

Fair Game: Producing gambling research

The Goldsmiths Report

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*On the back cover: Wordle illustration demonstrating the frequency of article keywords drawn from the three most recent issues of the *Journal of Gambling Studies* and *International Gambling Studies*. *International Gambling Studies*, Volume 12 Issue 3 (2012) to Volume 13 Issue 2 (2013); *Journal of Gambling Studies* Volume 29 Issue 1 (2013) to Volume 29 Issue 3 (2013).*

The authors

In 2011 we began a four-year project funded by the European Research Council (ERC) to investigate new ways to study emerging gambling phenomena across territorial, conceptual and disciplinary boundaries. While we do not attribute any essential moral value to gambling we are interested in the inequalities it generates within and between communities.

We work across a number of different scales, from the global and exceptional to the local and everyday. The relationship between financial services, gambling and capitalism is of interest to us, for example, as are apparently mundane encounters between blackjack players in a casino in Nova Gorica. We are equally interested in the production of gambling as its consumption: it is impossible to understand the impact of gambling products without considering the conditions which enable and constrain their production.

In order to study these phenomena we have spent several years embedded within different gambling cultures. Claire Loussouarn has worked with Chinese casino customers in London and more recently with spread betting companies and the financial services industry in the City of London. Andrea Pisac is a trained croupier who has worked in Nova Gorica and London. Rebecca Cassidy has worked in the horse racing industries in the United Kingdom and the United States and in betting shops in London.

Rebecca Cassidy, Claire Loussouarn, Andrea Pisac, Goldsmiths, December 2013

Abbreviations

BGPS	British Gambling Prevalence Survey
CAGR	Compound annual growth rate
DCMS	Department for Culture, Media and Sport
DEFRA	Department for Environment, Food and Rural Affairs
ERC	European Research Council
ESRC	Economic and Social Research Council
FOBTs	Fixed odds betting terminals
ILSI	International Life Sciences Institute
MRC	Medical Research Council
NCRG	National Council for Responsible Gambling
NDA	Non-disclosure agreements
NLC	National Lottery Commission
RGF	Responsible Gambling Fund
RGT	Responsible Gambling Trust
RiGT	Responsibility in Gambling Trust

Why this report?

By 2015, it is estimated that the global market for gambling will have grown to €351 billion at a compound annual growth rate (CAGR) of 3%. The recovery of this sector since the financial crisis has been remarkable, from a low of 1.9% in 2009 to a high of 8.8% CAGR in 2011.¹ This growth is driven by deregulation and the search for tax revenue, new technologies and the opening of new markets. Although some national governments continue to ban gambling and to depict it as a vice or moral failing, others, including the United Kingdom (UK) and Australia, have recast gambling as a form of entertainment. While presented as a response to changes in customer behaviour, in practice, changes in the classification of gambling are the result of interactions between the state and other regulators, the industry, and the consumer. In rolling out new policies based on this understanding of gambling as entertainment, governments have claimed to rely on what they refer to as ‘evidence-based policy’. However, in this report we show that the process of producing evidence about gambling is fraught with political and academic trade-offs. If evidence based policy is all that is protecting consumers from the potential harms caused by the deregulation of gambling, just how well does the system that produces evidence work?

This report focuses on the production and consumption of gambling research. Its purpose is to disrupt existing relationships between users and producers and to provide a set of recommendations around which discussions about the future of gambling research can take place. The report is based on qualitative data gathered using semi-structured interviews with 109 gambling research stakeholders including researchers, policy makers and members of the industry in the UK, Europe, Australia, North

America and Hong Kong / Macau. It also makes use of quantitative data gathered from the field of gambling studies, including content analysis of journals and conferences. It focuses on five themes: problems with gambling, evidence, the field of gambling studies, money, and access.

We asked academics to reflect on their own practices. **How do they decide what questions to pursue? What methods to use? How to secure funding for research? How would they characterise the field of gambling studies?** We asked regulators and policy makers how they used research. **How is gambling policy devised in practice? What counts as evidence?** Gambling industry executives described their encounters with researchers. **What does the industry think of academic research? How do they feel about granting access to data?**

Gambling research is not an external commentary on the global process of gambling liberalisation and contraction, but an important part of that process. As this report will show, it enables certain ways of thinking about gambling to flourish, and suppresses alternatives. As in many other research areas, money flows towards conservative or ‘safe’ ideas, while serious questions may be left unanswered, or even unformulated.

The lack of useful evidence on which to base gambling policy has been noted in several recent reports, special issues of journals, and in literature reviews.² However, this is the first report to explore these ideas using qualitative data. Its unique contribution is to provide illustrations of precisely how power operates in practice, in stakeholders’ own words.

¹ H2 Gambling Capital, 2012. ‘Leading global gambling nations – Asia and egaming continue to out perform’, URL: <http://tinyurl.com/kqsay2d>. 14 November. Accessed 22 October 2013.

² In the UK, see Culture, Media and Sport Committee, 2012. *The Gambling Act 2005: A Bet Worth Taking?* London: The Stationery Office. In Australia, see Productivity Commission, 2010. *Gambling*, Report no. 50, Canberra. See the section ‘Further Reading’ (Appendix 3) for examples of special issues and literature reviews of gambling research.

Conflicts of interest

Between 2006 and 2009 Cassidy and Loussouarn received £90,697.22 from 'Research into Problem Gambling', a collaborative research initiative between the Economic and Social Research Council (ESRC) (lead organisation) and the Responsibility in Gambling Trust (RiGT). The money supported Loussouarn's PhD study of Chinese casino customers in London and Cassidy's fieldwork in betting shops in London. All aspects of the grant were administered by the ESRC. The RiGT did not communicate directly with Loussouarn. Near the end of the project, Cassidy was asked by the RiGT to submit press releases for prior approval, a request that she declined. Between 2007 and 2009 Cassidy received ad hoc support from the National Lottery Commission (NLC) for the Gambling Research Network, a group of early career and PhD researchers coming together in London two or three times a year. Money covered refreshments and no explicit restrictions or inducements were placed on the group by the NLC.

Cassidy, Loussouarn and Pisac have paid to attend industry-sponsored events and attended free, industry-supported events. None of us have received any direct payments from the industry to conduct research or speak at conferences or events.

We have no other conflicts of interests to declare. We are grateful to the ERC whose mission 'allows researchers to identify new opportunities and directions in any field of research, rather than being led by priorities set by politicians'.³ With their support, we feel able to challenge the way that gambling research is funded and produced.

The wider contribution of this report is to provide an illustration of the more general process through which research cultures are formed and maintained. All research is embedded in webs of significance that anthropologists might refer to as 'culture'. Understanding how these relationships operate is the first step to critical participation in any field.

³ European Research Council Web Pages, 2013. 'Mission'. URL: <http://erc.europa.eu/mission>. Accessed 14 November 2013.

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What have we learned?

Problems with gambling (sections 1 to 14)

Researching gambling is a complex and politicised activity. Findings are used and misused to further agendas which change according to the political climate. Politicians are keen to accept the revenue that gambling generates, and to encourage the industry to base their operations within their jurisdictions, but they are also willing to accept the political capital which comes from opposing gambling when it suits them.

In a climate of unpredictable alliances and priorities gambling researchers can find themselves either co-opted or strongly criticised. Gambling is a polarising subject – disagreements are often passionate rather than rational. Those who favour less regulation – libertarian politicians and members of the gambling industry – present regulation as a patronising restriction of freedom. Those who favour slower deregulation – Churches and pressure groups – might once have used religious arguments to support their position, but are today more likely to look at the consequences of gambling rather than its moral status.

The debate is unified by a focus on ‘problem gambling’, which presents gambling as entertainment and places the blame for ‘bad’ gambling with the individual. ‘Problem gambling’ is silent on the relationships between the state and gambling operators.

Evidence (sections 15 to 25)

What counts as evidence is determined by political, rather than academic priorities.

A narrow definition of evidence makes many of the questions asked by policy makers impossible to answer, either because they are too simplistic, or because the money does not exist to fund the projects which would allow them to be answered, or because the data required to answer them is inaccessible.

The impact of evidence is unpredictable because its reception is contingent on factors including the constitution of boards, the personalities of board members, timing and luck.

The function of ‘safe’ gambling research is rhetorical. It enables the existing relationships between research, the industry and the state to endure, while meeting public expectations that research should take place.

Finally, as in many other fields, policy makers do not make decisions about gambling based solely on evidence, however it is defined.

The field of gambling studies (sections 26 to 34)

The field of gambling studies is closed and tightly controlled. It is shaped by relationships with the industry and the state as well as within the academic establishment. Relationships between researchers, treatment providers and industry are often unmediated by formal academic structures.

Conferences are dominated by industry interests and do not encourage critical debate. The industry is adept at discrediting research, leading some researchers to self-censor or opt out of publishing.

Competition for limited funding has created a research culture that is suspicious, sometimes hostile and even paranoid. This creates inefficiencies including unproductive rivalries and duplication. It makes it difficult to retain good researchers and to attract new recruits to the field.

Gambling research can create reputational risks for institutions. Senior management are not always supportive of colleagues working in this area. Entering and remaining in the field of gambling studies is therefore a considerable challenge, especially for early and mid-career researchers.

Gambling journals are not highly rated and the peer review process is conservative.

Gambling studies is not a prestigious field when viewed from other disciplines including anthropology, sociology, law, geography and economics. It is behind studies of tobacco, alcohol and drugs in terms of analysis, methods used, ethical transparency and dealing with conflicts of interest.

There is a lack of collaboration between gambling studies and related fields and a reluctance to accept alternative methodologies and wider definitions of evidence. The impact of creating disciplinary bunkers is that internally homogeneous communities of referees and commentators participate in self-referential dialogues, rather than engaging in wider, more creative discussions.

Money (sections 35 to 44)

As budgets shrink, researchers are under increasing pressure from their institutions to attract external money and present the 'impact' of their work in economic terms. As a result, gambling research is increasingly dependent on industry support.

In the UK, Australia, Canada, New Zealand and the USA, national research councils expect specialised gambling charities to support research. The uncertainty of funding streams makes it difficult for researchers to join the field and commit to the topic.

There are no neutral sources of funding. All funding bodies are motivated by particular priorities, shaped by distinctive administrative and bureaucratic cultures, and sustain methodological paradigms. The interests of funders are reproduced in diverse ways, including in the questions that are prioritised in calls, the ways in which applications are assessed and the ways in which research is disseminated.

Voluntary contributions to intermediaries responsible for commissioning research are conceptualised as gifts, rather than a cost of doing business. This allows the industry to maintain a sense of ownership over research.

There was no consensus among our participants about the implications of accepting funding from industry sources, directly or indirectly. Some felt that research should produce benefits for funders, including the industry. A few felt that industry funding did not affect their objectivity. Many were reticent, but pragmatic about the necessity to work with industry support. Some rejected money from industry and were critical of those who did not.

There is a lack of transparency about the conditions under which research is produced, and a poor understanding of conflicts of interests.

Access (sections 45 to 54)

The difficulty of gaining access to gambling environments and data is one of the biggest obstacles to producing high-quality research. The industry has the most useful data but has limited incentives to share it with researchers.

Most requests for access to data are denied or ignored. The industry reserves the exclusive right to determine what is and is not 'commercially sensitive'.

In order to have their requests for access considered, researchers are encouraged to 'seduce' the operator and to prove their trustworthiness by producing research that is uncritical, or commercially valuable.

Granting access to researchers may enhance an operator's reputation for social responsibility.

Academics who produce research for the industry are often asked to sign non-disclosure agreements.

Successful access is often the result of a serendipitous encounter, or the cultivation of long-term relationships with members of the industry. It is entirely unsystematic and often unrepeatable. Ad hoc arrangements of these kinds may be well-intentioned, well-structured and produce worthwhile insights, but they leave the relationship between commercial sensitivity and public accountability in the gambling industries untouched. In doing so, they detract from the systematic discussion of access which urgently needs to take place.

What should be done?

Problems with gambling

The state should not represent itself as the neutral referee between operators and their opponents. They are invested in commercial gambling as both operators and collectors of tax revenue. They also play a central role in sustaining the focus on 'problem gambling', an approach that obscures the relationships between the industry and the state.

Critical studies of gambling should investigate a wider range of social processes, including not only individual behaviour but also problem games, problem products and problem policies.

Evidence

Policy makers should consult a wider range of experts and recognise a wider variety of evidence. By focusing exclusively on problem gambling and causal relationships they serve the interests of the industry, which is interested in limiting regulation and minimising change.

The field of gambling studies

Gambling studies should, like other disciplines, have a professional code of ethics.

Where relationships exist between researchers and operators these should be a matter of public record and embedded within formal academic structures.

Gambling studies journals and gambling conferences should require authors and speakers to declare conflicts of interest, not limited to the particular article or presentation in question.

Gambling studies journals should include referees and articles from a wider range of disciplines.

Researchers should publish in a wide range of forums in order to raise standards, ensure that discussions about gambling are not restricted to gambling journals, and encourage colleagues outside gambling studies to recognise gambling as a valid topic for research.

Money

Gambling research should be funded by a compulsory levy that is administered by research councils.

Calls for research should not focus exclusively on problem gambling.

Research councils should prioritise interdisciplinary projects, particularly those that seek to use innovative methodologies.

Research applications should be reviewed by academics from a range of disciplines.

There should be a range of funding available to provide support for researchers at every stage of their career, and for projects of all scales.

Expert panels should be constituted by academics from a range of disciplines who are at different points in their careers.

Access

Access should be part of licensing and not based on ad hoc agreements.

Researchers should not enter into exclusive agreements with particular operators.

There should be a public discussion about the relationship between commercial sensitivity and public accountability. Questions to be discussed include the use of non-disclosure agreements and the right of operators to veto publications.

Researchers should disclose, in every publication, conference or event in which they are presenting their research, the conditions under which they have been granted access.

Navigating this report

This report quotes a wide variety of stakeholders identified by codes which are explained below. The report also uses expressions whose meanings are discursive and may not be instantly obvious. Their definitions are found in the glossary, below.

Stakeholder codes

The analysis presented in this report has emerged from our discussions with 109 stakeholders in the gambling research field. Their opinions are presented alongside relevant arguments.

We have devised a simple code which indicates the gender, type of stakeholder being quoted, the region in which they work, their years of experience, and their case number. In some cases these details have been withheld in order to reduce the likelihood that individuals may be identified.

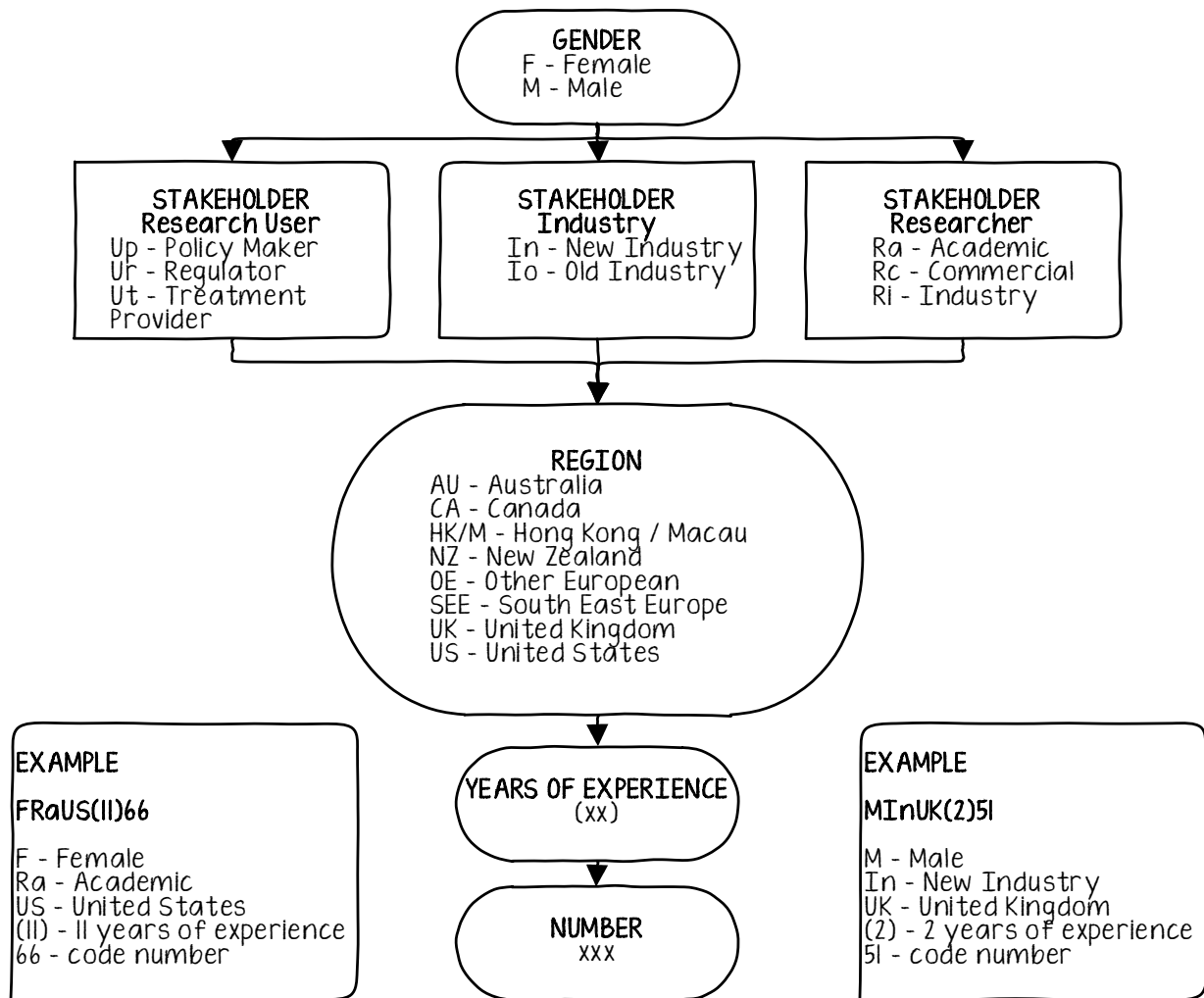


Figure 1 – Stakeholder codes

Glossary of expressions

The **'gambling field'** consists of the networks and relationships between stakeholders, including the state and the industry, researchers and treatment providers, their attitudes and interests. The relationships between research producers and those who commission, fund and use research create the political economy of the gambling field: the structural relationships that frame the movement of money, knowledge and policy between stakeholders.

Gambling studies is a sub-discipline which is dominated by the so-called 'psy' sciences and anchored in journals which include the *Journal of Gambling Studies*, based at the University of Nevada in Reno, and *International Gambling Studies*, whose chief editor is based at the University of Sydney.

Gambling research refers to all academic studies about gambling carried out by members of a variety of disciplines, including but not only, the discipline of gambling studies.

Problem gambling is a socially and politically constructed behaviour which attributes the blame for excessive gambling consumption to the 'faulty' individual.

Classified as an impulse control disorder in the most recent edition of the *Diagnostic and Statistical Manual of Mental Disorders (DSM-V)*, **pathological gambling** is a narrower category of gambling disorder which meets the criterion of psychiatric diagnosis.

Commercial gambling refers to a profit-making industry which is legal, state-owned or regulated and licensed to provide a variety of gambling products, such as casino games, betting or online gambling.

'Gambling industry' is a heterogeneous group of operators that vary across sectors and jurisdictions. It includes land-based operators such as casinos and betting shops, as well as online gambling providers.

'Psy' disciplines include psychology, psychiatry, psychotherapy and psychoanalysis, which focus on individual deficiencies, pathologies and deviations from the norm.

A **conflict of interest** is a set of circumstances and relationships that might undermine researchers' independence in the way they conduct, design and present their research findings. Conflicts of interest are commonly understood as benefiting the interests of the gambling industry and the government, but may equally arise in relation to research undertaken for an anti-gambling charity or indeed any interest group.

Social responsibility is the expectation placed on gambling operators to provide adequate education to minimise the risks of excessive consumption among their customers.

Responsible gambling is a politically constructed idea that individual consumers should be responsible for managing their own excessive behaviour.

Harm minimisation promotes the idea that managing gambling harms is a matter of educating consumers who are making poor or irrational choices in their gambling behaviour. In its least critical version, it assumes that harm is an inevitable consequence of commercial gambling, but not a reason to limit its supply. On the contrary, harms are to be managed through the encouragement of 'responsible gambling'.

The Goldsmiths Report

How is research produced?

We all conduct research in our everyday lives, whether this is searching online for a better deal for car insurance or reading a review for a movie in a newspaper. We learn to recognise and rank different kinds of evidence both formally, through schooling, and informally, by accumulating experiences of using data successfully or otherwise. We learn to distinguish between paid-for infomercials and genuine news items (although this distinction is increasingly fraught). We go to trusted sources for information. Periodically, we experience crises of confidence when a previously reliable source is exposed as biased or incomplete. We adjust our searches in relation to these events, and constantly evaluate information on the basis of its origin, both intuitively (correct spelling inspires confidence, emoticons may not) and in relation to structures including regulators, parliamentary enquiries and the wider media.

Research has also become a specialised industry, delegated to the scientific community, and subject to a plethora of professional standards. The most powerful recent trend in this professionalisation is the emphasis placed upon 'impact', particularly when measured in economic terms. A host of accompanying terms, 'deliverables', 'outputs', 'added value' and so on, have entered the academic lexicon. Professional research, according to this model, is no longer an esoteric pursuit that takes place in the studies and libraries of the ivory towers, but an outward-looking, commercially engaged and consequential, real-world activity.

This model of research fits imperfectly with the industries described by Charles Livingstone and others as 'dangerous consumptions' – gambling, tobacco, alcohol and drugs.⁴ Is the role of researchers to contribute to the knowledge of the tobacco industry or gambling operators to make their products more profitable? Or is it to reduce the harms produced by these industries on behalf of the state? Both scenarios produce problems. The first because, although it is now uncontroversial to assert that research should be leveraged to assist industries, particularly on a national or regional basis, there is something distinctive about dangerous consumption industries that makes this proposal distasteful, or at least politically risky. Unlike farming, or computer design, these industries are to be tolerated, rather than encouraged. On the other hand, the idea that research orients the moral compass of the state in guarding against the harms produced by these industries is unrealistic – the state is the greatest beneficiary of their activities in some cases. In Canada, the provincial and territorial governments are the monopoly operators of legal gambling, which, in 2010–11, generated revenue (after prizes paid, before operating expenses deducted) of approximately \$13,956,407,000.⁵ In jurisdictions with private operators, gambling generates significant tax revenue: in Australia, an average of 10% of the total tax revenue of state and territory governments, including 17% in the Northern Territory.⁶ This is the background to one of the pressing questions raised by this report: what is the purpose of gambling research?

4 Livingstone, C. 2013. 'Researcher profile: Monash University', URL: <http://tinyurl.com/lyrc97n>. Accessed 14 November 2013.

5 Responsible Gambling Council, 2012. *Canadian Gambling Digest 2010–2011*.

6 Hancock, L. and O'Neil, M. 2010. *Risky Business: Why the Commonwealth Needs to Take Over Gambling Regulation*. Geelong, Vic.: Alfred Deakin Research Institute, 11.

How is gambling research produced?

Academic research is usually produced at universities and may be unfunded or funded by national research councils (such as the ESRC in the UK), or international funding bodies, such as the European Research Council. Gambling research which takes place in universities and centres may also be funded by organisations and charities set up to distribute funds levied from the industry. These organisations take a number of different forms and include the Responsible Gambling Trust (formerly RiGT) in the UK and the National Centre for Responsible Gaming in the US. Recently, and to an increasing extent according to our participants, research in universities is funded by direct contributions from the gambling industry.

