsibilities to be identified. Gamblers have the final responsibility over their behaviour, however operators need to ensure that they provide gamblers with adequate information so that they can make informed choices (Blaszczynski et al, 2004, 2011). OQ participants articulate responsibility

for ‘PG’ residing with the gambler relying on the gambler’s ability or inability to ‘self-control’ consumption but they also articulate the unproblematised view of gambling which is conjoined to current regulation.

The RGFs were not rated as highly effective by gamblers. If ‘PG’ is going to be minimised, there needs to be a serious debate culminating in solutions. Academics who research ‘PG’ in-depth and counsellors who deal with it at critical points are vital to this debate and the findings reveal a disagreement amongst these groups; gamblers say something different from the other groups. When dealing with ‘PGs’ impact on individuals and society, there needs to be a seriousness in trying to solve the problem. The government’s neo-liberal political and economic strategies do not lend themselves to the serious debate that ‘PG’ demands. Further, it seems unlikely that government strategy will change; the UK is not facing up to ‘PG’ and the lack of independent research and industry influence is preventing proper investigation of a serious problem.

Summary of qualitative analysis

Findings from the qualitative analysis of the open-ended questions in the OQ are summed up in the following table;

Stakeholder group	Number of participants	Percentage	Responsibility recommendation
Operator	13 out of 21	62%	Individual
Academic	5 out of 62	8%	Individual
Counsellor	1 out of 22	4.5%	Individual
Gambler	23 out of 278	8%	Individual
Operator	3 out of 21	14%	Government

Academic	39 out of 62	69%	Government
Counsellor	18 out of 22	82%	Government
Gambler	240 out of 278	86%	Government

Table 7.3 Stakeholder comments about responsibility

It can be seen from the table above that for most operators 'PG' is seen as the responsibility of the gambler and most academics, counsellors and gamblers state that 'PG' is the responsibility of the government. The percentage of gamblers (86%) that recommend government responsibility is overwhelming and not reflected in any 'voice' in the UK today. In evaluating the role of government and appropriate governance of regulation, it is important to remember that gambling expansion is not population-driven but driven by both the appeal for industry expansion and government revenue (Nikkinen, 2014). Adams (2012) argues that gambling is not deemed addictive enough to want product-availability limitations, gambling is not tested from the perspective of harm and in addition, it would be difficult to reverse liberalisation. 'PG' so far has not been recognised by government as requiring a PH response. A culture of responsibility is not part of a coherent and integrated policy framework and responsibility is allocated to one agency: gamblers. The Gambling Commission's (2017) role is not about responsibility in policy matters and regulates gambling in partnership with licensing authorities. No authority has accountability for policy, planning or developing, establishing and policing RGFs and the provision of 'PG' help and support because no government has interest in curbing voluntary taxation. In this study 'PGs' do not excuse themselves from responsibility but it is clear that gambling destroyed their lives, therefore it is suggested that government, as revenue recipients, needs to ensure that part of this revenue is used to fund appropriate 'PG' support services. The reality is that absolute 'self-control' is not a common human characteristic. The body of evidence showing gambling's negative externality as an economic burden on individuals, families, communities and society is building up (Davies, 2016). It may be possible to say that allocation of individual responsibility is acceptable but only if it benefits the majority and does not increase wealth disproportionately to government and industry. The findings of the study have led to the conclusions that responsibilisation of 'PGs' is nothing more than the rationalisation of government and industry greed for revenue; state

and corporate nihilism. The tobacco industry has lobbied against the plain packaging of cigarettes (Davey, 2015) and the junk food industry is fighting restrictions on high salt, sugar and fat in food and drinks (Clarke, 2016). Aristotle said that the purpose of government is to facilitate its citizens to live a full and happy life and Mill says that the best form of government promotes, as much as possible, the common good and so part of the purpose of government is to pass laws to protect the individuals against corporate greed. But this has overturned and government has passed gambling legislation to promote its own and corporate greed.

Generally, operators responded that individual responsibility is likely to be an effective response to 'PG' and academics, counsellors and gamblers responded that government responsibility is likely to be effective. The response from OQ gamblers does not reflect the responses from the GI 'PGs,' where, generally, the latter were less optimistic about RG. This is likely to be due to where the participants would be identified on the spectrum of gambling-harms (Blaszczynski et al, 2004) gamblers in the OQ were likely to be made up of low-risk, medium-risk, high-risk and 'PGs,' whereas the participants in the GI were all identified as 'PGs.' The GI participants had developed serious problems with gambling and had sought self-help groups for support; their perceptions, behaviour and experiences were likely to be distinctive. This suggests that RGFs may be useful for *recreational* gamblers likely to be low-risk on the spectrum but not useful for high-risk and 'PGs' whose behaviour is out of control.

A grounded theory approach was adopted as the analytical tool in this thesis. The analysis was approached in a robust and thorough manner and therefore it is suggested here that the findings are valid and warrant being taken seriously. Most operator comments supporting individual responsibility could respond *well they would say that, wouldn't they*? It is the enormity of gambler responses recommending government responsibility that merits further attention. The fact that the gamblers have no voice, that they are a group without a leader, combined with the government's strategic position, that makes the 86% response rate so overwhelming, one might suggest this is like a cry for help.

An overview of the main original contributions

This thesis makes an original contribution to research into understanding the extent to which RG is possible in relation to the interests of society and gamblers. Firstly, it comprises an interdisciplinary theoretical framework that was used to analyse 'PG' which has hitherto not been applied in a single study. By exploring ethics, CSR, social policy, psychology and sociology side-by-side, the thesis provides an original insight into their complex relationship, can help understand different aspects of 'PG' and ultimately, the extent to which RG is possible in relation to the interests of society and gamblers themselves.

Second, the thesis incorporates a pragmatic mixed methods approach and provides a novel examination and understanding of 'PG' and the concept of RG. Moreover, it makes original use of narrative inquiry to examine the experiences and behaviours of 'PGs' which has not been used extensively to analyse the complexity of 'PG.' It provides an original comparison of the perspectives of gamblers and academics/counsellors in the quantitative stage of analysis. Differing opinions between the groups on the effectiveness of RGFs may facilitate a better understanding of what actually works for gamblers/'PG' in controlling their gambling behaviour. A strength of this thesis is the participation of operators, who provided no funding and were not involved at any point in the research design and therefore, it is likely that their contributions are honest. This is further corroborated by their responses which tended to align with the responses of gamblers, other than for the question about responsibility (see Table 7.3). It is a merit of this thesis that it gained the perspectives of operators and other organisations and this enhanced the thesis and understanding of approaches to 'PG.' Research in this thesis has shown that this approach has not previously been applied to 'PG' and the thesis provides an original understanding of the perceptions of key stakeholders.

Third, this thesis provided a fresh examination of the 'PG' perspective using narrative inquiry in the group setting. There was consensus that the needs and perspectives of 'PGs' were unimportant to government and operators and that RG was a meaningless concept where *gamblers are encouraged to gamble responsibly* akin to "encouraging drunks to get drunk responsibly, to crash our cars responsibly,

murder each other responsibly" (Davies, H., 2016). The findings from the OQ differed to the GI findings and participants identified utility in RGFs. This thesis recognises that a fundamental weakness in the evidence base is that gamblers are not an homogenous group and 'PG' occurs across a spectrum of harm and severity. The overwhelming focus of RG policy does not integrate a partnership approach whereby the perspectives and voices of the most vulnerable stakeholder, the 'PG' are taken into account. The thesis does not address how to integrate the 'PGs' as end users but it is a key finding but their voice is missing and would add significant value to future developments. A whole system approach of key stakeholders working as equal partners with shared responsibilities towards achieving goals is necessary. A partnership approach of gamblers-government-operators-researchers will be central to the success of minimising 'PG' and it is important to evaluate theory and empirical research in the context of the current regulatory framework.

Fourth, related to above point, an original contribution was using the MC. He was key to the success of the GI and he was more than group moderator and group counsellor and was both gatekeeper and mouthpiece. Given the sensitivity of the research, the vulnerability of 'PGs' and the ethical considerations inherent to studying 'PG,' gaining access to participants was very difficult and working with the group leader enabled the generation of rapport and trust so as to ensure honest responses and the smooth running of data collection. A number of other gatekeepers denied access to potential participants. The MC was a gatekeeper and his generalised awareness within the 'PG' community and this group was particularly useful for facilitating open communication. The MC also acted as a neutral mouthpiece, passively facilitating dialogue with the participants. Most importantly, his central responsibility was to protect the GI 'PGs.' This thesis incorporated learning tools to address the challenges of using the MC and reflexivity was used during the research to critically review all aspects of the research, it is anticipated that retrospective reflection identified the use of the MC as an area that worked well. Positive influences include engaging and involving the MC early in the research process and sharing honest and accurate information about the purpose of the research which are likely to have led to the MC's positive attitude regarding the research activity. Library searches for studies that have used a similar approach (a

gatekeeper and mouthpiece) for gambling research did not produce any results. The advantages and disadvantages have been discussed at length in chapter 4 but it is worthy to suggest that the use of the MC was an original approach for sensitive research with vulnerable participants.

Fifth, the thesis considers how sociological theory can contribute to the construction of a new model of 'PG.' For Goffman (1967) gambling was a pursuit separate from everyday life, however this is now completely defunct as gambling is synonymous with entertainment and an embedded feature of everyday life. Turner (1974) wrote that liminality was a socially constructed experience that allowed individuals to reclassify reality and to understand society and culture in different ways. He argues that in the moment of liminality, it is possible for individuals to step away from social positions and to formulate unlimited experiences. However, now gambling practices have permeated into everyday life and are institutionalised as an integral part of modern life. It is necessary to integrate into a new model of 'PG' gambling's culturally embedded position of normalised consumption and a blurring between 'PG' and 'non-PG.' Therefore, this thesis provides an original insight that may be of considerable value to those seeking to launch similar research of how a model of 'PG' needs to integrate the loss of the liminal experience in the current cultural context of gambling.

By incorporating an original interdisciplinary combination of topics, a novel examination of the thoughts and perceptions of 'PGs' and a novel comparison of the opinions of key stakeholders in this thesis, this thesis has made a number of original additions to existing knowledge and to understanding the extent to which RG is possible in relation to the interests of society and gamblers. First, the unclear meaning of RG in the perception of 'PGs.' Second, the thesis has shown that a partnership approach of all key stakeholders is required for the minimisation of 'PG.' Third, a new model of 'PG' is required integrating gambling's new cultural context and the loss of gambling's liminal experience because different strategies are required to influence new and effective models. Fourth, the thesis has shown that the lack of involvement from government and operators in the development of effective RG initiatives militates against minimising 'PG.' It is not that there is a

significant gap between the rhetoric of government and operator practice; the reality is that the government is not seeking to improve 'PG' support or care.

Having established the original contribution of this thesis, recommendations are set out below. However, it is necessary to make a short reflective statement at this point, because is has an impact on the recommendations. Like many research projects, at the end of the process there are more questions than at the start. Overwhelmingly, the findings of the GI were discouraging to the researcher because 'PGs' were disillusioned with what they considered the hollow concept of RG. Further, the 'PG' figures in the UK have risen from 0.5% in 2007, to 0.9% in 2010 and the rate of 'PG' in Wales in 2016 was 1.1%, with 3.8% identified as low or moderate risk gamblers (Gambling Commission, 2016b). These figures are disturbing and more dismaying are the findings of Li et al (2016) that gamblers export half of the harms they experience to those around them which reflects that 'PG' (the term used in this thesis to cover the wider-gambling-harms issue) constitutes a serious social and health problem that receives very little attention. The thesis has examined how gambling regulation is designed to protect government and operator revenue and it is unlikely that regulation will be redesigned to protect gamblers. The findings of this thesis and any useful research by independent studies is unlikely to be embraced by government or operators. Finally for any RG strategies to be effective, government regulation would be both essential but is unlikely. There is a moral argument for government action because 'PG' worsens the socio-economic disadvantages of the most vulnerable groups in society and there is an economic argument for government action because 'PGs' and their dependants make greater use of public services. However, neither of these arguments are openly acknowledged by government or society and there is no appetite for government to take responsibility for the social problems created by the industry and no urgency for the government to fill gaps in the available evidence base. As a result, the numerous recommendations put forward next are unlikely to receive any serious consideration in the near future.

Recommendations

The recommendations are based on paternalistic government action responding to 'PGs' who say government need to do more;

1. There is the need for an independent review of the impact of gambling liberalisation including an audit of the social impact of 'PG.'
2. There is the need to consider a RG education and the necessary infrastructure for an integrated system of 'PG' support.
3. There is the need for regular gambling health surveys which would be platforms for responsive change requiring significant resources and trained professionals.
4. There is the need for government to be proactive in identifying and supporting 'PGs' and seeking to assist gamblers who are on the low to medium risk on the gambling spectrum (Blaszczynski et al, 2004).
5. There is the need for a discussion of issues of terminology to ensure that a robust and inclusive definition of 'PG' is clarified with an understanding of 'PG' from the wider social perspective. A selection of definitions to be used consistently in dealing with the minimisation of 'PG' is necessary.
6. There is the need for consideration of implementing a partnership approach where end-users are critical and the delegation of a *service* to ensure appropriate 'PG' support.
7. There is the need for the establishment of a focus on outcomes for minimising 'PG.'
8. There is the need for 'PG' to be regarded as a PH concern and treating 'PG' as health-related should be explored. PH campaigns could encourage the removal of stigma so that gamblers can seek help more easily.
9. There is the need for RGFs to be clearly visible, easy to use and the information should be standardised.
10. There is the need for *informed gamblers* which requires the government to outline standards that need to be met and further government should audit compliance and CSR in the industry.

11. There is the need for greater awareness about 'PG' and information explaining what gamblers need to do and where to get help; a figurehead or leader of a lobby group would be useful.
12. There is the need for a greater understanding about gambling careers in order to understand the complex picture of 'PG' behaviour.

Further research

This thesis suggests that all the recommendations would be based on further research. It is vital to find appropriate methods of funding gambling research and independent funding is key:

- There is the need for more sociological research examining gambling's impact on society and sociological orientations to consumption and risk to balance greater numbers of psychology-based studies which examines 'PG' at the individual level.
- There is a need for more research that includes the perspectives of the end-users.
- There is a need for further research into the impact of rising numbers of 'PGs' using public services.
- There is a need for research into understanding the transition from recreational to 'PG.'
- There is the need for research to understand how 'PG' behaviour changes over time and the effects of more or less gambling over long or short periods of time on support provided for 'PGs.'.
- There is the need to understand more about RG's ability to change gambling behaviour.
- There is a need to expand research into mobile and social gaming.
- There is a need for research examining the impact of gambling on individuals, community, society and societal structures.
- There is a need for feasibility studies to classify 'PG' as a PH issue.
- There is a need for research into the desirability of OG regulation.

- There is a need for research to examine advertising and marketing in relation to RG.

Limitations of the thesis

This study has a number of limitations. First, there was a paucity of previous research in 'PG' narratives against which direct comparisons could be made. This limitation was seen also as a positive, with little literature relating to 'PGs' discussing their life-stories and the fact that there was very little to compare 'PG' narratives other than McGowan (1993) added to the original nature of the thesis. Second, in this thesis there was a lack of rich dialogue with large numbers of operators; however, there was some participation by operators and this was seen to be a positive even though numbers were relatively low (39). Third, the GI 'PGs' were in treatment and their perceptions may have been biased due to their previous behaviour and experience. However, it was appropriate to ask these participants about their experiences and behaviours as the research sought to increase knowledge by listening to the accounts of 'PGs' - *who better to ask*? Although it can be argued that the participants were responsible at the time of the GI, their life-stories indicate that there was a period when they were not responsible. However, listening to their previous experiences and behaviours was critical to the data collection stage. The contributions of 'PGs could also be considered as enhancing the credibility of this thesis, despite their comments not being comparatively fresh in their memories. Fourth, these findings may not be generalisable to all gamblers and the findings must be treated with thoughtfulness due to the limitations presented in Chapters 4 and 5. The GI is likely to not be representative of the general population of gamblers and/or OGs. Fifth, a limitation of the research relates to timing. The thesis was written on a part-time basis over a period of 7 years. It was self-funded for the first 4 years and the researcher had a young family and her employment status was part-time. This prevented long periods of writing and data collection and by researching over this timescale, there was more to read and more developments to keep on top of. For example, towards the end of this research, there was exponential use of mobile gambling apps and inplay sports betting which had not been integrated into the thesis.

Summary

This chapter has explained that in conducting a pragmatic mixed methods study by way of narrative enquiry, this thesis has met the objectives of the thesis and in doing so, met the aim of critically evaluating the extent to which RG is possible in relation to the interests of society and gamblers themselves and an examination of the efficacy of RGFs. The chapter discusses the main findings and limitations of the thesis followed by the original contribution this study has made, drawing attention, for example, to the overlooked perspectives of 'PGs.' It also discusses the interdisciplinary approach used in this thesis because the business discipline in social science does not contribute significantly to the understanding of gambling. It also provides a number of original additions to existing knowledge in the entangled field of gambling's ethical, political, social and economic concerns.

Concluding remarks

Friedman wrote "Many people want the government to protect the consumer. A much more urgent problem is to protect the consumer from the government" (in Skousen, 2013, p. 10). Governments are protecting operators, like pimps of an urban vice which contributes large amounts to their Treasury. Readers of this thesis may ask how an industry that can ruin many lives in the UK are able to put across a socially responsible gloss which is almost akin to BAT's suggestion on their website that they use recycled paper to produce their cigarettes. And the ultimate question that needs to be answered is how we can allow government and industry to do this.

Appendices

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Appendix 1 DSM-5 Diagnostic Criteria: Gambling Disorder

A. Persistent and recurrent problematic gambling behavior leading to clinically significant impairment or distress, as indicated by the individual exhibiting four (or more) of the following in a 12-month period:

1. Needs to gamble with increasing amounts of money to achieve the desired excitement.
2. Is restless or irritable when attempting to cut down or stop gambling.
3. Has made repeated unsuccessful efforts to control, cut back, or stop gambling.
4. Is often preoccupied with gambling (e.g., having persistent thoughts of reliving past gambling experiences, handicapping or planning the next venture, thinking of ways to get money with which to gamble).
5. Often gambles when feeling distressed (e.g., helpless, guilty, anxious, depressed).

6. After losing money gambling, often returns another day to get even (‘chasing’ one’s losses).
7. Lies to conceal the extent of involvement with gambling.
8. Has jeopardized or lost a significant relationship, job, or educational or career opportunity because of gambling.
9. Relies on others to provide money to relieve desperate financial situations caused by gambling.

B. The gambling behavior is not better explained by a manic episode.

Specify if*:*

Episodic: Meeting diagnostic criteria at more than one time point, with symptoms subsiding between periods of gambling disorder for at least several months.
Persistent: Experiencing continuous symptoms, to meet diagnostic criteria for multiple years.

Specify if*:*

In early remission: After full criteria for gambling disorder were previously met, none of the criteria for gambling disorder have been met for at least 3 months but for less than 12 months.

In sustained remission: After full criteria for gambling disorder were previously met, none of the criteria for gambling disorder have been met during a period of 12 months or longer.

Specify current severity:

Mild: 4–5 criteria met.

Moderate: 6–7 criteria met.

Severe: 8–9 criteria met.

From the *Diagnostic and Statistical Manual of Mental Disorders, 5th Edition* (section 312.31).

