



The Gamification of Responsible Gambling: A Critical Discussion of Emergent Techniques for Addressing Gambling-Related Harms

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Introduction

Figure 1 is a screen capture from the Ontario Lottery and Gaming (OLG) responsible gambling site, PlaySmart. It is an interactive educational tool designed to look like a slot machine game with the purpose of dispelling myths about luck and chance in such gambling games. These tools represent an emerging intersection between responsible gambling and gamification, which will be discussed in this essay in its concerning connection to broader trends of responsabilization.

Figure 1: "How to Play Slots", OLG PlaySmart, 2023



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The Gamification of Responsible Gambling

From language acquisition to losing weight, gamification has been touted as an exciting new tool in the never-ending project of personal improvement. In a Canadian context seeing rapidly expanding gambling markets, this paper seeks to bring together critiques of both gamification and responsabilization to throw new light onto the implications of gamification for “responsible gambling”, the primary, industry-led response to gambling-related harms.

Gamification is the integration of game-like experiences to drive productivity or provoke behavioural changes in non-game settings through the use of “game mechanics, narratives, and feedback mechanisms, such as auditory cues, rewards, and levelling systems” (Whitson & French 2021, p. 21). It is a new and rapidly growing practice that, while subject to critique, has been broadly conceived of as a progressive force with the potential for positive behaviour modification in a wide range of settings (Woodcock & Johnson, 2018). Whitson and French (2021) highlight the blurred boundaries between game/not game, production/consumption, gambling/not gambling and the issues these blurred boundaries create in regulating gambling and online gaming. The proliferation of digital responses to real-life issues through gamification is another vector in which we see blurred lines between game and not game, raising questions of regulation and responsibility.

Responsibilization is used to describe the process of making individuals assume risks and responsibilities that used to be managed by the state; it is characterised by a “managerial” relationship to services and to the self (Harris & White 2018). The use of gamification in responsible gambling (RG) initiatives is exemplified in the OLG slot’s awareness tool in Figure 1, above. Here, game-like mechanisms are used to make RG tools more compelling. They arguably gamify responsabilization, blurring the boundary between addictive consumption and harm reduction.

This essay seeks to address a gap in the literature on the implications of gamification for responsible gambling by bringing together critiques of both gamification and responsible gambling for their role in governance through individual behavioural modifications. Further, it raises questions about the potential use of gamification in responsible gambling tools within the current context of increasing online gambling in Canada due to both changing markets and the COVID-19 pandemic. Single-event sports betting was legalised in Canada in August 2021, and Canada is seeing the development of newly legal third-party online gambling markets. Ontario will be the focal point for references in this essay as it is the most populous province and the first to open a private online market. Online gambling also significantly increased during the COVID-19 pandemic, with public health measures shutting down most in-person forms of betting and companies intensifying advertisements for online offerings (Research Chair on Gambling Studies, 2021; Turner et al. 2022). A study out of Concordia University and the University of Laval found that in Quebec in 2021, 15% of the population is gambling online compared to 5% in 2018 (Bongiorno, 2023).

The paradigm of responsible gambling and the use of gamification must both be contextualised in the political and economic systems which have seen their proliferation. This essay intends to show the connections between the two practices by providing some of the contexts for their development with particular attention to their role in responsabilization. Gamification and RG can both be used as covers for structural issues as they direct attention onto individual personal behaviours. This essay highlights an emergent set of concerns for the potential of gamified RG to be employed by the gambling industry and function as an intensification of responsabilization.

This essay begins with a discussion of RG as a harm reduction response to the liberalisation of gambling in Canada and concerns over gambling-related harms. Next, gamification is discussed as a potential response to growing online gambling markets, as shown through the example of the awareness-raising tool depicted in Figure 1. Then, critiques of gamification and responsible gambling are brought together to highlight the potential convergence of these behaviour-change strategies.