Commercial research is commissioned by various trade associations, such as, for example, the Association of British Bookmakers in the UK, to comment on gambling trends and issues as well as to educate their key stakeholders. Commercial research can also be produced by financial investment companies in order to explore, assess and promote emerging gambling markets and products. For example, KPMG, a global network of professional advisory firms, has produced several reports on online gambling: its key trends, regulation issues and risks.

Policy research, commissioned by local authorities, NGOs, Churches and governmental bodies, is undertaken by academics and professional researchers in order to collect data that can be used to assess the impact of new gambling venues or products; new regulation; and new prevention and treatment programmes.

Neither the personnel who work in these three fields, nor the data they produce, are neatly divided or homogeneous. The British Gambling Prevalence Survey (BGPS), for example, was conducted and produced by NatCen, a British independent social research agency, in 1999, 2007 and 2010 with the aim of measuring participation in all forms of gambling and estimating the level of problem gambling. The 1999 survey was commissioned by GamCare (a charity providing support and treatment for problem gamblers), while the 2007 and 2010 surveys were commissioned by the Gambling Commission (the UK regulator) and funded by the Department for Culture, Media and Sport (DCMS). DCMS has indicated that it will not support a further study. In 2013 the Association of British Bookmakers offered to fund a fourth prevalence study to be carried out by the Gambling Commission.⁷

Case study 1: The United Kingdom

In 2012, five years after the Gambling Act 2005 was fully implemented, a select committee found that, 'an area of consensus between industry bodies, faith groups and academics alike was the need for more and better evidence on problem gambling and specifically about its causes'. They recommended that 'the Government works with the Gambling Commission to provide a clear indication of how it intends to ensure that sufficient high-quality research on problem gambling is available to policy-makers'. They also noted that 'it is particularly important that research is seen to be *independent and comparable over time to show whether or not there is a change in the levels of problem gambling*'.⁸

The UK-based researchers we interviewed have been supported by a variety of sources including the gambling industry, research councils [the ESRC and the Medical Research Council (MRC)], non-departmental public body the National Lottery Commission, and charities such as the Responsible Gambling Trust (RGT). RGT is funded by voluntary donations from the gambling industry. In the year ending 31 March 2014 RGT plans to distribute a total of £5,307,960: 84% of this money will be

⁷ Anonymous. 2013. 'British bookmakers make prevalence study offer', TotallyGaming.com.

⁸ Culture, Media and Sport Committee 2012. 'Conclusions and recommendations', in *The Gambling Act 2005: A Bet Worth Taking?*, 2.

spent on treatment, 10% on research and 6% on education.⁹

Although the funds allocated to research by the RGT are limited (recent examples of MRC grants on gambling range between £214,202 and £1.6 million, for example), because they are funded on a voluntary basis by the industry and have specific responsibilities to support gambling research, they act as a bellwether, reflecting and anticipating important changes in the relationships between industry, research, the regulator (the Gambling Commission) and the state.

RGT was formed in 2012 when a short-lived experiment with a tripartite structure which separated fund raising, distribution and setting the research agenda failed.¹⁰ RGT is currently responsible for both raising and distributing funds, in accordance with a research strategy which is advised by the Responsible Gambling Strategy Board and endorsed by the Gambling Commission.

The chief executive of the RGT is Marc Etches, who led the campaign to create a casino in Blackpool until 2004, afterwards acting as a consultant for clients with interests in 'leisure, gambling, hospitality, and tourism'. In 2004, *The Guardian* described him as 'the gambling lobby's most visible face'.¹¹ A year after taking up his post in 2013, he told Intergame that, 'Gambling is a legitimate and popular leisure activity and the industry's record of support for those who do suffer with problems is a good one and perhaps ought to be more celebrated.' He added that the industry is 'kept at arm's length' from research and that 'the governance arrangements that we are putting in place will ensure that everyone can have absolute confidence in the independence and objectivity of the research process'.¹²

Of the 27 interviewees who discussed RGT, 18 expressed serious doubts about their independence. Eleven researchers told us that they would not consider applying for funding from this source, either because it didn't provide grants that were large enough to support meaningful projects, or because it constituted a conflict of interests, or because it would negatively impact their reputation for independence.

Neil Goulden, Chairman of RGT, began his career at Ladbrokes before moving to Gala Coral. At the time of writing he is also Chair of the Association of British Bookmakers (ABB), although he has recently indicated his intention to step down from this role. In 2013 Goulden wrote that, 'There is very clear evidence that problem gambling is about the individual and not any specific gambling product or products.'¹³ As our report will show, this idea is strongly resisted by many researchers, who support the more nuanced perspective that the harms caused by gambling emerge from a complex encounter between people, products and environments.

Goulden's role at RGT has attracted criticism in the UK among anti-gambling campaigns and also from within the gambling industry. Consultant Steve Donoghue has blogged that, when research into electronic gambling machines is published in September 2014, during the build-up to the general election, 'it will be Neil Goulden who has to present its findings with his RGT hat on and then respond to the results with his ABB hat on. A farcical situation that can only end up with those campaigning against the Fixed Odds Betting Terminals (FOBTS) arguing that the results have been influenced by the cuckoo in the nest.'¹⁴

9 Responsible Gambling Trust Web Pages, 'Commissioning plan', URL: <http://www.responsiblegamblingtrust.org.uk/Commissioning-plan>. Accessed 14 November 2013.

10 For a description of the demise of this structure see Culture, Media and Sport Committee 2012, *The Gambling Act 2005: A Bet Worth Taking?*, paragraphs 85–93.

11 Mathiason, N. 2004. 'The man with a winning bet on Blackpool', *The Guardian*, 26 September.

12 Liddle, S. 2013. 'RGT stresses independence in Cat B research', *Intergameonline.com*, 7 February.

13 Anonymous, 2013. 'Gaming machines policy must be evidence based', *Centrallobby.politicshome.com*, 13 April.

14 Donoghue, S. 2013. 'Why many hats don't help when the sky falls in', *GamblingConsultant.co.uk*, 22 February.

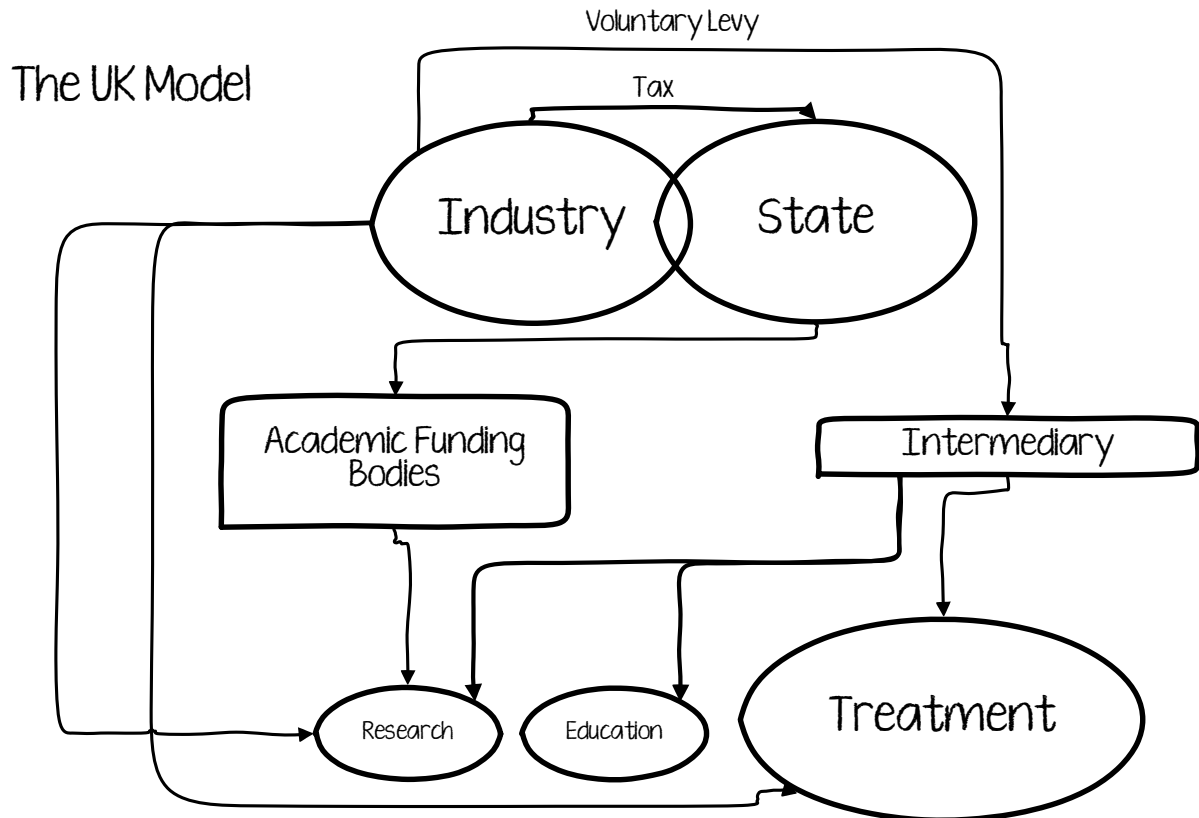


Figure 2 – The UK Model

Case study 2: Croatia

The Ministry of Finance is responsible for regulating and licensing games of chance, including the lottery, casino games, betting and slot machines in Croatia. The Croatian Lottery (*Hrvatska Lutrija*) has the monopoly on lotto games and a licence to organise all other games of chance. Other gambling operators, who must be registered in Croatia, may apply for licences for all other games of chance.²²

All gambling operators pay a fixed annual licence fee (valid for 15 years) and a fixed monthly tax deducted from their monthly turnover. Fees and tax rates vary between sectors. Lotto, for example, pays no annual fee and monthly tax of 10%. Slot machines pay an annual fee of HRK 10,000.00

(€1,313.00) per slot machine and monthly tax of 25%.

Croatia's income from gambling tax was HRK 668,868,424.18 (€87,829,781.62) in 2011²³ and HRK 675,389,111.46 (€88,686,019.55) in 2012.²⁴ The Ministry of Finance collects the tax from gambling operators and decides how it will be distributed. Currently, 50% of the total is spent on supporting good causes. There are no specific funds for treating gambling problems, educating people about gambling or for gambling research. For example, in 2013 the 50% of total tax revenue was distributed as follows: development of sport (35%); dealing

22 2009. Zakon o igrama na sreću (Gambling Act). *Narodne Novine*, no. 87. URL: <http://www.zakon.hr/z/315/>. Accessed 21 September 2012.

23 2011. 'Izvjescje o obavljanoj reviziji godisnjeg izvjestaja o izvršenju drzavnog proračuna Republike Hrvatske za 2011' (Croatia's 2011 Annual Budget Report). *Drzavni ured za reviziju*. URL: <http://tinyurl.com/q2ddrq9>. Accessed 29 November 2013.

24 2012. 'Drzavni proračun 2012' (Croatia's 2012 Annual Budget Report). *Ministarstvo Financija Republike Hrvatske*. URL: <http://tinyurl.com/p7zk5av>. Accessed 29 November 2013.

with drugs misuse and treating all other addictions (5.58%); humanitarian activities (9.11%); helping those with disabilities (16.2%); promoting technologies (5.18%); promoting culture (11.89%); education of children and youth (4%); promoting civil society (13.04%).²⁵ In Croatia, all academic research is funded by the Croatian Science Foundation (Hrvatska zaklada za znanost): no themes or subjects are specified as high priority.

The Croatian Lottery often, but not regularly, contributes money to self-help groups for treating

gambling-related problems. However, these arrangements are based on relationships between stakeholders, rather than structural. This situation may change as the Croatian Lottery has joined the European Lotteries and the World Lottery Association and may seek social responsibility credentials. Treatment providers are particularly anxious that there is no provision in the Gambling Law to channel revenue specifically to the treatment of people with gambling problems.

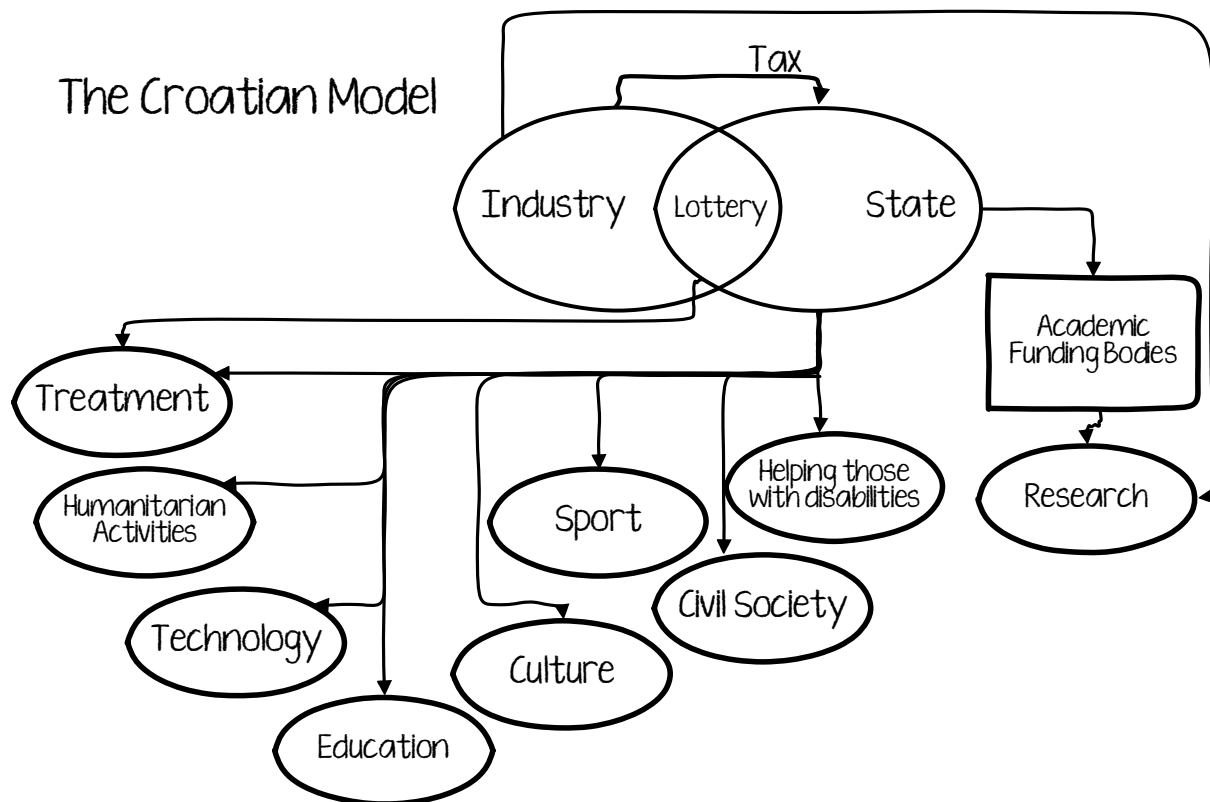


Figure 3 – The Croatian Model

Case study 3: Macau

In 2006, Macau overtook Las Vegas to become the world's most lucrative gambling market. The largest proportion of expenditure is generated by visitors from the Chinese mainland playing high stakes baccarat. In 2012 gambling generated \$33 billion (or €23.2 billion), 40% of GDP; 1.6% of

gross gaming revenue is paid to the Macao Foundation, which distributes funds to support not-for-profit projects.

According to their website, 'The Macao Foundation is instituted to promote, develop or research on cultural, social, economic, educational, scientific,

²⁵ 2012. 'Uredba o kriterijima za utvrđivanje korisnika i načinu raspodjele dijela prihoda od igara na sreću za 2013. godinu' (Criteria for the distribution of tax revenue to good causes) *Narodne Novine*, no. 144. URL: <http://narodne-novine.nn.hr/default.aspx>. Accessed 21 September 2012.

academic and philanthropic activities, as well as activities that promote Macao. The Macao Foundation mainly conducts its activities in Macao, and conducts exchanges and co-operations with institutions at home and abroad having similar ideals.' The Macao Foundation received 4.09 billion patacas (or €388.7 million) in 2012 and received criticism from the Commission of Audit for poor supervision of its chosen investments.²⁶ In addition to cultural and social activities, it funds academic research and has emphasised 'responsible gambling' for the past two years.

According to researchers, there are three sources of funding for research in addition to the Macao Foundation. Industry may commission research but in practice rarely does so, arguing that, as a highly taxed industry, they have

already provided the necessary support. Researchers can also apply to research funds at publicly funded universities but these are not specific to gambling. The Social Welfare Bureau, the welfare services division of the Macau government, regularly commissions policy-oriented research. While funding for research is described as adequate by our interviewees, high-quality, independent research is severely restricted. Academics at public universities are not allowed to go into casinos except on particular public holidays, or when they have applied for special permission (see section 47). The government is 'not easy to work with' and 'not as transparent as in western countries' (see section 47). Not every discipline is supported. The Science and Technology Fund does not, for example, recognise psychology as a science (see section 39).

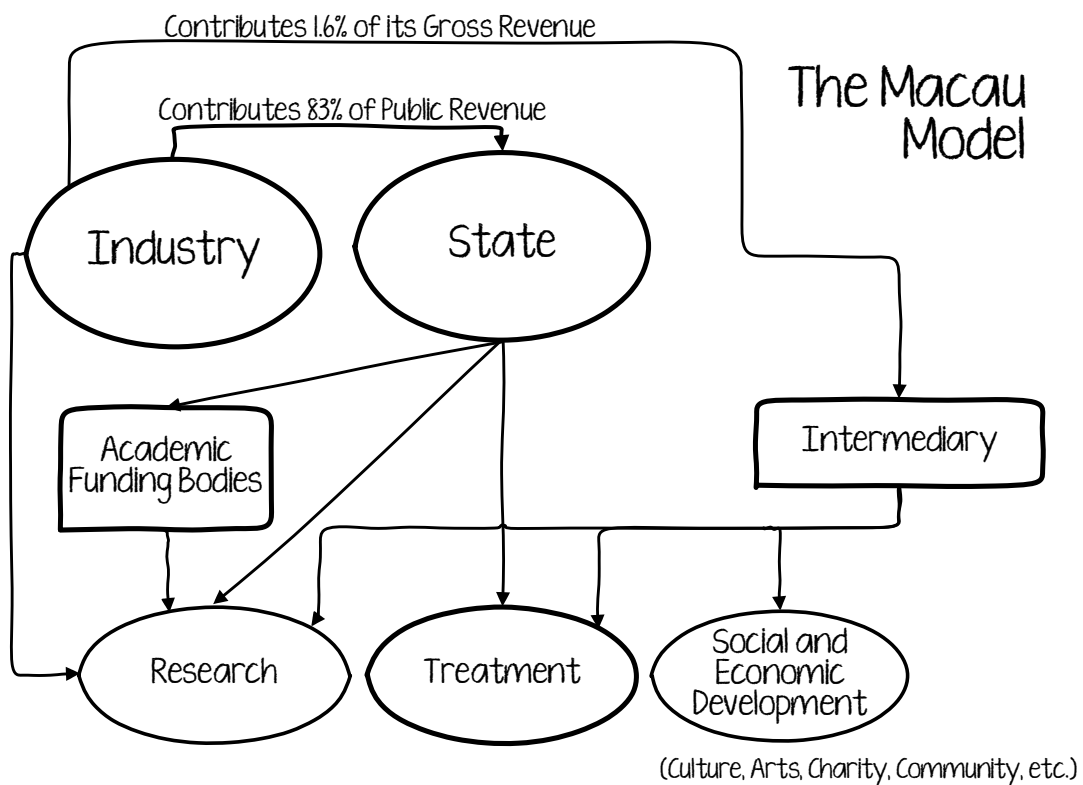


Figure 4 – The Macau Model

26 Quintã, V. 2013. 'Macao Foundation locks down subsidies', macaubusinessdaily.com, 7 August.

Problems with gambling

“

Problem gamblers have been used by politicians and regulators. They say they are passing the law to protect the player but what they really want is to make money. Politicians use the casino industry to stigmatise problem gambling, then they win votes. But these gambling operators pay most tax, and end up blamed for problem gambling. So they lose on all sides. **MUrSEE(25)10**

Headlines

- Gambling is an increasingly significant source of revenue for governments. ([section 1](#))
- Gambling research is dominated by strong vested interests, and findings may be used inappropriately. ([section 2](#))
- Gambling is divisive. It provokes passionate disagreements between defenders of religious or ethical positions and those who advocate freedom of choice. ([section 3](#))
- Definitions of gambling are locally various. What counts as 'gambling' in one place may not do so in another. ([section 4](#))
- The field is dominated by the idea of 'problem gambling'. (sections [5](#), [6](#))
- The idea of problem gambling normalises the majority of gambling while blaming the minority for not playing well. (sections [7](#), [8](#))
- 'Problem gambling' is silent on the relationships between the state and gambling operators. At the same time, it is an essential mechanism that sustains those relationships. ([section 9](#))
- Policy makers trust and demand numbers. ([section 10](#))
- Framing gambling as a public health issue does not guarantee a strong research tradition. ([section 11](#))
- An emphasis on treatment, harm minimisation and responsible gambling sustains the current arrangements between the state and the industry. (sections [12](#), [13](#))
- The idea of responsible gambling is travelling through professional and informal international networks and standards from more to less mature jurisdictions. ([section 14](#))

1. Gambling makes money for governments

Gambling is increasingly legal and therefore regulated, enabling governments to capture revenue through taxation. In the past governments acted as policemen, either enforcing bans or keeping legal gambling crime free. More recently they have become important participants in gambling markets as both operators and tax collectors.

I remember when gambling was like the Wild West and some of us can tell you where all the bodies are buried. It's not like that any more. The online business has really cleaned up its act, but in the early days it was hair-raising. It's quite dull now that we are a regulated industry. We have to play it straight because our closest partners are governments. **MUR**OE(21)93

The state sees the gambling industry as their golden goose, filling their budget. I'll be open: the state loves the gambling industry. **MUT**SEE(23)141

If you did good reliable research on which product is most addictive in all the EU countries,

then you could change the legislation all around. But nobody wants that because of the taxes. **MUP**OE(20)6

In the UK there has been a national lottery since 1994. In Canada all forms of legal gambling are run by provincial and territorial governments. In Australia, gambling taxes from commercial operators account for an average of 10% of state revenue: 17% in the Northern Territory.²⁷ Some of our participants described a culture of dependency, where the state is less likely to suggest measures to protect consumers from the harms that may arise from gambling if they are likely to have a negative impact on profit and therefore taxation.

The industry is interested in research as a public relations tool. They are terrified of research that might cut consumption. I think they're pretty open about that. They're businessmen, they're not going to cut their legs off. My concern is more the government complicity, the way in which government is involved. **XXXXX**

2. Gambling is dominated by vested interests

Gambling research is a political activity. Research funding structures, no matter how different they are from one jurisdiction to another, are affected by the interests of the state as operator or regulator and the gambling industry as a source of revenue. Research is thus always subject to co-optation onto political agendas, which may or may not be transparent or consistent. Gambling research can be used by policy makers and the media in ways that are unanticipated and may be inappropriate. Vested interests vary through time and space and reflect the social histories of gambling in particular jurisdictions.

Gambling is a politically charged field. Any time you do research you have some random guy in [the] legislature use it incorrectly and misinterpret it, and it goes on like that so I think there are all these things around it that makes it difficult to do academic research. **FR**US(11)66

You have so many different interests to try to anticipate: politicians, regulators, law enforcement. You have to see where the power lies and that's not always obvious and can change fast. **MR**OE(15)89

The problem is that the state issues licences and receives a lot of money from that. So is it really in their interest to have research on gambling when they make money on gambling? Is it really in their interest to know what the real situation with gambling products and practices is? **MI**oSEE(20)3

The state receives millions of euros, but those who become victims of gambling receive nothing. They are lost in the system: they become victims of loan sharks, their families are broken, they receive inadequate treatment, they spread

²⁷ Hancock and O'Neil, *Risky Business*, 11.

the problem to others because others care about them. **MU_{SEE}(13)142**

3. Gambling is controversial

Despite efforts to recategorise it as a form of leisure, gambling remains divisive. Debates are often passionate and polarised between religious or moral positions that seek to minimise opportunities for gambling, and commercial or free choice models that seek to submit gambling choices to the logic of the market only.