Appendix 2 All analysis from Chapter 5

	Academics and Counsellors
	Gamblers

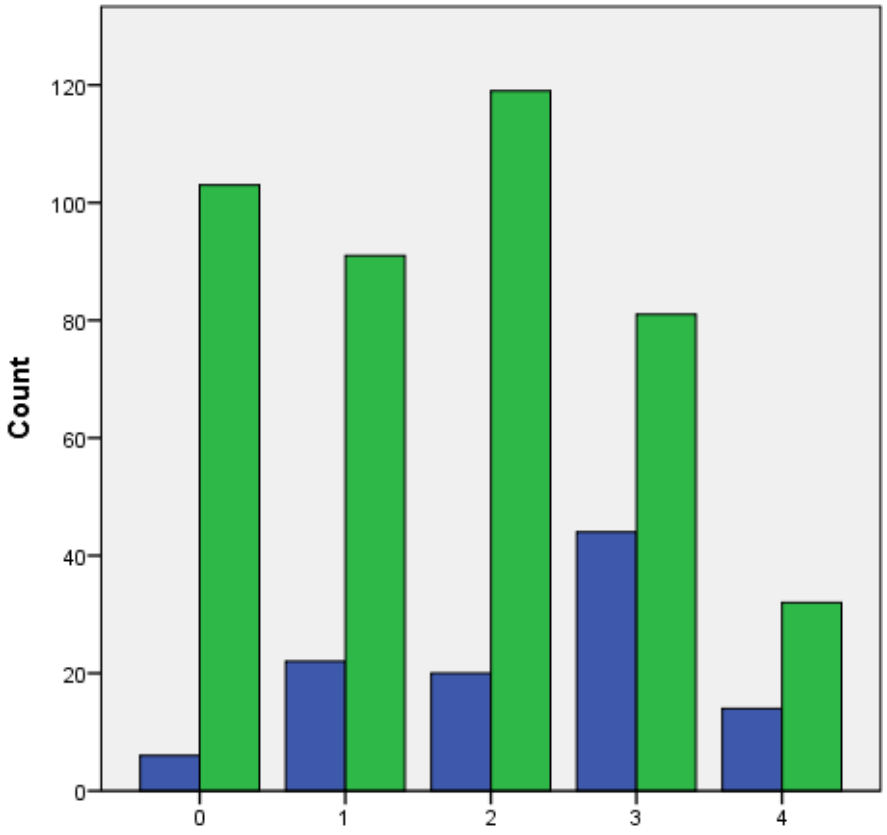


Figure A1 Slowing Play

The Mann Whitney U Test score = 15216, Z = 5.332 and p < 0.001. The effect size Pearson r = 0.2657. There is a small effect size; it is >0.2 (<0.2 is small effect size) but <0.5 (0.5 is a moderate effect size) so there is a difference but a small difference (Coe, 2002).

All Respondents Agree or Strongly agree	Only Operators Agree or Strongly agree	Only Academics Agree or Strongly agree	Only Counsellors Agree or Strongly agree	Only Gamblers Agree or Strongly agree	All Others Agree or Strongly agree

32.7% (210)	24.0% (6)	48.1% (40)	73.1% (19)	26.4% (114)	29.5% (30)

Table A2 Slowing Play

Academics and counsellors answered that this feature is effective but gamblers and operators did not agree and this is dismissed by gamblers. This is an example of the gap between the groups of participants. Although academics and counsellors may have considerable experience in the field of study and practice, they may not understand the behaviour and experiences of the positive or problem gambler. Hing and Nuske (2012) conducted research examining groups who are critical in providing effective help to 'PGs' in the gaming venues, including counsellors who are professional and trained. Counsellors reported that their feedback was well-received and that 'PGs' acknowledged that counsellors give help if needed and are not there to make the money (ibid, p.167). Hing's earlier research in 2007 involved counsellors and recovering 'PGs' to 'humanise' the issue of 'PG' and debate RG theory and practice. It was anticipated that the counsellors would share their experiences as trained and professional stakeholders. The inclusion of counsellors is important to the research of this thesis and it is important to note their responses. It is more complicated to assimilate their responses with those of end users.

Blaszczynski et al (2003) suggest that slowing the reel spin as a modification of design characteristics to limit expenditure may reduce the potential for problems to arise and contain the impact of 'PG' once it has started. This applies to EGM gambling but is not applied to OG, however, this may be an area for consideration. The result of 26.4% of gamblers agreeing with slowing speed as effective may support Blaszczynski et al's claims (2001) that faster speeds are more enjoyable. Only 24% of operators agree which may support the idea that making the games faster is a way to make more money (Ladouceur and Sévigny, 2006). A study examining the impact of slowing the rate of play concluded that it did not appear to reduce the amount of money lost, but did result in a loss of enjoyment (Blaszczynski et al, 2001). Blaszczynski et al (2004) concluded that since RG policies should promote measures to reduce or eliminate gambling-harms, slowing the speed of

play is not a measure that should be targeted in prevention strategies. This argument is supported by Ladoucer and Sévigny (2006) who agreed that speed is not a significant variable to promote harm minimisation.

There is an issue that needs to be explored further related to the unbalanced power relationships amongst the key stakeholders which has led to a suggested compromised independence and integrity (Adams, 2008). It has been argued that academics have failed to address contentious gambling issues in case research funding is lost or 'PG' treatment agencies adopt a 'gambling neutral' stance to pacify government gambling regimes. Further, it could be suggested with evidence in this thesis indicating a disparity between what the academics and counsellors say versus the gamblers, that some evidence exists to lend weight to the argument put forward by Adams (ibid).

	Academics and Counsellors
	Gamblers

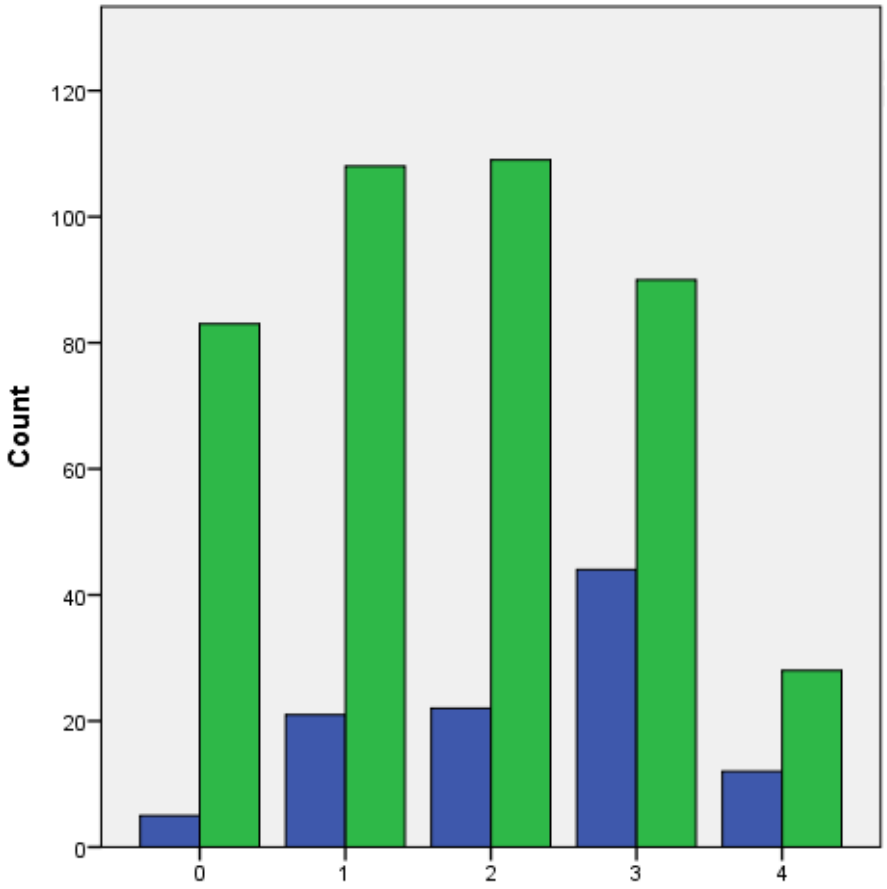


Figure A3 Reducing audio-visual effects

The Mann Whitney U Test score = 14959, Z = 5.06 and p < 0.001.

The effect size Pearson r = 0.2214.

There is a small effect size; it is >0.2 (<0.2 is small effect size) but <0.5 (0.5 is a moderate effect size) so there is a difference but a small difference (Coe, 2002).

All Respondents	Only Operators	Only Academics	Only Counsellors	Only Gamblers	All Others Agree or

Agree or Strongly agree	Agree or Strongly agree	Agree or Strongly agree	Agree or Strongly agree	Agree or Strongly agree	Strongly agree
33.2% (211)	15.3% (4)	45.1% (37)	80.0% (20)	28.3% (120)	38.1% (29)

Table A4 Reducing audio-visual effects

Gamblers and operators disagree with counsellors that this is effective; academics agree in the majority but there is no consensus. Research is inconclusive regarding whether audio-visual game features such as game speed, presence of sound, or visual complexity can be connected to safer gambling (Peller, 2009). It is necessary for further research to determine if there are certain patterns of audio-visual features that affect the gambling experience and gambling persistence and this can be applied to 'PG' online.

A further point is safer game design and structural characteristics appear to be an important factor in the maintenance of gambling behaviour (Parke and Griffiths, 2007). By identifying and understanding how game design and associated features are structured, research is needed to investigate why some games are problematic for vulnerable players and what makes them playable or fun for social players. Specific features of games are associated strongly with 'PG,' including games with a high event frequency, meaning that the games are fast. These ideas need further investigation.

	Academics and Counsellors
	Gamblers

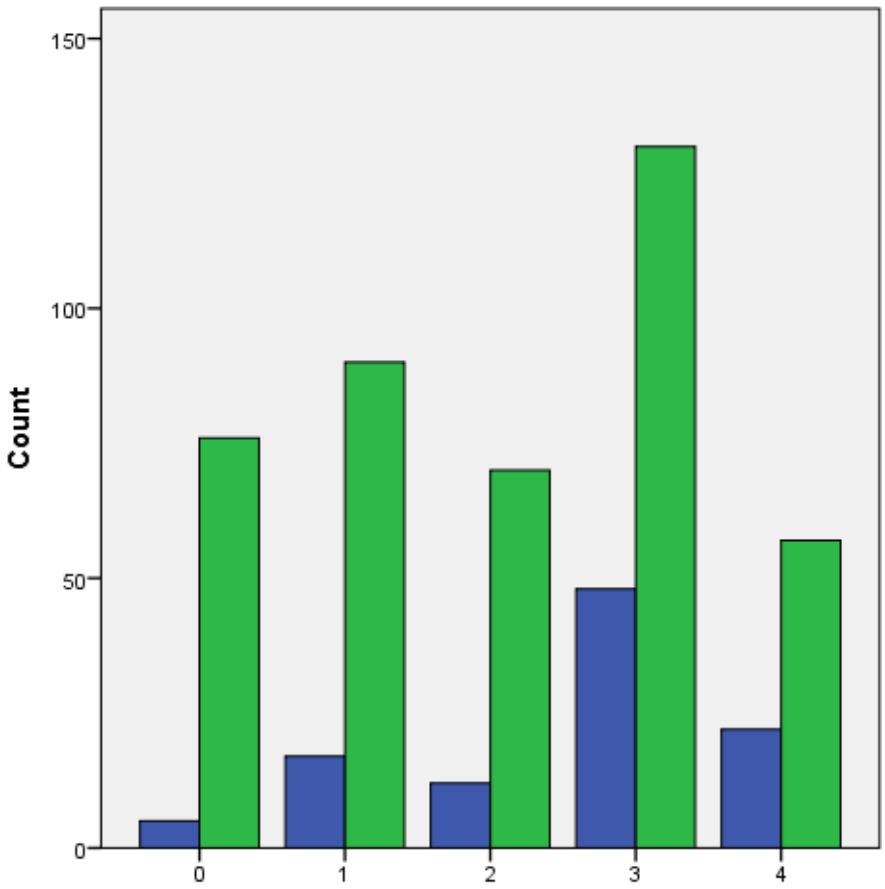


Figure A5 Reducing maximum bet size

The Mann Whitney U Test score = 16206, Z = 4.29 and p < 0.001. The effect size Pearson r = 0.1867. There is a small effect size <0.2; there is a difference but just a small difference (Coe, 2002).

All Respondents Agree or Strongly agree	Only Operators Agree or Strongly agree	Only Academics Agree or Strongly agree	Only Counsellors Agree or Strongly agree	Only Gamblers Agree or Strongly agree	All Others Agree or Strongly agree
37.7% (304)	45.9% (11)	61.2% (51)	84.0% (21)	43.9% (189)	41.9% (31)

Table A6 Reducing maximum bet size

This feature gets higher approval rates than many others. Reducing maximum bet size is a structural feature of gambling and it has been claimed to influence the development of 'PG' (Griffiths, 1999; Griffiths and Delfabbro, 2001). LaPlante et al (2008) found that most gamblers changed their behaviour by reducing their participation, bets and bet size. However, regulators and operators fail to take the findings of the research into consideration. Operators are not going to implement a feature that will negatively impact upon revenue (Adams, 2008). However, if operators are seriously committed to the concept of being socially responsible, this RGF needs to be applied in practice. Regulators do not urge nor motivate operators to implement this feature, which research has proved can be effective. Also, if regulators are seriously committed to the concept of social responsibility and RG, the reasons why it is not enforced must be discussed. This represents the dilemma that operators face because being socially responsible and implementing a proven safety feature of reducing maximum bet size will impact upon the revenues; the economic argument of social responsibility outweighs the moral argument.

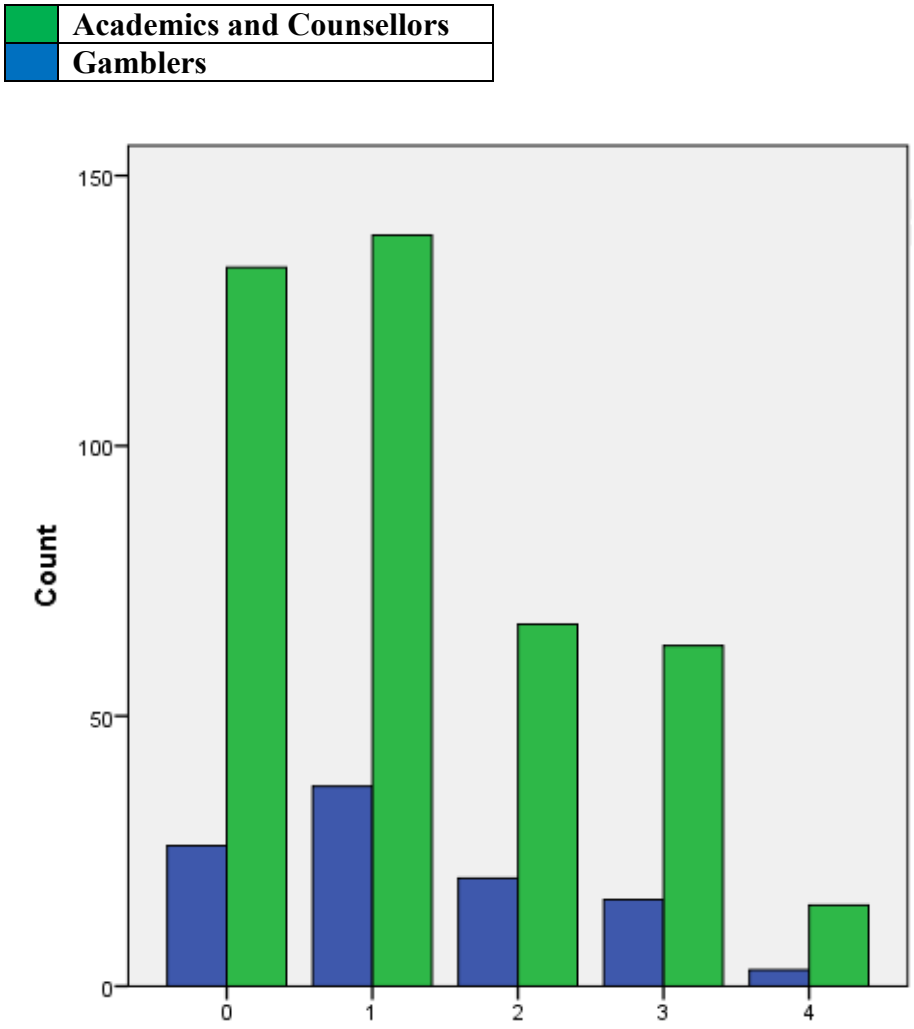


Figure A7 Increasing minimum bet size

The Mann Whitney U Test score = 20046, Z = 0.94 and p = 0.35. The effect size Pearson r = 0.0410. There is a small effect size <0.2; there is a difference but just a small difference (Coe, 2002).

All Respondents Agree or Strongly agree	Only Operators Agree or Strongly agree	Only Academics Agree or Strongly agree	Only Counsellors Agree or Strongly agree	Only Gamblers Agree or Strongly agree	All Others Agree or Strongly agree
18.4% (115)	13.6% (3)	18.5% (15)	20.9% (5)	18.5% (78)	16.2% (12)

Table A8 Increasing minimum bet size

This question was incorporated into the OQ to balance the previous question and in part, to ensure that participants were involved in carefully reading the question. OG can offer small stakes, some bingo and casino sites offer games costing as little as 1p. Sites have low start-up costs (Watson et al, 2004; Jawad, 2006) and can have an infinite number of games. An advantage of OG is the ability to place small bets (ibid). The findings indicated that increasing minimum bet size would not be an effective RGF and this was agreed by all categories of interest. Comments made in Chapter 4, referred to initial gambling progressing to bigger stakes; gambling was not perceived as being problematic when small affordable sums are being wagered, however it is the potentially the gateway to gambling becoming a problem. There would be concerns if gamblers were priced out of the market, but also it is interesting to note, that whilst the sums were small, all stakeholders did not disapprove. This seems to go along with the idea that operators would prefer one million gamblers to lose £1 each, then have one gambler lose £1million.

Academics and Counsellors

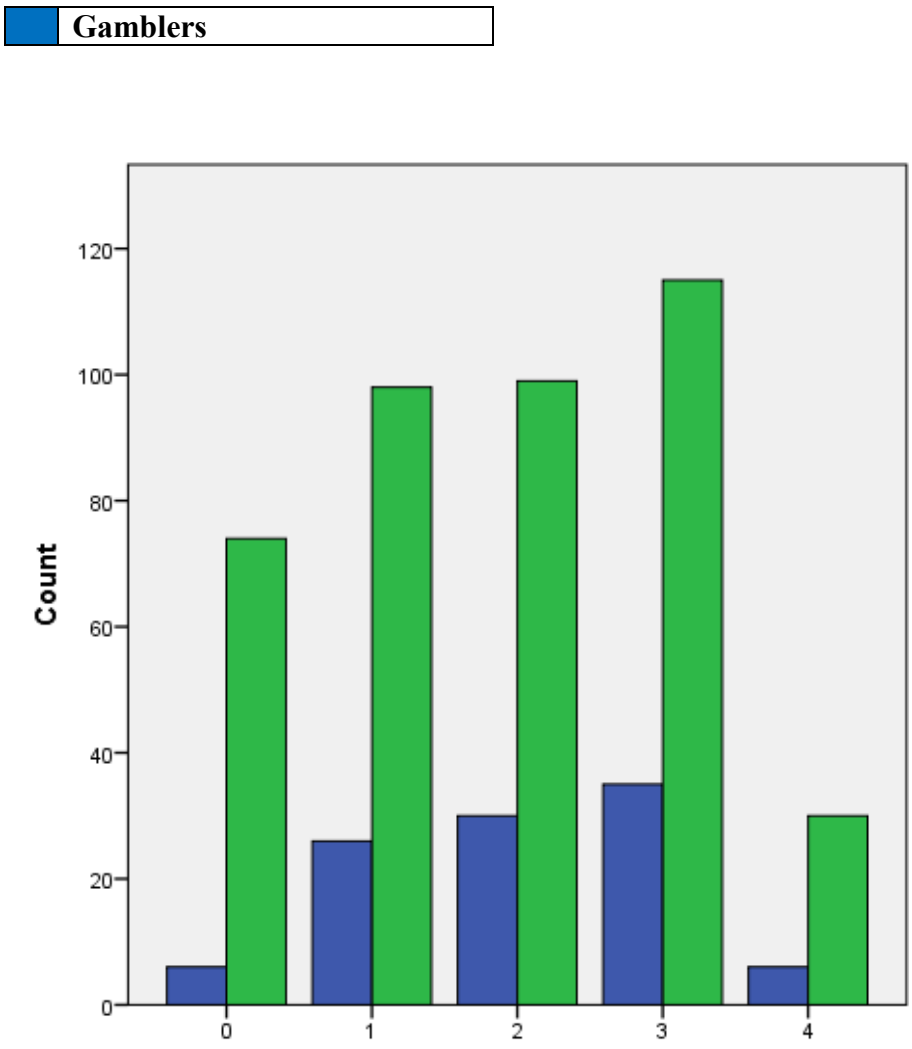


Figure A9 Decreasing game variety

The Mann Whitney U Test score = 18880, Z = 1.92 and p = 0.054. The effect size Pearson r = 0.0844. There is a small effect size <0.2; there is a difference but just a small difference (Coe, 2002).