Section 1: Responsible Gambling as a Response to the Liberalisation of Gambling

The mainstreaming of gambling in Canada

In recent years, gambling has become a ubiquitous form of entertainment and a significant revenue stream for Canadian governments (Cosgrave & Klassen, 2009). In 1969 and 1985, major amendments to the Canadian Criminal Code gave provincial governments the authority to manage State lotteries and, later, electronic forms of gambling. In this time period, every Province established a state lottery, and through the 1990s, many created Crown corporations to manage casinos and video lottery terminals (Campbell & Smith, 2003). Between 1992 and 2006, gambling was Canada's fastest growing industry in terms of per cent GDP increase (Cosgrave & Klassen, 2009, p. 1). The adoption of the North American Free Trade Agreement and the corresponding recession meant Canadian governments were struggling to meet the revenues needed for service provision (Cosgrave & Klassen, 2009, p. 123). At the same time, neoliberal policies of lowered taxes put pressure on governments to find alternative sources of revenue (Reith, 2013, p. 723).

These factors set the stage for the development of casino gambling in Ontario in the early 1990s. Ontario now has over 70 gambling establishments and over 23000 electronic gaming machines (Destination Ontario, 2023; Stevens, 2021). In the fiscal year 2021–22, the crown corporation, OLG, generated \$7.1 billion in total proceeds (OLG Annual Report, 2023, p. 11).

Gambling-related harms conceptualised in the psy-sciences

The past 40 years of gambling liberalisation have produced increasing concerns over issues of gambling-related harms and, in turn, the emergence of gambling studies, particularly the identification of "problem gamblers" as pathological subjects (Cassidy 2014; Reith 2013). At the same time, the field of gambling studies became increasingly focused on narrow topics of pathology, with psychology, business, and medicine now being the most common disciplinary backgrounds for published research on responsible gambling (Cassidy 2014; Reynolds et al.,

2020). The conception of excess gambling as a disease was cemented in the 1980s, with the addition of compulsive gambling as an 'impulse control disorder' in the DSM-III and the development of psychological treatments and screenings for gamblers (Campbell & Smith 2003). Today, in the DSM-V, "gambling disorder" falls into the section on behavioural addictions (American Psychiatric Association, 2022). Today, in the DSM-V, "gambling disorder" falls into the section on behavioural addictions (American Psychiatric Association, 2022).

In the 1990s, provincial governments began funding problem gambling treatment and prevention measures. These were generally provided by the same social agencies that dealt with substance abuse, cementing state response to gambling-related harms as a medical, not a social, issue (Cosgrave & Klassen, 2009, p. 129).

It is important to note the serious social and personal costs of gambling, which have been well documented in a large body of literature. A study of problem gambling behaviours in Ontario students grades 7-12 found higher risks of mental distress, "delinquent behaviours", and a staggering 17.8 times greater rate of suicide attempts compared to non-problem gamblers (Cook et al., 2015, p. 1122). While gambling-related harms have primarily been documented in a biomedical framework, there are also significant damages to relationships, with lost time from families, isolation, and disconnection from others, as gambling consumes time and money which may otherwise contribute to the building or maintaining of relationships (Reith, 2013, p. 731). As well, there can be harm to communities through the loss and commercialisation of spaces into gambling enterprises (Reith, 2013, p. 731). It is crucial to note that gambling-related harms are unequally distributed, and some scholars call it a "regressive form of taxation" (Cosgrave & Klassen 2009, p. 10).

The development of RG

As gambling has expanded and become crucial to public revenues, there has also been a growing concern about gambling-related harms. In response to these concerns, the framework of "responsible gambling" (RG) was established by the influential "Reno Model Papers" published starting in 2004 and has become a dominant approach in addressing gambling-related harms (Reynolds et al., 2020). The Reno Model emphasises personal freedom and informed choice as consumer rights and sees RG measures as part of a balancing act of consumer protection (Blaszczynski et al., 2011). Reno Model authors, Blaszczynski, Ladouceur, and Shaffer (2011), proposed a tripartite model for facilitating a "safe environment" for gamblers, emphasising the importance of governmental responsibility for legislation, industry responsibility not to mislead consumers, and gamblers' responsibility to know the risks of their consumption. The Reno Model employs a cost-benefit analysis to gambling, positioning RG as a tool to minimise harms and social costs in legal gambling jurisdictions. In this logic, because the cost-benefit analysis is done on a public health scale, RG programs that reach many people but have low effectiveness may be viewed as more valuable than those that are highly effective but reach few people (Blaszczynski et al., 2011). The interventions most commonly promoted by the RG paradigm are warning messages, player set loss and time limits, self-exclusion, and public awareness of problem

gambling (Reynolds et al., 2020). The Reno Model promotes collaboration between government, industry, and consumers as necessary for effective RG programs because each of these stakeholders is portrayed as having joint responsibility for minimising gambling-related harms.