How dare Nanny State tell me how I can spend my money? This is a free country. **MI_oUK(11)42**

The traditional view was ‘Why should a Christian put their trust in chance?’, ‘Why should they be worried about greed or money, when we should be trusting in God rather than winning the lottery?’ However, the current position of this church, you could say has developed, some people would say has been watered down. When the gambling bill was going through that was the time to campaign on right and wrong. Carrying on complaining won’t do anything at all. It’s a waste of breath. It’s not like we’ve abandoned our principles, it’s just that for a consultation document gambling is already there and you can only really answer the questions they ask. **MU_pUK(6)99**

The gambling field started in some places from a position of advocacy so you really had people who felt very strongly one way or another

almost morally about gambling, whether it’s right or wrong and so you had people who were kind of looking for evidence to support their world view. **FR_aUS(11)66**

Politicians can gain support by opposing or condemning gambling.

Gambling will always be a matter of conscience. It is morally aspirational to oppose gambling. **MU_pUK(40)87**

If you are a minister you don’t want to be anywhere near gambling because it is so politically sensitive. Politicians are self-interested and they are re-elected by local populations and so if there are things that can draw them to their local attention then they will take them up. Some will take them up with a lot of passion and with a lot of knowledge, some will take them up with a lot of passion and very little knowledge and of course there will be those who have very strong personal views about gambling. So in a way politics reflects, as often it does really, life in general. That’s how most people are. There will be a reason why you might have a view, and if you do have a view around things like gambling it’s often quite a strong view. **MI_oUK(12)41**

4. There is no universal definition of gambling

At the most basic level, there is no internationally shared definition of what is, or is not, gambling. The gambling industry includes a range of sectors with very different characteristics and interests including: lotteries, sports betting, casinos, arcades, online, bingo and poker. Even in neighbouring jurisdictions within Europe, gambling may be understood and regulated quite differently. As a result, there is a mosaic of national markets and regulators, even at the same time as technology reduces the significance of territorial and political boundaries for consumption. This variation has a

huge impact on research and means that findings are not directly comparable across jurisdictions.

You have to understand that there is nothing inherent that gambling shares all over the world. Sports betting in the US is mob dirty. It cannot be a part of the campaign to make online legal. Now where in Europe could you imagine a similar situation? These things are very distinctive. Everything about them, the way that power works in the system, and the way that people gamble. **MR_iOE(15)89**

Research has many different problems, of personality, or comparability and of rigour. First of all, there is no agreement about what 'gambling' actually means, so, as lawyers, we are able to create all kinds of exceptions, even some that seem contrary to common sense. The motivation for this comes from many directions: from regulation, but also from commercial pressure, mainly taxation. So, we are not in

agreement about what is gambling, we constantly talk past each other. The differences are in fact locally significant, so this is not always a failure, but an attempt to take into account local sensibilities, understandings, culture if you will. It's not a deliberate thing, it is part of the complexity of studying gambling, a process that is culturally diverse at the most profound level.
MUOE(7)91

5. Most research focuses on problem gambling

Gambling is a complex phenomenon which can be usefully studied in a variety of ways.

It's important to understand that this is really quite a hard thing to study. When I say that the standard [of the research] isn't particularly high, that should be set against the context that this is a difficult thing to study. Gambling is a multifaceted social psychological thing, and there are huge numbers of ways of looking at it and understanding it. **XXXXX**

Despite this, gambling research is dominated by a focus on 'problem gambling', variously defined and understood.

Research producers and users regularly call for a widening of perspectives to include a greater variety of approaches. However, the political economy of gambling research (including funding, commissioning and dissemination) is strongly skewed towards problem gambling research, as we will show. Narrow understandings of gambling

as a problematic behaviour associated with the individual have stabilised under present conditions, reinforcing disciplinary divides at a time when multidisciplinary approaches are being encouraged outside the field of gambling studies.

The term 'problem gambling' implies an individual subject and it's quite difficult to break out of that given that there is such interest in continuing to focus on problem gambling and issues that fix individuals rather than communities, and also vested interest in not bringing too much scrutiny to bear on the parties that benefited so much from the growth of the gambling industry through a period of deregulation.
FRaAU(15)25

The dominant strand is still a quantitative, positivist model and a psychological approach to gambling is definitely dominant. Addiction is always the first thing that people want to talk about. **XXXXX**

6. Problem gambling dominates the entire field



Figure 5 – Problem gambling. Data drawn from the papers given at the University of Nevada’s 15th International Conference on Gambling & Risk Taking (21–31 May 2013) and the European Association for the Study of Gambling’s 9th European Conference on Gambling Studies and Policy Issues (18–21 September 2012).

From policy making to research questions, problem gambling and the related concepts of ‘responsible gambling’ and ‘harm minimisation’ dominate all aspects of the field. Research focusing on problem gambling receives most funding and is most widely disseminated. Funding structures which promote ‘safe’ research inhibit academics, consciously or unconsciously, directing their attention towards conservative themes. As a result, many ethical issues surrounding gambling harm as a wider public health issue are overlooked.

I have been interested in why the field is dominated by problem gambling and it certainly has to do with how the field is constructed and where researchers are getting their money. XXXXX

There are two sides to gambling research in Australia: there is a large group who uses gambling research as they would with any research to build an academic career [...] not having any

particular purpose in mind, and then there is a public health purpose which is to build an evidence base in support of reform. XXXXX

I tried my best but sometimes I felt alone. For this reason, I think people try to write more on responsible gambling, talking to visitors, talking to gamblers. I think that’s relatively easy. I think that also explains why we have lots of articles about problem gambling but not qualitative approaches to operations, how they work in practice. Of course I can switch my research topics to other areas. For example, I can ask problem gamblers, ‘What do you feel?’ ‘What can government do to help you?’ That kind of stuff would be relatively easy. But I’m bored when I read these articles. I can guess more or less what is going on behind them. That’s something which pushes me to do something different, I would say interesting. MRaHK/M(6)12

7. The problem gambling paradigm

You should work on the political economy of the industry, because it is completely fascinating. Have you read Polanyi? If you don’t get how the economy reproduces itself you have no idea of how to make an intervention. The gambling industry is impenetrable. It reproduces seamlessly, and the problem gambling stuff is a big part of that. MInUK(2)51

The problem gambler is a socially constructed and vigorously maintained category which emerged in late-modern consumer societies. A problem gambler is someone who is indulging in ‘inappropriate

consumption'.²⁸ The dysfunction is therefore located with the individual or citizen: the person, rather than in wider relationships. This idea is epitomised in Margaret Thatcher's famous assertion that 'there is no such thing as society'.²⁹

A strong premise of the commercial gambling industry is that a gambler has a choice, as a consumer, to spend their money as they wish. By normalising and institutionalising gambling, the state has discursively created an abnormal category of people who cannot consume appropriately – the problem gamblers.

Gambling regulation and the way gambling operators organise gambling rests on the idea of informed choice, or 'buyer beware'.³⁰ This model presupposes that if a consumer is presented with enough information about a gambling product and its possible harms, anything they do is their own responsibility (and fault).

I am very much in favour of the informed choice model. If people have the information, they can use it or not. The decision needs to be based on a voluntary basis. We need to give them information to motivate them to decide they want to go home. If they have options, then they can decide. **MUpOE(10)6**

Why should we spend time and money researching these things? Well, because as far as we can in a free society we are not going to prohibit the consumption of crisps, what we want

to be able to do is create informed consumers. Now I'd be the first to recognise that this is a new form of conceiving citizenship in civil society. Governments allow opportunities to be created through privatisation, licensing. If you want to you can, you are a free agent, choose, we will put warning labels on food. Red, bad for hearts, green eat me, amber only a little. There's a perfect analogy: the food industry falling over itself to complain about the way in which the Food Standard Agency wants to do this. The food industry says you've got to give consumers much more information and of course all they've got is tiny print on the back of a bottle of Coke. Ultimately it's a political question, how do you conceive of your society? **MRaUK(40)57**

These choices, however, take place in environments that are manufactured to maximise profits.

The prevailing paradigm is one that is excusatory, it is one that not just by default but by explicit design sets out to blame the individual [...] In the UK you've got a very discouraging political context, in terms of free markets and informed consumers: anything goes as long as people get a bit of information and then whatever they suffer is their own fault and they have to suffer and bear the blame. That then becomes quite an impediment to more critical research because then they are working outside the paradigm so it's more difficult to get funded. **XXXXX**

8. Images of problem gamblers

The notion that there are problem gamblers is almost necessary to justify gambling as a form of entertainment because it legitimises it and if you take that away from people it becomes more difficult to construct gambling as an entertainment. The staff found it problematic if you encourage people to think of customers as friends, then it upsets people if what you are doing is hurting them. Whereas if you have the more traditional Las Vegas style that the customers are all idiots then you're not that personally

affected by anything that happens to them because they are constructed in a different way. **FRaUK(2)58**

By categorising a small minority of people as 'problem gamblers', the state and the industry are able to continue to promote gambling as a safe and legitimate form of leisure and entertainment for the 'normal' majority. Images of problem gamblers in our data are many. They include those labelled as losers, weirdos or simply those who

28 Reith, G. 2007. 'Gambling and the contradictions of consumption: a genealogy of the "pathological" subject', *American Behavioral Scientist* 51(1): 33–55, 41.

29 Interview 23 September 1987, as quoted by Douglas Keay, in *Woman's Own*, 31 October 1987, pp. 8–10.

30 Hancock and O'Neil, *Risky Business*, 11.

don't gamble well, but most are flattened out and decontextualised accounts of problematic people. Industry's views of problem gamblers, in particular, are often deterministic and derogatory. They are seen as people who are unable to control their behaviour. Some described treatment as a waste of money, and people with gambling problems as 'problem people'.

Problem gamblers are problem people. They are drug addicts, criminals, they are unable to control their impulses and this is why it is impossible and pointless trying to prevent them from harming themselves. All the studies about comorbidity in Australia show this – these are damaged people. The research in the UK is far behind Australia. Treatment is standard cognitive behavioural therapy. And this is why so-called talking cures are worthless. They are an expensive cosy chat with a friendly face, but they don't cure problem gambling. They might even enable problem gambling. The evidence just isn't there to evaluate these treatments. The treatment providers hide it because they know it will show they don't make any impact. If we had that hard evidence it would show spontaneous recovery as they've found in Australia and the US, and the treatment providers would be out of a job, so they have a vested interest to conceal their recovery rates. **MIoUK(11)42**

Gambling is about greed and it requires discipline more than anything, to walk away. Ask a gambler why he has a problem and he will say 'I was unlucky or made a mistake on a card, or a cheque wasn't paid through'. He'll never say 'I just lost £500 on a FOBT, my giro hasn't come through', the truth. **MIoUK(20)74**

The industry people say: 'We don't want problem gamblers.' It's like the problem gambler is a kind of species, it's bizarre. It's not only bizarre from a research point of view, from any kind of cultural or social point of view it's quite bizarre. The industry produces this figure. They really simplify it. The problem gambler is like a caricature. The problem gambler is someone who doesn't gamble well. Like in Australia, the idea is that people gamble money for fun, so this Australian problem gambler is spoiling it for the rest of us. It's very much how it works. **FRaAU(15)25**

In practice, there was disagreement within the industry about how to understand and deal with problem gamblers.

At the end of the day we are running a business and we don't want to ruin lives, we don't want to wreck people. We have personally intervened if people have got themselves into trouble, we don't want to have that on our consciences. I don't think every company is the same. Some companies think of their customers as totally different from themselves or their families. They objectify them and that gives them *carte blanche* to exploit them. Especially if they can laugh at their problems. I would say that we have retained our empathy compared to other gambling companies that I've worked with. We are part of the world still and so that person who can't make their house payment could be your sister or sister in law. And then you see there is no real choice but to step in and say you've had enough. I think research should focus on patterns that indicate problems with gambling, but I can also see how that would be a very difficult thing to identify because you've got such varying expenditure. So you've got to go a lot with feel, what seems right and what stinks. If it stinks, shut down the account, or talk to your customer. It isn't impossible to do and it just means don't be greedy. That's what they should teach gambling executives. Don't be greedy. **MIInUK(10)45**

In shops we must get better at identifying problems. You are not allowed to tell someone they've got a problem. Even if someone is clearly betting beyond their means they may be insulted. Managers are now button pushers, no one wants them to manage they just want them to follow protocol. You imagine a Tote shop on the corner of a housing estate, old Doris is she really going to say, 'Blimey Bob, you've gone from 50p to £50 a race! Are you sure?' This is the problem of a profit-related business. **MIoUK(20)74**

Uncertainties about who the problem gambler is and how they come to occupy this category persist. Many stakeholders were aware of the lack of a clear definition of problem gambling, and instead worked with various different images, depending on their position, methodologies and agendas.

We say we don't want problem gamblers, but what's the difference between a problem gambler and a really good, loyal customer? It's in the eye of the beholder really. Does the person think he has a problem? Can he sustain his expenditure? If he can't he won't be back. If he can then who's to say he has a problem? We should make him welcome. He's a bread and butter customer. Years ago he would be welcomed. Now are we saying that if you spend too much you have a problem? Who gets to decide how much is too much? It's a free country and he can spend his money how he pleases. What it's got to do with anyone else I don't know. This is where the government has got things wrong. My wife buys a lot of shoes and handbags. She doesn't need them. They are expensive. I don't go to her and

say, 'Madam, I'm afraid I think you have a problem. Could you please seek counselling?'
MIoUK(17)54

Poker is great, it's a cure for problem gamblers. Those who become addicted to slot machines and roulette should be treated with poker. The problem here is that when you say you play Bela, it's okay, but the moment you say you play poker, they think you're a gambler. Poker doesn't allow you to form a habit and addiction is nothing but a habit. Poker has strong rules, it teaches you money and time management skills. An addict takes £10 and goes gambling hoping to win £10,000. This is madness. A poker player takes £10 and plays hoping to win £12. There's no skipping steps here. Poker builds strong character. **MIoSEE(30)11**

9. The focus on problem gambling produces 'safe' research

The so-called 'psy' disciplines of psychiatry and psychology, by focusing on problem gambling as a definitive and measurable activity, produce 'safe' research, which focuses on the 'faulty' individual, passing responsibility for the existence of markets for risk-taking from the state to the individual consumer. Gambling is studied as an individual pathology, unrelated to the wider socio-political context. This research is silent about relationships between the state, the industry and the consumer.

Psychology invites some very safe research in that a lot of the research has come out of labs and is not really contextualised in any sort of policy context. There are probably not that many psychologists who I would say have questioned the prevailing paradigm that tends to legitimate a lot of the government and industry coalescence of interests. **XXXXX**

'Safe' gambling research is also informed by and reproduced through the use of certain concepts. 'Responsible gambling', for example, is a powerful construct which, with 'problem gambling', filters and narrows down research themes and methodologies that are rewarded by funders and journal editors. Such key concepts also influence what counts as evidence both in academic terms and as a basis for policy making. The major policy contribution of problem gambling research is to promote

'responsible gambling', a product that is difficult to define, and possibly oxymoronic. Newcomers to the gambling industry were struck by the use of these terms by gambling executives, and fascinated by their political genealogies.

Research looks at problem gamblers. Gambling operators talk about responsible gambling – how much did they have to pay to get that phrase into the gambling jargon? 'Promoting responsible gambling'. Anyone who has read anything about messaging can see what a brilliant sleight of hand that was for the gambling industry. Well, just try out these two different approaches: Preventing problem gambling. Promoting responsible gambling. Which would you rather have? What about cigs? 'Preventing chain smoking' or 'Promoting moderate smoking': which would you sign up for? **MIInUK(5)53**

When we came into his business we were absolutely flabbergasted that there was a built-in cushion for bad products. Problem gambling! When gambling goes wrong! (laughs) You know, you get this big let off. It says, 'Don't worry if people get addicted to your machine or your game – there are some real weirdos out there. What can you do? People are weak.' At a very

basic level, it shifts responsibility from the industry to the consumer, and that is great for us, but not so great for you. **MInUK(2)51**

10. Policy makers trust numbers

Quantitative research methods can produce fast empirical results that are commonly perceived as credible and scientifically objective by policy makers. Numbers and statistics are particularly valued. Qualitative research methods translate less well into policy settings, as they are often based on specific phenomena or contexts and may not produce generalisable insights.

Some disciplines like psychology are actually very good at being able to do something fast and empirical and get the results out quickly. You can have a veneer of objectivity and scientific respectability with numbers. That goes a long way with the bureaucrats. **MRaAU(12)98**

To have an impact, and I'm talking now as a lobbyist, you need something snappy and easy to explain. You literally have minutes to make an impression. **MRiOE(15)89**

Psychological research is regarded as more credible and scientific and that's in spite of long-established disciplines of public health, of geography, public economics. **FRaAU(15)25**

As cultural anthropologists, we were the only group of researchers who used qualitative methods. No one else, not even sociologists, or communicologists, were trained in qualitative methods. The general attitude is that such an approach is not scientific as well as representative

enough. Qualitative methods are currently suppressed at the Slovenian academic centres. **FRaSEE(6)1**

The gold standard of this numbers ontology is the prevalence study, the most common metric used by politicians and regulators. It is used to assess the overall 'health' of gambling, and, in theory, to assess the 'impact' of changes in policy. At times, entire gambling policies appear to hinge on the outcomes of periodic prevalence studies. In practice, as we show in sections 23 and 24, prevalence studies often fail to capture much of what is considered important about gambling by policy makers and researchers, and their findings are subject to huge variations in interpretation.

It's really unhelpful that problem gambling is expressed as a proportion of 1%. I've heard that figure given at seminars and so on: the 1 versus the 99 and it's not right, it's incorrect. They should talk about the population numbers – the 450,000. They have tried hard to introduce this idea of behaviours on a spectrum so that you aren't just focused in on one end of it, and so that's why they had all that information about people at risk, but it just got ignored. A lot of policy weight is hung on the prevalence survey and I think they would be better to take a more rounded perspective. If I'm looking through the eyes of policy makers, if you are looking for an evidence base, if you've got something that people generally accept then it's an easy option to take, 'Thank god it's something they can agree on!' **FRcUK(6)62**

11. Is gambling a public health issue?

In most jurisdictions, problems caused by gambling are couched in terms of individual pathology. In practice, this means that the roots of the problem, as well as the solutions, are sought in the 'addicted' individual, leaving societal factors unexamined. Anything to do with gambling products, their technological wiring, or their accessibility, is presented

as of secondary significance when devising treatment approaches or assessing policy.

In New Zealand, Canada and Norway, problem gambling has been presented as a public health issue to a greater or lesser extent and with varying outcomes. In its ideal form, a meaningful public health approach would include the state and the

workings of the gambling industry as legitimate objects of study, not just the 'addicted' individual. Many researchers suggested that the public health model would produce a more nuanced approach, encouraging the production of diverse types of evidence. However, in practice, the political implications of such an approach, and the potential impact on gambling consumption, limit its influence.

I keep chuntering on and on about the regulatory model that's applied in the gambling context which is essentially a command-and-control model, which I think is just hideously out of date, given all the technology that now abounds in gambling, and really doesn't address things from a public health perspective, and I'll probably keep going on about it till the grave but if you are truly interested in reducing harm as a government official then surely you should be using the industry against itself and making sure that they use some of that expertise and some of that brain power that it's recruiting to help mitigate the downsides of its own products. Almost force the industry into taking a longer-term perspective rather than what everyone admits

to: a year on year slash-and-burn policy towards customers. **MinUK(8)35**

In New Zealand gambling is explicitly formulated as a public health issue. I don't think it's going to happen in Britain. I can't see the Department of Health wanting to take responsibility for it and I think there are plenty of powerful stake holders who think it works for them where it is in DCMS. **FRcUK(6)62**

Approaching gambling as a public health issue does not in itself guarantee a critical examination of the underlying politics of the field.

It has now gone from an illness [or] medicalised version into more of a public health one, but in terms of influence of the industry, their understanding of public health is a very conservative one and doesn't take on board much about prevention apart from education and information for the individual to make more informed choices, but the choices are constrained by the toxicity of the product and the lack of care and vision in both the regulatory paradigm and the way that venues are run by operators. **XXXXX**

12. The industry would rather support treatment than fund research

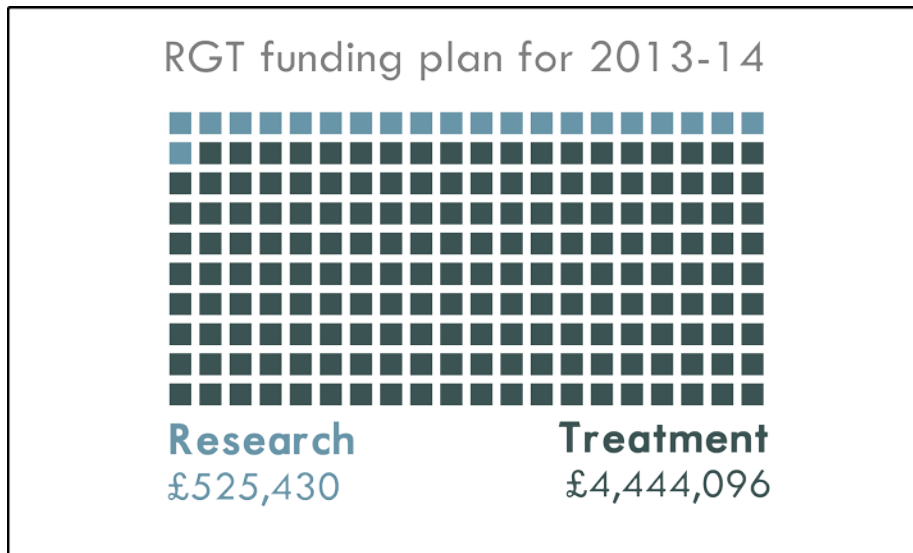


Figure 6 – RGT funding plan for 2013–14. This shows the proportion of funds given to research and treatment .

The problem gambling model emphasises treatment and harm minimisation rather than using research to investigate the causes of harm and how

it can be prevented. Focusing on treatment suggests that harms are the inevitable price of a commercial gambling industry.

The danger is that when lobbying for greater independence and objectivity in research the industry will say ‘Well, we are paying tax, a voluntary contribution for treatment and also paying a voluntary contribution for something which is of no benefit to us and there’s a lot of research that puts us in a negative light.’ I’ve seen GamCare in a public meeting where the most vociferous and aggressive member present from the industry said, ‘I don’t know what all this fuss is about! We should just write a cheque for GamCare.’ And GamCare were present and they nodded. So, that really is (laughs) that really is the position, in terms of independent research. **MRcUK(10)79**

Well, industry fund GamCare, one has to recognise the reason for that: it is a nice little cross over for everybody. It’s probably still a bit of a mix of ‘Hmm, slight worry, but we had better go with it’ and some are going with it rather more openly than others. It is not a homogeneous whole. That’s always played out in funding, bingo people say ‘But we are soft! It’s the machines people who should be stumping up’. **MRaUK(40)57**

The political sensitivity around the funding of GamCare in the UK illustrates how relying on a single source of industry funding – either as a researcher or a treatment provider – makes one vulnerable and unable or unwilling to ask challenging questions.

13. Can problem gambling be cured?

If problem gambling existed then it would be a problem for the NHS and they would find a cure for it. **MRcUK(4)56**

The treatment of problem gambling reflects the idea that it is an individual pathology. This model, several treatment providers have noted, treats the problem gambler – a politicised construct – rather than a person with a gambling problem.