All Respondents Agree or Strongly agree	Only Operators Agree or Strongly agree	Only Academics Agree or Strongly agree	Only Counsellors Agree or Strongly agree	Only Gamblers Agree or Strongly agree	All Others Agree or Strongly agree
35.0% (219)	20.9% (5)	40.0% (32)	40.0% (10)	34.7% (146)	35.1% (26)

Table A10 Decreasing game variety

OG extends the range of choice and allows players to move through cyberspace to play the games they want. Only 20.9% of operators agree to reducing the variety of games; possibly because this would impact on revenues. Operators like Flutter and Betmart accept bets on anything from who will win the Nobel Prize to whether Madonna is getting a divorce or not (Satyani, 2008). Betable.com allows a person to create his or her own bets. Sites like Bodog advertise bets on weird and unusual propositions.

Academics and Counsellors

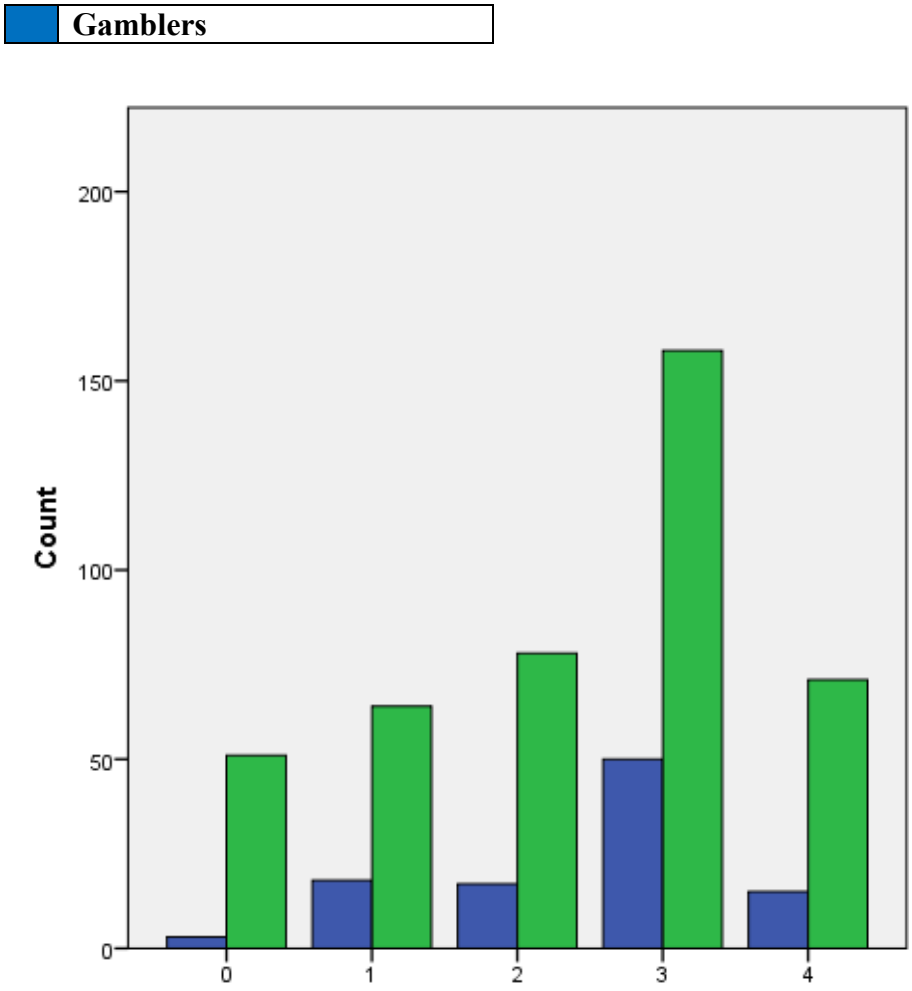


Figure A11 Removal of some types of games from online gambling

The Mann Whitney U Test score = 19880, Z = 1.40 and p = 0.162. The effect size Pearson r = 0.0610. There is a small effect size <0.2; there is a difference but just a small difference (Coe, 2002).

All Respondents Agree or Strongly agree	Only Operators Agree or Strongly agree	Only Academics Agree or Strongly agree	Only Counsellors Agree or Strongly agree	Only Gamblers Agree or Strongly agree	All Others Agree or Strongly agree
35.0% (219)	20.9% (5)	40.0% (32)	40.0% (10)	34.7% (146)	35.1% (26)

Table A12 Removal of some types of games from OG

Approximately one-fifth of operators and approximately two-fifths of other groups agreed or strongly agreed that this might be effective in assisting a person who felt his or her gambling was becoming a problem. It is not within the remit of this thesis to ascertain whether participants felt that some games are more addictive than others or whether a game is more addictive in the online environment than the land-based venue. However, this is an area for future research. The Gambling Review Body (DCMS, 2001) argued that some types of gambling are more additive than others. Games that are more addictive have short intervals between stake and payout. They also have near misses, a mixture of high top prizes, frequent winning of small prizes and involve the suspension of judgement. OG can meet these and other criteria. More research into understanding the addictive qualities of OG is required. The Gambling Review Body concluded that increasing the availability of gambling will lead to an increase in the prevalence of 'PG' although the Labour government (1997-2010) went with its planned liberalisation despite this conclusion (Light, 2007). It may be necessary for a lobby to develop in response to gambling-harms to get the attention from the government.

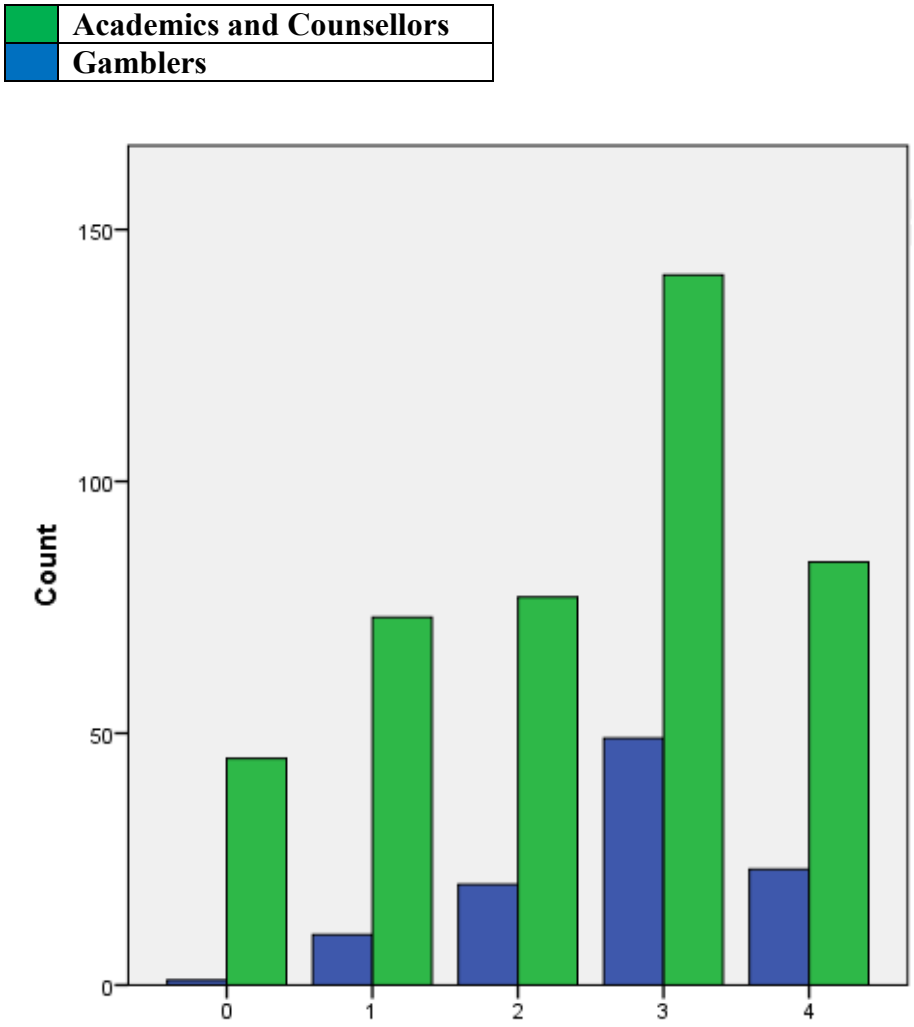


Figure A13 Eliminating bonus rounds

The Mann Whitney U Test score = 17589, Z = 3.05 and p < 0.002. The effect size Pearson r = 0.1331. There is a small effect size <0.2; there is a difference but just a small difference (Coe, 2002).

All Respondents	Only Operators	Only Academics	Only Counsellors	Only Gamblers	All Others

Agree or Strongly agree	Agree or Strongly agree	Agree or Strongly agree	Agree or Strongly agree	Agree or Strongly agree	Agree or Strongly agree
35.0% (219)	20.9% (5)	40.0% (32)	40.0% (10)	34.7% (146)	35.1% (26)

Table A14 Eliminating bonus rounds

This feature was included to assess perceptions of chasing losses. Korn and Shaffer (2004) state that an indicator of 'PG' is, after losing money, gambling continues or there is a return to play to get even. Less than one-third of the gamblers but nearly half the academics and three-fifths of the counsellors agree it would be effective. Academics and counsellors again have different views from the end-users. With such a gap in opinions, it is necessary to understand who is being heard and why. Academics, for example, participate in conferences, which focus on public policy (Shergold, 2011). The question focuses on whether academics have influence on the reduction of gambling-harms or not. Shergold continues that the possibility of academics contributing key knowledge to the development of public policy is unfulfilled.

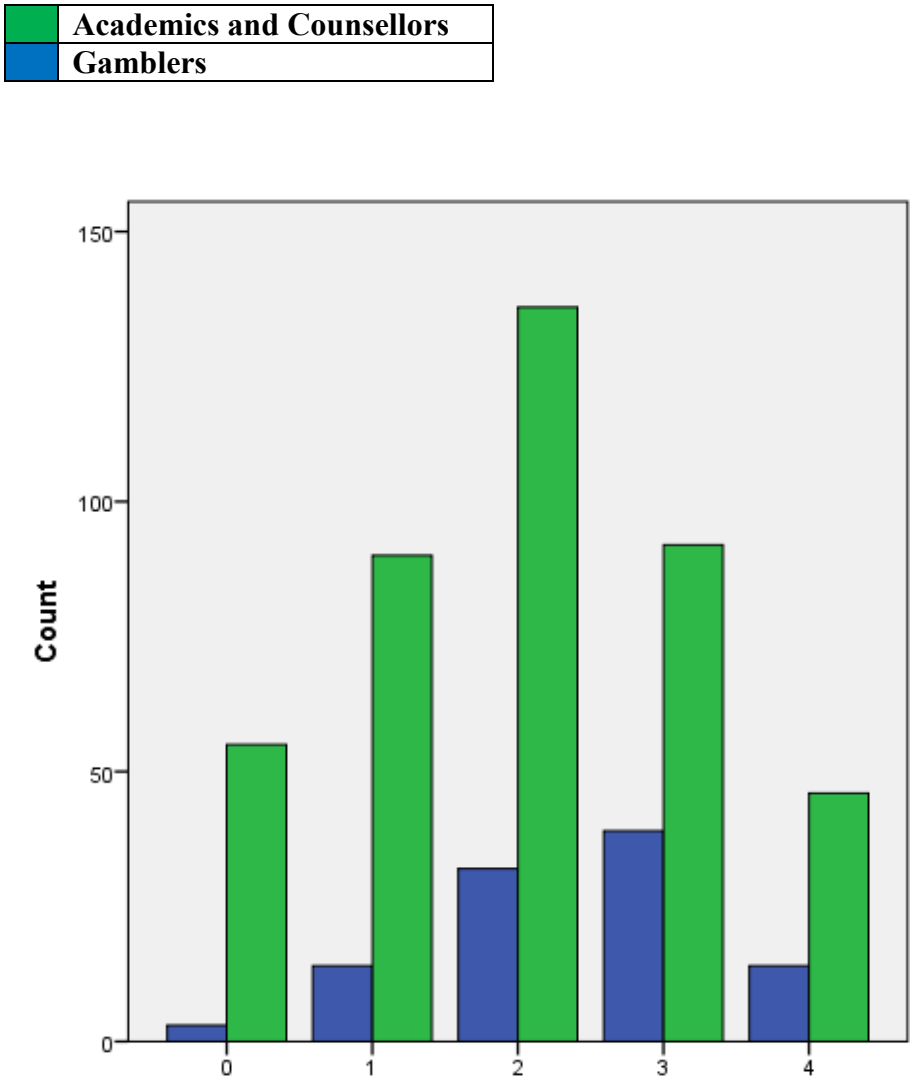


Figure A15 Removing number of high stake, high risk games

The Mann Whitney U Test score = 16143, Z = 3.95 and p < 0.001. The effect size Pearson r = 0.1732. There is a small effect size <0.2; there is a difference but just a small difference (Coe, 2002).

All Respondents Agree or Strongly agree	Only Operators Agree or Strongly agree	Only Academics Agree or Strongly agree	Only Counsellors Agree or Strongly agree	Only Gamblers Agree or Strongly agree	All Others Agree or Strongly agree
54.5% (342)	38.1% (9)	63.8% (51)	88.0% (22)	53.2% (226)	46.0% (34)

Table A16 Removing number of high stake, high risk games

Gamblers, academics and operators tend to agree in high percentages that this is an effective feature. A third of operators want to see the removal of certain games probably due to the negative impact on revenues. Shaffer et al (2010) with *bwin*, analysed data reflecting gambling patterns and provided detailed information about gambling behaviour and the conditions under which gamblers bet. The analysis of the *bwin* data produced seven peer-reviewed publications that contradict the notion that OG leads to 'PG' (Broda et al, 2008; LaBrie et al, 2007, 2008; LaPlante et al., 2008, 2009; Nelson et al., 2008; Xuan and Shaffer, 2009). However, regulators overseeing the products operators can and cannot have is contradictory to the liberalisation of gambling policy where market forces rule. However, the findings from this question arguably support the idea that the stakeholders are aware that some gambling products are more harmful than others and this needs further investigation: the products which may be most harmful need to be identified and gamblers need to be given more information about the risks involved.

Academics and Counsellors

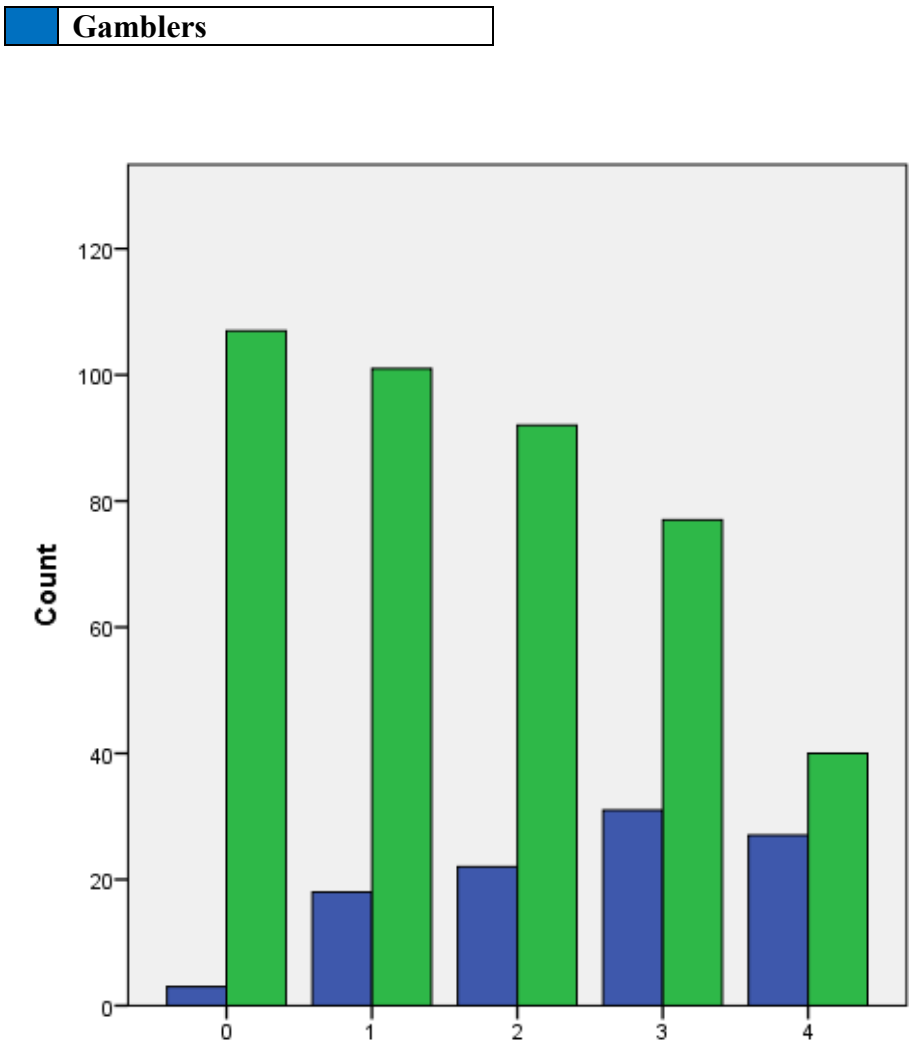


Figure A17 Prohibiting free play mode

The Mann Whitney U Test score = 12321, Z = 6.62 and p < 0.001. The effect size Pearson r = 0.2908. There is a small effect size; it is >0.2 (<0.2 is small effect size) but <0.5 (0.5 is a moderate effect size) so there is a difference but a small difference (Coe, 2002).

