



### Responsible Gambling: Who is Responsible?

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#### What is responsible gambling?

Responsible gambling is defined as either the responsible gambling behaviour of gamblers and/or as the responsible provision of gambling (Christensen, 2019). The term 'responsible' generally means a person or organisation is accountable for their actions or for performing certain duties (Cambridge Dictionary, 2020). However, it can also mean the capability to make 'moral' or 'good' decisions (Dictionary.com, 2020). These two definitions and meanings suggest that responsible gambling refers to the ownership and capacity to make 'good' decisions and that the actor is accountable for their actions. This has important implications for those experiencing problem gambling harms as increasing harms typically indicate increasing loss of control and compulsive gambling behaviour (American Psychiatric Association, 2013). The consequence for those experiencing gambling problems is that they have less control over their gambling and hence have less 'responsibility' for their gambling. This is captured in the 'chasing' phenomenon where gamblers attempt

to win back their losses, compounding their financial problems and experiencing more distress (Christensen, Jackson, Dowling, Volberg, & Thomas, 2015). Similarly, governments exist in a nexus between opposing goals as they try to increase gambling revenues while reducing harms ([Alberta Gaming, Liquor and Cannabis, 2019](#)). Although specific policies can reduce the expenditure of those experiencing problems whilst having a minimal impact on gambling enjoyment for recreational gamblers (Jackson, Christensen, Francis, & Dowling, 2016), typically the most powerful policies are only implemented in more regulated environments (Norsk Tipping, 2016). Consequently, in gambling environments where there is a mix of commercial and government interests, those experiencing the most severe gambling harms provide substantial revenues to governments (Williams, Belanger, & Arthur, 2011). In an attempt to minimise these issues the definition of 'responsible gambling' has been blurred to include those experiencing some harms ([Alberta Gaming, Liquor and Cannabis, 2018](#)). Responsible gambling

appears doubly conflicted; the capacity for responsible gambling seems to be a relative term.

### **Characterisation and implementation of responsible gambling**

Jurisdictions typically promote responsible gambling as an important component in their frameworks for managing gambling. The two major conceptualisations are the Reno model (Blaszczynski, Ladouceur, & Shaffer, 2004) and various conceptualisations of Public Health approaches (Shaffer & Korn, 2002; Adams, Raeburn, De Silva, 2009). Although sharing some similarities, these models differ on the importance of partnerships between industry and research, and whether conflicts of interests can be overcome. These differences are essentially between individual and collective responsibility and the ownership of responsible gambling in jurisdictions. For example, the [Nevada Gaming Regulations](#) under 'Programs to address problem gambling', include requirements to provide written materials about problem gambling, training for staff to identify problem gambling behaviours, and state that 'Each licensee that engages in the issuance of credit, check cashing, or the direct mail marketing of gaming opportunities, shall implement a program containing the elements described below, as appropriate, that allows patrons to self-limit their access to the issuance of credit, check cashing, or direct mail marketing by that licensee' (Nevada Gaming Control Board, 1998, 5.170.4). Indicating the individual and voluntary nature of mandated responsible gambling measures in Nevada, and the lack of more powerful strategies likely to mitigate problem gambling (e.g., loss limit settings). Although, the Nevada Gaming Control Board interactive gaming regulations include self-exclusion provisions. By comparison, stronger public health approaches require mandatory player identification and self-exclusion orders for all types of gambling activities. For example, the [New Zealand Gambling Act 2003](#), Part 4, 'Harm prevention, minimisation, enforcement, and other matters',

mandates among other measures, policies to identify problem gamblers, self-exclusion procedures, a duty to assist a problem gambler, a requirement to exclude those under an exclusion order, fines for failing to exclude those under an exclusion order, and a duty to keep records of self-excluders. In addition, the act also provides the Governor General to regulate various harm minimisation measures including mandating maximum stakes, loss limits, and conducting scientific research, among others (New Zealand Government, 2003). However, stronger public health approaches exist in other jurisdictions. For example, in Sweden, the [Gambling Act 2018](#) under chapter 16, 'Responsible gambling', requires staff training for problem gambling, limits on losses, deposits and login time, self-assessment tests, information on winnings, losses and login time, self-exclusion, and reporting requirements on the use of responsible gambling features (Sweden Government, 2018). Consequently, the emphasis of responsible gambling as an individual responsibility or as a collective duty of care impact the number and degree of responsible gambling measures implemented in a jurisdiction.

### **Conflicts of interests and harms: Risk, revenue, and participation**

In addition to the evaluations of responsible gambling measures, there have also been robust discussions about the integrity of responsible gambling research by individuals and organisations. Parallels have been made between gambling and tobacco research where those sponsored by tobacco companies are more likely to diminish the harmful effects of tobacco consumption (Cassidy, 2014; Barnes & Bero, 1998). Although gambling journals now require statements from authors regarding funding sources, the perception remains that funding by industry supported organisations comes with some risk as industry has the potential to direct research outcomes and that 'positive' responsible gambling research contributes to the support of harmful gambling delivery (Livingstone et al., 2018).

Moreover, early career gambling researchers report their unease that funding exists for gambling research that they describe as supporting existing ideas and structures rather than challenging the status quo (Cassidy, 2014). Similarly, significant funding exists for established gambling researchers to conduct prevalence research that some argue are used by industry supporters to minimise the demand for the implementation of effective responsible gambling initiatives (Livingstone et al., 2018).