GamCare has shifted. It was once much more about someone’s social problems. It’s starting to shift a bit more now, taking on board that maybe there might be an aspect of brain chemistry for example, more of a disease model

Working with the agencies, because their funding is coming from the industry, there is a certain party line. They are very, very careful for example when it comes to what they say about the FOBTs which I know do cause a significant amount of problems for a significant amount of people that did not have gambling problems in the past. But because GamCare is afraid of upsetting the gambling industry by saying that they tend to downplay it. And I’d like to say I’m certainly not anti-gambling, I’m not anti-industry, in fact I have a very good relationship with the industry, but yes, I feel that one is stifled when working with agencies that receive all their funding from that source because they are very afraid of saying anything negative that might upset them. **XXXXX**

GamCare have now said publicly that they have no intention of taking a view on fixed odds betting terminals because that’s biting the hand that feeds them. And informally most of them will say, well and truly, ‘Yes, betting terminals are the devil’s work.’ But it’s true that there’s a certain reluctance on the part of some of the big players to actually come out and say it because they fear for funding. Research has taken a backward rather than a forward step. Which in turn is predicated on GamCare’s desire to not rock the boat. **MRcUK(10)79**

stance on it, and saying there’s no gender difference is all a part of that, like saying, now we are treating a problem gambler rather than an individual who has a gambling problem and why. Treat the problem gambler rather than the person who has developed a gambling problem. Shorter-term, more medical models, a focus on data collection to an extreme degree, a focus on completing accurate paperwork rather than time with clients. More number-crunching data from treatment, rather than freeing time for face to face. Demand on therapists is increasing in terms of the number of people they are expected to see in a day. And this is demanding work, there is a limit to what you can

process. Now it's how many people can we get through as efficiently as possible. XXXXX

Some treatment providers chose a 'middle way', emphasising the environmental and temporal factors in gambling behaviour and presenting gambling as a form of exchange which relies on and creates various relationships. This approach stresses the importance of learning and unlearning different types of behaviours.

I want to take the middle way. There are things going on in the person that have either predisposed them to having a gambling addiction or have actually triggered it because there are issues in their lives and there's a personality area. That's my natural orientation. But increasingly I have a lot of sympathy for the public health model, which is looking at the fact that there is a huge public health dimension and the extreme example of that is New Zealand. They would take a radically other stance and say basically it's [the] industry. Psychologists are employed in working out time in front of slot machines and so on and machines themselves are addictive. [...] And so you've got a kind of a radical view of the public health, it's all the fault of the industry, it's all their fault, it's a bit like drugs, it's antisocial and it shouldn't be allowed. Where I sit is I

want to see both sides of those. I would adhere to, not a medical model, I don't see it as a disease, I see it as a maladaptive learned behaviour. That with therapy, counselling support, can be unlearned. **MUUK(27)82**

If clients express anxiety about gambling brains and genes, I say, let's talk about learned behaviour. We learn how to be a woman, how to be a man. To me gambling is all about relationships. Those that don't work, do work, having them or not having them. There are so many different ways of gambling now, and the psychology of problem gambling hasn't changed. We're wasting money on that. XXXXX

In Hong Kong and Macau, treatment providers suggested that therapy focused on a sovereign, isolable individual may not be appropriate outside Europe and North America, highlighting the fact that the 'problem gambler' is a social and historical construction.

For Chinese people there are family members involved, not like western people where you are responsible for yourself. It's not the case for Chinese people. [...] So in our centre we emphasise help for the family members. **MUHK/M(13)103**

14. Exporting responsible gambling

The problem gambling paradigm is being exported from mature to younger jurisdictions through international trade organisations which call for responsible gambling measures. In mature jurisdictions problem gambling has been subjected to critical attention, even if this has not succeeded in promoting alternatives. Elsewhere a focus on problem gambling is regarded as a necessary first step in the attempt to encourage the industry to engage in greater 'social responsibility'. In south-eastern Europe and Hong Kong / Macao, for example, there is a sense that the government should take a more prominent role in developing responsible gambling policies. This role would also involve commissioning and directing research, which has hitherto been motivated by commercial incentives.

Previously the government focused on the development of the gaming industry so they would

encourage competition to increase the gaming revenues. They didn't do a lot on responsible gaming and were publicly criticised. **MRaHK/M(2)13**

The casinos are not very active in this area of problem gambling because it doesn't make money. Their interest is more to make money than other things. I haven't heard them do any research in Macau. **FUHK/M(8)106**

In Croatia the first prevalence study of the adolescent population was an important step in raising awareness that gambling could produce social harm.

The first prevalence study in Croatia was important for us because we could finally draw on the evidence gathered in our own country. Until

then, I'd always use data from EU countries or Canada or Australia. I was never sure how Croatian data compares to those others. It turned out that our problem gambling rate in adolescents is higher than in Europe. My conclusion is that gambling in Croatia is not regulated enough or not regulated well enough, with very little awareness of responsible gambling on the part of the operators. **MUISEE(23)141**

With no systematic funding structure in place, treatment providers and researchers from the newer jurisdictions find it important to frame gambling in terms of addiction in order to invite a more committed response from the state. They must also be careful to avoid antagonising either operators or the state.

In my opinion, measuring the problem gambler incidence rate and prevalence rate between

different places: growing the evidence base and localisation is the purpose of gambling research. **FUIHK/M(6)107**

When we set up self-help groups we had to avoid stigmatising gambling operators. We wanted a truce, so we spoke of the pathology that can be a result of games of chance rather than of games of chance being pathological in themselves. We received support from both state-run and private gambling operators. **MUISEE(23)141**

In mature jurisdictions this process took place some time ago.

In the early days I exploited problem gambling to the hilt, to get the issue on the agenda. The industry got a bit fed up with it and I could see why. **XXXXX**

Evidence



The *Daily Mail* has had more impact on policy than any researcher or centre. Is this evidence-based policy? I think not! It is politics pure and simple. **MUpUK(18)100**

Headlines

- Research does not produce the kind of evidence required by policy makers in order to change legislation. (sections [15](#), [16](#))
- There are basic and profound disagreements about what constitutes evidence in gambling research, even within stakeholder groups. A recognition that different research questions and methods produce a variety of forms of evidence is missing. (sections [17](#), [18](#), [19](#))
- Policy makers do not make decisions about gambling based on evidence, however it is defined. ([section 20](#))
- Research in natural environments and in laboratories is complementary. These ways of working and their findings need to be productively combined in multidisciplinary experiments. ([section 22](#))
- Data produced by prevalence surveys are subject to widely different interpretations. ([section 23](#))
- Prevalence studies do not produce evidence of causal relationships. ([section 24](#))
- A narrow definition of evidence makes many of the questions asked by policy makers impossible to answer, either because they are too simplistic, or because the money does not exist to fund the projects which would allow them to be answered, or because the data required to answer them is inaccessible. ([section 25](#))

15. The tyranny of evidence

Have you got actual evidence that FOBTs cause problem gambling? Because that is the only way that we will get them banned. Listen, I didn't come into politics to liberalise gambling, I can tell you. **MUpUK(11)88**

It is conventional for stakeholders to assert that the growth of commercial gambling should be managed by evidence-based policy. The UK government, for example, will not make any changes to policy unless it is presented with unequivocal evidence that problem gambling is caused by particular products or pieces of legislation. This was made clear during a discussion in the House of Commons in January 2013:

Hugh Robertson: Yes, the Government are seriously concerned about problem gambling. This is one of those quite tricky areas where common sense suggests that it is a major problem but there is a lack of evidence to back that up. I very much hope that the major

research project that is being undertaken will give us the necessary evidence and, absolutely, once the problem is proved to exist, the Government will act.

John Penrose (Weston-super-Mare) (Conservative): Does the Minister agree that there is currently not much evidence to prove that fixed odds betting terminals are the most addictive form of gambling? Although I applaud his concern for the problems caused by problem gambling, will he reassure the House that he will proceed only on the basis of firm evidence when that is available? ³¹

Politicians are held to this guarantee by each other, and also by the industry. In April 2013, Chairman of the Association of British Bookmakers Neil Goulden said that: 'The Government has promised an evidence-based policy review and we will hold them to that promise.'³²

16. There is a dearth of evidence on which to base policy

Policy makers complained that research did not provide the kind of evidence they required to make decisions. They struggled to apply findings from other jurisdictions to their own, and to compare the methods and metrics used by different researchers. They were unable to bring research together into a single coherent body.

We have absolutely no research on which to base policy. Nothing is directly translatable from the US or Australia. Yeah, you can kind of make a leap and say, well what has happened when they introduce machines in these places, or whatever, but really it is guesswork and ministers don't want that, because they need to justify political decisions on the basis of black-and-white evidence. We just don't have that. There's a huge gap. I'd say expectations of stakeholders are completely unrealistic. We find one piece about opening a casino in Atlantic City and they just jump on it and you say, well it's not

quite that straight-forward because you might need to look at who wrote it and when, and the particular context and all that and they look at you with panic! **MUrOE(8)92**

Unfortunately there is absolutely no reliable research in this area and we can't work out why. Is it because the government won't support it, or because the industry won't play ball? It's really frustrating. We all felt on the council that before we made such a big move we would need to understand the implications, but we just couldn't find any relevant material. That's why we looked into commissioning ourselves, which turned into a complete joke. Gambling research is just like local politics! Factions, vested interests and no money! That turned out to be an expensive red herring. **MUpUK(3)95**

³¹ House of Commons Debates, 13 January 2013, col. 443.

³² Anonymous, 2013. 'Gaming machines policy must be evidence based', Centrallobby.politicshome.com, 13 April.

The problem is that research often cannot give us concrete answers because there are problems with methodology, the industry often won't participate, then the conclusions and recommendations are very limited. I do know that it took us 100 years to get good research on alcohol and we are not many years in[to] this research. Research that is there is reliable for

the moment in which it's being produced. I don't say it's bullshit, but it's very difficult to compare and be relevant more broadly. That makes it difficult. And it has to do with politics as well. Researchers can write and say what they like but it's the politicians who make decisions.

MUpOE(20)6

17. Where do policy makers look for evidence?

In 2011 Gary Banks, chairman of the Productivity Commission in Australia, spoke of the importance of consulting a wide variety of evidence in order to formulate gambling policy, referring to a 'triangulation' approach, which drew systematically from a range of sources.³³ Despite his intervention, the 49 witnesses consulted by the most recent select committee on gambling in the UK included 25 industry and trade organisation representatives. The committee also heard from six regulators, six representatives of faith groups and two treatment providers. Only two researchers, Professor Jim Orford and Heather Wardle of NatCen, were called.

After presenting their findings, chair John Whittingdale MP, concluded that:

Gambling is now widely accepted in the UK as a legitimate entertainment activity. We took a lot of evidence in this inquiry, from all sides, and while we recognise the need to be aware of the harm caused by problem gambling, we believe that there is considerable scope to reduce and simplify the current burden of regulation and to devolve decision-making to a more local level.³⁴

Their central recommendation: to remove the limits on the numbers of FOBTs in betting shops in order to reduce clustering on British High Streets was described as 'completely illogical' by the Local Government Association: 'It's clearly not sensible to increase the number of slot machines in betting shops to tackle the problem of too many slot machines.'³⁵

18. Evidence of what, for what, and by whom?

Gambling policy is not based on evidence, but on the politics of what counts as evidence. It is whoever decides this question who holds the cards. **MUpOE(18)100**

There are basic and profound disagreements even within stakeholder groups about what counts as evidence, and what level of proof is required to support a statement or argument. Despite this, an explicit discussion of the concept of evidence or how it is used in practice is often missing from policy debates and consultations. Certain kinds of

evidence are favoured, and others discounted, for reasons that are rarely made explicit.

The awareness that evidence is always of or for something, and therefore that it exists in relation to a question, is lacking. The knowledge-making practices of the gambling field determine that this question is often 'What causes problem gambling?' Some industry participants in particular expressed a preference for proof of causal relationships based upon large-scale, quantitative data.

The industry likes empirical research, based on quantitative data and hard evidence. Evidence

33 Banks, G. 2009. 'Evidence-based policy making: What is it? How do we get it?' (ANU Public Lecture Series, presented by ANZSOG, 4 February), Productivity Commission, Canberra.

34 'Reduce centralized gambling regulation, says Committee', www.parliament.uk, 24 July 2012. URL: <http://tinyurl.com/bqhmms>. Accessed 14 November 2013.

35 Clyde Loakes, vice-chair of the LGA's Environment and Housing Board, quoted in Bridge, T. 2012. 'LGA: Action against gambling clusters is "completely illogical"', LocalGov.co.uk, 24 July.

means if x then y. They don't want low-quality research that focuses on problem gamblers and is based on hearsay. They don't want research that threatens profits, like work on Fixed Odds Betting Terminals. They are the goose laying golden eggs. **MIoUK(11)42**

Others expressed dissatisfaction with this approach.

We cling onto this sort of position that is personified by Harvard in particular, this uber-empiricist worldview where everything can be objectively measured in some way, whereas I think that research that has been done from a qualitative perspective actually sheds a great deal more light on what gamblers really think. I'm very pragmatic in my views of what is good enough evidence. The old idea of taking a precautionary principle is entirely apt when it comes to social harms like gambling and alcohol and so the quest for the sort of levels of causality and association and proof that the commission and the strategy board keep chuntering on about are a waste of time. **MIInUK(8)35**

Researchers also called for recognition of a variety of forms of evidence on the basis that different problems called for different types of questions and therefore different methods. Too often problem gambling is presented as the only possible

problem. Problem games, problem products and problem policies, for example, receive much less critical attention.

I think that one of the things that frustrates me about the research environment at the moment is that there is not enough appreciation of different methods and how every method is question relative. You have to think about the question you are trying to answer. **XXXXX**

Some felt that gambling studies was slow to recognise the importance of qualitative approaches, unlike alcohol research, and suffered from a narrow definition of evidence which was not shared by related disciplines (see also sections 26–34).

One of the ways in which the industry-friendly academics attacked us at workshops and conferences was around the fact that our stuff was only anecdotal and that we were cherry picking things that were negative or bad. In fields like alcohol or leisure studies there's a huge amount of qualitative research ... they recognise it as a valid evidence base and I think that's partly why the narrow policing of the field around a particular tradition of quantitative research is part of the way in which they are able to undermine more critical work. Because they just don't care to accept the same kinds of evidence which other fields or disciplines would. **FRaUK(7)67**

19. What kind of evidence does the industry value?

The industry commissions and welcomes research which suggests that gambling is a positive social activity which is not harmful for the majority of gamblers.

Have you read the new book by Patrick Basham? *Gambling: a healthy bet*. It's one of the new bits of work coming out which proves that the idea that gambling is harmful has been created and nurtured by do-gooders and religious nuts. This is the kind of work that we want to see – open and accurate, evidence-based and unbiased. Gambling is educational, sociable, it teaches them about risk, it is enjoyable, it is part of every culture. If gambling was bad for us then it would have died out! People aren't stupid. It's good for us, this is Basham's point, and well

overdue. Time we had someone providing a scientific view in research when we find so much misinformation that the press loves and the industry despairs about. **MIoUK(2)32**

Betting shops are very sociable places aren't they? Very sociable. Very misunderstood. Wonderful characters there. You should write something about that. That would really be quite unique and we would welcome that kind of work. **MIoUK(5)31**

Other members of the industry use research to better understand how to produce addictive or 'sticky' products.

What we want to know is what could we offer to big poker players in order to be more attractive to them? I also think we would need to know

better how a poker room would communicate with the rest of the casino. You know, how to get these players to play other table games, to really gamble. **MIoSEE(15)5**

The only thing I might use gambling research for is to tell me how to set up stakes and prizes. So I might look at a problem gambling paper, or read Natasha Schull's book to see how I make my products sticky, addictive, or whatever. **MIInUK(5)53**

20. Policy is not based only on evidence

The difficulties of producing evidence-based policies are not unique to gambling. In 2012, Davies used four UK case studies to illustrate that although there are relatively few cases in which unequivocal evidence can be used directly, data may also be used 'conceptually': to enlighten and thereby indirectly influence policy and 'symbolically', 'to legitimate and sustain predetermined positions'.³⁶ The impact of evidence is not predictable, because, as Banks has argued, its reception is contingent on many other factors: 'policy decisions will typically be influenced by much more than objective evidence, or rational analysis. Values, interests, personalities, timing, circumstance and happenstance – in short democracy – determine what actually happens.'³⁷

From a lawyer's perspective this is why evidence-based policy is a bit of a red herring. It draws a veil over a lot of more complicated economic and political issues. **MRiOE(15)89**

The main issue for gambling with the exception of Las Vegas and Macau is that it's just not important. If you say the laws are outdated the general response is 'well, yeah'. There's no real attractiveness for a politician to say 'I'm going to change the gambling law!' Then, when you do ask for a decision, no matter what evidence you put in front of them they make their minds up on the weirdest and most irrational grounds. It is predictably unpredictable. If you don't like the decision today, wait until tomorrow and try again! **MURiOE(9)90**

At the most mundane level there was a lack of time to devote to understanding complex questions and arguments.

Gambling is a complicated subject and politicians don't have time to understand it. It's all about politics ... **MRiOE(15)89**

At a local level, policy making was circumscribed by national legislation.

Even if the research showed that there was a direct correlation between betting shops and deprivation there's nothing we can use it for except raising awareness. In practical terms research is useless when you have national regulation ... real politics takes over. **FUpUK(2)96**

At all levels, policy makers were mindful of potentially hostile media reactions to changes in legislation.

Gambling is a poisoned chalice for ministers and politicians. There are no votes in gambling, no good news stories, just the *Daily Mail* breathing down your neck, waiting for the next single mother on benefits to rack up an enormous debt with some bookmaker. Then you get it in the neck. Legislating is a nightmare. People don't respond to the evidence, they have preconceived ideas about gambling, and you can't unsettle them using evidence, that is such an idealistic approach. Those attitudes are deeply ingrained and they are there to represent their constituents, and so they reflect their views as best they can. **MUpUK(40)87**

Several stakeholders suggested that continually referring to a lack of evidence justified a 'wait and

36 Davies, P. 2012. 'The State of Evidence-Based Policy Evaluation and its Role in Policy Formation', *National Institute Economic Review* 219 (1): R41–R52.

37 Banks, Evidence-based policy making: What is it? How do we get it?

see' policy of inaction and was part of a wider power game in the field. This constitutes a 'symbolic' use of evidence, according to Davies' categorisation.

This issue is becoming a really hot potato and everything that we do must be accountable. We are looking at votes, and the council would like to commission research to be seen to be doing something. **FUrUK(2)94**

We did a study of how to implement in high schools a programme on problem gambling prevention. We gave the commissioners concrete recommendations of how to introduce people who would moderate such programmes at schools and educate the general public. [...] Unfortunately, the research probably ended up somewhere in an archive, the project was closed and that's it. Such is the practice in this country. **FRaSEE(6)1**

One civil servant told me the industry was pressuring government to have more pokie machines. They were having trouble saying no because there was no evidence at all, and the very fact that we could start this programme, they could say 'Well let's wait and see what the evidence says before we make a decision.' Even if the evidence is in process or they didn't use it, they could use it to put a buffer in between industry and individuals or government. I found that out after the fact that [because of] us running that programme there was no increase in poker machines in that time. So in a way the effect on policy wasn't a positive one, it was one you wouldn't have noticed, it was the fact that nothing did increase while you were doing it as part of a process rather than I had some unique intervention that could either help problem gamblers or help efficiency of management or regulation. It was more that you could be used as part of the discourse and that in itself had an outcome. **MRaAU(12)98**

21. Size matters

Those who used quantitative methods favoured large samples and criticised 'evidence' based on small samples. The most common complaint, from economists in particular, was that psychologists used small-scale surveys to support generalisations about the wider population.

I review a lot of gambling research and I have seen what I think is poor practice in terms of people making highly questionable inferences from very small and highly selective samples, in terms of the survey evidence people have used. I might be partial being an economist, but I think there are some poor practices in some of the gambling literature: very questionable inferences, making very strong inferences from very weak data. **XXXXX**

I'm not hostile to psychology or qualitative research but I think there is overconfidence in psychology that your findings are strong enough that you would tell regulators that you should change policy, when in fact you've talked to too few people to interfere in a commercial sector. You need evidence which is stronger than interviewing people. **XXXXX**

Those who used small samples argued that conclusions based on small samples, whether of quantitative or qualitative data, needed to be measured and provisional, but could nonetheless generate important insights.

I cringe at some of the papers published now that have a dataset of 1 million. The first paper I wrote was based on eight gamblers. It's still a nice little paper. The idea of datasets of hundreds of thousands is quite recent. **XXXXX**

22. Between the real world and the laboratory

There is a long tradition of researchers attempting to reproduce the conditions under which gamblers make decisions in the laboratory, commonly using

psychology students as their subjects. Lab-based studies are thought by some to be capable of

providing evidence about causal relationships between frequency of bet or volume of stake and behaviour. They are often contrasted with studies that take place in 'natural' environments including betting shops and casinos where it is far more difficult to attribute changes in behaviour to isolated variables.

I think the naturalistic studies inherently have a number of limitations, in terms of you have very little control over the environment and I think that's where the lab-based stuff that we do has some advantages. I often end up in conversations with people about the importance of the lab stuff, they just say 'These simulations, they are too basic, they don't capture what we're interested in and it all should be field research.' And I suppose I feel as though I'm banging my head against a brick wall in that I don't seem able to convince them. In the laboratory our approach is a very piecemeal [one] and I admit that but we basically take structural characteristics more or less one at a time. So, okay, let's just do a study on near misses, we're going to strip a slot machine down to its bare bones and we are going to either present different rates of near misses or we are going to present near misses and ask them to give some sort of rating or some sort of behavioural measure after them, and we are going to try to work out how the near miss works in this experiment. This is very methodical, very piecemeal work, but that way you can, if you see an influence of that thing that you've manipulated, I think you have a very clear signal that that does something and hopefully that would then converge with some naturalistic fieldwork that might give you a clue that that was a relevant variable in the first place. I think it's very hard from the field research to know that this is from the rate of near misses, or whatever. It's the lab studies that allow us to identify which is the key thing that we should be legislating. **XXXXX**

Stakeholders in every sector felt that lab-based studies could also produce unrealistic depictions of gambling experiences.

A lot of the literature is quite medicalised and quite quantitative, but also that whole neuroscience literature trying to look at the medical nature of addiction and seeing that stuff where

the brain lights up when they play a fruit machine, and I have quite a few concerns about that approach because it's quite reductive and determinist. **FRaUK(7)67**

The stuff on risky decision making done with Psych 101 students, I have some difficulties with that. These are very simple tasks which are very alien from the environment in which you would be making those decisions. And you're looking at adolescents up to 25. They are not representative of the adult population. **MRaUK(40)57**

There has been necessarily, and I understand why, a lot of lab work and a lot of work with students at universities and so on as proxies for real behaviour but actually let's really try and look at what real people do in real time. **MI-oUK(12)41**

Being incredibly cynical, we all hear stories of drugs companies wanting to sell their drugs. I think it's incredibly disempowering for clients to hear that. There was a bit in a programme where a brain was scanned and it frightened the living daylights out of so many clients, because if there's something wrong with my brain how am I ever going to be able to change my behaviour? But again my evidence suggests that if it's been argued that problem gambling exists because of something faulty in their neurotransmitter or something, how do we explain people who do stop gambling and have still stopped a year later as a result of actually looking at what it was that triggered it in terms of their relationships and their lifestyle? How do you explain that? **XXXXX**

None of our participants suggested that lab studies could replace naturalistic studies, and many felt that both were essential, as they answered different questions and provided different kinds of data.