All Respondents Agree or Strongly agree	Only Operators Agree or Strongly agree	Only Academics Agree or Strongly agree	Only Counsellors Agree or Strongly agree	Only Gamblers Agree or Strongly agree	All Others Agree or Strongly agree
54.5% (342)	38.1% (9)	63.8% (51)	88.0% (22)	53.2% (226)	46.0% (34)

Table A18 Prohibiting free play mode

Evidence shows that free play is harmful because the odds are often better than real play (Blaszczynski et al, 2001; Sevigny et al, 2005; BMA, 2007; Griffiths, 2008; FAHCSIA, 2009; Monaghan, 2009). A further risk is that that free play creates dissociation between actions and consequences where players do not lose real money. Free play sites generate players for future cash play games and has the potential to be as addictive as real play (FAHCSIA, 2009). The free play environment is often the first experience that young people have of gambling (Derevensky, 2005; McBride, 2006; Lambos et al, 2007). However, research by Jolley (2005, p.206) says that there is no or little difference in gamblers' behaviour between free play and real play. The counsellors agree with Blaszczynski et al, 2001; Sevigny et al, 2005; BMA, 2007; Griffiths, 2008; FAHCSIA, 2009; and Monaghan, 2009 and about half of the gamblers agree with Jolley et al. Whilst Griffiths (2008) argues that any free play or practice mode must be accompanied by RG information and that the odds in free play or practice mode should be the same as real play, generally the area of RG has little or no driving force for change.

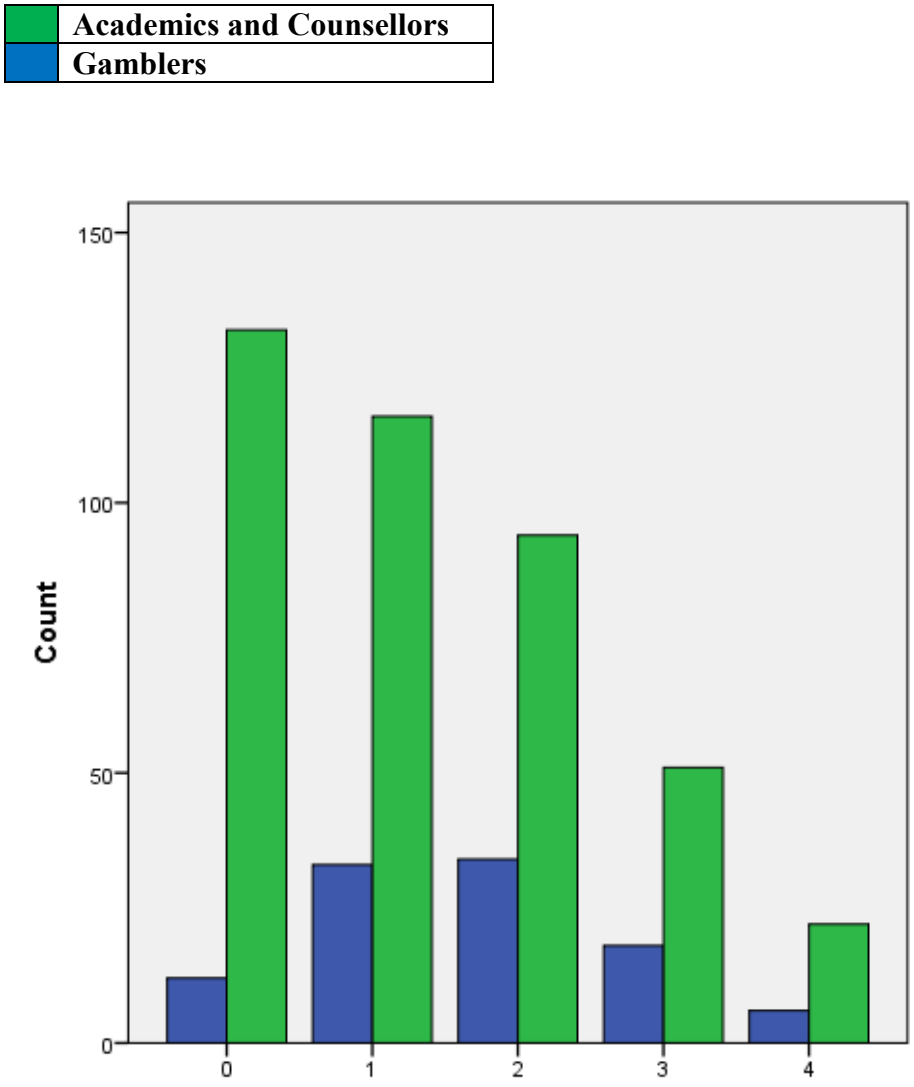


Figure A19 Decreasing the chances of a win occurring

The Mann Whitney U Test score = 16614, Z = 3.62 and p < 0.001. The effect size Pearson r = 0.1588. There is a small effect size <0.2; there is a difference but just a small difference (Coe, 2002).

All Respondents Agree or Strongly agree	Only Operators Agree or Strongly agree	Only Academics Agree or Strongly agree	Only Counsellors Agree or Strongly agree	Only Gamblers Agree or Strongly agree	All Others Agree or Strongly agree
18.7% (116)	17.3% (4)	21.3% (17)	28.0% (7)	17.6% (74)	19.4% (14)

Table A20 Decreasing the chances of a win occurring

Generally, groups did not think that decreasing the chances of a win occurring would be an effective feature. Possibly operators felt that if their site offered less wins, the consequences would involve gamblers playing at other sites or land-based venues thereby affecting revenues. Xuan and Shaffer (2009) looked at the patterns of behaviour using a group of self-identified 'PG' who had voluntarily closed their accounts. The study found that while they experienced increasing losses prior to account closure, gamblers tried to recoup their losses by increasing their stake per bet on events that were probabilistically less risky. Also, among this group, betting long odds is rare. It therefore could be argued that gamblers will modify their behaviour when there is less chance of a win occurring and this result could be recognisant of this.

	Academics and Counsellors
	Gamblers

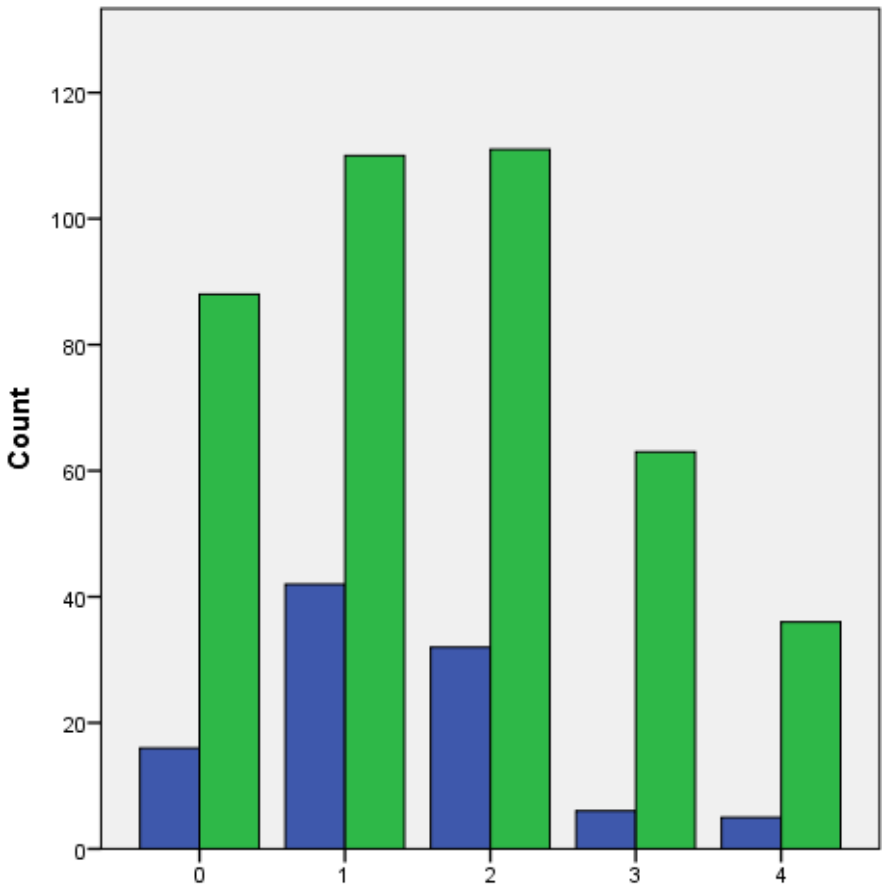


Figure A21 Increasing the chances of a win occurring

The Mann Whitney U Test score = 18815, Z = 1.40 and p = 0.163. The effect size Pearson r = 0.0618. There is a small effect size <0.2; there is a difference but just a small difference (Coe, 2002).

All Respondents Agree or Strongly agree	Only Operators Agree or Strongly agree	Only Academics Agree or Strongly agree	Only Counsellors Agree or Strongly agree	Only Gamblers Agree or Strongly agree	All Others Agree or Strongly agree
19.8% (121)	13.0% (3)	8.8% (7)	16.7% (4)	24.0% (99)	11.2% (8)

Table A22 Increasing the chances of a win occurring

This feature is dismissed as being effective with agreement by all participant groups. The BGPS (Wardle et al, 2011) found that the most popular reasons for gambling were in five main categories: first, social reasons (to be social or to impress others) second, monetary reasons (for the chance to win big money) third, recreational reasons (excitement or amusement) fourth, as a hobby, fifth, enhancement reasons (for the challenge or learning or knowledge) sixth, coping reasons (to cope or escape or avoid). For some gamblers, increasing the chances of a win occurring would be effective if it *satisfied* the reason for gambling. However, it might be effective if there was a significant win to stop some gamblers, however some of the reasons identified need continuous wins for their maintenance. A final comment on the features of the size of stakes and increasing or decreasing the probability of winning (or perceived probability of winning) is associated with higher levels of 'PG' (Parke and Griffiths, 2007) and therefore this is an area for further research.

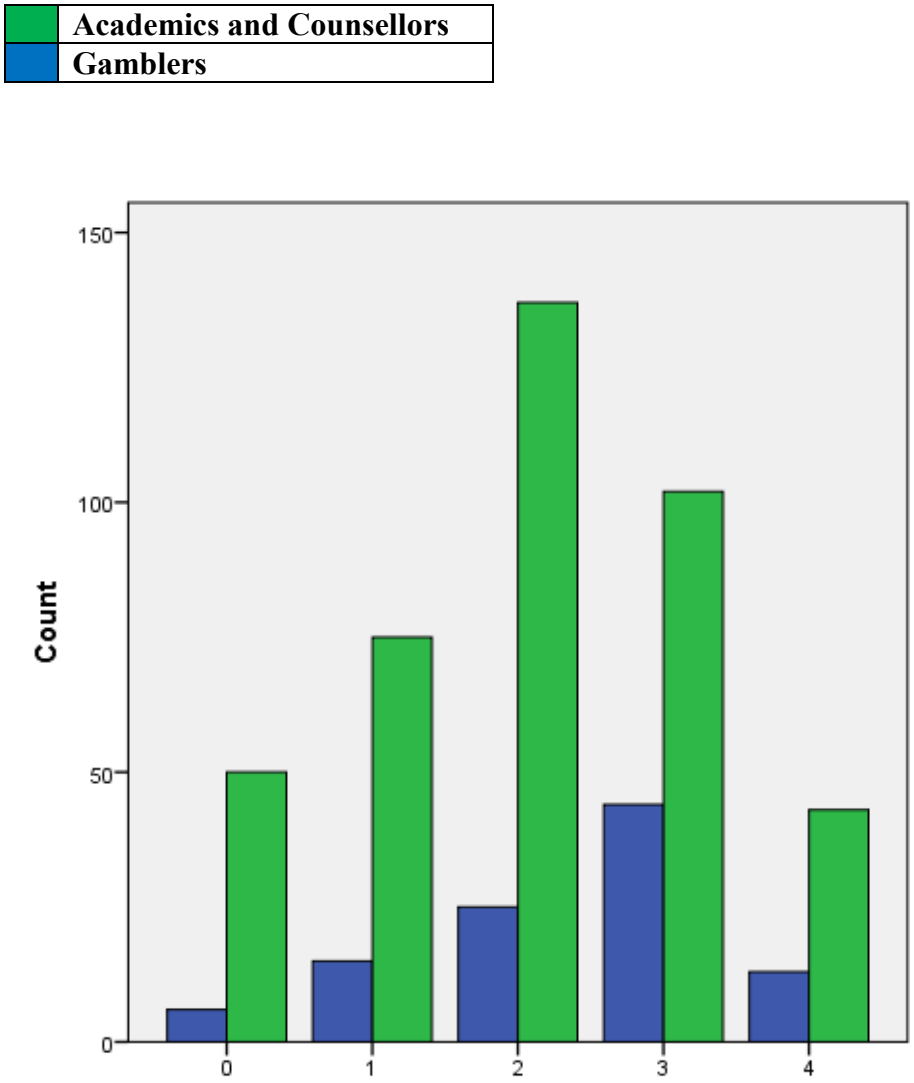


Figure A23 Displaying time of day on screen

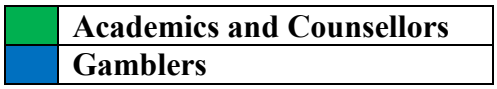
The Mann Whitney U Test score = 16838, Z = 3.20 and p < 0.001. The effect size Pearson r = 0.1412. There is a small effect size <0.2; there is a difference but just a small difference (Coe, 2002).

All Respondents Agree or Strongly agree	Only Operators Agree or Strongly agree	Only Academics Agree or Strongly agree	Only Counsellors Agree or Strongly agree	Only Gamblers Agree or Strongly agree	All Others Agree or Strongly agree
38.8% (238)	39.1% (9)	48.8% (39)	72.0% (18)	35.2% (145)	36.1% (26)

Table A24 Displaying time of day on screen

Academics and counsellors support inconclusive findings of studies in this field. An on-screen clock on EGMs can allow gamblers to be aware of the time they have been playing and therefore they should be more able to control the time and money spent (Blaszczynski et al, 2001). The results of a Canadian study indicate that the on-screen clock had no effect on the session length or expenditure of both problem and non-'PGs' (Ladouceur and Sevigny, 2003). Whilst 'PGs' admit to losing track of time when gambling, they were aware of the time when it came to overextending their play instead of returning to work or collecting children from school (ibid). It is possible that some gamblers do lose track of time and overextend gambling; such gamblers are in a minority and so clock display will not make any difference since they either will concentrate on gambling or just not look at the clock (ibid). Gravelle (2004) argues that clocks on VLTs have a positive influence on gamblers' attitudes and awareness. It is of interest and importance that it is uncertain if research in traditional gambling environments can be applied to OG; however, with the paucity of OG research it is important to examine these very issues. Griffiths (2008) argues that a website clock must always be visible because gambling can create dissociative states where gamblers can lose track of time. Gambling websites regulated by the 2005 Act must display clocks and timers indicating the current time. However, this is not a requirement for sites not holding a UK gambling licence and as a result some gambling websites will have clocks and some gambling websites will not have clocks. Further, the Act does not explain the reasons supporting the decision for UK licensed sites to have mandatory clocks; if it is based

on academic research, it is important to understand why the regulators embrace some research and dismiss other parts.



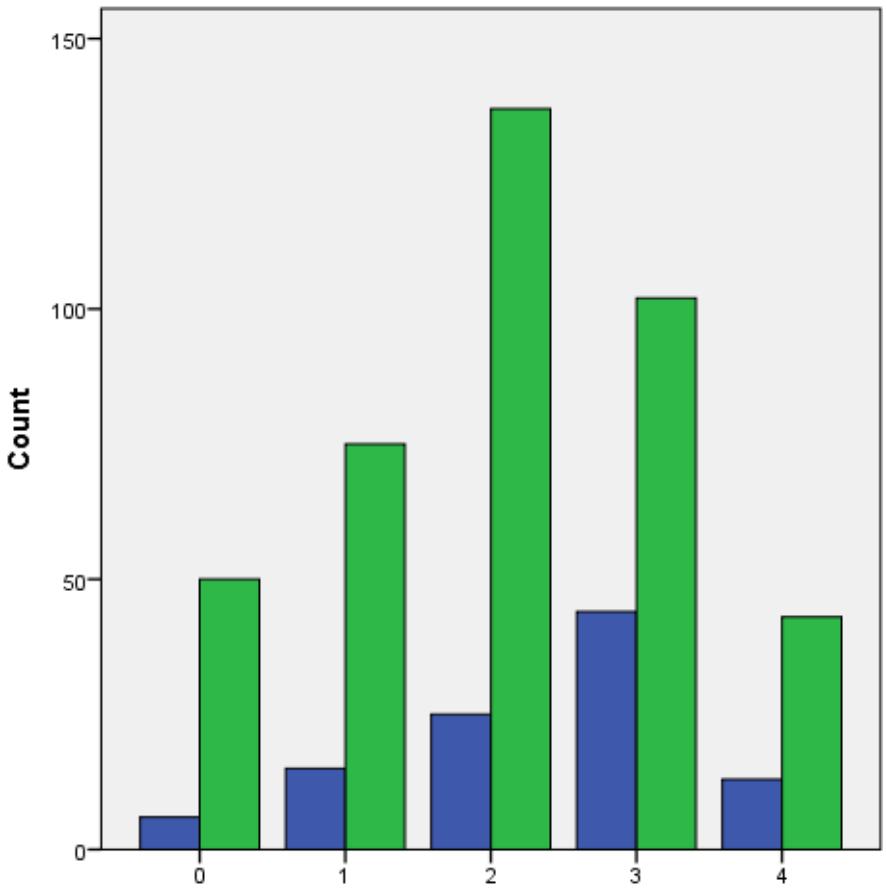


Figure A25 Displaying total time of play on screen

The Mann Whitney U Test score = 16071, Z = 3.93 and p < 0.001. The effect size Pearson r = 0.1735. There is a small effect size <0.2; there is a difference but just a small difference (Coe, 2002).

All Respondents Agree or Strongly agree	Only Operators Agree or Strongly agree	Only Academics Agree or Strongly agree	Only Counsellors Agree or Strongly agree	Only Gamblers Agree or Strongly agree	All Others Agree or Strongly agree
38.8% (238)	47.8(11)	66.3% (53)	92.0% (23)	49.1% (204)	52.1% (38)

Table A26 Displaying total time of play on screen

Half of operators and gamblers agree that this is an effective feature and academics and counsellors rate this feature highly. A limitation of the OQ is that it does not find out the reasons for the responses, however, it could be linked to the feature above (Displaying the time of day on screen) in that gamblers are aware of the time duration but choose to ignore it or despite of the time duration cannot stop gambling. It is necessary to understand why the views of the counsellors are so different from gamblers. Whilst counsellors are at the 'front line' of treatment, so are the gamblers. It could be that counsellors see the extreme negative effects of gambling and have a rationality or impartiality in the subject area but the views are so different and it is uncertain whether the counsellors are right or the gamblers. On this point though, it is vital to consider the responses of the gamblers; if the counsellors are correct and the display of the total time of play on screen is effective and gamblers utilise this feature (as many sites have this feature) it is necessary to understand why gamblers do not feel it is effective. It has been impossible to find research examining the role of counsellors in gambling problems online, however this is an area that needs exploring. If the situation is compared to what counsellors would suggest is good for alcohol drinkers with problems, it would probably not correspond with what drinkers think would be good (or effective) to help control problems that they are experiencing. Chapter 7 discusses the utility of end-users participating in regulatory policy making as well as the government's apparent failure to consider empirical research.