However, other positions exist. For example, an industry funded empirical examination of the responsible gambling features of an electronic gaming machine identified the potential issues and possible avenues to improve these features (Blaszczynski, Gainsbury, & Karlov, 2014). Further, some researchers emphasise the advantages of empirical analyses of gambling and responsible gambling whilst acknowledging the societal, economic, and political influences on gambling, and possibly gambling research (Delfabbro & King, 2017). Consequently, there are disputes between researchers regarding their responsibilities and ownership of responsible gambling research, whether they support the industry or act as impartial observers. This raises the question of whether responsible gambling researchers are independent actors and/or have responsibilities for social change. Answering these questions reveals important researcher and personal values. Examining our own ethical positions for conducting research will likely clarify what we expect from ourselves and others, with the possible result of better collaborations and wider support for stronger responsible gambling measures.

Another issue is the conflict between income generation and the duty of care for industry and governments. Gambling provides significant revenues for industry and governments. This conflict is most acute for governments and their institutions as these groups are elected by and are responsible to the electorate. Consequently, government institutions attempt to 'balance' the competing

concerns of revenue generation and harm minimisation (Productivity Commission, 2010; Alberta Gaming, Liquor, & Cannabis, 2019). However, for most mixed gambling environments (i.e., the combination of government and private businesses), minimal to modest responsible gambling measures are most often implemented because of the threat of reduced revenues from implementing stronger measures (Williams, West, & Simpson, 2012). For example, the introduction of the mandatory MyPlay pre-commitment system in Nova Scotia resulted in a 16% drop in revenue between 2012 and 2013 (Christensen, 2015; see also [Chronicle Herald 2020](#)). Further, prevalence studies suggest that those experiencing gambling problems contribute a significant proportion of gambling revenues despite constituting a small percentage of the population (Williams, Belanger, & Arthur, 2011). Therefore, the consequences of implementing powerful responsible gambling measures are likely to raise serious concerns for those in government who place greater value on increasing revenue rather than harm minimisation.

However, some evidence suggests that the implementation of stronger responsible gambling measures does not always result in reductions in gambling revenue. For example, [Norsk Tipping](#) introduced mandatory pre-commitment loss limits in 2014 (e.g., \$500 daily, \$1200 month) as part of a suite of responsible gambling measures (e.g., time limits, pauses, and self-exclusion) resulting in an *increase* in gambling revenue and interruptions of problematic gambling behaviour (Norsk Tipping, 2016). Therefore, the possibility of 'balance' appears feasible, as perhaps the provision of a 'safer' gambling environment might result in greater enthusiasm for gambling.

Finally, as a majority of adults gamble but approximately less than 1% of the population experience problem gambling (Williams, et al., 2020), an argument can be made for a need to introduce responsible gambling measures that target those with gambling issues (Jackson et al., 2016).

However, some researchers suggest that highlighting these disparities is unhelpful for introducing effective responsible gambling measures (Livingstone et al., 2018). Nevertheless, effective programs typically rely on an accurate understanding of the causes, distribution, and structures that support problem gambling and the use of responsible gambling measures. Dismissing these factors will likely cause further problems. Recognising the inequities that those with problem gambling experience, as well as the more numerous gamblers who experience no, low or moderate harms, can better focus responsible gambling strategies.

### **Who is responsible?**

Those who are most responsible for responsible gambling appear to be the gambler, the provider, and the government. However, for gamblers who experience problem gambling their responsibility is diminished as compulsive gambling behaviour reduces their ability to make rational choices. Although this argument is accepted in psychological, medical, and public health fields, sadly this has not been accepted as a legal defence. Unravelling the legal defence for placing sole responsibility for gambling losses on those experiencing problem gambling would quickly result in significant industry support for effective responsible gambling measures. As providers receive significant revenues from legal gambling they need to comply with government regulation. In addition, they need to be aware of societal demands for corporate responsibility so to avoid critical reviews of their practices. However, government organisations that work in partnership with commercial organisations have additional responsibilities as they are responsible for both revenue generation and also for the safety of the public. As stated before, government organisations try to 'balance' revenue generation with public safety, placing them in a conflicted position where either position can compromise the other. However, what both commercial and government organisations agree on is that those experiencing

problem gambling need help and that gambling for them is no longer a recreational activity but a destructive behaviour. If commercial and government organisations can sincerely address these issues by introducing effective responsible gambling practices, the conflict between revenue generation and duty of care issues can be mitigated. For example, Norsk Tipping reported that when loss limits were introduced all types of gamblers (low to high intensity players) reported they thought loss limits were positive (low: 90.8%, high: 74.2%) and also that reaching a loss limit stopped their gambling (low: 95.3%, high: 78.7%). However, further research is needed to validate these early results.

Finally, responsible gambling measures need to be systematically evaluated to determine their efficacy and effects. This will require empirical analyses using quantitative and qualitative approaches from a diverse range of disciplines (e.g., public health, psychology, sociology, anthropology, ethnography, gender studies, critical studies, history, indigenous studies, political economics, etc.). These studies can be interdisciplinary or stand alone. My perspective is that there is no requirement that any approach needs to support another or advocate towards a specific end. Science and Humanities can easily work together and/or separately for their own or joint purposes without any commitment for ideological purity. Pursuing specialisation or some type of rapprochement can benefit specific fields or the pursuit of social justice. What seems prudent is that all approaches have research opportunities and that discipline or ideological differences are personal strictures rather than requirements for others. Some see empirical studies and social justice goals as false dichotomies where both are possible. Others see specialisation and discipline specific foci as important differences that require strict observance. Either approach seems sufficient and partial to me.

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