When you're looking at processes that you'd like to in some sense measure, you really have to have good experimental design, sometimes work in the lab, sometimes work on the internet, and then, just bring some really sort of good quantitative methods, I think they are complementary, I don't think that one is prior, they are there to understand things at different levels

and I've become much more catholic in the methods that I use, I really don't mind using different methods now. **XXXXX**

23. Prevalence studies – the holy cow of gambling research

Let's just take prevalence research for a moment. It's one of those holy cows, where everybody recognises that this cow is slightly imperfect and it's been in the field quite a few years now but actually it sort of works and it sort of gives you an output of milk called surveys that are done from time to time, but nobody ever asks the question of whether conducting prevalence research in the way that we do is the right approach. [...] And so much is predicated on this. And so we don't talk about that, it's the imperfect cow in the corner of the field that we all know and love and milk and actually perhaps we ought to be thinking whether some other beast might serve our purpose better but I think that would be a question just too hard to ask at the moment. **MInUK(8)35**

Prevalence studies express the number of problem gamblers as a percentage of the population. They are commonly commissioned by the state as well as being accepted as authoritative by the industry. As the recent select committee report in the UK showed, they are of limited value as a basis for policy because they are subject to widely different interpretations. The select committee described the evidence provided by the prevalence study, and the range of possible interpretations of its findings.

It is important to note that, whilst the increase in the number of problem gamblers observed between 2007 and 2010 is most likely to be 0.9% (a 50% rise), the increase could in fact lie within a range of between 0.7% and 1.2%. In other words, the percentage increase could be in the order of between 16% and 100%. Whilst the most likely level of increase identified by the BGPS is 50%, this result is defined as only marginally significant due to factors such as the relatively small sample size.³⁸

It then goes on to quote an alternative interpretation.

Whilst it is agreed that the findings of the BGPS are significant in the sense that they are 'statistically significant', there is debate as to whether this translates into 'real-world' significance. Gambling industry representatives argue that little has changed, with the Bingo Association stating that: 'levels of problem gambling remain broadly the same as before the Act was implemented'.³⁹

As well as problems of statistical significance, there is limited consensus on who qualifies as a problem gambler and whether self-reported data is a sound basis for such a survey.

I think that the methodology behind trying to identify who is and is not a problem gambler could have had a different approach that would have been more effective. I'm not convinced by the history of those three surveys. I will wait and see what comes out of the replacements, but I suspect that I shall have similar reservations about that. This is of course because they are based on screens which are questionable and variable, but also because so much of it comes out of self-report and of course if you are being asked whether you have a problem I think naturally you would shy away from saying that you have. **MloUK(12)41**

There is also no agreement as to how the study can capture people who are at risk and have not yet developed a problem, or whether this measurement is significant. The prevalence survey provides a snapshot of problem gamblers without giving any indication of how this behaviour changes through time. It does not include data about how non-problem gamblers are affected by problem gambling.

38 Culture, Media and Sport Committee, *The Gambling Act 2005: A bet worth taking?*, paragraph 25.

39 Culture, Media and Sport Committee, *The Gambling Act 2005: A bet worth taking?*, paragraph 26.

The large population surveys have been done thousands of times. Most funding around the world has been sucked into this. Mainly, I would argue, because they are very convenient for industry and government because most of the surveys pretty much say the same thing, that 1 to 2% per cent of the population has got problem gambling issues, but beyond that there is very little investment, except some investment in treatment research. XXXXX

I don't think the prevalence study is any good, that sounds horrible, because it's a big study and it's quite well done, but the questions are not fabulous. The data that you get relates to the questions that you ask. FRaUK(11)61

There are alternatives to using prevalence studies to express the number of problem gamblers as a percentage of the total population, including referring to the actual number, or identifying additional categories such as people at risk of developing a problem.

24. Prevalence studies paradoxes

When commissioned, the Gambling Commission described how the prevalence study would be used to provide comparisons between 'pre- and post-implementation of the Gambling Act 2005' and 'to help develop policy for the regulation of gambling and to advise the Secretary of State on gambling issues'.⁴⁰ However, the type of evidence called for by policy makers and industry is much more specific than the type of evidence that the prevalence study produces. The prevalence study measures the percentage of problem gamblers in the population, while evidence which supports a change of regulation is expected to capture causal relationships between particular products or policies and problem gambling. This understanding of evidence is described in statements from the Gambling Commission, for example:

To date there is no evidence that establishes the nature of any causal link between gaming machines (fruit machines, slot machines) and

I'm less interested in the proportion of the whole population that has a gambling problem. I'm much more interested in the number of gamblers who have got a gambling problem. If we were only to concentrate on that issue then we could stop some of this daft talk about 'Well it only affects a tiny number of people' blah de blah and ask 'Who's at risk?' MInUK(8)35

In policy it's typically a quantitative basis, tied to the evidence-based policy, where numbers seem to be the most important thing. You look at prevalence studies and those kinds of things, the interest is not the number of problem gamblers but the percentage, which is interesting because that percentage could be a large number of people. It's funny how it becomes acceptable for industry or state to say the rates are 1 to 3% and therefore that's fine. Gambling studies, at least in the main journals, is dominated by a numbers ontology. XXXXX

problem gambling. While rates of problem gambling may be higher amongst gamblers who participate in certain activities, this does not necessarily mean that the type of gambling in question causes people to develop problems to a greater extent than other forms of gambling.⁴¹

According to this understanding of evidence, no significance can be attached to higher rates of problem gambling associated with any particular product, as problem gamblers may choose to use these products, but their problem gambling may have been 'caused' by anything (a genetic or personality predisposition, for example). This use of evidence is also illustrated by the select committee of 2012:

The imprecise nature of [the BGPS] findings also results in part from the lack of any significant studies on the causes of problem gambling. Professor Orford told us that the

40 Gambling Commission Web Pages, 2013. 'British Gambling Prevalence Survey 2010'. URL: <http://tinyurl.com/keuzf2y>. Accessed 14 November 2013.

41 Gambling Commission Web Pages, 2013. 'Frequently Asked Questions'. URL: <http://tinyurl.com/lkpkqkw>. Accessed 14 November 2013.

increase in problem gambling levels was as a 'consequence of the changes introduced under the Act'. Whilst we recognise that the figures from the BGPS show a likely increase of 50% in the numbers of problem gamblers, we have seen no hard evidence to support the view that this increase was the result of the 2005 Act.⁴²

The prevalence study supports and enables strategic inertia. Between prevalence studies the approach to policy can be 'wait and see'. Once results are known, they may be endorsed or condemned as having fallen short of the standard of evidence required to justify changes to policy.

The prevalence study we wait for and if it's good news and stands up then it will be useful. If it doesn't it gets rubbished, we just ask is it robust and will it stand up in court. It depends on what hat I'm wearing. If the rate goes up and I'm objecting to a licence or to deregulation in another sector then that will be of use. **MI-UK(20)74**

Gary Banks, chairman of the Productivity Commission in Australia, has described the double standard employed by the industry in arguments about evidence:

The industry essentially owes its existence and current size to the lack of an evidence-based approach to liberalization, which has resulted in extensive 'community-based gambling'. It

subsequently protested only a little at the lack of evidence for most of the (ineffectual) harm minimisation measures introduced over the past decade, despite their compliance costs. But it has been insistent on high standards of proof for measures that promise to be effective. One major industry group even suggested that no measure should be introduced if the possibility of error was more than 1 in a 1000!⁴³

In the UK, the situation is comfortable: the government, the regulator and the industry all endorse the position that problems with gambling are caused by faulty individuals rather than dangerous products or policies.

Research conducted outside the control of the industry was treated with huge caution and even suspicion because there was a fear that work may suggest that gambling problems are not only caused by the weakness of character or mental health but could actually reflect the way that gambling is marketed and provided. What no one will say and what the (UK Gambling) Commission has refused to say throughout is that causality may run in both directions. Or, if not in both directions, then at least to the extent of saying, well, it could be the product and not the person. Essentially, they say: 'no, let's just throw all our money at treatment' and all members of the industry held quite closely to that. **MRcUK(10)79**

25. Beyond prevalence studies

There was no agreement as to whether or not it was *in principle* possible to produce evidence of causation between particular products and problem gambling, or between changes in policy and changes in the rate of problem gambling expressed as a percentage of the total population.

A mixture of longitudinal studies, qualitative studies into gambling behaviour and its environments, complemented with lab experiments to assess the way both gamblers and non-gamblers interact with products, could provide evidence from a number of different perspectives. However it would be

very expensive and still might not meet the standards of proof called for by the industry, regulators and policy makers.

In order to establish causality, you need longitudinal studies. Let's start with an example, let's say the hypothesis is 'Slot machines cause gambling problems'. That is often stated as a fact in the field, but if you look at the bulk of research, what's been done is asking gamblers in treatment which game they played that got them into trouble and the bulk of those people will say slot

42 Culture, Media and Sport Committee, *The Gambling Act 2005: A bet worth taking?*, paragraph 27.

43 Banks, G. 2011. Presentation to South Australian Centre for Economic Studies, Corporate Seminar, Adelaide, 30 March, 6.

machines. So your evidence there is retrospective. People looking back and trying to identify the cause of their problems, and it's based on a very small sub-sample of gamblers who have problems because we know that not many gamblers with problems go into treatment. So you then have some evidence that suggests there's this link. What you would need to do to establish that with more certainty is to, if you didn't have issues of funding, which are huge, you would do a very large-scale longitudinal study starting with people who may be prone to having gambling problems but you would have to start early and see who plays what games and then who develops problems. That would be a first step and you might find through that design that people who ended up playing slot machines would then have greater incidence of gambling problems. From there, you ask the question, well is it slot machines causing gambling problems or is it potentially something about the people and their personalities that draws them both to slot machines and draws them to potentially have problems as well, the third variable. And so then I would say you might need to start moving toward laboratory experiments, where you have

a casino lab and you're looking at some kind of large-scale study where people who haven't been gambling are introduced to many different types of games, maybe across a couple of weeks, and you might see who has markers of developing problems based on that. That would be more of a control study. So that's one way to go about establishing evidence for that hypothesis. I think it's important that you use multiple methods – every method has its own problems. With casino labs the argument is that it is not very realistic – even if you give people real money it's not money that they earned that they care about so they don't think about it in the same way. You really need a whole mix of methods and all the evidence pointing in the same direction before you can be sure of a causal link. If you're a funder and you don't have a full understanding of these design issues then a longitudinal study is a lot more expensive than doing the same kind of thing with a cross-sectional study. There's debate as to what you can measure with repeated cross-sectional studies. We would argue you can't measure causality and impact and other groups might say that you can get at it at least. **FRaUS(11)66**

The field of gambling studies

“

Every discipline has a particular power structure, but gambling studies is so small and coherent: everyone knows everyone, funding is limited to such particular streams, research councils think that gambling is funded by the industry bodies, which has a particular remit. I probably won't stay, I will go across to cultural studies, but then of course I will be ignored by anyone in gambling. It's a discipline that has done nothing to break down the boundaries between different approaches and different ways of doing things. It is inherently conservative and that makes me really sad. **MRaOE(6)72**

Headlines

- The aim of gambling studies is to produce data that can be used to support policy. In practice, this means focusing on problem gambling. ([section 26](#))
- Relationships between researchers, treatment providers and industry are often unmediated by formal academic structures. ([section 27](#))
- Conferences are dominated by industry interests and do not encourage critical debate. ([section 27](#))
- The industry is adept at discrediting critical research. ([section 28](#))
- Some researchers self-censor or opt out of publishing their work for fear of the industry's aggressive attention. ([section 29](#))
- The field of gambling studies is closed and tightly controlled. ([section 30](#))
- Entering and remaining in the field of gambling studies is a considerable challenge, especially for early and mid-career researchers. ([section 30](#))
- Gambling journals are not highly rated and the peer review process is conservative. ([section 31](#))
- Gambling research is not prestigious and can create reputational risks. ([section 32](#))
- Gambling studies is not an interdisciplinary field. There is a lack of collaboration with related fields and a reluctance to accept alternative methodologies and wider definitions of evidence. (sections [33](#), [34](#))

26. Looking for evidence

What I do is I go to people like Mark Griffiths and I ask them this question: ‘What can you tell me about those things?’ And what they say is that they don’t know the answer. **MUpOE(20)6**

Who are the gambling experts? How do they understand evidence? What are the conditions of production of gambling research? How are disciplinary tensions between different approaches, for example naturalistic studies and laboratory-based studies, resolved in practice?

The deregulation of gambling has coincided with the emergence of the sub-discipline of gambling studies. Gambling studies is dominated by the psy

disciplines, particularly psychology and psychiatry. Important journals include the *Journal of Gambling Studies*, produced in the United States, and *International Gambling Studies*, which is produced in the UK but edited in Australia. Although both journals claim to be interdisciplinary, the majority of articles published focus on excessive gambling represented as a psychological problem, substantiated largely through quantitative methodologies.

Gambling research is also produced outside these journals, particularly by social scientists. These contributions include criticisms of some of the central concepts of gambling studies including ‘responsible gambling’.⁴⁴

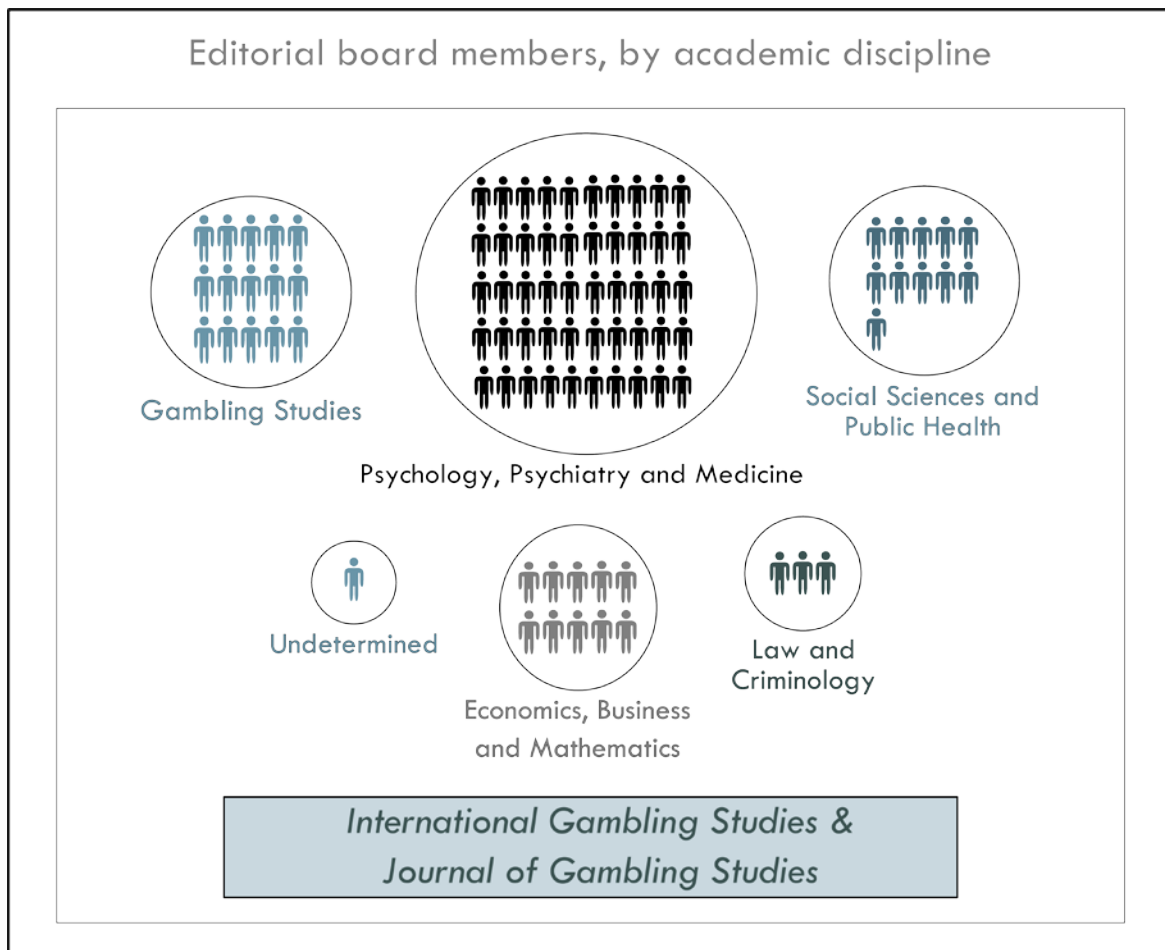


Figure 7– Gambling journal editorial board members. 56% of editorial board members from the two leading gambling journals have a background in Psychology, Psychiatry or Medicine. The majority of those who self-identify as Gambling Studies are also psychologists by background.

44 See, for example, Kingma, S. 2008. ‘The liberalization and (re)regulation of Dutch gambling markets: national consequences of the changing European context’, *Regulation & Governance* 2: 445–458.

27. The club mentality

Every research culture benefits from critically assessing its own practices. Gambling studies was described as a field that is unwilling to deal with challenging questions. This lack of critical awareness is particularly obvious at conferences.

The gambling world suffers from what I would call a cosy club mentality, particularly the larger conferences. It's as if they say, 'This is a community, and regardless of whether you are an industry person or a researcher or a treatment specialist, we all need to get along with each other.' There are some unwritten codes about how that is done, and the limits of the discourse that is possible. I think the discourse is particularly bland in the whole gambling area. There is a lack of challenge between various parties and therefore the overall governance of gambling, particularly in Britain, and I think to some extent in Europe as well, is kind of weak because people aren't engaging with each other, they aren't challenging each other, they aren't grappling with one another in a way that could actually ensure greater safeguards and more meaningful policy making. **MInUK(8)35**

Some relationships between researchers, treatment providers and industry are unmediated by formal academic structures.

I've never known anything like the way that some of these gambling academics are in bed with the industry. **FRaUK(7)67**

The industry are very good, they can offer a very nice little perk. I was the recipient of quite a lot of corporate hospitality, very nice, thank you very much! They can do that so they are very good at getting people on their side by legitimate acceptable ways in this country or not. I mean I don't know if they cross the line, they probably do at times, like everybody else does. **XXXXX**

I remember a professional organisation wanted to find out that the rate of problem gambling was less than 1% or something like that. My boss was offered a £10,000 bribe paid straight into

his bank account. This bloke turned up in his Jaguar looking a bit like Arthur Daley off *Minder*. **MRaAu(12)98**

Some scholars have a close relationship with the industry but some scholars don't have so much connection. The gaming industry asks sometimes some specific scholars to do research for them. **MRaHK/M(2)13**

There is no formal code of conduct governing these relationships, something that is in place in other areas of dangerous consumption. The International Federation of Pharmaceutical Manufacturers and Associations, for example, updated its code of practice in 2012 following high-profile settlements by Johnson & Johnson and Pfizer Inc. of foreign bribery cases in the US. The eight-point code focuses on the 'transparency of promotion' and forbids doctors from receiving payments to attend conferences, for example.⁴⁵ Industry codes of practice do not prevent wrong-doing from taking place if individuals have malign intentions, but they do encourage stakeholders to engage systematically with ethical questions and conflicts of interest, something that does not seem to be taking place within gambling research.

Although some participants felt that a code of conduct would be useful, others felt that it would simply legitimate the wide range of practices that currently endure, not all of which meet the ethical standards required of academic research.

A code of conduct would really help, but I don't think it would prevent abuses. It would be helpful because it would force participants to engage with issues that they are currently either blissfully unaware of or choose to ignore. The outcome would be a bit irrelevant. **FRaUK(4)68**

A code of conduct would do precisely nothing to help this situation, because it would be sufficiently loose to accommodate all the stuff that goes on already. The industry could then dress it up as everything being fine, and avoid the need for greater scrutiny, as is its way. **MI-oUK(11)42**

45 IFPMA Code of Practice 2012. URL: <http://tinyurl.com/6s2sxx2>. Accessed 14 November 2013.

28. Breaking the club code

At the opposite end of the bland and unchallenging discourse of gambling research are the industry's attacks on those who challenge the status quo. Several participants had experienced or witnessed such attacks, some felt that they were orchestrated, others that they were spontaneous and reflected the industry's lack of confidence.

I have strong memories of seeing presenters attacked in those meetings in a way that was much more hostile than anything I've ever seen in an academic environment, it was much more personal. It seemed more like ganging up, when you had two or three people going for a presenter. Over time I got the impression that it was a pre-planned and systematic attempt to discredit people rather than a normal academic discussion. **FRaUK(7)67**

The industry are very clever. They have people who are knowledgeable about the industry, who can argue their case well, who are now very bright with a good education, and they can pick off their detractors quite well. They are very good at dividing people. They are very good at lobbying. **XXXXX**

To be honest with you I've come to this conclusion for a few years now that I've been really shocked by how red in tooth and claw the industry is really. The best that can be said for it is that you never need to be disabused as to what their position is (laughs). Because it's very clear! **MRcUK(10)79**

Industry participants confirmed that such practices were strategic and felt that they were to be expected.

People in the industry are just suspicious about research because, let's face it, the likelihood is

that they already know if there's a problem and their job is to keep it quiet. If research comes up that we don't like then you either say it's not comparable, because it comes from somewhere else, or the offering is different, or regulation is different or whatever, or you look at the methodology and you say well it's only based on 50 people so it's hardly representative, or you just get hold of some other research you've done already that says the opposite. It's not difficult.

MloUK(11)43

Not all resistance to potentially disruptive research takes place in public. Some preferred to register their displeasure behind the scenes, providing an example of the deployment of 'soft power' by the industry, and the fraught relationship between funding and research.

How do we deal with bad news? We just don't respond. Don't provide any oxygen, but behind the scenes we might give someone a bollocking for funding a bit of research. If we sit on a board we might show that we weren't very happy. When GamCare comes round cap in hand we might point out that we weren't very happy. Just the usual things that you would expect really. **MloUK(17)54**

Treatment providers have also found ways to express disapproval of the industry at conferences.

I've been in situations where I've felt very uncomfortable in New Zealand when, part of a conference I was attending, there was industry personnel asked to speak like they are asked here and clinicians walked out. Because they think 'I'm not having anything to do with the industry', because they think they are responsible for problem gambling. And so it's polarised.

MUUK(27)82

29. Forced to fold

Researchers who experienced vehement criticism from the industry early on in the research process self-censored their subsequent publications. Some found the experience so upsetting that they found

ways to avoid repeating it. Others feared that being exposed to further critical attention would undermine their academic reputation. They either opted out of publishing their findings, or left the

field. The threat of aggressive criticism contributes to the maintenance of an uncritical, homogeneous discipline by rewarding conservative contributions and marginalising alternatives.

With the anxiety that I always felt about potentially upsetting the industry and colleagues who were closely linked with them, I had enough. I didn't even finish writing up, because it was going to be too much. So no one ever told me not to publish, but in a sense I self-sabotaged. I was really scared about potentially annoying the industry and then getting my reputation trashed, because I saw that happen at something and it really was horrible. So I had a choice, say everything is fine. In other words, lie. Or keep quiet and not expose myself to that critical attention. Wasn't very brave of me was it? **FRaUK(5)77**

We ran some seminars and workshops to disseminate our findings and people came to those and attacked us – people from the industry primarily. Attacking us and suggesting that our research was flawed and asking us about studies we'd never heard of and then claiming we didn't know anything about the field; they were trying to undermine our reputation. They tried to

intimidate us indirectly in terms of what we published. And to discredit us in the eyes of other people. No one tried to shape directly what we wrote, but I didn't try to take the work forward after that. **FRaUK(7)67**

When I was talking with the audience I stepped over the line very slightly and cor blimey, they got very hot on me. It was quite good actually, it really brought me up, thinking. What I usually say in academic conferences, I'm quite free, whereas you've got to be really careful with these audiences, you've got to be very sensitive to them. I mean we don't want to upset the operator who gave us access, but equally we don't want to be their mouthpiece necessarily. **MRaUK(2)59**

The industry are very good at knocking down research that they don't agree with by questioning the evidence and the industry usually get their arguments let alone their facts straight and that's when they will trot out their data so they are very clever and they work it to their advantage. **XXXXX**

30. Club politics

At conferences and in public spaces the research field is shaped by networks of industry representatives and researchers. This shaping is also in evidence when academics apply for funding or seek to have their work published. The pool of referees and assessors within gambling studies is small and homogeneous. Established academics are allowed to 'wear many hats', serving on funding boards, refereeing journals and applying for funding themselves. This circular flow of academic recognition and legitimacy makes entering the field, and in particular remaining in it, a considerable challenge, especially for early and mid-career researchers. Many young scholars are demotivated and switch to other topics.