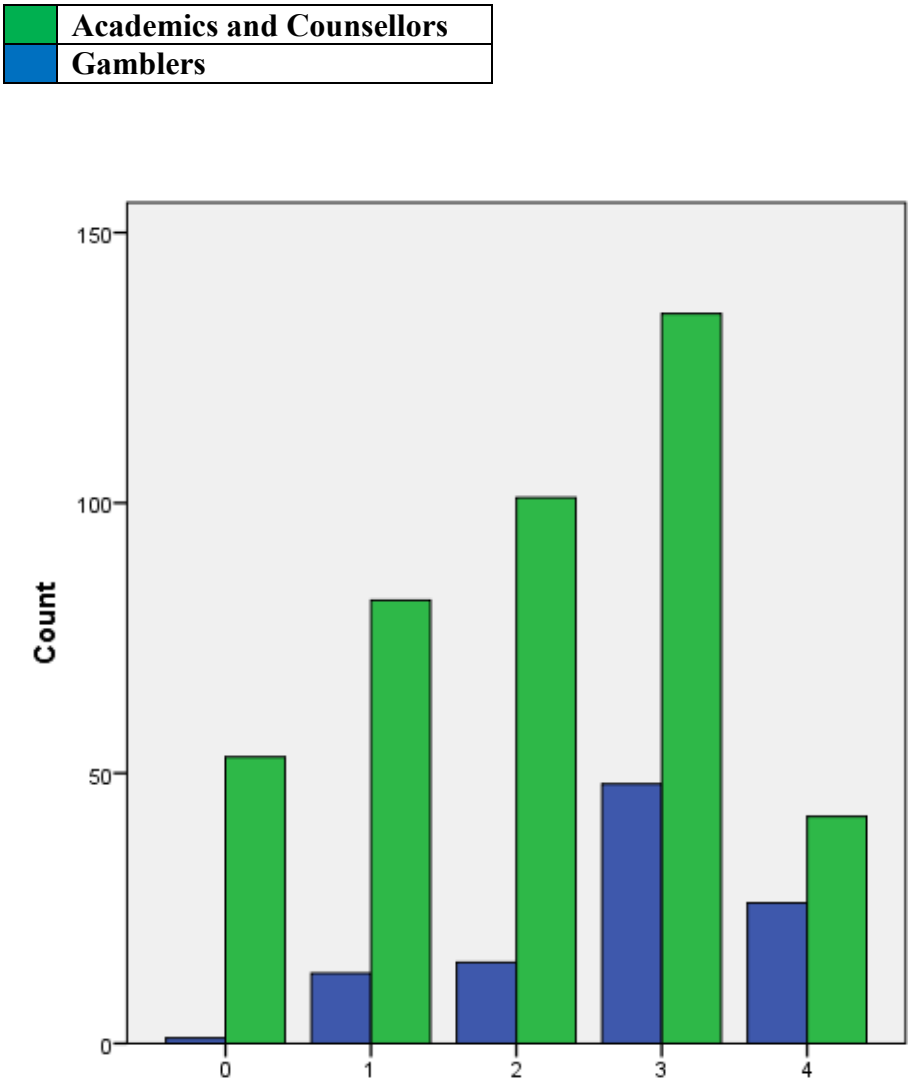


Figure A27 Requiring players to set a predetermined time limit

The Mann Whitney U Test score = 13748, Z = 5.79 and p < 0.001. The effect size Pearson r = 0.2530. There is a small effect size; it is >0.2 (<0.2 is small effect size) but <0.5 (0.5 is a moderate effect size) so there is a difference but a small difference (Coe, 2002).

All Respondents Agree or Strongly agree	Only Operators Agree or Strongly agree	Only Academics Agree or Strongly agree	Only Counsellors Agree or Strongly agree	Only Gamblers Agree or Strongly agree	All Others Agree or Strongly agree
48.3% (299)	34.7% (8)	67.6% (54)	80.0% (20)	42.5% (178)	52.8% (38)

Table A28 Requiring players to set a predetermined time limit

The response to this feature is similar to the one above. Gamblers may agree with the findings of the eCogra study (2007) which rated self-set limits and self-exclusion as the least effective of the RGFs rated. Further, it could be argued that it is for the same reasons that self-set limits and self-exclusion are ineffective, because the gambler can move on to another site and just continue gambling irrespective of any self-set limits or self-exclusion on the last gambling website. The Gambling Act 2005 requires sites to have visible the time in play and there is some empirical and theoretical support for the use of time limits (Broda et al, 2008; Ladouceur et al 2007; Monaghan, 2009; Nelson et al., 2008). However, it is essential that further empirical investigations, including longitudinal research, be conducted to establish the most effective tools to facilitate responsible OG. The eCogra study found survey participants generally considered RGFs useful, though most measures were considered in the middle range. 55% wanted effective self-regulation for online sites; 54% wanted clarity of regulations; 51% wanted uniformity of code of conduct; 49% wanted responsiveness to complaints and 48% wanted improved RGFs. Self-set time limits (and self-exclusion) had the lowest level of usefulness of the measures tested. Williams et al (2007) however wrote that the findings of the e-Cogra study will have a significant impact on policy-makers, regulators and operators; however, arguably, that is incorrect.

A complete evaluation of the effectiveness of time limits and possible side effects is still necessary (Schellinck and Schrans, 2005; Bernhard and Preston, 2004). The

suggestion is types of time limits could perhaps trigger frenzied gambling behaviour associated with losing control as the limit gets closer (Haefeli et al, 2011). However, arguably more effective may be signage such as asking gamblers to consider the amount of time or money spent during a session and whether they should take a break from play (e.g. *'Do you know how long you have been playing? Do you need to take a break?'* (Monaghan and Blaszczynski, 2007). It is suggested by Monaghan and Blaszczynski (ibid) that RGFs about the amount of time that has been played may be more effective.

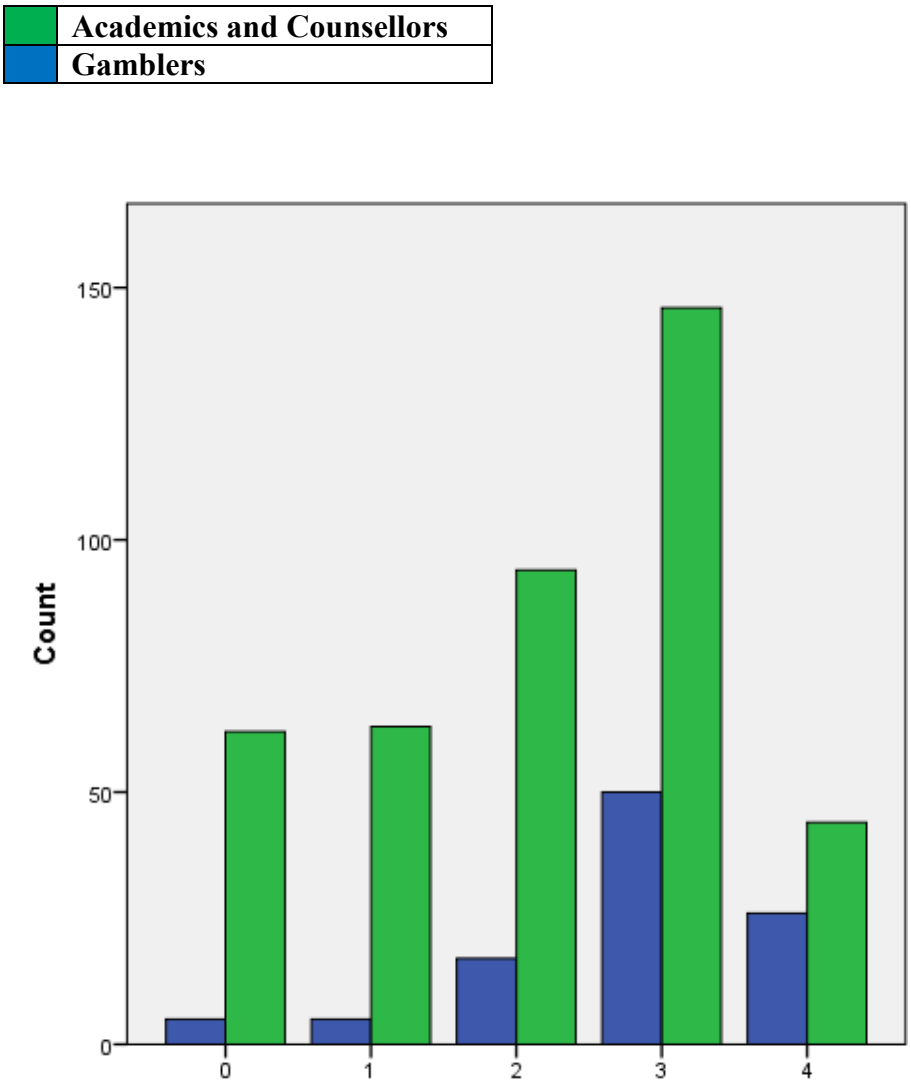


Figure A29 Enforcing play stoppage, break or interruption

The Mann Whitney U Test score = 13919, Z = 5.53 and p < 0.001. The effect size Pearson r = 0.2444. There is a small effect size; it is >0.2 (<0.2 is small effect size) but <0.5 (0.5 is a moderate effect size) so there is a difference but a small difference (Coe, 2002).

All Respondents Agree or Strongly agree	Only Operators Agree or Strongly agree	Only Academics Agree or Strongly agree	Only Counsellors Agree or Strongly agree	Only Gamblers Agree or Strongly agree	All Others Agree or Strongly agree
51.5% (317)	47.8% (11)	70.0% (56)	84.0% (21)	45.9% (190)	54.1% (39)

Table A30 Enforcing play stoppage, break or interruption

Similar results as above. Operators and gamblers agree and academics and counsellors are more confident of the effectiveness of this feature than other groups. Research shows that informative pop-ups after play asking gamblers 'whether they wanted to continue was shown to have a small effect in decreasing the gambling duration and expenditure' (Haefeli et al, 2011) but only for high-risk players; however, this is with EGMs (Schellinck and Schrans, 2002). Monaghan and Blaszczynski (2010) suggest that messages promoting self-appraisal (e.g. 'Do you need to think about a break?') gave a greater behavioural change than informative messages (e.g. 'Your chances of winning the maximum price are generally no better than one in a million'). Meyer and Hayer (2010) argue that scientific evidence indicates that online gamblers are more likely to be 'PGs' and consequently need effective protection. They suggest that operators should be more accountable for RG online measures. It could be suggested that the real position of operators is either unknown or not conducive to the argument based on evidence (ibid). Further, it has been suggested that although operators have implemented RG online measures they have not been adequately scientifically validated (Griffiths et al, 2009). Although some operators will ensure that protection measures are in place, more research is required regarding which activities correspond with which prevention goals (Meyer and Heyer, 2010).

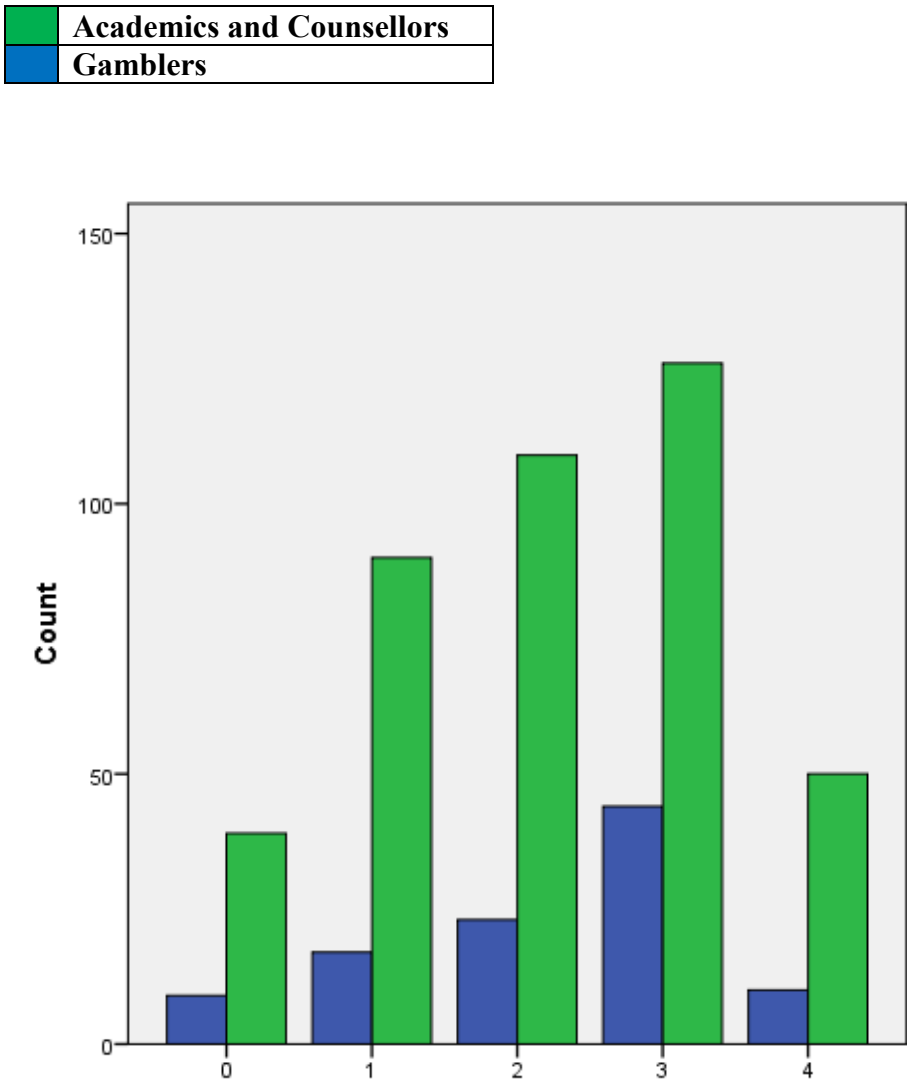


Figure A31 Providing general information about RG on welcome screen

The Mann Whitney U Test score = 19684, Z = 1.25 and p = 0.212. The effect size Pearson r = 0.0548. There is a small effect size <0.2; there is a difference but just a small difference (Coe, 2002).

All Respondents Agree or Strongly agree	Only Operators Agree or Strongly agree	Only Academics Agree or Strongly agree	Only Counsellors Agree or Strongly agree	Only Gamblers Agree or Strongly agree	All Others Agree or Strongly agree
44.2% (274)	30.4% (7)	48.8% (39)	60.0% (15)	42.2% (177)	49.3% (36)

Table A32 Providing general information about RG on welcome screen

Alcohol and tobacco products have warnings and general information on their packaging; arguably these messages are more than instant if the alcoholic drink is taken from a can, or bottle and the cigarette is taken from a packet. The 'Drink Aware' message is on each bottle or can though not on each glass and the warnings are on each packet of ten or twenty cigarettes. Therefore, the message should be seen on more than one occasion. However, these are complemented by public health campaigns on safe drinking levels and *Stop Smoking*. Advice on problems with alcohol and smoking can be accessed through the NHS and there are television campaigns about the problems of drinking, smoking and healthy eating and exercise. However, 'PG' is not embraced by public health organizations. There is a problem in treating gambling in the same way as alcohol and smoking when gambling has been liberalised and moved into an area of entertainment. Gambling has been grouped as one of the vices; with alcohol, tobacco, as well as drugs and pornography but the policy of successive governments was for gambling to be regulated. However, it is a matter of liberty and in a free society, individuals should be allowed to spend their own money as they wish and this is not a matter for the government. However, if the 0.9% rise in the number of 'PGs' is significant (Hancock, 2011) then it may be appropriate to review the liberalisation. However, if a gambler wants to gamble from the comfort of their home, there will be an operator using a server in the Caribbean who can meet this demand.

It is interesting to note the positivity in the RGFs that the counsellors consistently have agreement with. It could be that with a negative attitude concerning gambling problems, the gamblers when being assisted by counsellors would make little

progress. It could be that generally, counsellors must adopt a positive attitude to possible responsible OG features.

The responses from participant groups to the effectiveness of this feature can be related to a conclusion of the previous chapter from the focus group interviews. An important finding was the futility felt by gamblers, to the concept of RG. In connection to the next feature, it is a suggestion that any effectiveness of RG must be linked to the importance that is placed on it. If it is a given superficial role, then its effectiveness is limited, however, if RG is applied comprehensively, then it may have a better chance of working.

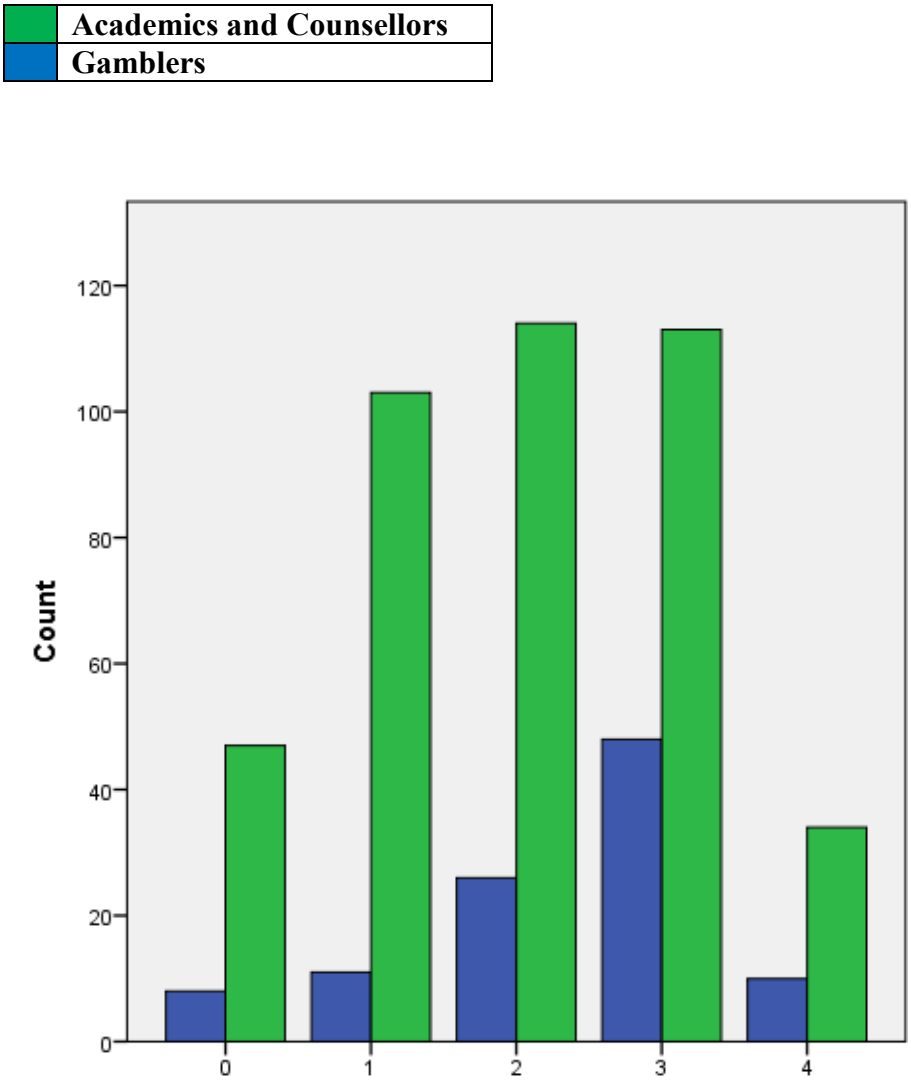


Figure A33 Displaying RG messages during play

The Mann Whitney U Test score = 16356, Z = 3.70 and p < 0.001. The effect size Pearson r = 0.1627. There is a small effect size <0.2; there is a difference but just a small difference (Coe, 2002).

All Respondents Agree or Strongly agree	Only Operators Agree or Strongly agree	Only Academics Agree or Strongly agree	Only Counsellors Agree or Strongly agree	Only Gamblers Agree or Strongly agree	All Others Agree or Strongly agree
65.6% (405)	52.2% (12)	77.6% (62)	92.0% (23)	63.8% (268)	57.5% (42)

Table A34 Displaying RG messages during play

There are high approval ratings for this feature. Message reminders are more like messages on cigarette packaging and alcoholic beverage labelling, which a consumer will see repeatedly. It may be that continuous reference to RG is preferred if the aim is to help 'PGs.' Operators may be reluctant to display messages either before or during play if they have an impact on revenue. However, operators committed to RG may find this a useful feature, and it has approval ratings from all participant groups.