The liberalization and expansion of gambling has occurred in an era of political and economic restructuring, which has involved the privatisation and globalisation of capital, as well as corresponding changes to social relationships, including weakened social safety nets and increased personal responsabilization (Reith, 2013). This set of transformations is complex, but for the purpose of this essay, it can be characterised with reference to neoliberal policies². Within these changes, gambling has become a site of increased and increasingly profitable consumption and a new “social pathology” (Reith, 2013, p. 718). “Responsible gambling” discourse has been used to normalise the previously deviant activity (Cosgrave & Klassen, 2009, p. 130). The idea of responsible gambling rests upon the conception of gambling-related harms as localised in a minority of people and attributed to deficiencies of those individuals (Cassidy, 2014; Nicoll, 2007). While the responsible gambling model pitches itself as a cooperation between government, industry, and users, the measures and strategies promoted in this model place the onus squarely on the gamblers themselves to avoid harm by taking personal responsibility to increase their awareness and change their behaviours (Ariyabuddhiphongs, 2013; Reynolds et al., 2020). This individualising can be seen, for example, in the slogan “know your limit, play within it” used by OLG in lottery advertisements (Cosgrave & Klassen, 2009, p. 130). Ariyabuddhiphongs’ (2013) literature review found frequent use of prevention measures in RG. These target gamblers before they have placed a bet, commonly by providing information about odds, risks, and responsible gambling strategies. According to this review, awareness measures have been found to be successful at combating misconceptions about gambling, including awareness about odds. However, they have not been found to be successful at changing behaviours (Ariyabuddhiphongs, 2013).

Critiques of RG

Hancock and Smith (2017) posit that the Reno Model has been so appealing and widely accepted because it requires little accountability from regulators and the gambling industry. The Reno Model also places emphasis on compromise between industry and regulators, which waters down consumer protection efforts. Critics have also raised concerns about industry funding received by the Reno Model authors and how this may have impacted their work (Hancock & Smith, 2017, p. 1160). Discourses of responsible gambling have little clarity or consensus on the meaning of key terms, such as “problem gambler”, meaning the terms can be used widely in public messaging without carrying a definitive mandate (Miller et al., 2016). Since there is little empirical evidence for the efficacy of the Reno Model, it has been criticised for inefficacy in addressing harm and

² A 20th century economic and political ideology with the propositions that “governments should not seek to intervene in the economy, because the market is an efficient and effective mechanism if left to its own devices; and that individuals should be responsible for themselves and run their own lives” (Harris & White, 2018, “neoliberalism”)

serving as a cover or “legitimation strategy” for the expansion of the legal gambling market (Reynolds et al., 2020, p. 24). This critique is bolstered by the dilemma of profit motives for the industry-led development of RG since “problem” gamblers are key to industry revenues (Hancock & Smith, 2017).

Section 2: Gamification as a Response to the Changes in Online Gambling

Changing online gambling market

Currently, Canada has a shifting legislative framework for online gambling. Single-event sports betting was legalised federally in August 2021, and the first private 3rd party online gambling market opened in Ontario in April 2022. Due to the, until very recently, underground nature of online gambling in Canada, there are not many sources on prevalence. However, online gambling is clearly significant because the first year of Ontario’s legal market reported 1.6 million active player accounts and \$35.6 billion in wagers (Jiang, 2023).

Gamification in RG

The development of an online market for gambling has been the cause of much concern over the increased availability of gambling and related harms, as well as the new challenges faced by regulators in an increasingly international market. At the same time, the shift to online gambling has been seen as a site for potential in RG. Online gamblers are highly surveillable and some researchers believe this provides opportunities for enhanced behavioural tracking and interventions (Wood & Wolh, 2015). Surveillance of gamblers is an industry imperative, and common practice, because it can be used to tailor experiences to accelerate consumption (Reith, 2013, p. 729). Proponents of an RG model have also touted the opportunities for data-driven player interventions, which would, as is a tenet of the RG method, specifically target a subsection of players determined to be “problematic” or “pathological”. This tendency is highlighted by the use of algorithmic machine learning programs, which are used to identify players’ risk levels in online casinos. There have been concerns raised over the lack of evidence for the classifications produced by these programs; however, they are used in many online gambling sites, including OLG (Wood & Wolh, 2015; OLG annual report, 2023).