Two problems with the field which is why I would never really intend to work in gambling studies again. One is there's a very tight controlling and policing of who is allowed to be in the gambling research community by certain key academics. The other side of it is the way that the industry

operates ... they operate both separately and together to decide who is allowed to do what in gambling studies. **FRaUK(7)67**

As a small and closed field, gambling studies suffers from intense internal competition.

I always thought that the field was very insular, uncritical and dominated by one or two really objectionable individuals. **FRaUK(5)77**

I do think that there's a certain hostility between researchers in the area and I think that's a very damaging feature of the way that gambling research, certainly in the UK, seems to work, it's pretty pernicious. **XXXXX**

The academic treadmill ... the people with the cushy jobs and the research only, they are the ones who manufacture these fake little agendas, because what they do is safe for the vested interests. There are these little cabals of

researchers who dominate the so-called big ranked journals with the same stuff year in year

out. They are quite exclusionary and self-reinforcing. **XXXXX**

31. The club newsletter

Publishing articles in gambling journals has been described as a vicious circle. While academics need to appear in them in order to get established in the field, they also lose out within their own disciplines because gambling journals are relatively poorly thought of outside the sub-discipline of gambling studies.

It's a Catch 22 because if you don't publish in gambling studies journals then they say you haven't been cited in the field, you don't know what you're talking about, you're not an expert, and they completely discredit you. But what's so frustrating is that the quality of articles in gambling studies is so dreadful. **FRaUK(7)67**

Researchers often preferred to publish their material in more prestigious disciplinary focused journals.

I didn't publish in any gambling journals, they were moderate at best. I think the best ideas were coming out of the very few critical scholars who dared to work outside the problem gambling paradigm, but that is of course unsustainable because they don't get funded. **FRaUK(5)77**

I publish in journals that I think are going to be recognised by the Research Exercise Framework and I don't think gambling journals would. **XXXXX**

I have contributed to some of those gambling specialist journals but that's problematic. They are low rated journals and they are also dominated by the characters that I have been talking about, so I prefer to publish in public health or addiction journals. **XXXXX**

Some researchers felt that changes were taking place, and that the scope of the journals was widening.

The journals, like conferences, have changed. They used to be only quantitative and economics. I think there is a lot more scope for qualitative work now. **FRaOE(15)71**

If you look at the journals they don't really make an impact. It's because of the lack of experience and knowledge of research methods but I think they are very conscious of that and actively seeking international partners. **XXXXX**

Researchers still found it particularly difficult to have accepted for publication work that criticised the established theories and approaches that dominate the journals. Their impression was that a chosen few tightly guarded gambling studies by discouraging critical thought and offering reviews which were difficult to address or did not invite dialogue.

The first paper we wrote was rejected. I knew that it was going to be very difficult to publish in gambling journals because of the way that we were drawing on social data and using qualitative approaches, that doesn't fit very well with the approach of gambling studies journals. **FRaUK(7)67**

I've never had any luck at all when I've submitted papers. I've always had really negative comments and requests for complete rewrites and things, so I've tended to publish in academic sociology journals. **XXXXX**

My experience has always been that it's much more open in the addiction field more generally. You'd have more confidence that you are going to get at least one sensible review, not necessarily a favourable one, but you'd hope you'd have a fighting chance. I'd go so far as to say it's a disincentive to work in the area because you just don't know what's going to come back to you, you know, whether you can address it, and I think it's an active disincentive to work in the field. I think it's a real issue. **XXXXX**

32. 'Why on earth are you working on gambling?'

Gambling studies fails to attract new researchers not only because it is tightly controlled, as described above, but also because the topic lacks prestige within other disciplines.

Gambling is everywhere around us but in academia, it's not given importance or legitimacy. There are very few people who would even admit they ever studied gambling. **FRaSEE(6)1**

When I was doing my PhD people laughed, people still laugh when I tell them I'm the world's leading academic expert in this area. My supervisor was fabulous and it was a very good university, but other members of staff would say, 'What's she doing in this department? That's not what we study.' **FRaUK(11)61**

Certainly I don't have any regrets about going into gambling, but for a while I wondered whether it was a prestigious enough area to study and I don't know why. It was not seen as a thing that sociologists should be studying. **XXXXX**

When I've given presentations a few people have said to me 'Why on earth are you working on gambling?' Because gambling is seen as a frivolous thing and many academics see it as a negative thing and even a sinister thing in terms of the impact it has on a variety of communities and the way the industry operates so I do think in disciplines outside gambling studies it's not particularly well thought of. **FRaUK(7)67**

There is also suspicion among some senior colleagues and university management that working on gambling creates reputational risk for academic institutions. As a result, proposals for centres, seminar series and research projects may not be fully supported.

Our vice chancellor is borderline terrified of the work I do because he didn't want our students and staff to be labelled as having gambling-related problems. **FRaUK(8)64**

Despite these obstacles, some researchers were drawn to gambling by their intellectual curiosity.

I was struck at the time by the amount of gambling that I saw around me and this was partly instigated by the fact that I was an occasional gambler at the time. I had some connection with the life-world of gambling. I thought 'Wow, this is really interesting. I've got to look into this.' **XXXXX**

More commonly, researchers were 'following the money', benefiting from grants made available to develop gambling studies at politically strategic times.

I wish I could tell you 'Oh yes, I have always been interested in gambling.' I went for it because basically there was an opportunity there for me. I was following the money. **FRaOE(5)105**

I wasn't planning to keep doing gambling but that's where the money was. It just took off and I guess I was drawn into it. **MRaAU(12)98**

33. What is research for?

Isn't the aim of research to solve problem gambling? Wouldn't the aim be that the prevalence study comes out and the rate of problem gambling is 0%? I'm all for study for study's sake but if it's going to be applied to a very commercial industry like gambling I think the industry would say 'Well, we've got all this body of research, how has it helped us reduce problem gamblers, or what does it tell us we should be doing to solve the problem?' **MIoUK(10)55**

The demand for evidence-based policy shapes ideas about the purpose of research in general. Gambling studies scholars think that research should produce tangible results and be applicable to the 'real world', a view often supported by the industry.

The key has to be to learn something that's useful, not just put something well written in a top

journal. It needs to be accessible and meaningful for taking action in the real world. 99.9% of us are focusing on understanding where the leisure components stop and the more destructive elements begin. **MRaUK(14)18**

Research should be about identifying issues which will potentially have some kind of policy or impact broadly defined. **XXXXX**

If it stays within academia, it loses its impact. The results should be written in language that everyday people can understand. The more audiences are reached the better. This might have a positive effect with problem gamblers themselves, or raise awareness of socially responsible gambling. It may even influence people who lobby against gambling altogether (like the Catholic Church). **MioSEE(20)3**

Work which does not fall within this remit is difficult to place in gambling journals and can provoke reactions including, 'So what?' Researchers who attempt to work outside this paradigm are criticised as selfish and esoteric.

I hate pure academic research. I think that gambling research must be useful, either for industry or government. Scholars have to focus on publications so sometimes they are not concerned by the impact on society, they don't care about it, but I don't think that's good research. Research outputs should have a kind of impact, not just to be published in a journal, where not many people read it but the authors still get a high score. **MRaHK/M(2)13**

Research has been driven by the whims and ideas of the researchers instead of what's needed. **XXXXX**

There was also resistance to this position, particularly from social scientists.

34. Opening the field

Gambling studies reproduces the industry position on gambling, and at the same time presents itself as a commentary on the industry or at least the products. The stuff on problem gambling, measuring them, separating them from everyone else, writing 'loser' on their forehead. All that

People will say that the main purpose of research is building an evidence base to support policy change. That's an idealised purpose. The real purpose is to maintain the status quo. **XXXXX**

Our goal is to get published in high level academic journals. **XXXXX**

Early career researchers often provided the most insightful descriptions of this conservative system, showing that its reproduction relied upon the flow of money and prestige along entrenched paths that were difficult to disrupt.

I know that people prefer to see numbers and talk about problem gambling but we have to keep pushing. I really believe that, even though I am 'early career'. Plenty of times I have been pushed to take up more of a conventional perspective on problem gambling, or measuring or using existing work to rehash ideas that are already out there. There is support in that there is money, even. There is career progression. This is the amazing thing for a new scholar in your field. And discouraging too. It is very hard to do something new. You are discouraged, because to work with people you have to choose someone who has a record of getting money. But if you do that the likelihood is that they are a person who sticks just to problem gambling. They may be completely genuine and their research may be excellent, in those terms, but those terms are not the ones on which I want to work. I want to go beyond that and there is absolutely no chance to do that in gambling studies. **MRaOE(6)72**

This exclusive understanding of the purpose of research admits certain kinds of evidence and excludes others. It also limits the interdisciplinary development of gambling studies.

stuff. Gambling studies like that are as much a part of the machines as the algorithms, the buttons, the bells and whistles! **MInUK(2)51**

Throughout this report we suggest that the production of gambling research revolves around the

struggle to control what counts as evidence. Whereas other research cultures are enriched by a variety of disciplinary approaches which help them to address this complex problem, in gambling studies there is a lack of collaboration between disciplines and a reluctance to use different methodologies. Interdisciplinary approaches could produce more nuanced and layered data about gambling behaviour – a phenomenon that is highly complex and multifaceted. It could also prevent the creation of disciplinary ‘silos’ within gambling studies. Productive interdisciplinarity would also challenge ingrained epistemological and methodological models. For interdisciplinarity to flourish certain replicable elements of collaboration would need to be in place, including tolerance of epistemic ambiguity, trust and willingness to take risks.

People working in drugs and alcohol would easily be able to bring expertise and develop gambling studies and the fact that they don’t but they interact with each other and more widely with leisure studies is a reflection of the insularity and policing of the gambling field. It is a very incestuous field and quite a closed field. I was quite surprised how little gambling papers drew on other literature from related fields. Other kinds of addictive behaviour, young people’s behaviour in sociology or other literatures that I think might offer useful insights to gambling studies. **FRaUK(7)67**

My colleagues were not interested in gambling. It wasn’t thought important or part of our discipline. They didn’t like my ideas, they rejected my approach. Actually a group steeped in quantitative research embraced my expertise and were keen for me to bring this different approach and learn about qualitative methods. **MRaOE(4)73**

Data practices would also need to be brought together, so that a physicist, for example, and a social scientist might make use of a single dataset in a way that is mutually enlightening.

Treatment providers have got this wealth of data and it’s just sitting there. Some of them have got data going back 40 years. And it’s just a travesty that somebody isn’t thinking: ‘How can we use this body of information to look at the behaviours of this very specific subgroup?’ I

think there’s a real power in saying, well we’ve got the broad picture from the prevalence study and that tells us something, but then you’ve got these case study insights of people who are seeking treatment and of course they are very specific sample, etc., etc., so there’s all sorts of caution you need to have, but it’s about building pieces of the picture from the information you have available. I think that there’s a real opportunity to put these things together. We could sort of sit that in the broader context of the prevalence study but we can’t find anyone to provide the funding. **FRcUK(6)62**

Funders would also need to recognise and adapt to disciplinary rhythms and diverse ways of using resources. Our participants were unsure that funders understood university finances.

My experience is that people don’t really understand full economic costing, so when you’re discussing what would count as a fundable project it’s a small amount of money in the university context, it means you can’t really do a lot. It’s a particular problem here I think. **XXXXX**

They also criticised the lack of availability of funds for small, cutting-edge projects.

In gambling research there are little things that could actually make a difference but they are quite small projects maybe £40,000–50,000. But there’s just no way to get that kind of money any more, the ESRC doesn’t do small grants. **FRcUK(6)62**

At the other end of the spectrum, longitudinal, multisourced, multidisciplinary projects are increasingly highly valued as sources of robust data that can account for long-term differences in health and wellbeing and provide a critical window on many different kinds of social inequality. Examples include Whitehall 2, which is based at University College London and supported by the MRC, the British Heart Foundation, the National Heart, Lung and Blood Institute (USA) and the National Institute on Aging (USA), and the Sustainable Behaviours Research Group, supported by DEFRA (Department of Environment, Food and Rural Affairs), the ESRC and the Scottish government.

A more creative understanding of research and its possibilities was also encouraged by several new

entrants to the gambling industry. They called for approaches that were responsive to the new kinds of interactions taking place within gambling and gaming.

Gambling is a really interesting field, but not in the way that it's been studied so far. I mean the problem gambling stuff is important, I get that, but the rest of it – gambling as a disruptive technology, changes in gambling behaviour towards playful games rather than isolated engagement, all these things are really interesting. **MIInUK(2)44**

Research should tell us about how people play, how that changes in conversation with technology, how that is monetised as gambling, or through subscriptions or micropayments. People are very closed-minded about gambling and the work we do here, but I think that we are seeing the development of a new kind of artistic or creative process, one that is between users of social media and providers of games. If you can somehow get at that then I think you will be doing something very valuable. If you just frame these questions around problem gambling you miss something essential about what is happening. You rule out certain questions, and foreground others. You forget about the creative process and you look for pathologies. You write change out of the analysis. You fix technology when the definitional feature of the work we do is that it is a responsive process. I think all of these things show that using the problem gambler paradigm to understand social gaming risks

producing the same failures as you can find in the gambling research literature. It freezes what is fluid. It simplifies the interaction between individual and collective behaviour. It writes out technology and embodied practices. It misses ritual, religion, culture, kinship and gender and replaces it with genes, brains and neurons. That's one picture, but what I think is that you need to have lots of different pictures that capture something more interesting, more nuanced and more complex, not just rely on cramming actions, or people into the existing categories that we have made for them. My idea of research is that it should emerge from the data in a kind of dance. There is no dance in gambling research. It is robotic. Idiotic. It is unresponsive. It is rigid. You should be doing research that is agile, something of beauty, something true. **MIInUK(3)48**

A lawyer representing gambling operators echoed this sentiment.

This is not only about games, it is about changes in the ways that people consume new media. To limit it to gambling is short sighted. Look at how people use the Home Shopping Network, how they use social media and these kinds of things. This is more relevant, to understand changes in consumer behaviour, than studies of casinos or prevalence studies. We all know that these are blunt tools. I have three questions I would like to see in research: 'What is gambling?' 'What is the definition of value?' 'What is regulation?' But I never do see these questions. **MUR0E(7)91**

Money

“

Most of the senior researchers in the world have for quite some time been funded by the industry directly or indirectly, so the whole academy is very distorted. We've got a clean-up job to do. XXXXX

Headlines

- Lack of funding is one of the most important obstacles to high quality research. ([section 35](#))
- Uncertainty about funding makes it difficult for researchers to join and commit to gambling research. ([section 36](#))
- Researchers are under pressure from their institutions to attract funding from industry and to present the 'impact' of their work in economic terms. ([section 36](#))
- The lack of funding available makes researchers dependent on industry support. ([section 37](#))
- There are no neutral sources of funding. All funding bodies are invested in gambling in various ways. All sources of funding are motivated by particular priorities, shaped by distinctive administrative and bureaucratic cultures, and sustain particular methodological paradigms. ([section 38](#))
- The interests of funders are reproduced in diverse ways including in the questions that are prioritised in calls, the ways in which applications are assessed and the ways in which research is disseminated. ([section 38](#))
- Calls for research generally focus on problem gambling. ([section 38](#))
- Research councils expect specialised gambling charities to support gambling research. ([section 39](#))
- Funding that originates from voluntary contributions is conceptualised as a gift from industry to researchers, even when it is administered by an intermediary. ([section 40](#))
- The purpose of intermediary bodies is to launder industry money of influence. In practice, the industry maintains a sense of ownership over research. ([section 41](#))
- There was no consensus among our participants about the implications of accepting funding from industry sources, directly or indirectly. ([section 42](#))
- Gambling studies has a weak tradition of recognising and acknowledging conflicts of interest. There is a lack of transparency about the conditions under which research is produced. ([section 43](#))
- Research councils are more independent than specialist intermediaries. ([section 44](#))

35. No money, no research

There is insufficient funding to support a research programme capable of producing evidence as understood by policy makers.

The biggest obstacle to improving research is money. Gambling research isn't anything like properly funded and it's not perceived to be a salient public health issue. **XXXXX**

I think actually the biggest challenge is just increasing the money available for research. **MRaUK(14)18**

In the UK, where there is a voluntary levy of approximately £5 million per year or 0.033% of gross gambling win,⁴⁶10% of which is spent on research, 23 out of 24 researchers described a lack of funding as one of the most important obstacles to conducting research.

I haven't done anything on gambling for four years. There's no funding to do anything. [...] I was really glad to return to my original interests to be honest! **FRaUK(5)77**

I was very lucky to get funded. It's gone downhill more recently. [...] I think it's really hard to get funding like that now. **XXXXX**

The grants aren't very big to be honest, you can't do a lot with that kind of money. **FRaUK(11)61**

As well as there being a perception of very limited funding, at present there is also uncertainty, making it very difficult to plan or commit to a future in gambling research.

The current state of funding is totally unknown. With the funding cuts that have happened with DCMS withdrawing their grant in aid to the Gambling Commission, the Commission has hardly any capacity to do any research of their

own and the recent changes to the RGT as a funding body, they are still finding their feet and they haven't made it exactly very clear about how they are going to fund research, what are their priorities, how they are going to set those, what the input of the industry is going to be in that process. And so that leaves you with the corporate sector and that, for me, is really linking up with the social responsibility side, or it leaves you with the large grant-funding bodies which is just incredibly competitive. **FRcUK(6)62**

Without a dependable funding stream gambling research is unsustainable. Some felt that the solution was in a better organised, more proactive RGT supported by a compulsory levy.

Research should be funded by a statutory levy on profits. Sorry I don't believe in the RGT budget of £300,000 a year [sic] on research. **XXXXX**

If the RGT was bigger and better organised we could apply to them like they do in Canada. They have a levy and that is why Canada is the leading country in the world in gambling research. [...] Here I feel that the ESRC / RiGT joint initiative in 2005 did get some sparks going and I don't feel there's been enough money in the field to retain or keep all those researchers in the field. A levy here would have an enormous impact. **XXXXX**

The impact of a levy would be determined by the way in which distribution is organised, and would not resolve all of the problems that we describe in this report. It is possible that additional funding would simply produce more conservative research. In Macau, for example, where there's a 1.6% levy, research is limited by problems with access that we describe in the next part of the report (see section 47).

46 H2 Gambling Capital, 2012. 'Leading global gambling nations – Asia and egaming continue to out perform'

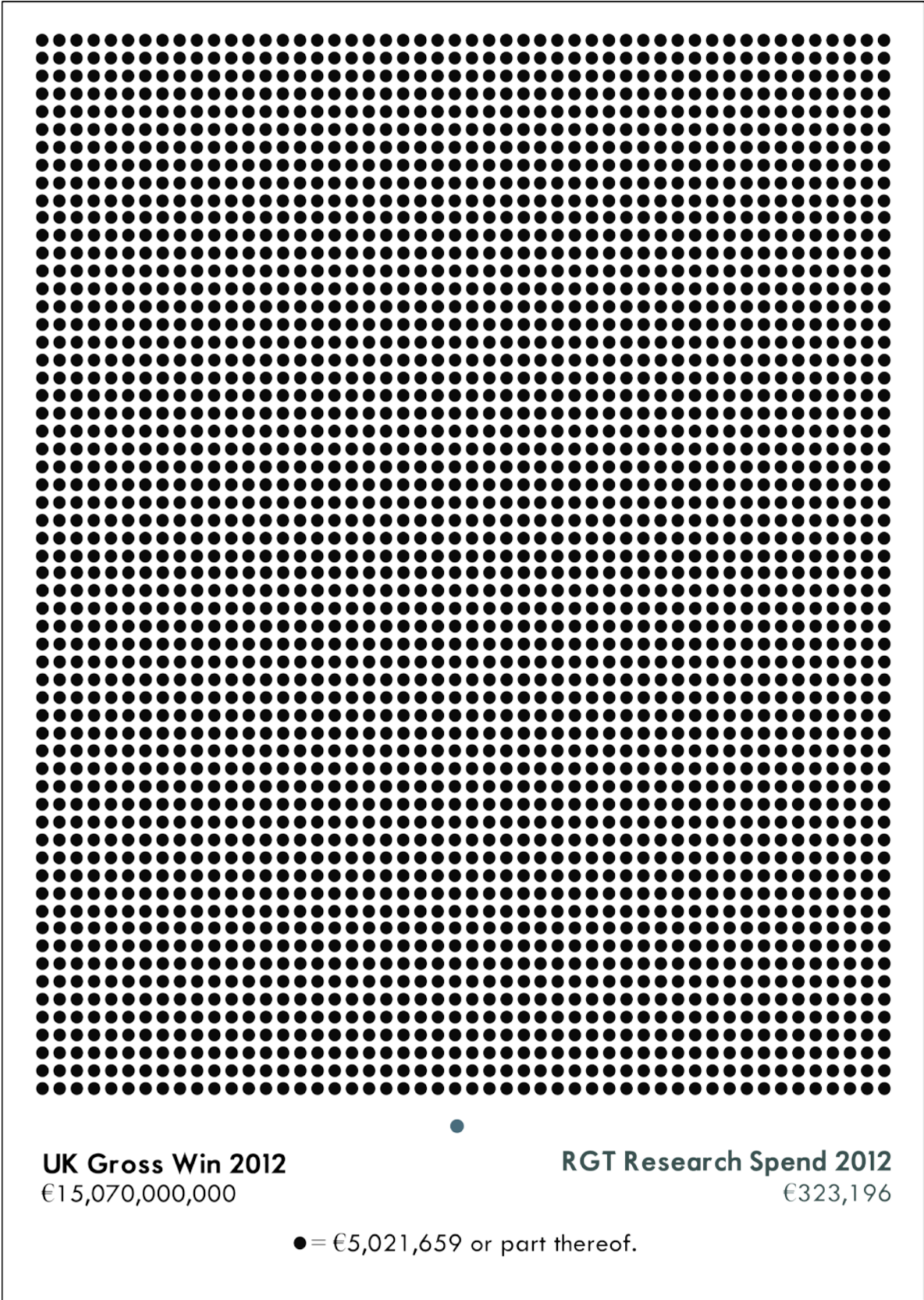


Figure 8 – Gross Annual Win vs RGT Research Spend, UK, 2012. The amount spent on research was one 46,628th of the UK gross win in 2012. To proportionally represent this ratio using the diagram above would require over 15 pages of black dots to one blue dot. Based on figures from H2 Gambling Capital, 'Leading global gambling nations – Asia and egaming continue to out perform', 2012.

36. Following the money

The stuff we work on is dictated by funding. XXXXX

The withdrawal of public support from higher education has accelerated since the financial crisis. Universities are now expected to be 'self-financing' and academics are required to attract support from industry partners. Gambling research is no different in this regard. On an individual level, external funding provides time out from the pressures of teaching and administration, so that researchers can build up their publications, the basis of promotions. With the exception of economists who work on secondary data, most researchers are limited in what they can achieve without funding.