Griffiths and Wood (2008) argue that the objective of a socially RG code of conduct is to maximise opportunity and minimise harm, whereby good social responsibility practices should be focused on three main dimensions. These are design, behavioural transparency and customer support (Wood and Griffiths, 2007). The design dimension is concerned with two areas for the gambling industry; first, the design of gaming venues such as light, colour, sound, layout, cash dispenser machine location, alcohol access and second, the design of games such as stake size, jackpot size, event frequency, skill, etc. (Griffiths and Parke, 2003; Parke and Griffiths, 2007). Reid (1986) argues that behavioural transparency requires operators to provide information to gamblers about advertising, gambling, 'self-control' and/or feedback about behaviour, including monitoring in order for gamblers to be able to make informed choices. Griffiths and Wood (2008) say that customer support is about practices that either help staff to understand gambler behaviour or help gamblers get access to RGFs, including referral services to help. Consequently, it can be argued that behavioural transparency, which is a key part

of RG, demands the display of RG messages during play. The responses to this feature appear to support the finding of Griffiths and Wood (ibid).

Monaghan (2009) suggests that RG pop-up messages encourage gamblers to be aware of their own behaviour whilst gambling because it helps players to gamble within appropriate time and expenditure limits. Monaghan (ibid) says that pop-up messages and RG information promoting self-awareness are supported with empirical research proving their effectiveness in communicating information to guide OG and EGM play. Jardin and Wulfert (2009) argue that basic informative pop-up messages can affect a player's attitude and gambling behaviour when displayed during the gambling session, instead of displaying it at the start. Therefore, it is suggested that the timing of RG information also needs further research.

However, further research is necessary to validate the effectiveness of RG messages on OG websites and to establish the most effective message content and frequency to facilitate RG (ibid).

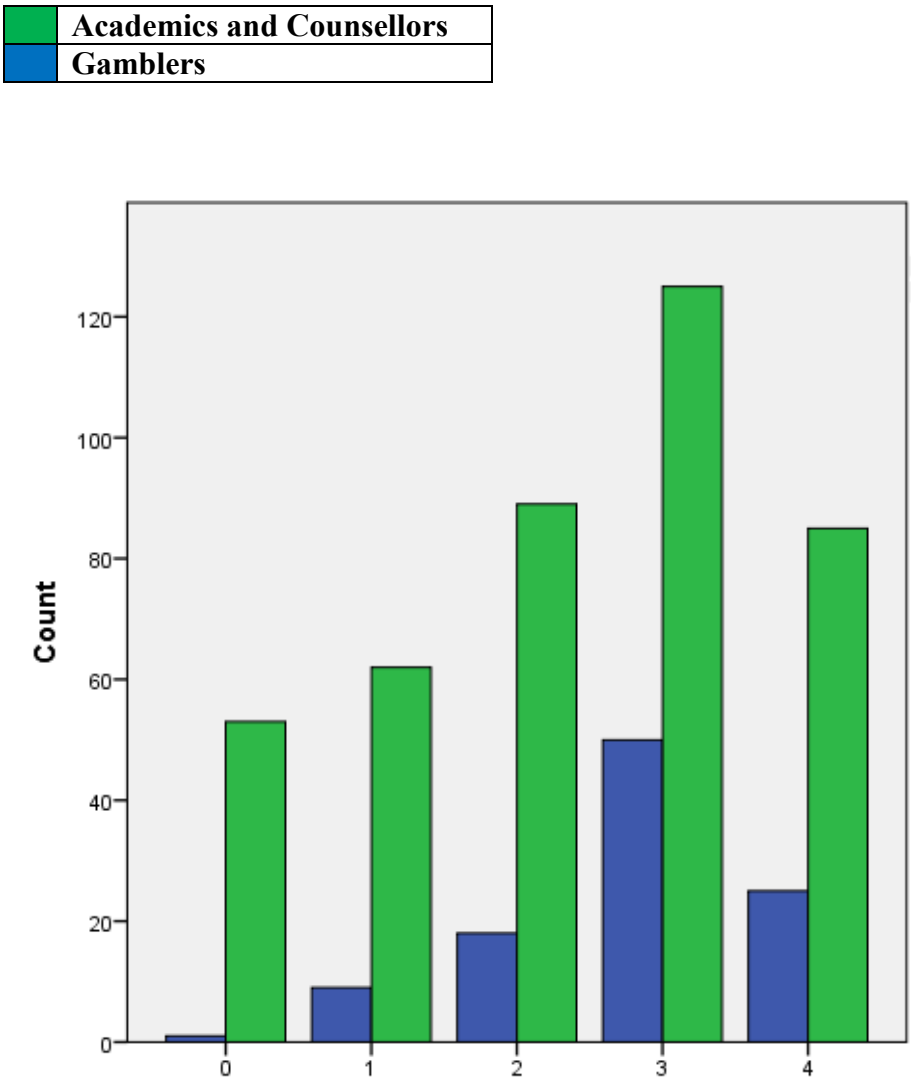


Figure A35 Allowing only one credit card per account

The Mann Whitney U Test score = 16376, Z = 3.76 and p < 0.001. The effect size Pearson r = 0.1654. There is a small effect size <0.2; there is a difference but just a small difference (Coe, 2002).

All Respondents Agree or Strongly agree	Only Operators Agree or Strongly agree	Only Academics Agree or Strongly agree	Only Counsellors Agree or Strongly agree	Only Gamblers Agree or Strongly agree	All Others Agree or Strongly agree
54.3% (337)	50.0% (11)	61.3% (49)	84.0% (21)	50.5% (212)	52.1% (38)

Table A36 Allowing only one credit card per account

This feature receives approval from academics and counsellors and the latter agree in higher percentages. But a limitation is that the OQ does not ask if it should be one credit card per website, which would allow for more gambling activity than a single credit card applied to a multitude of gambling sites. There are dangers when using a credit card to pay for gambling. It has been argued that paying for OG with credit cards exacerbates the financial harms of 'PG.' Griffiths (2003) argues that it is well-known that in commerce, people will spend more when using debit and credit cards because it is easier to spend money using plastic. This is the reason that chips are used in casinos and why tokens are used on some slot machines because chips, tokens and it could be argued credits mask the true value of money's true value and lower the psychological value of the money to be gambled. Tokens, chips and arguably credits are often re-gambled without hesitation, as the psychological value is less than the real value. Research suggests that people gamble more using e-cash than they would with real cash (Griffiths, 1999). It also could be argued that, when gambling with a credit card, that the individual is playing with money that he or she does not yet have and that is part of a moral debate that is not within the remit of this thesis to examine. Also, this question does not address an important point of underage persons using a parent's or other adult's credit account to gamble. In a study, Griffiths (2001) states than one in 20 teenagers found the prospect of using their parent's credit card to gamble tempting. The OQ had 6 individuals who self-reported as being gamblers under the age of 18 and unfortunately it was not within the remit of this thesis to ascertain their means and methods for their OG activity.

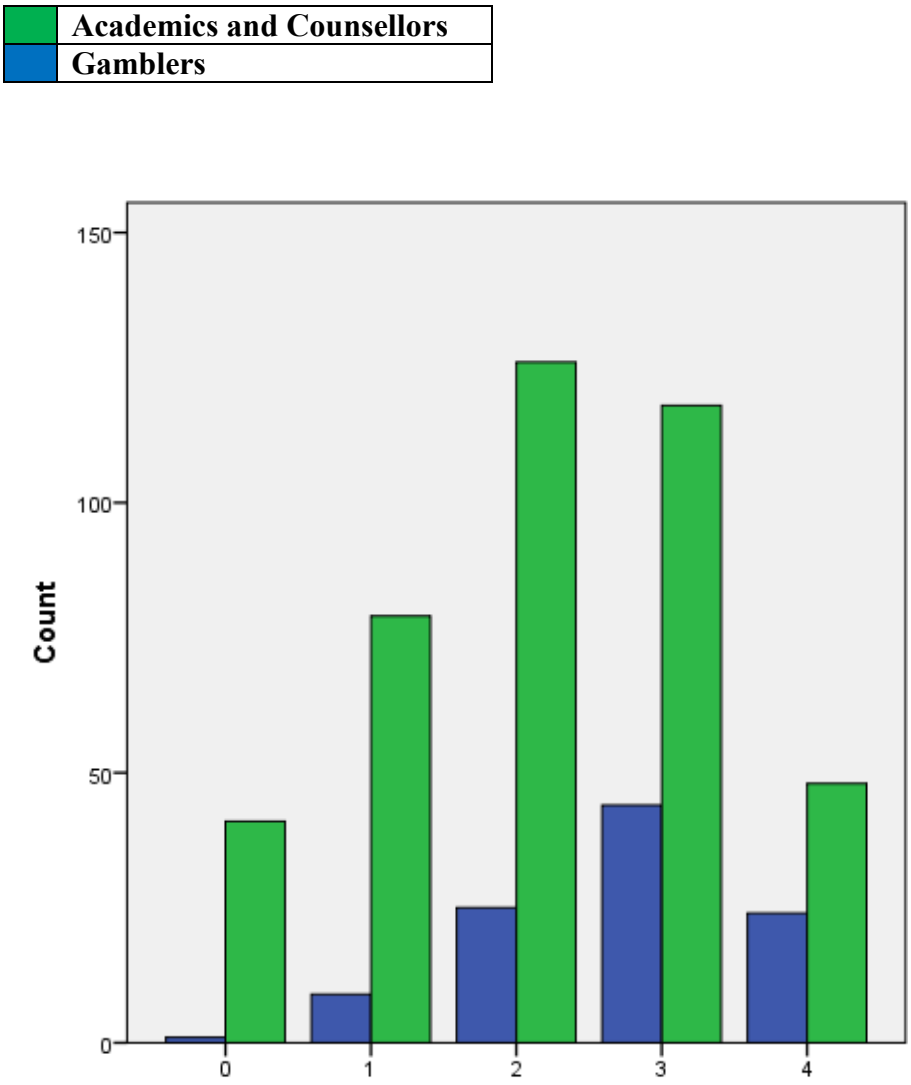


Figure A37 Eliminating advertising of big prizes on websites

The Mann Whitney U Test score = 14384, Z = 5.23 and p < 0.001. The effect size Pearson r = 0.2305. There is a small effect size; it is >0.2 (<0.2 is small effect size) but <0.5 (0.5 is a moderate effect size) so there is a difference but a small difference (Coe, 2002).

All Respondents Agree or Strongly agree	Only Operators Agree or Strongly agree	Only Academics Agree or Strongly agree	Only Counsellors Agree or Strongly agree	Only Gamblers Agree or Strongly agree	All Others Agree or Strongly agree
43.9% (272)	21.7% (5)	56.3% (45)	80.0% (20)	40.0% (167)	42.4% (31)

Table A38 Eliminating advertising of big prizes on websites

There is little consensus in participant responses to this feature. Possibly operators think the advertising of big prizes is good marketing with a good impact on revenues.

RG according to the Reno Model refers to policies and practices designed to prevent and reduce potential harms associated with gambling (Blaszczynski et al, 2004). These policies and practices have a diverse range of interventions designed to promote consumer protection, community and consumer awareness and education, and access to effective treatment. This model has been widely used by the tobacco and alcohol industries to place risk and responsibility on the user of the product as well as to moderate the risk of litigation. As a result, operators can produce educational material to provide individual informed choice regarding risks and benefits of gambling. But it has been argued that this competes with high intensity advertising and marketing encouraging people to gamble for enjoyment and entertainment (Korn and Reynolds, 2009). They discuss the power of advertising/promotion and money and argue that commercial gambling advertising is omnipresent (ibid). It incorporates messages that normalise and promote gambling as an almost risk-free form of leisure entertainment. The amount of money spent by the industry to shape and cultivate adult participation in a range of gambling activities is significant. For example, in Ontario, $6 billion/year is spent on advertising and promoting gambling venues and games (Korn, 2005; 2008). With such significant amounts of money spent on advertising and promotion, it could be argued that the gamblers could be persuaded by extensive marketing. Gambling advertising/marketing can also include the ‘rebranding’ of poker as an

exciting online ‘experience’ (McMullan and Miller, 2008; Williams and Wood, 2007; Wood et al, 2007; Goff and Graham, 2005). Research into marketing by McMullan and Kervin (2010) found that 23% offered online retail, in the form of poker accessories, electronics, clothing, gift certificates, jewellery and sports equipment to link online poker sites with images such as glamour, and desire and to offer a ‘personal’ approach to selling that stressed consumer-cantered multi-digital media communications. It has been argued by McMullan and Kervin (ibid) that marketing is exploiting themes that conflict with cultural values such as careful investment, hard work and saving, and they argue that gambling advertising and marketing stretches the credibility of the definitions of decent, honest and truthful. They invite governments to consider ‘outlawing’ operators, providers, advertisers and publishers who encourage ‘their’ citizens to play, to play for longer, and to play beyond their means (ibid).

Griffiths (2001) argued that the whole success of OG depends on several factors including advertising. Whilst there is the suggestion that the UK has strict regulations on appropriate advertising of OG, including the involvement with sports sponsorship and promotional products (Gainsbury, 2012) it could be suggested that neither the UK nor any other jurisdiction has control over marketing or advertising of unregulated OG websites. Ultimately the OG market is harder to control.

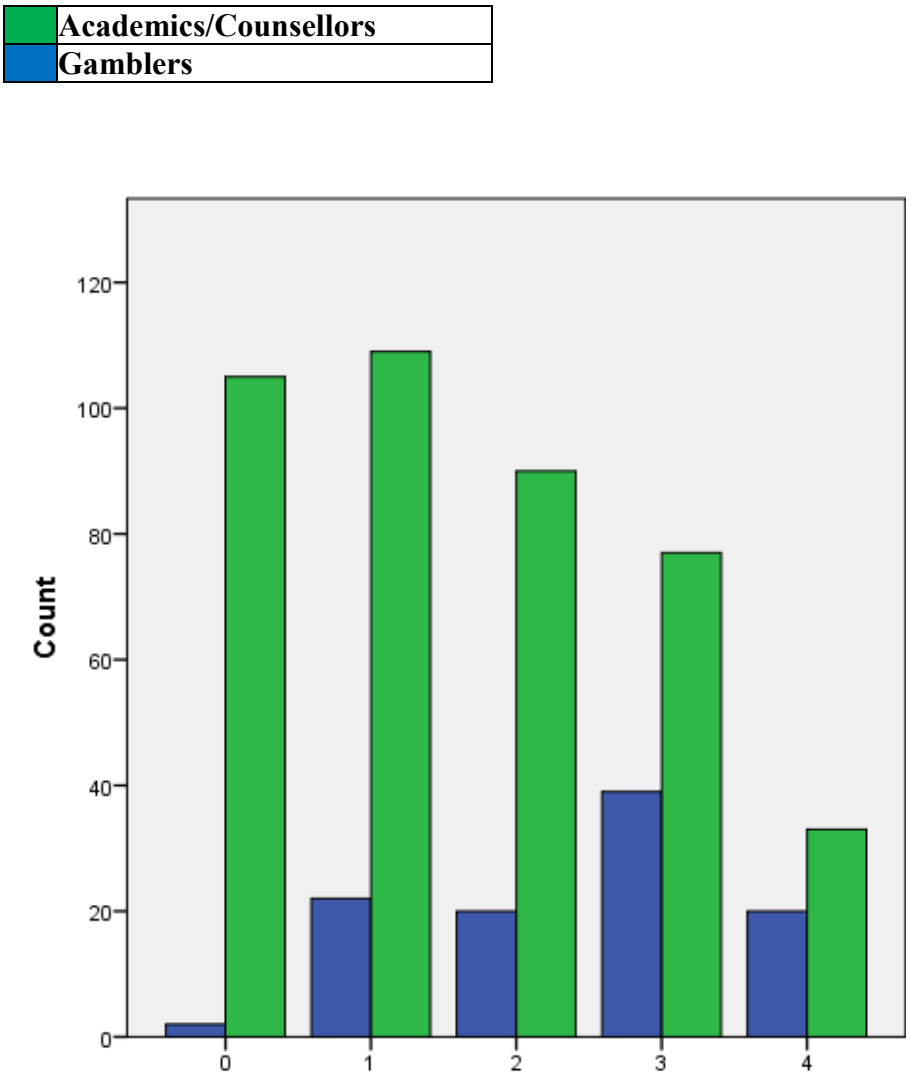


Figure A39 Delaying immediate access to large wins (e.g., paying out large wins in the form of cheques)

The Mann Whitney U Test score = 12541, Z = 6.63 and p < 0.001. The effect size Pearson r = 0.2915. There is a small effect size; it is >0.2 (<0.2 is small effect size) but <0.5 (0.5 is a moderate effect size) so there is a difference but a small difference (Coe, 2002).

All Respondents Agree or Strongly agree	Only Operators Agree or Strongly agree	Only Academics Agree or Strongly agree	Only Counsellors Agree or Strongly agree	Only gamblers Agree or Strongly agree	All Others Agree or Strongly agree
33.2% (200)	17.7% (4)	68.4% (54)	56.0% (14)	23.6% (110)	37.5% (27)

Table A40 RGF - Delaying immediate access to large wins (e.g., paying out large wins in the form of cheques)

Academics more than other participant groups think that this is an effective feature. 'PGs' are attracted by the characteristics of EGM use, including the ease of crediting and re-crediting the balance using cards and the ease of payout (Berger and Hauk, 2002; Henderson, 2003; Nisbet, 2005). It could perhaps be argued that this easy payout could be applied to 'PG' and online sites. However, it is necessary to be cautious about applying research findings in the land-based or online environment. Comparisons of OG to traditional gambling are inapplicable because the comparison is of an unregulated activity to a highly-regulated activity and that a comparison should be of regulated OG to land-based gambling.

Wood and Williams (2007) argue that the primary reasons individuals gave for preferring OG were first convenience, comfort and ease, second dislike of the atmosphere and clientele of land-based venues, third pace and nature and fourth potential for higher wins and lower overall expenditures. It could be argued that this feature of delaying immediate access to large wins (e.g., paying out large wins in the form of cheques) does not receive wide support of the general OQ participants because it does not represent the ease of OG that is a primary reason for preferring it in the first place.