The changing gambling market is still being theorised, and this shifting landscape is ripe for potential development in RG. One of these potentials, which is currently under-researched, is the use of gamification to promote or enhance the use of RG tools, such as limit setting and awareness measures. Gamification is already common in promoting gambling through bonuses and player loyalty cards, which has led some researchers to believe that it can be a useful technique for promoting RG programs (Griffiths, 2019).

OLG example of gamification

OLG promotes standard RG tools, such as limit setting and self-exclusion. The site prompts the user to complete a “Play Profile” by filling out the nine question Problem Gambling Severity Index. This generates a risk profile which, if registered as medium or high risk, prompts the user to

“customise their play” by setting limits on deposits and playtime. The emphasis in OLG responsible gambling tools is on personalization and customization. They also include many pages of awareness measures, and some utilise game-like experiences designed to raise consumer awareness of gambling habits and dispel myths about luck and odds. One such case of this can be found on the OLG’s PlaySmart slots information page.

Figure 2: “How to Play Slots”, OLG PlaySmart, 2023



The slots information page is populated with colourful cartoon-style drawings illustrating different slot machine elements and gameplay. Images and information are presented in carousels that the viewer can flip through. A Random Number Generator slot machine simulation is on the “How to Play” page. As illustrated in Figure 2 above, this allows the viewer to click a “spin” button that stops two quickly flashing symbols: a common slot machine icon and a digital number. On the next slide of the carousel, there is a 3 by 5 square slot machine simulation labelled “What You See” beside a corresponding grid of digital numbers labelled “What the Machine Sees”. When the user clicks the “Try Again” button, the grid of numbers flashes through different digits until the user selects the pulsing yellow “Spin” button, which pauses the numbers and spins the grid of symbols for approximately 2 seconds. Any “wins” are marked with a yellow line, and “false wins” are identified.

The design of this RG resource encourages a playful interaction with the site; they have chosen bright colours and interactive features over a page of text. This simulated slot machine uses the action of spinning a slot wheel and the interaction of the user’s “spins” in order to inform the user

that the outcomes of a slot machine are random. Similar game-like programs exist on the RG websites for the state-run gambling corporations in British Columbia, Quebec, and Nova Scotia. Further gamification was attempted by the Nova Scotia Gaming Corporation in 2011 to combat low user engagement with the RG tools on the player cards system. The corporation offered gamified incentives, including entering gamblers into a cash draw, as a reward for using the RG tools on their play cards. The project was criticised for encouraging gambling and was terminated in 2014 (Griffiths, 2019).

Section 3: Bringing Together Critiques to Highlight the Potential Concerning Convergence of Gamification and Responsible Gambling

The utilisation of game-like elements on RG websites is an entry point to examine the implications of gamification in responsible gambling measures and how critiques of gamification can provide insight into the current RG paradigm. The use of game elements cannot be understood solely through their “playful frames”; they must be contextualised within the social, political and economic forces that have facilitated their development and proliferation (Whitson & French, 2021; Woodcock & Johnson, 2018).

Contextualising gambling and labour

While gambling is primarily conceived of as a leisure activity, it is important to contextualise its current mode of development within the expansive force of capitalism and be mindful of the profit motives that require expansion and intensification in the gambling industry. The gambler is a participant in a mode of “techno-economic” capitalism where their consumption is a form of profit production for industry and governments (Reith, 2013). Their play is a market relation, where the player exchanges money for the intangible experience of gambling (Reith, 2013). Instead of a market exchange for a physical good, their play of the machine is itself the commodity, making their consumptive leisure also a form of production.