There is pressure from the university to bring money in. As an academic you are definitely penalised for not engaging. More and more universities judge you by the funding you bring in in terms of research, and gambling and alcohol funding is very easy to get, especially if you don't care where it comes from. XXXXX

I've hardly ever applied for anything. Grants are now something that universities are prioritising. To an economist the grant is an input not an

output. You should be judged by your outputs and if you have outputs without any input you've done even better. But universities don't see it this way. They want research grants. XXXXX

Completing funding applications is time-intensive with no guarantee of an end product. In order to increase the odds of success, researchers are inclined to produce proposals that fit unambiguously with the priorities of funders. This reduces dynamism and creativity within the field, encouraging conservative and derivative approaches that will find broad support among gambling's power brokers.

I've made a decision not to play that game of unashamed metrics. It's a personal choice. [...] I think that working long hours and sending off loads of papers to gambling journals to become known by funders is a game. I don't want to turn into that person. To use a draconian expression, I don't want those to be the conditions of possibility in my own life. MRaAU(12)98

37. Taking the money

The primary effect of the shrinking research budget in higher education has been for researchers to become increasingly dependent on the industry. The majority of researchers we spoke to had received funding from the industry, indirectly or directly.

Gambling industry funding is particularly useful when there is not much funding available elsewhere. MRaUK(14)18

I can't think of a single leading researcher who hasn't taken money from the industry. XXXXX

Most of the senior researchers in the world have been for quite some time funded by the industry directly or indirectly. XXXXX

38. Terms and conditions

All research comes from somewhere. I don't think any research can be entirely independent of its funding, whether that funding is research council or anyone else. FRaUS(11)66

There's no such thing as disinterested research, don't be so naïve. MInUK(11)47

The priorities of funding bodies are realised through their commissioning activities. Particular questions are either explicitly or implicitly foregrounded. In the case of gambling, calls for applications often focus on 'problem gambling' or 'harm minimisation', rather than inviting researchers to be creative or imaginative in envisaging how

they might answer a particular question, or solve a problem. Examples include the ESRC/RiGT funding streams 'Interventions in Problem Gambling' and the three-year Gambling and Aboriginal People Awareness Program, designed to 'lower the impact of problem gambling on Aboriginal communities in New South Wales'.

Most research is managed by never asking questions which are likely to produce embarrassing results. **XXXXX**

39. Who's responsible?

Based on their experiences of applying for funding, UK academics felt that research councils were reluctant to support gambling projects for two reasons. First, because it should be funded by RGT, a specialist fund. Second, because it was not regarded as a serious public health issue.

Gambling isn't really thought as a major issue, so there is not very much ESRC funding for instance. There is not much from the larger academic funders available for gambling research. **FRaUK(7)101**

There seems to be limited understanding by academic funding bodies of the importance of gambling research. [...] In economics, research bodies have said it should be funded by commercial organisations, not by us. **XXXXX**

The main challenge is simply that it is not a priority area for research nationally or for any influential group of people in society. Gambling is relatively hidden, all addictions tend to be hidden but gambling addiction particularly so. It's not politically very high on the agenda, unlike say smoking or alcohol, because of the effect of smoking and drinking on physical health. There aren't measurable effects of gambling on cancer or on liver disease, for example, and unlike drug problems there isn't the obvious connection with HIV and AIDS or other conditions, or with public disorder. **XXXXX**

The apparent lack of support from research councils places greater emphasis on the RGT as a source of funding. In practice, support may be more limited than expected.

Part of the problem is not so much that they get in there and interfere in your research results but they set the questions. If you know social scientists, half the battle is getting a good research question and then working out what I'm going to do. So by actually setting fairly banal questions, questions that allow a focus on harm minimisation or how you may help a particular set of problem gamblers allows us to avoid more considered in-depth analysis, certainly looking at systemic structural issues and the like. **MRaAU(12)98**

There is a perception within the funding bodies that gambling research is funded by the RGT. It's not. **FRcUK(6)62**

I haven't received any RGT money. They don't seem to have any money. What proportion of gambling research in the UK is funded by the RGT? I don't know the answer to that but I would expect not a very high proportion because they don't have any money. **XXXXX**

This problem is compounded in younger jurisdictions, like south-east Europe and Hong Kong. The profile of gambling as a public health issue is even lower and, as a result, there is not yet a dedicated fund for research.

In Hong Kong the main challenge is to have more funding. I think everyone you spoke to probably had the same answer. I think it could be really helpful to have a gambling research specific fund because I understand that in many other countries funding is allocated to gambling research, it's separate from clinical services. So it would be helpful for the development of gambling research in Hong Kong to have a separate fund specifically assigned to research. **FU-tHK/M(15)102**

Croatia doesn't prescribe a certain percentage for the gambling research, prevention and treatment that would be taken out of their money. The Croatian Lottery does give money to different social causes but this money goes to the Ministry of Finance and then is distributed by them. **MRaSEE(10)7**

In Macau, there are funds available, but opinions differed as to whether or not they were adequate, and accessible.

It's not difficult to get funding: I have never failed. The Macau Foundation has a lot of money, 1.6% of gambling gross revenue goes to the Foundation. They have a different focus each year. In the last two years it has been responsible gambling. We also have the social work bureau. **FRaHK/M(5)23**

It's not difficult to get funding, mainly because the Macau government has enough money now. Gaming revenue is so high. I have to write a proposal to say why I've chosen this topic and how important this topic is. If they are interested I think it is not difficult to get funding. **MRaHK/M(2)13**

Macau doesn't have a dedicated fund like in the UK. The UK has the Responsible Gambling Trust

but in Macau we don't have that yet. And also there are some other funds that in many situations they don't like psychology. They don't believe psychology is a science. **MRaHK/M(3)22**

I would not say that there is a lot of funding available in Macao. It depends. If you take the easier approach, say for example, I wanted to distribute questionnaires to maybe 3000 visitors to Macao asking them their opinion of the facilities in casinos. For this kind of research, it would be relatively easy to get funding. But when it comes to qualitative research it's really difficult. Unfortunately not many people know about the difficulties involved. It has to be approved by various panels, and unfortunately some of these panel members do not know how research in gambling is conducted. They might be experts in other areas, for example, in arts or in Chinese literature, maybe in law, but when it comes to gambling it's another issue. **MRaHK/M(6)12**

40. The burden of the gift

Despite the fact that their pot of money is small the influence of the RGT is great. They set the terms on which gambling research is defined, its function and how it should be funded.

The RGT describes itself as, 'the leading charity in the UK committed to minimising gambling-related harm. [...] The aim is to stop people getting into problems with their gambling, and ensure that those that do develop problems receive fast and effective treatment and support.'⁴⁷ In the US the NCRG (National Council for Responsible Gambling) describes itself as, 'the only national organization exclusively devoted to funding research that helps increase understanding of pathological and youth gambling and find effective methods of treatment for the disorder.'⁴⁸

These descriptions emphasise problem gambling and treatment as an exclusive priority. We have

described how this narrowing effect functions in practice in previous sections. Both organisations also conceptualise voluntary contributions as gifts or donations on their websites:

Gambling is a legitimate and popular leisure activity and the industry's record of support for those who do suffer with problems is a good one and perhaps ought to be more celebrated.⁴⁹

Today, with the assistance of so many generous companies, organizations and individuals, more than \$22 million has been committed to the NCRG, an unprecedented level of funding for gambling research from the private sector.⁵⁰

Gifts create particular kinds of relationships that call for constant attention and management. They

⁴⁷ Responsible Gambling Trust Web Pages, 2013. 'About us'. URL: <http://www.responsiblegamblingtrust.org.uk/About>. Accessed 18 November 2013.

⁴⁸ National Council for Responsible Gambling Web Pages, 2013. 'About NCRG'. URL: <http://www.ncrg.org/about-ncrg>. Accessed 18 November 2013.

⁴⁹ Liddle, S. 2013. 'RGT stresses independence in Cat B research'.

⁵⁰ National Council for Responsible Gambling Web Pages, 2013. 'About NCRG – Funding', URL: <http://www.ncrg.org/about-ncrg/funding>. Accessed 18 November 2013.

are framed by mutual interests and the preservation of harmony. This dynamic shapes relationships between industry, intermediary bodies and researchers, and is partly responsible for the cosy mentality described in section 27.

What are the implications of this approach to funding research? By presenting voluntary contributions as gifts to be celebrated rather than one of the costs of doing business, intermediaries place particular pressures on themselves and researchers. One of the ways in which this idea of gifting manifests itself is in the tendency of the industry to maintain a sense of ownership over research. This belief was expressed by members of the industry and also some researchers, particularly in the idea of value for money.

The research we do has to be of some use to the industry, after all they are paying for it. You can't just choose something completely esoteric – you have to demonstrate that what you produce is going to be of some benefit to them

otherwise you won't get funding. They are paying for it after all. I think that's reasonable!
FRaUK(4)68

Research must provide value for money for industry. They are paying for it after all. Some researchers have been irresponsible, and this is why the industry does not trust them to share data. We have to work on that relationship and reassure industry that they have nothing to fear from research. Then we can start to work together. The relationship between research and industry should be mutually beneficial. Academics should produce value for money, research that meets the needs of industry. Industry has a responsibility to support that kind of research.
MIoUK(12)41

Gifts are never entirely alienated from their donors – they retain traces of their interests. Receivers experience gifts as relationship maintenance. We discuss this sense of industry ownership of data and research in sections 45 to 54.

41. Ethical sanitation⁵¹

Adams has described five methods used to distance industry funding from its source: structural decoupling, as practised by the NCRG; the tripartite partnership committee, as it existed in the UK before 2012; independent panels of experts, such as the Victoria Panel, now disbanded; peer review; and the blending of sources.⁵²

Policy makers have created intermediaries with the intention of cleansing money of industry influence. In practice our participants reported a range of experiences. It was not always predictable whose interests were promoted by particular structures. The outcomes were equally dependent on individual personalities and how they fitted together.

Some of our participants contributed to research panels that they described as genuinely independent.

How the research is reproduced is contextual. In our case we had a free hand, genuine independence. There may have been industry

people on the board but the actual operation of the charity was independent and the board did not dictate, or I wouldn't have worked for them.
XXXXX

Others pointed out that the majority of funding bodies either include industry representatives or maintain close relationships with the industry. Relationships may be formally embedded within consultations and strategic discussions, or informal and enacted in diverse social spaces including gambling conferences, annual general meetings and social events.

The people on the board are very articulate, they are very good at making their viewpoint known and they are very assertive people. And then if you look at the academics who are on the same board, you think actually they are fairly... they are nice people, and very good academics, but they are not as assertive as the gambling industry representatives. And what they are

51 Adams, P. 2011. 'Ways in which gambling researchers receive funding from gambling industry sources', *International Gambling Studies* 11 (2): 145–152.

52 Adams, 'Ways in which gambling researchers receive funding from gambling industry sources', 147.

good at expressing is that we don't rock the boat. 'We', say the industry, 'are funding this research'. [...] They are very good at saying, 'Well we don't want ...', 'It's not a good idea to do that...', 'If we do that piece of research we might not get the contributions in.' Of course it would take a couple of years to get a levy set up, so that's also a worry because you need on-going funding for treatment. **FRaUK(11)61**

Now, industry are on the GamCare board. What does that tell you? That to me creates, and bearing in mind how good the industry are at creating paths that smooth the way for them and they've done that. They've got these linkages now with GamCare and GamCare will be less critical, I will predict, less critical in the future, of areas of the industry that could do with scrutiny. **XXXXX**

The situation in the UK provoked the strongest comments from researchers, who expressed varying degrees of scepticism about the influence of industry over research since the collapse in 2012 of the tripartite arrangement which separated fund raising from the commissioning of research.

I'm very critical of the funding arrangements in the UK now because the specialist research for gambling research comes from the gambling industry via a voluntary levy. They raise a certain amount of money each year and that goes to the RGT, which is an industry-led organisation which then decides where the money would go, which seems to me quite the wrong thing to do because it represents a conflict of interest, really. The gambling industry shouldn't be so closely involved in the national system of funding research. **XXXXX**

It shouldn't be industry people deciding where to put the money. I think it should just be researchers, using the experiences of the policy makers and clinicians to find out. So I'm not in favour of having anyone from industry dictating what happens in the research field. It has made it rather complicated actually. [...] Of course RGT money counts as industry money. Of course it does. **FUIUK(15)78**

If you look at what happened to independent research in the UK, with the power of industry

and the takeover of the RiGT then RGF (Responsible Gambling Fund) into what is now basically a totally industry-dominated charity which gives across a paltry amount as a voluntary levy. They fought very hard to not have a mandatory one that the Secretary of State had the power to invoke but chose not to. You see a complete about-turn, in terms of the UK research and regulatory agenda where now it's just totally dominated by the industry and where even the benign end of the continuum around treatment is dominated by one provider who has actually captured the powers that be in its own interests. **XXXXX**

I think the RGT is a complete and utter disaster zone. I won't hold back. At least before there was some ESRC money coming in and in that sense a bit more legitimacy to the whole endeavour, but now that doesn't seem to be of any interest to anyone and I can't understand why. Why wouldn't you want to attract more funding in the first place and, second, why wouldn't you want to achieve a greater degree of legitimacy to your research endeavours by involving those sorts of third party organisations? **MInUK(8)35**

Some researchers argued that the purpose of intermediary bodies is to present the appearance of independence even as they reproduced the interests of the industry and the state. In this sense, their function was rhetorical.

The RGT only funds research that fits their agenda. The new structure of it is really worrying because it's still too heavily industry. If you look at the independent people they've got, they are independent people who know nothing about gambling whatsoever. And not a lot about research. **FRaUK(11)61**

The main aim is to launder the money, to make sure that the money from industry is managed by what looks like an independent body. Australia really developed this model. You have a panel with government representation, representatives of the industry and representatives of the community. The community could be research or public health people, or could be anybody they like who is compliant. The actual part within

that committee is basically the relationship between government and industry with the

pretence that there is some sort of scientific independence. **XXXXX**

42. Negotiating independence

Some of those who are funded by the industry, whether directly or indirectly, argued that this has no impact on their independence. They rely on their personal integrity to manage these relationships.

I've never started something thinking, 'Oh it's funded by industry.' My independence is something I value. I will say it how I see it. That's the reason some people will hire me. **XXXXX**

In 2007, Peter Collins, specialist adviser to the joint parliamentary committee which contributed to the final Gambling Act, as well as the more recent select committee in 2012, was running the Centre for the Study of Gambling at the University of Salford. It received £100,000 a year from casino corporations such as MGM Mirage, Isle of Capri and Kerzner International. At the time, Collins maintained that, 'the reason [the firms] fund this [centre] is because they are sympathetic to the views that I hold anyway, independently'.⁵³

Experiences of working for industry or their funding intermediaries varied. Some were entirely hands off:

I have to say, from my experience of having done research for 13 years, I probably had the least interference as far as commissioning goes by the gambling industry, by a substantial margin. **MRaUK(14)18**

I must say I haven't experienced any pressure whatsoever from the RGT. **FraUK(4)70**

The state operator didn't give us any leads or direction – do whatever you like, we were free to do whatever, every year we organised a conference, they attended, we published proceedings. We'd say, let's have lunch to let them know we are alive and producing. We chose topics based on our own interests. It might have been difficult if we had chosen something really obscure. In a broad sense it had to be relevant.

No direction though, no 'You should look at this and not that.' **MRaOE(10)86**

Others who had accepted industry funding expressed more ambivalence about the effect that this had on their work.

I have felt pressures as we've touched on, and some of the pressures have been very strong pressures, but if the alternative is there's going to be no research I don't know if we are going to cut off the nose to spoil the face. Every moral virtue needs to be employed and I do think that it can possibly contribute to the gambling debates and our knowledge, but if we are talking about where the organisation supporting you wanting to white-wash or dilute findings then that's not really acceptable. **FraUK(8)64**

One research user was critical of academics who, he argued, confused independence with a lack of accountability.

Academics are appalling. They expect to be completely unaccountable. I think that if you accept funding then the least you should expect to provide is a regular report. This is not saying, 'Do this, change this', but just 'Tell us what you are doing, are you making progress?' and so on. But academics are far too arrogant. You would be amazed. **MUfUK(7)84**

Many researchers rejected industry funding, and were critical of those who had accepted it.

I would be suspicious about industry-funded research, and I would wonder whether the funder had stepped in and influenced the research question. They are bound to differ and that's why I'd be wary. **XXXXX**

What I would like to see is obviously independence of research as much as possible. One of the problems we have had in Australia is that research hasn't been independent from

⁵³ Barnett, A. 2007. 'Revealed: march of the new casinos', *The Guardian*, 21 January.

governments and the industry. I think researchers are complicit in that. **MRaAU(12)98**

If researchers want to be independent, they mustn't kiss up to the industry and do research for their needs. They shouldn't take a single euro from them, because if they do it, this is the end of independent research. **MRaSEE(4)2**

One member of the industry agreed.

Whenever a casino operator commissions research, the chances are they will control the results. The state should be the one commissioning and paying for the research. Universities should do the research, but there shouldn't be any connection between them and the gambling operators. **MloSEE(20)3**

Researchers suggested that the industry was aware that the source of funding affected perceptions of independence.

It was a gambling industry report and nobody from the gambling industry had paid a penny towards it. In fact at the end, the gambling people were like, 'Somebody ought to do more

things like this', and I said 'You're making shit loads of money, you should fund them.' 'Oh we wouldn't want to fund them. It wouldn't be seen to be independent,' they said. So don't expect any money to pop out of the woodwork. **MRcUK(9)20**

Some felt that the potential for bias could be overcome by practical measures to protect their independence, including negotiating terms with funders before research begins.

When you are working with industry, the best that you can do is to set up a contract and a basis for collaboration where academic integrity is maintained to the greatest possible extent. In every contract we write we have a language that basically says the funder does not get a say in what we publish and when. We are allowed to publish our findings as we write them, wherever, and we won't enter into a contract that doesn't have that stipulation. **FRaUS(11)66**

43. Conflicts of interest

Researchers and research users called for more transparency in gambling research, notably for acknowledgements of funding sources and descriptions of research design including reference to any conditions placed on access, non-disclosure agreements or other special arrangements between operators and researchers. Without these acknowledgements, articles and journals suffer from a lack of credibility.

Addiction studies has a much stronger tradition of acknowledging conflicts of interest. Since 1997 it has used 'The Farmington Consensus', which was intended as a framework within which journals could 'conduct their professional activities and [...] safeguard moral and ethical principles.'⁵⁴ This has been the catalyst for work which interrogates the production of research in a number of fields.

In the field of alcohol research, Babor has identified seven areas of industry involvement, all of which also apply to the field of gambling research:

- (i) sponsorship of research funding organizations;
- (ii) direct financing of university-based scientists and centers;
- (iii) studies conducted through contract research organizations;
- (iv) research conducted by trade organizations and social aspects/public relations organizations;
- (v) efforts to influence public perceptions of research, research findings and alcohol policies;
- (vi) publication of scientific documents and support of scientific journals;
- and (vii) sponsorship of scientific conferences and presentations at conferences.⁵⁵

⁵⁴ Various, 1998. 'The Farmington Consensus', *Alcohol & Alcoholism* 33 (1): 6–8.

⁵⁵ Babor, T.F. 2009. 'Alcohol research and the alcoholic beverage industry: issues, concerns and conflicts of interest', *Addiction* 104 (Suppl. 1): 34–47.

He concluded that the industry's activities could, 'confuse public discussion of health issues and policy options, raise questions about the objectivity of industry-supported alcohol scientists and provide industry with a convenient way to demonstrate "corporate responsibility" in its attempts to avoid taxation and regulation.' Similar conclusions were reached by researchers.

No decent journal will take an article which is funded by tobacco or alcohol, few will take them from pharmaceutical-funded research and I think we need to be working towards the same situation in gambling research. XXXXX

When I get research which is for an editorial process I'm actually careful to look back 'What's motivated this piece of research?' 'How was it paid for?' XXXXX

44. Valuing independence

A number of participants suggested that research councils provided a more suitable funding model as they were independent, as well as being perceived as such, by a wider variety of stakeholders. A research council funding model would create a more robust structure focused on academic merit. It would attract more and more high-quality applications, although it would still face the challenge of selecting reviewers from outside the established field of gambling studies.

Gambling research should be funded through research councils and through traditional mechanisms, i.e. it should come from public money some of it, but I also think that there is no reason why some of the industry shouldn't make a contribution that is then made available for people to compete for to see if they can get projects started as happens in other jurisdictions. XXXXX

The way I'm funded works quite well. I can do independent research because it goes through the national research council and I'm assessed by people at the same level. That it is integrated in the regular funding administration works well. Because I think it's important that research is not

The journal *Addiction* is developing a much stronger process for ensuring that people who are funded by industry don't ... at least it's open that they are but ideally they shouldn't publish any more because their independence is questionable. But it hasn't been normative in the gambling field so much of the research so far is highly questionable. XXXXX

In the field of food studies, the International Life Sciences Institute (ILSI) North America Working Group on Guiding Principles has set out conflict-of-interest guidelines regarding industry funding. Their intention is to protect 'the integrity and credibility of the scientific record, particularly with respect to health, nutrition, and food-safety science'.⁵⁶

... serving the interests of the industry. **FRaOE(5)105**

There really needs to be significant funding that is outside gambling studies. The ESRC programme started that, it disrupted it, it funded a few people, but because there were so few, relatively small grants and one-off grants then they were all pushed back out again. If you had a major funding body that deliberately set out to fund research but not in gambling studies then you could get a critical mass of people. **FRaUK(7)67**

The RGT should hand it over to the MRC and say it's for gambling. **FUUK(15)78**

A research council model, in which funding is more thoroughly decoupled from the industry, would mitigate some of the worst excesses of the existing arrangements. Whichever structure is adopted, however, funding will always be subject to the forces we have described. Gambling is lucrative, research has financial consequences. It is therefore in the interests of stakeholders to find ways to influence this process.

⁵⁶ Rowe, S.R., Alexander, N., Clydesdale, F. et al. 2009. 'Funding food science and nutrition research: financial conflicts and scientific integrity', *Nutrition Reviews* 67: 264–272.

Access

“

As long as you don't write anything they don't agree with I don't see why there should be a problem. **MIoUK(35)27**

Headlines

- The industry controls the terms on which research is produced as well as how it is received. ([section 45](#))
- The industry has the most accurate and informative data but it rarely shares it with researchers. ([section 45](#))
- Access to industry people, places and information determines the type of research which can be carried out. ([section 46](#))
- Responses to access requests vary between sectors. ([section 46](#))
- The majority of requests for access to data or environments are unsuccessful and most are ignored. (sections [46](#), [48](#))
- In less mature jurisdictions access to gambling environments is tightly controlled by the industry. ([section 47](#))
- Academics are asked to provide tangible benefits to the operator in return for access. ([section 49](#))
- Granting access to researchers can enhance an operator's reputation for social responsibility. ([section 50](#))
- Successful access is often the result of a serendipitous encounter, or the cultivation of long term relationships with members of the industry. It is therefore entirely unsystematic and often unrepeatable. ([section 51](#))
- Some academics produce commercial research as well as academic research. Their work for industry is often subject to non-disclosure agreements. ([section 52](#))
- The industry reserves the exclusive right to determine what is and is not 'commercially sensitive' data. ([section 52](#))
- Ad hoc data sharing arrangements leave the relationship between commercial sensitivity and public accountability in the gambling industries untouched. In doing so, they detract from the discussion of systematic access which urgently needs to take place. ([section 54](#))

45. The industry has the best data

When responding to criticism, the gambling industry continually asserts that existing research captures correlations rather than evidence of causal relationships between particular products, for example, and problem gambling. At the same time, researchers are denied access to meaningful data and forced to spend time and money devising ingenious ways to reproduce and capture gambling behaviour using experiments and surveys, knowing that their findings will be dismissed. It is even more galling to have to go through the tortured process of producing data about gambling in labs or natural environments in the knowledge that the gambling industry routinely records data relating to individual players, A and B tests, and new products, and therefore has a far better understanding of how gamblers behave.