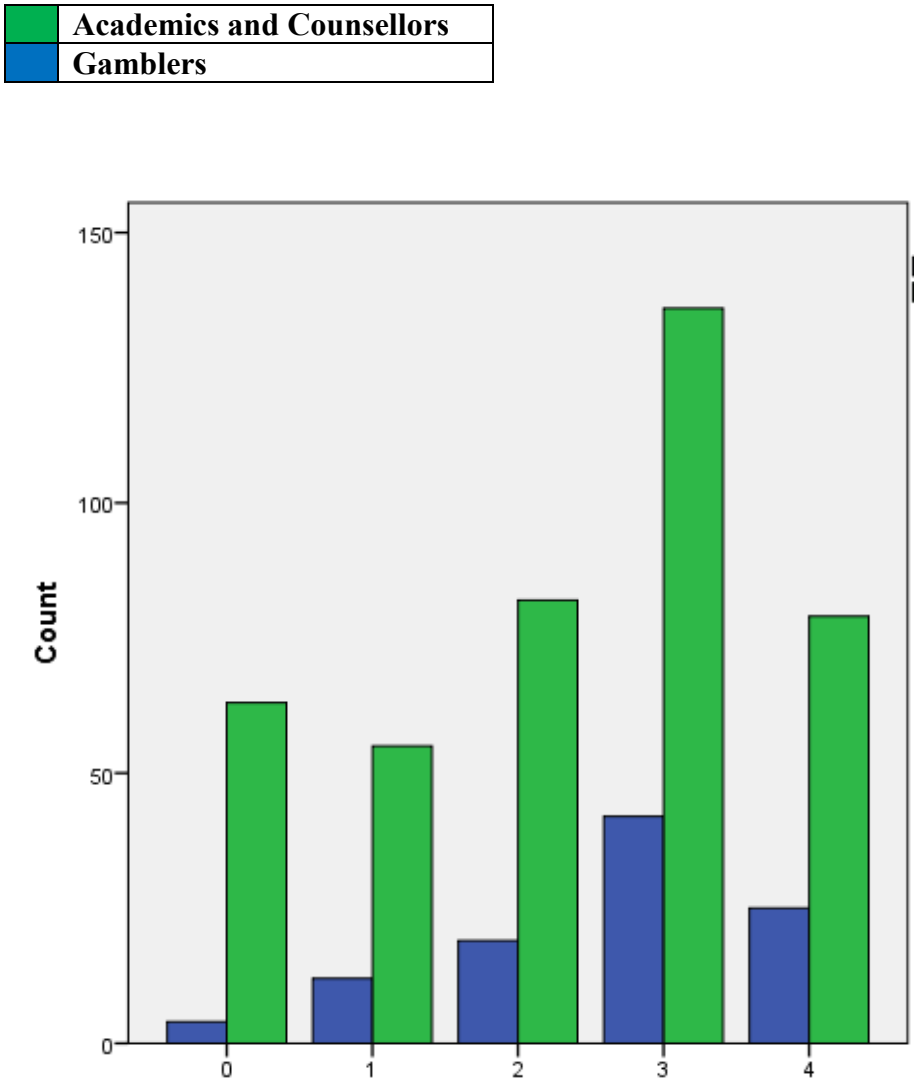


Figure A41 Sharing problem gambler identification information with other operators

The Mann Whitney U Test score = 17454, Z = 2.83 and p < 0.005. The effect size Pearson r = 0.2861. There is a small effect size; it is >0.2 (<0.2 is small effect size) but <0.5 (0.5 is a moderate effect size) so there is a difference but a small difference (Coe, 2002).

All Respondents Agree or Strongly agree	Only Operators Agree or Strongly agree	Only Academics Agree or Strongly agree	Only Counsellors Agree or Strongly agree	Only Gamblers Agree or Strongly agree	All Others Agree or Strongly agree
53.4% (331)	47.8% (11)	60.8% (48)	76.0% (19)	51.4% (216)	50.7% (37)

Table A42 Sharing problem gambler identification information with other operators

There are many issues relating to the legality of this sharing of information. In a 2009 study looking at the relationship between gambling and debt, Downs and Woolrych discuss how operators involved in focus groups recognised the need for the sharing of data between online and land-based operators regarding self-excluded gamblers. They discuss more sharing of information, for example, sharing among creditors via financial organisations; a database of self-excluded gamblers that allows information to be freely and legally shared between members, including support groups such as counselling services; as well as sharing of information between the gambling and debt advice agencies.

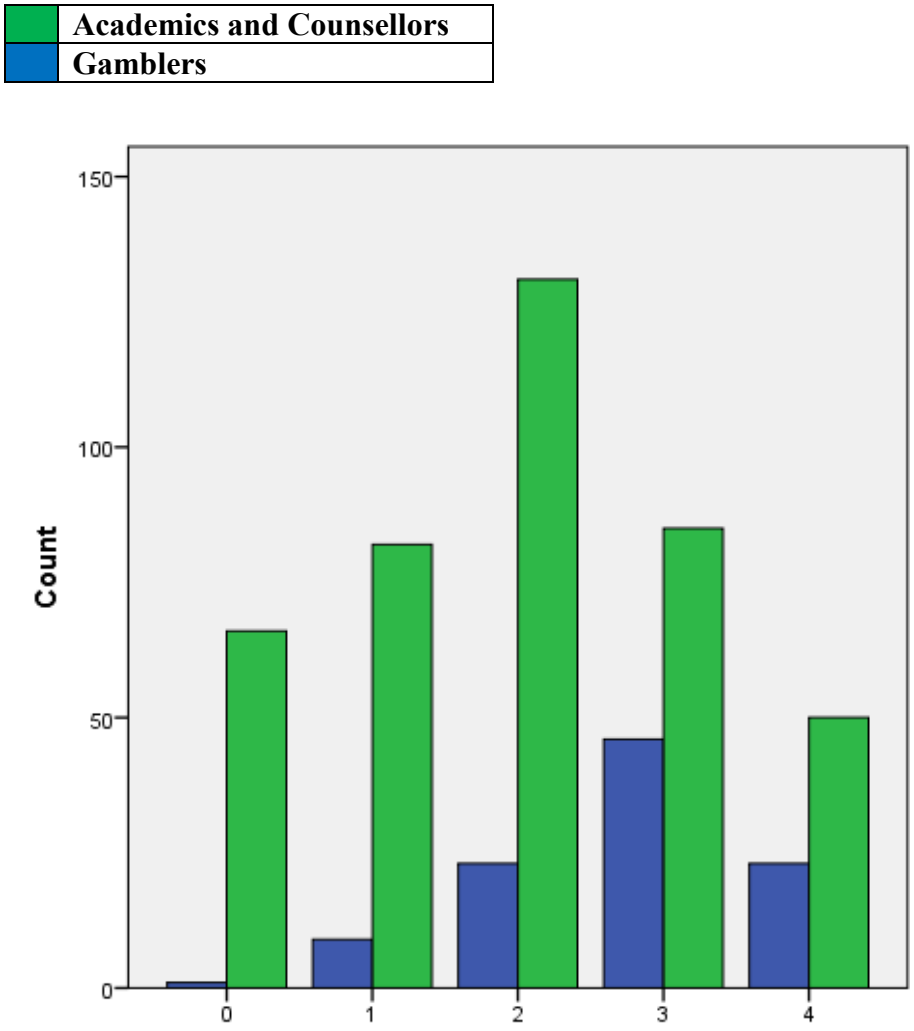


Figure A43 Reducing OG marketing

The Mann Whitney U Test score = 12586, Z = 6.50 and p < 0.001. The effect size Pearson r = 0.2861. There is a small effect size; it is >0.2 (<0.2 is small effect size) but <0.5 (0.5 is a moderate effect size) so there is a difference but a small difference (Coe, 2002).

All Respondents Agree or Strongly agree	Only Operators Agree or Strongly agree	Only Academics Agree or Strongly agree	Only Counsellors Agree or Strongly agree	Only Gamblers Agree or Strongly agree	All Others Agree or Strongly agree
38.9% (241)	30.4% (7)	62.0% (49)	84.0% (21)	32.2% (135)	39.7% (29)

Table A44 Reducing OG marketing

The response of the operators is understandable due to the probable impact on revenues. The response from the gamblers suggests that marketing has little impact on the decision to gamble and it is possible that the reasons to gamble are fuelled by the reasons discussed earlier such as hoping for a big win or playing for fun.

It has been argued that OG marketing is exploitative (Griffiths and Parke, 2002; McMullan and Kervin, 2010). However, Binde (2009) argues that in a study of 25 'PGs', none reported that advertising was the main cause of their gambling problems. By marketing gambling, it has been argued that there is an increase of the risk of increasing the prevalence of 'PG' and engendering expensive social and economic costs (Nichols et al, 2000). OG marketing is a field that requires more attention as there are no studies of promotional advertising at website environments (McMullan and Kervin, 2010).

Appendix 3 Responsible Gambling Features Online Questionnaire All Responses

No.	RGFs	Interest	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree
1.	**Slowing Play**	All Respondents	20.2% (130)	20.8% (134)	**26.3% (169)**	22.7% (146)	10.0% (64)
		Operator	12.0% (3)	20.0% (5)	**44.0% (1)**	12.0% (3)	12.0% (3)
		Academic	8.4% (7)	24.1% (20)	19.3% (16)	**37.3% (31)**	10.8% (9)
		Counsellor	3.8% (1)	7.7% (2)	15.4% (4)	**50.0% (13)**	23.1% (6)
		Gambler	24.3% (105)	21.1% (91)	**28.2% (122)**	18.8% (81)	7.6% (33)
		Other	18.4% (14)	21.1% (16)	21.1% (16)	**22.4% (17)**	17.1% (13)
2.	**Reducing audio-visual effects**	All Respondents	17.5% (111)	23.6% (150)	**25.7% (163)**	25.0% (159)	8.2% (52)
		Operator	30.8% (8)	19.2% (5)	**34.6% (9)**	11.5% (3)	3.8% (1)
		Academic	6.1% (5)	24.4% (20)	24.4% (20)	**36.6% (30)**	8.5% (7)
		Counsellor	4.0% (1)	8.0% (2)	8.0% (2	**56.0% (14)**	24.0% (6)
		Gambler	19.8% (84)	25.5% (108)	**26.4% (112)**	21.5% (91)	6.8% (29)
		Other	17.1% (13)	19.7% (15)	25.0% (19)	**27.6% (21)**	10.5% (8)
3.	**Reducing maximum bet size**	All Respondents	15.5% (99)	19.8% (126)	17.0% (108)	**32.5% (207)**	15.2% (97)
		Operator	16.7% (4)	20.8% (5)	16.7% (4)	**29.2% (7)**	16.7% (4)
		Academic	4.9% (4)	19.5% (16)	13.4% (11)	**41.5% (34)**	20.7% (17)
		Counsellor	4.0% (1)	8.0% (2)	4.0% (1)	**60.0% (15)**	24.0% (6)
		Gambler	18.1% (78)	21.2% (91)	16.7% (72)	**30.2% (130)**	13.7% (59)
		Other	14.9% (11)	16.2% (12)	27.0% (20)	**28.4% (21)**	13.5% (10)
4.	**Increasing maximum bet size**	All Respondents	30.7% (192)	**33.1% (207)**	17.8% (111)	14.4% (90)	4.0% (25)
		Operator	**40.9% (9)**	27.3% (6)	18.2% (4)	9.1% (2)	4.5% (1)
		Academic	24.7% (20)	**37.0% (30)**	19.8% (16)	16.0% (13)	2.5% (2)
		Counsellor	29.2% (7)	**33.3% (8)**	16.7% (4)	16.7% (4)	4.2% (1)
		Gambler	32.0% (135)	**32.9% (139)**	16.6% (70)	14.9% (63)	3.6% (15)
		Other	28.4% (21)	**32.4% (24)**	23.0% (17)	10.8% (8)	5.4% (4)
5.	**Decreasing game variety**	All Respondents	16.6% (104)	23.4% (146)	25.0% (156)	**27.5% (172)**	7.5% (47)

		Operator	**29.2% (7)**	20.8% (5)	**29.2% (7)**	16.7% (4)	4.2% (1)
		Academic	6.3% (5	25.0% (20)	28.8% (23)	**37.5% (30)**	2.5% (2)
		Counsellor	4.0% (1)	24.0% (6)	**32.0% (8)**	24.0% (6)	16.0% (4)
		Gambler	18.1% (76)	23.3% (98)	**24.0% (101)**	27.6% (116)	7.1% (30)
		Other	20.3% (15)	**23.0% (17)**	21.6% (16)	21.6% (16)	13.5% (10)
6.	**Removal of some types of games from Internet gambling**	All Respondents	11.3% (71)	15.9% (100)	18.6% (117)	**37.5% (236)**	16.8% (106)
		Operator	13.0% (3)	30.4% (7)	8.7% (2)	**39.1% (9)**	8.7% (2)
		Academic	5.0% (4)	21.3% (17)	15.0% (12)	**47.5% (38)**	11.3% (9)
		Counsellor	0.0% (0)	4.0% (1)	20.0% (5)	**52.0% (13)**	24.0% (6)
		Gambler	12.2% (52)	15.0% (64)	18.7% (80)	**37.2% (159)**	16.9% (72)
		Other	16.2% (12)	14.9% (11)	**23.0% (17)**	**23.0% (17)**	**23.0% (17)**
7.	**Eliminating bonus rounds**	All Respondents	12.1% (76)	20.3% (127)	**31.5% (197)**	24.6% (154)	11.5% (72)
		Operator	17.4% (4)	**34.8% (8)**	13.0% (3)	30.4% (7)	4.3% (1)
		Academic	3.8% (3)	15.2% (12)	32.9% (26)	**38.0% (30)**	10.1% (8)
		Counsellor	0.0% (0	12.0% (3	28.0% (7)	**36.0% (9)**	24.0% (6)
		Gambler	13.2% (56)	21.5% (91)	**32.5% (138)**	21.9% (93)	10.8% (46)
		Other	17.6% (13)	17.6% (13)	**29.7% (22)**	20.3% (15)	14.9% (11)
8.	**Removing number of high stake, high risk games**	All Respondents	10.0% (63)	15.6% (98)	19.9% (125)	**34.4% (216)**	20.1% (126)
		Operator	13.0% (3)	17.4% (4)	**30.4% (7)**	17.4% (4)	21.7% (5)
		Academic	1.3% (1)	13.8% (11)	21.3% (17)	**45.0% (36)**	18.8% (15)
		Counsellor	0.0% (0)	0.0% (0)	12.0% (3	**56.0% (14)**	32.0% (8)
		Gambler	10.8% (46)	17.2% (73)	18.8% (80)	**33.2% (141)**	20.0% (85)
		Other	17.6% (13)	13.5% (10)	23.0% (17)	**28.4% (21)**	17.6% (13)
9.	**Prohibiting free play mode**	All Respondents	21.5% (134)	**22.5% (140)**	22.2% (138)	20.1% (125)	13.8% (86)
		Operator	**27.3% (6)**	18.2% (4)	22.7% (5)	22.7% (5)	18.2% (4)
		Academic	3.8% (3)	19.2% (15)	**28.2% (22)**	26.9% (21)	21.8% (17)
		Counsellor	4.0% (1)	16.0% (4)	0.0% (0)	**40.0% (10)**	**40.0% (10)**
		Gambler	**25.8% (109)**	23.9% (101)	22.5% (95)	18.2% (77)	9.7% (41)
		Other	20.3% (15	**21.6% (16)**	20.3% (15)	18.9% (14)	18.9% (14)

10.	**Decreasing the chances of a win occurring**	All Respondents	27.4% (170)	**28.3% (176)**	25.6% (159)	13.2% (82)	5.5% (34)
		Operator	**30.4% (7)**	**30.4% (7)**	21.7% (5)	13.0% (3)	4.3% (1)
		Academic	11.3% (9)	32.5% (26)	**35.0% (28)**	17.5% (14)	3.8% (3)
		Counsellor	12.0% (3)	28.0% (7)	**32.0% (8)**	16.0% (4)	12.0% (3)
		Gambler	**31.7% (133)**	27.9% (117)	22.9% (96)	12.4% (52)	5.2% (22)
		Other	25.0% (18)	25.0% (18)	**30.6% (22)**	12.5% (9)	6.9% (5)
11.	**Increasing the chances of a win occurring**	All Respondents	21.4% (131)	**30.1% (184)**	28.6% (175)	11.9% (73)	7.9% (48)
		Operator	17.4% (4)	**43.5% (10)**	26.1% (6)	4.3% (1)	8.7% (2)
		Academic	15.2% (12)	**40.5% (32)**	35.4% (28)	6.3% (5)	2.5% (2)
		Counsellor	16.7% (4)	**41.7% (10)**	25.0% (6)	4.2% (1)	12.5% (3)
		Gambler	21.8% (90)	26.9% (111)	**27.4% (113)**	15.3% (63)	8.7% (36)
		Other	29.6% (21)	28.2% (20)	**31.0% (22)**	4.2% (3	7.0% (5)
12.	**Providing regular financial statements**	All Respondents	7.3% (45)	8.5% (53)	22.9% (142)	**43.2% (268)**	18.1% (112)
		Operator	4.3% (1)	8.7% (2)	26.1% (6)	**30.4% (7)**	**30.4% (7)**
		Academic	3.8% (3)	8.8% (7)	17.5% (14)	**47.5% (38)**	22.5% (18)
		Counsellor	4.0% (1)	12.0% (3)	20.0% (5)	**52.0% (13)**	12.0% (3)
		Gambler	7.4% (31)	8.4% (35)	22.5% (94)	**45.5% (190)**	16.3% (68)
		Other	12.3% (9)	8.2% (6)	**30.1% (22)**	27.4% (20)	21.9% (16)
13.	**Displaying time of day on screen**	All Respondents	11.6% (71)	17.1% (105)	**32.5% (199)**	27.2% (167)	11.6% (71)
		Operator	17.4% (4)	8.7% (2)	**34.8% (8)**	17.4% (4)	21.7% (5)
		Academic	7.5% (6)	17.5% (14)	26.3% (21)	**40.0% (32)**	8.8% (7)
		Counsellor	0.0% (0)	12.0% (3)	16.0% (4)	**48.0% (12)**	24.0% (6)
		Gambler	12.4% (51)	18.2% (75)	**34.2% (141)**	24.8% (102)	10.4% (43)
		Other	21.9% (16)	15.3% (11)	**34.7% (25)**	22.2% (16)	13.9% (10)
14.	**Displaying total time of play on screen**	All Respondents	11.6% (71)	17.1% (105)	**32.5% (199)**	27.2% (167)	11.6% (71)
		Operator	8.7% (2)	4.3% (1)	**39.1% (9)**	30.4% (7)	17.4% (4)
		Academic	6.3% (5)	11.3% (9)	16.3% (13)	**52.5% (42)**	13.8% (11)
		Counsellor	0.0% (0)	8.0% (2)	0.0% (0)	**60.0% (15)**	32.0% (8)
		Gambler	10.1% (42)	13.5% (56)	27.2% (113)	**37.3% (155)**	11.8% (49)

		Other	12.3% (9)	9.6% (7)	26.0% (19)	**37.0% (27)**	15.1% (11)
15.	**Requiring players to set a predetermined time limit**	All Respondents	11.3% (70)	18.1% (112)	22.3% (138)	**34.1% (211)**	14.2% (88)
		Operator	13.0% (3)	**30.4% (7)**	21.7% (5)	21.7% (5)	13.0% (3)
		Academic	1.3% (1)	16.3% (13)	15.0% (12)	**46.3% (37)**	21.3% (17)
		Counsellor	0.0% (0)	8.0% (2)	12.0% (3)	**44.0% (11)**	36.0% (9)
		Gambler	12.9% (54)	19.6% (82)	24.9% (104)	**32.5% (136)**	10.0% (42)
		Other	16.7% (12)	11.1% (8)	19.4% (14)	**29.2% (21)**	23.6% (17)
16.	**Enforcing play stoppage, break or interruption**	All Respondents	13.5% (83)	13.0% (80)	22.0% (135)	**37.4% (230)**	14.1% (87)
		Operator	8.7% (2)	26.1% (6)	17.4% (4)	**39.1% (9)**	8.7% (2)
		Academic	6.3% (5)	6.3% (5)	17.5% (14)	**50.0% (40)**	20.0% (16)
		Counsellor	0.0% (0)	0.0% (0)	16.0% (4	**44.0% (11)**	40.0% (10)
		Gambler	15.2% (63)	15.2% (63)	23.7% (98)	**35.3% (146)**	10.6% (44)
		Other	18.1% (13)	6.9% (5	20.8% (15)	**33.3% (24)**	20.8% (15)
17.	**Displaying gambling activity in cash value instead of credits**	All Respondents	6.3% (39)	10.1% (63)	17.8% (111)	**41.1% (256)**	24.7% (154)
		Operator	8.7% (2)	8.7% (2)	17.4% (4)	30.4% (7)	**34.8% (8)**
		Academic	6.3% (5)	8.8% (7)	15.0% (12)	**43.8% (35)**	26.3% (21)
		Counsellor	0.0% (0)	0.0% (0)	12.0% (3)	**44.0% (11)**	44.0% (11)
		Gambler	6.2% (26)	11.9% (50)	17.8% (75)	**41.8% (176)**	22.3% (94)
		Other	8.2% (6)	5.5% (4)	23.3% (17)	**35.6% (26)**	27.4% (20)
18.	**Requiring players to set predetermined spending limits**	All Respondents	8.0% (50)	10.6% (66)	15.8% (98)	**42.6% (265)**	23.0% (143)
		Operator	4.3% (1)	17.4% (4)	26.1% (6)	**43.5% (10)**	8.7% (2)
		Academic	5.0% (4)	6.3% (5)	11.3% (9)	**46.3% (37)**	31.3% (25)
		Counsellor	0.0% (0)	0.0% (0)	8.0% (2)	**52.0% (13)**	40.0% (10)
		Gambler	8.3% (35)	11.4% (48)	16.4% (69)	**43.3% (182)**	20.5% (86)
		Other	13.7% (10)	12.3% (9)	16.4% (12)	**30.1% (22)**	27.4% (20)
19.	**Providing general information about RG on welcome screen**	All Respondents	10.6% (66)	19.3% (120)	25.9% (161)	**31.6% (196)**	12.6% (78)
		Operator	17.4% (4)	17.4% (4)	34.8% (8)	21.7% (5)	8.7% (2)
		Academic	12.5% (10)	17.5% (14)	21.3% (17)	**41.3% (33)**	7.5% (6)
		Counsellor	0.0% (0)	16.0% (4)	24.0% (6)	**44.0% (11)**	16.0% (4)