Critiques of Gamification

The strategy of behaviour modification through gamification has faced sociological critiques for masking the task of self-regulation through a game-like appearance (Woodcock & Johnson, 2018). Woodcock and Johnson (2018) put forth that in our neoliberal capitalist society, gamification is a behavioural management tool that furthers managerial and oppressive social relations, and gamification literature should stop ignoring the consequences of implementation. Just as technology has provided greater opportunities for the surveillance of gamblers, surveillance has become an increasing part of the workplace through new technologies that can track workers more closely and intimately than ever before (Woodcock & Johnson, 2018). This is connected to the economic changes which increasingly place responsibility on workers for their condition, as seen through the boom of the gig economy and the redefinition of many workers as “independent contractors” (Woodcock & Johnson, 2018, p. 5). The feedback provided by real-time surveillance allows for the quantification of everyday life and for gamified applications to be experienced as pleasurable by the user (Whitson, 2013). The practice of gamification must be

contextualised based on the social relations it is used in. Gamification is focused on promoting self-governance and can be located within the neoliberal paradigm of responsabilization and diffuse governance through personal choices. Gamification is fundamentally individualising as it rests on the assumption that unpleasant or exploitative dynamics and conditions, such as workplace productivity, can be improved through individual behaviour and motivation modifications. Gamification sees worker boredom and lack of fulfilment as a problem to be solved through technological innovation, not social or structural change (Woodcock & Johnson, 2018).

Bringing Critiques of Gamification and Critiques of RG Together

It is important to contextualise the prominence of the RG model within the neoliberal era of governance, characterised by a decreased state responsibility for both social welfare and market regulation (Reith, 2013, p. 722). RG has been critiqued for its emphasis on individual responsibility in managing gambling behaviours and dealing with gambling-related harms (Reynolds et al., 2020). The strategies and methods promoted in RG are focused on assisting individuals' management of their own behaviour over environmental changes or regulations. Critics argue that the Reno Model frames individual responsibility for gambling-related harms as free, informed choice and personal liberty when gambling companies actually have significant power over the harmful aspects of gameplay (Hancock & Smith, 2017).

In a consumer culture where choices of products and leisure are partly constitutive of the self, RG can be seen as a fitting response conceptualising problem gambling as a failure of inappropriate consumption (Reith, 2013). With the normalisation of gambling, the "pathological gambler" was created as a label to define people experiencing harm from gambling as distinct from 'normal' gamblers, whose consumptive production is beneficial for the economy. Reith (2018) argues that the socioeconomic trends of neoliberalism co-create the conditions for gambling deregulation and for the development of a self-regulating responsible gambler. The elements of "pathological" gambling, lack of control and reason, also condemn the subject as failing at the neo-liberal values of free market choice and appropriate, controlled consumption (Reith, 2013, p. 727). In "Powers of Freedom", Rose (1999) writes of governance through the regulation of subjectivities. This approach raises key questions as to the conditions in which we have come to rely on the labels of "responsible" versus "pathological" gambler and to the role of RG in constructing and regulating these subjectivities within a larger system of diffuse neoliberal governance. "Good governance" has come to describe the indirect steering of policy over direct state service provision or involvement (Rose, 1999). The neoliberal emphasis on governance through personal freedoms and choices provides a cultural backdrop to RG researchers' invocation of "personal liberty" (Reith, 2013, p. 724). RG measures are laid out as a cost-benefit analysis weighing the right to gamble against the harms for the consumer and the right to make money versus the social responsibility of an industry not to harm (Blaszczynski et al., 2011). Within this context, we can observe the similarities in logic between RG and gamification, as they both draw from neoliberal values of personal responsibility and are individual responses to more complex issues with structural implications.

Conclusion

This OLG awareness tool purports to address the user's misconceptions about chance. It does so through a game-like interface that does not reveal the environmental or structural factors in gambling-related harms. Gamification in RG presents a potential escalation of the emphasis on personal responsibility that exists in both practices.

This essay began by framing RG as a response to the harms caused by the liberalisation of gambling in Canada and moved to show gamification as an emerging development in the RG response to increasing online gambling. Then, it brought together critiques of both practices to show their overlapping contexts in the proliferation of neoliberal governance.

It is important for further research to make note of gambling corporations' utilisation of game elements in the RG response to new challenges of online gambling. As gamification presents an extension of neoliberal capitalist self-governance through personal freedoms, we can see a potential concerning future for the use of gamified applications in RG measures. This may further entrench the logic of personal responsibility and effectively mask corporate harms, bolstering the narrative of "safe" gambling expansion and deregulation. Concerning aspects of the RG paradigm, which shields structural factors in favour of an emphasis on the gambler's personal responsibility, may be bolstered by the use of gamification, as it also relies on individualising and responsabilization logic. Researchers and consumers ought to be wary of gamified strategies to promote or enhance RG tools.

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