		Gambler	9.8% (41)	21.5% (90)	26.5% (111)	**30.3% (127)**	11.9% (50)
		Other	15.1% (11)	9.6% (7)	26.0% (19)	**27.4% (20)**	21.9% (16)
20.	**Displaying RG messages during play**	All Respondents	12.3% (76)	20.1% (124)	27.9% (172)	**30.3% (187)**	9.4% (58)
		Operator	26.1% (6)	13.0% (3)	34.8% (8)	21.7% (5)	8.7% (2)
		Academic	10.0% (8)	12.5% (10)	26.3% (21)	**43.8% (35)**	7.5% (6
		Counsellor	0.0% (0)	8.0% (2)	20.0% (5)	**56.0% (14)**	16.0% (4)
		Gambler	11.8% (49)	24.9% (104	**27.8% (116)**	27.1% (113)	8.4% (35)
		Other	18.3% (13)	7.0% (5)	**31.0% (22)**	26.8% (19)	16.9% (12)
21.	**Requiring mandatory registration**	All Respondents	8.8% (54)	11.8% (73)	26.3% (162)	**34.4% (212)**	18.8% (116)
		Operator	13.0% (3)	4.3% (1)	17.4% (4)	34.8% (8)	30.4% (7)
		Academic	3.8% (3	7.5% (6	27.5% (22)	**37.5% (30)**	23.8% (19)
		Counsellor	0.0% (0)	12.5% (3)	12.5% (3)	**58.3% (14)**	16.7% (4)
		Gambler	8.9% (37	12.5% (52)	27.6% (115)	**34.1% (142)**	16.8% (70)
		Other	15.1% (11)	15.1% (11)	23.3% (17)	**24.7% (18)**	21.9% (16)
22.	**Allowing only one credit card per account**	All Respondents	11.1% (69)	13.7% (85)	20.9% (130)	**32.2% (200)**	22.1% (137)
		Operator	18.2% (4)	9.1% (2)	22.7% (5)	18.2% (4)	31.8% (7)
		Academic	1.3% (1)	10.0% (8)	20.0% (16)	**47.5% (38)**	21.3% (17)
		Counsellor	0.0% (0)	8.0% (2)	8.0% (2)	**52.0% (13)**	32.0% (8)
		Gambler	13.1% (55)	14.8% (62)	21.7% (91)	**29.8% (125)**	20.7% (87)
		Other	12.3% (9)	13.7% (10)	21.9% (16)	**27.4% (20)**	24.7% (18)
23.	**Eliminating advertising of big prizes on websites**	All Respondents	9.7% (60)	17.1% (106)	29.2% (181)	**30.2% (187)**	13.7% (85)
		Operator	30.4% (7)	26.1% (6)	21.7% (5)	17.4% (4)	4.3% (1)
		Academic	1.3% (1)	11.3% (9)	26.3% (21)	**38.8% (31)**	22.5% (18)
		Counsellor	0.0% (0)	4.0% (1)	16.0% (4)	**56.0% (14)**	24.0% (6)
		Gambler	10.3% (43)	18.9% (79)	**30.7% (128)**	28.5% (119)	11.5% (48)
		Other	12.3% (9)	12.3% (9)	**30.1% (22)**	26.0% (19)	16.4% (12)
24.	**Delaying immediate access to large wins (e.g., paying out large**	All Respondents	20.5% (127)	**24.0% (149)**	23.2% (144)	21.8% (135)	10.5% (65)
		Operator	26.1% (6)	26.1% (6)	30.4% (7)	13.0% (3)	4.3% (1)
		Academic	2.5% (2)	21.3% (17)	20.0% (16)	**40.0% (32)**	16.3% (13)

	wins in the form of cheques)	Counsellor	0.0% (0)	20.0% (5)	24.0% (6)	**28.0% (7)**	**28.0% (7)**
		Gambler	25.3% (106)	**26.0% (109**	22.4% (94)	18.4% (77)	7.9% (33)
		Other	18.1% (13)	16.7% (12)	**27.8% (20)**	22.2% (16)	15.3% (11)
25.	**Providing self-exclusion options**	All Respondents	4.9% (30)	9.3% (57)	27.1% (167)	**34.6% (213)**	24.2% (149)
		Operator	4.5% (1)	4.5% (1)	31.8% (7)	40.9% (9)	18.2% (4)
		Academic	3.8% (3)	10.1% (8)	17.7% (14)	**44.3% (35)**	24.1% (19)
		Counsellor	0.0% (0)	0.0% (0)	0.0% (0)	44.0% (11)	**56.0% (14)**
		Gambler	4.6% (19)	10.1% (42)	30.5% (127)	**33.4% (139)**	21.4% (89)
		Other	9.6% (7)	8.2% (6)	24.7% (18)	26.0% (19)	**31.5% (23)**
26.	**Providing accurate information on chances of winning**	All Respondents	4.7% (29)	9.5% (59)	17.8% (110)	**39.5% (244)**	28.5% (176)
		Operator	4.3% (1)	8.7% (2)	17.4% (4)	47.8% (11)	21.7% (5)
		Academic	3.8% (3)	12.5% (10)	15.0% (12)	**37.5% (30)**	31.3% (25)
		Counsellor	0.0% (0)	4.0% (1)	4.0% (1)	**72.0% (18)**	20.0% (5)
		Gambler	3.8% (16)	9.4% (39)	17.3% (72)	**39.2% (163)**	30.3% (126)
		Other	12.3% (9)	8.2% (6)	28.8% (21)	**30.1% (22)**	20.5% (15)
27.	**Providing 'PG' education and awareness programs**	All Respondents	5.7% (35)	11.2% (69)	21.8% (135)	**44.2% (273)**	17.2% (106)
		Operator	18.2% (4)	9.1% (2)	9.1% (2)	50.0% (11)	13.6% (3)
		Academic	3.8% (3)	10.0% (8)	17.5% (14)	**53.8% (43)**	15.0% (12)
		Counsellor	0.0% (0)	4.0% (1)	20.0% (5)	**52.0% (13)**	24.0% (6)
		Gambler	5.5% (23)	12.5% (52)	24.2% (101)	**41.7% (174)**	16.1% (67)
		Other	6.8% (5)	6.8% (5)	17.8% (13)	**43.8% (32)**	24.7% (18)
28.	**Promoting advertising standards that responsibly promote gambling with clear warnings of the dangers of gambling**	All Respondents	5.8% (36)	10.1% (63)	27.3% (170)	**40.2% (250)**	16.6% (103)
		Operator	17.4% (4)	13.0% (3)	30.4% (7)	30.4% (7)	8.7% (2)
		Academic	6.3% (5)	12.5% (10)	21.3% (17)	**40.0% (32)**	20.0% (16)
		Counsellor	0.0% (0)	4.0% (1)	16.0% (4)	**40.0% (10)**	**40.0% (10)**
		Gambler	5.0% (21)	10.0% (42)	29.3% (123)	**42.1% (177)**	13.6% (57)
		Other	8.2% (6)	8.2% (6)	26.0% (19)	**32.9% (24)**	24.7% (18)

29.	**Identification of 'PGs' by operators**	All Respondents	8.2% (51)	12.2% (76)	19.8% (123)	**37.8% (235)**	21.9% (136)
		Operator	17.4% (4)	13.0% (3)	30.4% (7)	30.4% (7)	8.7% (2)
		Academic	5.1% (4)	3.8% (3)	20.3% (16)	**43.0% (34)**	27.8% (22)
		Counsellor	0.0% (0)	12.0% (3)	12.0% (3)	**56.0% (14)**	20.0% (5)
		Gambler	8.3% (35)	13.6% (57)	20.0% (84)	**38.1% (160)**	20.0% (84)
		Other	11.0% (8)	13.7% (10)	19.2% (14)	26.0% (19)	**30.1% (22)**
30.	**Sharing problem gambler identification information with other operators**	All Respondents	13.7% (85)	12.7% (79)	20.3% (126)	**32.9% (204)**	20.5% (127)
		Operator	26.1% (6)	13.0% (3)	13.0% (3)	26.1% (6)	21.7% (5)
		Academic	5.1% (4)	10.1% (8)	24.1% (19)	**38.0% (30)**	22.8% (18)
		Counsellor	0.0% (0)	16.0% (4)	8.0% (2)	**48.0% (12)**	28.0% (7)
		Gambler	15.5% (65)	13.1% (55)	20.0% (84)	**32.6% (137)**	18.8% (79)
		Other	13.7% (10)	12.3% (9)	23.3% (17)	**26.0% (19)**	24.7% (18)
31.	**Reducing Internet gambling marketing**	All Respondents	14.0% (87)	17.1% (106)	**30.0% (186)**	24.2% (150)	14.7% (91)
		Operator	21.7% (5)	8.7% (2)	39.1% (9)	26.1% (6)	4.3% (1)
		Academic	2.5% (2)	11.4% (9)	24.1% (19)	**39.2% (31)**	22.8% (18)
		Counsellor	0.0% (0)	0.0% (0)	16.0% (4)	**64.0% (16)**	20.0% (5)
		Gambler	16.0% (67)	19.8% (83)	**32.0% (134)**	20.3% (85)	11.9% (50)
		Other	17.8% (13)	15.1% (11)	27.4% (20)	16.4% (12)	**23.3% (17)**
32.	**Providing age verification controls**	All Respondents	4.2% (26)	6.6% (41)	20.1% (125)	**36.6% (228)**	32.6% (203)
		Operator	4.3% (1)	4.3% (1)	17.4% (4)	39.1% (9)	34.8% (8)
		Academic	2.5% (2)	22.8% (18)	18.8% (15)	35.0% (28)	**40.0% (32)**
		Counsellor	0.0% (0)	0.0% (0)	4.0% (1)	44.0% (11)	**52.0% (13)**
		Gambler	4.3% (18)	7.6% (32)	20.6% (87)	**38.4% (162)**	29.1% (123)
		Other	6.9% (5)	6.9% (5)	25.0% (18)	23.6% (17)	**37.5% (27)**

Table 47 **Table A45 Responsible Gambling Features Online Questionnaire All Responses**

Appendix 4 Design of the online questionnaire

The OQ utilised a professional form of Survey Monkey software and several recommendations were followed;

- support multiple platforms and browsers (Yun and Trumbo, 2000);
- prevent multiple submissions (Yun and Trumbo, 2000);
- can present questions in a logical way or adaptive questioning when a participant is asked depending on his or her answers to previous questions (Kehoe and Pitkow, 1996). It is hoped that the questions are logical BUT the OQ does not include adaptive questioning;
- collect both quantified selection option answers and narrative type question answers (Yun and Trumbo, 2000);
- provide feedback 'thank-you' upon completion of the OQ (Smith, 1997) as well as details of a support group;
- informed consent information;
- in a study using an OQ where open ended questions were located after a set of coded questions, over 70% of the participants provided additional information and explanations through the open-ended question opportunity (Andrews, Price and Turoff, 2001);
- Arial size 12 fonts, on a beige background is recommended for most dyslexics (Ross, 2002);
- For participants with reading difficulties. The following fonts are recommended Arial (PC)Comic Sans, Geneva (Mac)Helvetica or Arial (Mac)Myriad Pro, Tahoma, and Trebuchet (Scottish Parliament, 2007);
- Left-aligned, non-justified text, with a line spacing of 1.5 or 2 lines; avoiding large paragraphs or blocks of text, and the use of pale yellow, beige or blue are recommended (Scottish Parliament, 2007

Appendix 5 Online questionnaire

1. About the survey

About the survey

This research aims to investigate the effectiveness of responsible gambling features in which your participation is requested. It is hoped that the results of this research will contribute to understanding the issues related to responsible Internet gambling and that the results will assist the design and provision of appropriate interventions for individuals who develop problems controlling their gambling behaviour when using Internet gambling sites.

This survey should take about 10-15 minutes of your time. Most questions ask you to place a tick in the box provided and/or may ask you to provide some additional information as well. Any comments you may wish to make will provide the researcher with a greater understanding of any issues involved.

The information recorded on this questionnaire will be kept completely confidential and all information you provide will be recorded on a completely anonymous basis. It will be passed on to the researcher from Swansea Metropolitan University, who will ensure that the information you provide is kept securely stored. You are not asked to provide your name at any point during the survey. If you find the research interesting and would like to receive a copy of the results, please contact the researcher.

If you have any problems completing the survey or would like to speak to the researcher, then please contact;

Caroline Jawad
Swansea Metropolitan University
Swansea Business School
Mount Pleasant
Swansea
SA1 6ED
01792-481000
e-mail: caroline.jawad@smu.ac.uk

2.

Before you start to answer the main survey questions, please tick the following boxes to confirm that you are happy to take part in the survey and understand the terms on which you are providing information.

1. I agree that I have:

- [ ] Read the information provided on the first page
- [ ] Received satisfactory information regarding the research

2. I understand that:

- [ ] I am free to withdraw from the study at any time if I wish and if I choose to do this, there will be no further contact from the researchers
- [ ] Any personal information I provide will be treated as strictly confidential
- [ ] I can refuse to answer any question
- [ ] Confidentiality and anonymity will be maintained and it will not be possible to identify me from any publications

3. About you

3. Gender

- ◯ Male
- ◯ Female
- ◯ Prefer Not To Say

4. Age

- ◯ Under 18
- ◯ 18 to 25
- ◯ 26 to 35
- ◯ 36 to 45
- ◯ 46 to 55
- ◯ 56 to 65
- ◯ Older than 65
- ◯ Prefer Not To Say

5. Please tick one of the following that best suits your interest in this gambling survey

- ◯ Operator
- ◯ Academic
- ◯ Counsellor
- ◯ User of Gambling Site(s)
- ◯ Other (please specify)

6. How many times a week do you gamble online?

- ◯ Never
- ◯ Once a week
- ◯ Few times a week
- ◯ Every day

7. How long do you gamble each time you gamble online?

- ◯ I never gamble online
- ◯ Up to 1 hour
- ◯ Between 1 to 2 hours
- ◯ Between 2 to 3 hours
- ◯ Between 3 to 4 hours
- ◯ Between 4 to 5 hours
- ◯ More than 5 hours

8. Usual bet size

- ◯ I never gamble online
- ◯ £1 or less
- ◯ Between £1 to £5
- ◯ Between £5 to £10
- ◯ Between £10 to £25
- ◯ Between £25 to £50
- ◯ More than £50

If more than £50 please specify

4. Responsible Gambling Features

9. In your opinion, how effective would the following modifications be in reducing the risk of problem gambling on Internet websites

	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree
Slowing play	◯	◯	◯	◯	◯
Reducing audio-visual effects	◯	◯	◯	◯	◯
Reducing maximum bet size	◯	◯	◯	◯	◯
Increasing minimum bet size	◯	◯	◯	◯	◯
Decreasing game variety	◯	◯	◯	◯	◯
Removal of some types of games from Internet gambling	◯	◯	◯	◯	◯
Eliminating bonus rounds	◯	◯	◯	◯	◯
Removing number of high stake, high risk games	◯	◯	◯	◯	◯
Prohibiting free play mode	◯	◯	◯	◯	◯
Decreasing the chances of a win occurring	◯	◯	◯	◯	◯
Increasing the chances of a win occurring	◯	◯	◯	◯	◯
Providing regular financial statements	◯	◯	◯	◯	◯
Displaying time of day on screen	◯	◯	◯	◯	◯
Displaying total time of play on screen	◯	◯	◯	◯	◯
Requiring players to set a predetermined time limit	◯	◯	◯	◯	◯
Enforcing play stoppage, break or interruption	◯	◯	◯	◯	◯

	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree
Displaying gambling activity in cash value instead of credits	○	○	○	○	○
Requiring players to set predetermined spending limits	○	○	○	○	○
Providing general information about responsible gambling on welcome screen	○	○	○	○	○
Displaying responsible gambling messages during play	○	○	○	○	○
Requiring mandatory registration	○	○	○	○	○
Allowing only one credit card per account	○	○	○	○	○
Eliminating advertising of big prizes on websites	○	○	○	○	○
Delaying immediate access to large wins (e.g., paying out large wins in the form of cheques)	○	○	○	○	○
Providing self-exclusion options	○	○	○	○	○
Providing accurate information on chances of winning	○	○	○	○	○
Providing problem gambling education and awareness programs	○	○	○	○	○
Promoting advertising standards that responsibly promote gambling with clear warnings of the dangers of gambling	○	○	○	○	○
Identification of problem gamblers by operators	○	○	○	○	○
Sharing problem gambler identification information with other operators	○	○	○	○	○
Reducing Internet gambling marketing	○	○	○	○	○

	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree
Providing age verification controls	○	○	○	○	○

5. Gambling Statements

10. Please indicate your agreement or disagreement with the following statements

	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree
Gambling is an addictive product	◯	◯	◯	◯	◯
It is a good thing to be able to gamble on the Internet	◯	◯	◯	◯	◯
It is too easy to gamble nowadays	◯	◯	◯	◯	◯
Internet gambling should be banned	◯	◯	◯	◯	◯
If there is a problem on an Internet gambling website, it is a good thing to be able to move to another site	◯	◯	◯	◯	◯
Gambling is enjoyable entertainment	◯	◯	◯	◯	◯
There should be more gambling opportunities	◯	◯	◯	◯	◯
People should not play poker online	◯	◯	◯	◯	◯
I like to bet on the horses	◯	◯	◯	◯	◯
I enjoy gambling at casino table games	◯	◯	◯	◯	◯
I like to play on the National Lottery	◯	◯	◯	◯	◯
I never gamble	◯	◯	◯	◯	◯

6.

11. What responsible gambling features do you think would be most effective and why?

12. Do you have any other comments?

7. Help and Advice

Thank you for taking time out of your busy schedule to take part in this survey. Your co-operation is appreciated.

This section contains information that you may be interested in as a result of completing the survey. If you feel distressed or have any concerns during or after completion of the survey, you are encouraged to seek assistance and to contact the services listed below.

Confidential, free counselling, advice and information for anyone affected by problem gambling

HelpLine 0845 6000 133

NetLine www.gamcare.org.uk