Working with industry is really important. The added benefit is the data. They are working

with gamblers day in day out, in some cases hundreds of thousands if not millions of them. If you look at all the stakeholders in this research field, the industry know more than anybody because they see the real-world environment. They're not academics in artificial settings looking at self-reported data that may or may not be true. Getting their research and advice on research is really helpful. **MRaUK(14)18**

They have a very good database but it's really, really confidential. Yes. We can't get it. **MRaHK/M(3)22**

It's very difficult to get data from the gambling industry, it would be easier to get data directly from casinos if I could but the gambling industry is very concerned about sharing its data. **FRaHK/M(5)23**

46. Access denied

A lack of access to relevant people, places and information limits the quality and scope of research. More profoundly, the understanding that access is likely to be denied informs research design. Researchers are unlikely to form questions which depend upon access to anything but the most innocuous data or public space.

Social scientists are particularly vulnerable to refusals of access as they collect data in natural settings. Access to information in and about natural environments is closely guarded by the industry.

I can't help you with access. I don't know anyone in the gambling industry who will speak to you. Sometimes a particular person might say that they will help, but usually when I go and ask them again they have either changed personnel or they ask me to call back in a few months because they are really busy. We never really get to a discussion about the ins and outs because it never gets that far. I've given up, and now I just say the same as everyone else – that I work independently of the industry. I never say it's because they won't speak to me I say it's because of ethics! **MUpUK(1)36**

I prepared two questionnaires: one for the casino employees and the other for ordinary people living in the proximity of casinos. I wanted to outline the differences in opinions and experiences between these two groups of people. The problem was that [the operator] wouldn't allow me to circulate the questionnaire to the employees. I had to give it to them to do it. They wouldn't allow me to have direct contact with casino workers. I had the impression that the answers I got were not honest or that they were done in haste. I got only multiple-choice questions answered, not the descriptive ones. Out of 50 casino workers, only 10 returned the answers. I didn't think the questionnaire helped me to collect any kind of 'objective' data. It is in this way that [the operator] prevented me from doing the research I wanted to do. **MRaSEE(4)2**

Psychologists who work in laboratory settings also face difficulty when they need industry data or gambling products to reproduce behaviour in their experiments.

My experience of it is that it's very hard to do it, it's not easy to get access to these people and I don't think there's been any particular reason

or incentive for the industry partners to help researchers. That's my strong impression. In my experience they haven't had an incentive. It's not that they are necessarily strongly anti. Some are, but I just don't see that they have many incentives for doing it and I also think that say, for example, in the online environment commercial imperatives are such that they really can't. They are so busy trying to keep going that they are not going to spend a lot of time with researchers. XXXXX

Another psychologist described his efforts to 'borrow' an electronic gambling machine to use in his lab.

People were nodding a lot for a few months and then, you know, it looked like it was going to happen and then a couple of months later it went cold. [...] We got a sense that this was going to be a sort of 'this slot machine fell off the back of a lorry outside the psychology department'. And we'd have to carry it inside. It seemed to be done in that way. XXXXX

Economists told us that they had fewer problems securing access to data partly because they work with secondary data, and partly because their interests are more closely aligned with those of the industry.

In economics the emphasis is more on the typical gambler rather than the problem gambler and that's much less frightening for the industry than the relationship with the psychologist. [...] Economists tend to believe that consumers should have as much choice as possible so it's not often that they are writing about wanting to restrict what the industry can do. Whereas almost everything that comes from psychology leads to some prescription and that there should be some limitations on the industry. [...] I don't think that economists particularly have a fraught relationship with the industry. XXXXX

Responses to access requests also vary between sectors. Traditional bookmakers were among the least accessible.

Possibly the people that we found hardest to get hold of were the traditional bookies, Ladbrokes, Coral, William Hill. They were not very interested in talking. They were dismissive to the

point of, I would say, some kind of cognitive dissonance. MRcUK(9)20

The men who run this company and I mean men, old men, still make decisions as though they are part of a club. They are suspicious of all researchers. Of course they are! Why would they want outsiders coming and digging about in their business? They told me not to talk to you. They aren't nervous, they know they don't need to be. There is nothing that you can write about machines that will have any impact on them. But they don't need you. You are an annoyance, not a threat or anything like that but a bit irritating. MIoUK(11)29

Are you really a spy? I always think that you are really a spy for the competition. MInUK(2)52

Casinos and lotteries were relatively more open to requests.

As far as the company was concerned it was very good access. [...] As far as getting to talk to staff was concerned they were quite, sometimes they sort of forgot us but quite accommodating. They usually managed to find some people for us to talk to. FRaUK(2)58

These differences reflect perceptions in the media of different gambling products. Betting operators in the UK are nervous about FOBTs. Casinos are eager to show that they are the most highly regulated sector. Lotteries are interested in maintaining their reputation as a soft form of mass participation gambling that is accountable to the public, its customers.

Some members of the new gambling industries, including social gaming, exchange betting, and mobile, were interested in distancing themselves from older sectors, which they presented as less open to outsiders including researchers.

When I go home I don't hang out with gambling people. They are a strange lot. It's all very cloak and dagger, close friendships, people moving between firms, commercial secrecy seems to lubricate the job market and all that stuff. Their business model is very different to ours. We see our role is to use our imagination to bring new processes to life, to move them from one context

to another, to do things that people haven't done before. I think that the gambling industry has more pressure to repeat the existing models and make money that way. They are paranoid about research! They really don't like it. But I think that is because they are fearful in general, not really about researchers as individuals. But about everyone! I think this is what you get when an industry becomes very insular, self-referential and fearful of either regulation or missing commercial opportunities. They are inward looking, they circle the wagons at the slightest excuse. Not all of them, but wagon circler would be a good name for gambling executives as a breed. **MInUK(2)46**

The gambling guys are totally paranoid. It's tighter than the Masons. **MInUK(11)47**

In one case the narrowness of the approach taken by most researchers was the basis for denying them access to a workplace in the new gambling industries.

We see gambling researchers as focused on problem gambling, as crusaders, rather than interested in the complexity of particular products or markets. They are looking for ways to support their existing ideas about gambling. They make judgements and make very loose arguments based on very limited information. It makes us very frustrated actually, and so even though I think it would be great to have researchers come and see us, I can't persuade other people because I don't want them to be uncomfortable in their work place. I can't have someone making them feel like the job they do is actually morally bad or something. The people who work here like making games that people enjoy, and we have very smart and very thoughtful people here. They are hurt by what they read about our industry in the newspapers and they feel like they can't win. **MInUK(2)50**

Even within sectors there is a great deal of variation. Some operators are known to be more receptive than others. For example, MloUK(7)115 was a small independent bookmaker eager to welcome a researcher in order to differentiate itself from the more established competition that it was

attempting to disrupt. The presence of the researcher was a central feature of their compliance documentation used for licensing purposes.

Sure you can come in. Ask anything you like, look at anything you like. We've got nothing to hide. You can do whatever you like, just let me know if you need to speak to someone or whatever you want to do. [...] Write whatever you like, tell us about it or don't tell us about it, up to you. We've got nothing to hide. **MloUK(7)115**

Attitudes to research also vary for entirely personal reasons. One industry executive was about to retire and keen to express his misgivings about the direction the betting industry was taking.

You know I will always talk to you lot [researchers] as long as you change my name. I used to hold my head up in this job. Betting was honourable. But machines have changed everything. We all thought we were a cut above the arcades but not any more. You can't justify what we do with these machines. It's one thing to give someone a chance to win a few quid on a horse, it's another thing to get them hooked on a machine that is no better than a roulette wheel. I've been in this business twenty years and I've started being a lot more cagey when I tell people what I do. Imagine that at my age! And a proud bookie for twenty years. But the machines are a different ballgame. **MloUK(20)74**

One member of the policy making community in the UK suggested that the industry should allow researchers to look into inconsequential issues, and by doing so enhance their reputation for cooperation.

I understand the industry's position – it doesn't want people looking at its laundry, but it isn't doing itself any favours. Perceptions would soften if they would allow people to carry out research. Areas where it could tidy its act up, others where they do a particular thing and there's little or no impact. They throw the baby out with the bathwater by bringing down the shutters completely. **MUpUK(10)85**

This approach was already endorsed by some industry representatives.

If you are doing research with the company for the company, then it might find out some useful

stuff. And by useful I mean that it means bigger profits. If you are an independent researcher then they hope that you are going to find out

something that is uninteresting. So what kind of deal is that for researchers? Not a great one. **MIUK(1)49**

47. No entry

In younger jurisdictions including Macau and Croatia, the industry has a less fully developed policy of social responsibility and refusals of access were expected.

I did a survey on problem gambling among casino patrons, I tried to seek the casino operators' support but generally they said, very politely, 'Well we cannot proceed.' Finally, I gave up and I said 'Okay, I'll do the survey outside in the public area', they said they are really happy, they are relieved. **MRaHK/M(3)22**

I had real problems with accessibility to casino operators and managers. [...] Current employees are not allowed to talk about their experiences. **FRaSEE(10)4**

It's not easy at all to approach casino employees and I needed to spend so much time and effort to have the opportunity to interview them. And it was a painful and long and expensive process. In Macau they didn't want to disclose too much of their operation because they consider it strategically sensitive, which would affect their operation and profitability. So that's why they tended to keep secret or to completely say no to your requests. **MRaHK/M(6)12**

Gambling operators expressed a general distrust of researchers, and did not recognise research as a valid activity.

We cannot allow a researcher, no matter how competent they might be, to use our database. We have sport scores from the last 10 years stored there, what would happen if an academic were to meddle with the information and inadvertently erase something? It's the same as if I tried to rummage through the British Museum archives and ruined something there. **MIoSEE(20)8**

In Macau, researchers, like all civil servants, are not

allowed to enter casinos except during Chinese New Year. Requesting permission for access at other times of the year is a lengthy bureaucratic procedure without any guarantee of success. This seriously limits the kind of questions researchers can ask.

As a research scholar in Macau we are not allowed to go in the casino so we don't have so much information available. For me it seems ok because I just focus on regulation, but for some people, if they focus on management, it's really hard for them to do that. **MRaHK/M(2)13**

You know that, as researchers, especially from public institutes, we're not allowed to go to casinos. If we want to go to casinos we have to go through a really long procedure. I have to apply to my boss and my boss needs to apply to his boss who will pass my application to the Secretary adviser. **MRaHK/M(6)12**

Researchers also received varying levels of cooperation from the government.

I rarely need details from the gambling industry but sometimes I need statistics from the government. Some of them are in the public domain. I can easily access that information. It is not easy to work with the government, it's not as transparent as in western countries. They don't like to say too much to the public. One time the government body called me and asked me to go the office and talk a little bit. I criticised them and they didn't feel happy about it. **MRaHK/M(2)13**

Although there is a levy in Macau, and funding is therefore less of an issue, the difficulty of gaining access to gambling data and environments totally determines the type of research that can take place. Solutions to funding problems do not guarantee high-quality, critical research.

48. 'Polite, but with no intention of ever, ever coming through'

Rather than denying access, a common tactic is to discourage researchers by ignoring their requests for interviews, or simply being unavailable, continually postponing any possibility of access without ruling it out entirely. This approach protects the industry from accusations that it is being uncooperative.

You just sit tight and hope that the research looks somewhere else. I would ignore your emails, then be really apologetic and upfront if I saw you again. Polite, but with no intention of ever, ever coming through for you. I've seen people talk to you like that at conferences and the best bit is that you don't realise that's what they're doing! I deal with them every day and I see what they're doing. They are saying under their breath 'Oh no, it's that Professor again!' I see the fear in their eyes! And they say to you, 'Yes Professor Cassidy, of course. You are very welcome to visit our company, let's set something up over the summer' and I see your face getting all excited and then they walk off going, like 'Score! That's her put off for another six months. How long did she say her project was going on for?' And you have no clue! You literally start to look excited! **MInUK(1)49**

I tell researchers how much I enjoyed our conversation and to keep in touch and maybe we can sort something out next year. Works every time. **FInUK(11)39**

We negotiated for months with the industry to get access to gaming floors to interview patrons. And that just stalled and stalled and stalled, and in the end we did an interview over the phone instead to get a sample. **XXXXX**

If I can manage to find an email address, which I usually can, I find that my emails are completely ignored. **FRaUK(8)64**

They didn't tell me anything, they just ignored my efforts to communicate with them. Eventually, after many months when they replied, my fieldwork was over. So this was their way of avoiding the cooperation: just silence. I sent emails, letters and phoned many people within the company, but I received no reply. **FRa-SEE(6)1**

They were not interested in my presence. They didn't say I couldn't do it but they also never said I could. I had an informal allowance to be there but I was never given a formal approval. Until the last day I was asking for statistics of the Tote, they never gave it to me. I didn't feel they were interested in any way in this research. **FRaOE(5)105**

A lack of strong evidence in published research can appear to reflect either the non-existence of data or the lack of imagination or determination of the researcher. In practice, it is a reflection of the conditions under which the majority of research takes place.

49. What can you do for us?

There is no point in having someone from university just for the sake of it. If they came along and said I want to do some qualitative research on this and that, you're like 'Oh'. It would be the big 'So, what?' You produce a paper. What does it mean to me? Do I care? We know a lot of information about our players. It would have to be quite compelling upfront. Someone would have to do an amazing pitch. Everyone must go 'Wah! That's good! I really like that, I haven't thought about that'. A good example is, if somebody came along and said, 'I spent two years

studying the Chinese gambling market and I think there is a good way to take your products into it profitably.' That's more interesting. Research to me is more like a pure business opportunity. **MInUK(16)19**

Gambling companies have their own researchers so do not need our help. **FRaHK/M(5)23**

Researchers described access negotiations with gambling operators as torturous, time-consuming and generally unsuccessful. For requests to be considered, academics must demonstrate that some

tangible benefit is likely to accrue to the company as a result of their research. The most sympathetic recipients of requests for access were generally found in compliance departments, to whom the potential benefits of collaboration, however marginal, are most immediately obvious. The success of access frequently depended upon the influence of the compliance department, which varied between operators. In order to 'sell' research to the rest of the company (particularly those in more commercially focused departments), compliance officers coached researchers to produce proposals that would help them to prove to colleagues that the research would be beneficial to the company.

As a researcher, you need to produce a document that very clearly sets out the tangible benefits to the company, to sell it to the organisation. **MInUK(8)35**

The most important thing is that you'll need to find a way to persuade them that the research can be useful to them in some way, can bring good publicity or show that they are interested

50. Make us look good

As well as the hypothetical benefits that researchers are urged to generate by compliance departments, actual benefits may accrue to operators who consent to working with researchers. These include the enhancement of reputation through the appearance or reality of investment in socially responsible gambling.

Lottery companies get kudos for bringing in an academic. **XXXXX**

I've had a couple of people approach me and it becomes clear that they are looking for favourable publicity and just being seen to be doing research. And I think you just have to walk away from that. The chances are that nothing comes of it anyway. I think there is a responsibility on parts of the industry now to actually start to grow up a little bit and know that people are going to want to do research in the field anyway and their best tactic is to engage with it rather than sort of set it aside or seek to exploit it solely for public relations. **XXXXX**

in social responsibility. If it's in their interests to do it they will be more inclined to speak to you. **MloUK(12)30**

Research is a bit hit and miss. Depending on who the people are and what their interest is. No one will talk to you about machines in betting shops. But something like cross-border gambling, this will be supported. It is the sort of thing that has a chance of talking to a good cross-section of people. **MloUK(7)28**

Impression management is not restricted to access negotiations. Even in quite superficial interactions, researchers are conscious that they must not 'scare off' the industry.

I think when you tell people you're a sociologist, I think people think you're there to pry and ask questions, cause trouble and be quite critical. I used to introduce myself at conferences as a feminist sociologist but it looked as though people's heads were about to explode so I stopped doing that. **XXXXX**

I spoke to a director, who helped me to a point. But I had the impression that they wanted my work to emphasise only the positive effects of the casino industry in the area. Their expectation was for me not to criticise or relativise gambling but to write positively about what has been happening in the town so that the overall picture in the general public would solidify as a positive one. **MRaSEE(4)2**

I think research is really interesting and as a company we really need to think outside the box and draw on academics to learn about the business and our customers. I have to take it upstairs though, so they need to make a good case for themselves – something that clearly shows the advantages for us, in terms of social responsibility, reputation, Brownie points from the Gambling Commission, that kind of thing. We then sell it upstairs as a kind of exercise in responsibility. Academics might get some papers

out of it and we get to say that we have a researcher working with our company. **MI_nUK(1)40**

I would ask researchers to write a letter with some nice comments in, you know, how grateful they are to us for helping them with their research, how open we were, and how good our social responsibility training was. We can use that for licensing. **MI_oUK(35)33**

Researchers may also produce cheap, useful research for operators.

I suspect that is one of the reasons that we were able to do our research at the time, because the companies saw that there was a way that they could help research at very little cost to themselves, and actually I think there was virtually no cost or even any risk to them really, but I think that seems to have passed and although there are companies who will talk to you, it's not particularly marked out as a priority for them. **XXXXX**

The industry is more likely to provide access to researchers whose work is commercially valuable, sympathetic or agnostic to their interests. Beyond these cases there is very little to be gained from collaborating with researchers.

51. Ad hoc agreements

When access is granted it is often the result of a unique agreement and negotiation process between a researcher and individual staff of a gambling company. The opportunity to meet with a company's employees and discuss the possibility of access is often serendipitous, and dependent upon the individual researcher's efforts to develop those contacts and the industry's interests in using them. It is dependent on goodwill and therefore entirely unsystematic, non-transparent and often unrepeatable or unsustainable.

So I'm the only person in the world with the dataset. It's all about developing and constructing relationships with industry and they will supply you with data out of goodwill. Well, sometimes they supply you data at a discounted price. **XXXXX**

I think in general industry just puts up with researchers because they know they need to. I don't think industry is that interested in research if it's about pathological gamblers, I think they are very interested in research in terms of maximising the potential of the machines for example. So there's a slight difference of interest, so to speak, between researchers, and different types of researchers who are paid by the industry. **FU_tUK(15)78**

Industry representatives are bound to say they are interested in research but I think they're interested in some kind of research more than others, and unsurprisingly not very keen on research which might have negative results for them as an industry. **XXXXX**

The operator didn't like me presenting the plurality of opinions. They showed off with having a treatment programme for problem gamblers, that they have mechanisms for prevention. On the other hand, many casino workers told me this never really worked in practice. That casino management knew exactly which people were problem gamblers and how they were approaching bankruptcy, but they didn't do anything to stop that. **MR_aSEE(4)2**

A senior casino manager had read papers by me and he approached me. I think I raised with them that they had a lot of data that could answer questions in gambling studies and that the regulators were very keen on firmer collaboration with researchers. And he accepted the idea. **XXXXX**

Some of our research involved industry data. [...] Often when they've been interested in what we're doing we've been able to get them on side and convince them that what we're doing is interesting and potentially useful to them. And in some cases there was an element of goodwill, where we had just a good relationship for some time with some of the companies. They were happy to supply data because they know us. It doesn't always work, we didn't always get what we wanted. Quite often it does. [...] That's the

key, when there is personal contact with somebody high up in the organisation. **XXXXX**

Because it is based on personal relationships with specific individuals, negotiations to access are vulnerable to changes in personnel in an industry which has a high staff turnover.

Last year was okay, but talking about getting access wouldn't get anywhere right now because they are going through such massive changes. People are twitchy about share prices. You should definitely hold off until a better time.

52. Access, but with limits

The experience of collaborating with industry on particular projects was highly variable. Some researchers expressed surprise at the independence they were afforded.

I have worked for these people for eight months and I have been shocked by the openness and the responsibility to help by the majority of the industry, professionals that I have spoken to, they're really keen to increase our knowledge about what is a problem gambler, how do we identify them, how can we stop it being a problem for these people. It's much more responsible that I imagined it to be. So I had a really good experience of working with industry, it's been quite open and collaborative and seeking the best for the people they provide the services to. Because none of them want to have problem gamblers within their services, it's not helpful for them. So it surprised me really. **FRaUK(7)101**

Across jurisdictions, state-run lotteries were notably less controlling than other sectors.

They accepted our research design without query and we weren't expected to do anything in return, only to inform them of our final results. As academics, we had open hands. They never influenced our research topics or methodology, they only asked us to include three more questions in our questionnaire. These were the questions which were specifically related to them. They received the results as an incentive to improve their socially responsible gambling measures. **MRaSEE(10)7**

Maybe next year will be easier. There are some really good people there but they are going. **MInUK(11)37**

I'm very happy to have people come in and work with us but unless I can convince the people in the upper corridor to get on board then I won't be able to do anything. And people are leaving at such a rate it gets so that I waste a lot of your time and mine getting someone on board and then they leave. **MInUK(1)38**

They were really good actually, really nice, really supportive of my work, I know lottery is not strictly industry but they [...] were really good, really supportive. I was worried that they would try to manipulate the data or steer the research in certain ways, but they really didn't try to do that at all. They just let me get on with it. **XXXXX**

In other cases access was closely controlled and researchers were directed and 'managed'.

I have been warned by different casino executives, that I wasn't allowed to contact the casino staff right after the interview, or get their phone number, and they were not allowed to contact me again. I mean all that kind of stuff. And other companies wanted me to sign some kind of agreement stating that I will keep everything secret or otherwise I would be charged. **MRaHK/M(6)12**

Researchers are routinely required to sign non-disclosure agreements which restrict publication.

As for influencing the way I would use the data, I had smaller issues. When I was still in the process of writing, I had to let one of the directors read my work. He would cross out many parts and say: 'This is not the case.' I had to remove some parts because he said he would not allow the work to be published. **MRaSEE(4)2**

If the industry doesn't like what the research says they may decide not to publish it. [...] I had situations where upfront they wanted to withhold data because it was commercially sensitive, you know, before they knew the results. It was clear

from the start that it probably wouldn't be published. And then you get something in the middle where they stipulated that they owned the data and then they have control of the data and then they may or may not let you publish it. [...] It's up to the researcher to haggle upfront about what the terms are. **MRaUK(14)18**

We would at the very least need to know what researchers want to achieve and how we fit in with that. There will always need to be a contract in place establishing our role and how the data can be used. We can't just give people *carte blanche*; what if there is a paper lying open on the table and you glance at it and go off and act on it and make a lot of money? **FlUK(3)34**

In some cases where the interests of the industry and the researcher were in alignment, no restriction was necessary.

I never had industry intervention on what we should publish. [...] But generally speaking the way we [economists] tend to do research tend to be positive rather normative so we're looking at how well can you use this data to predict things or what might happen if you do this which perhaps isn't so sensitive to the companies. **XXXXX**

Some new industry executives didn't feel the need to restrict access.

If a researcher was here I might have to be a bit careful when we have clients come by because the business boys are very sensitive, you

53. Concordia discors

Several participants suggested that increased collaboration between industry and research, based on greater trust on both sides, would improve the quality of gambling research.

I would love to see greater collaboration between independent researchers and the gambling industry, but you've got to win the gambling industry's trust, and that is very difficult to do. **XXXXX**

Cooperation between academics and the gambling industry is necessary. In countries where the

know commercial secrecy and all of that, but we don't worry about that NDA [non-disclosure agreement] stuff. I'm from advertising and broadcasting. I think of gambling as a technology or entertainment. There's no difference now in the skills you need to bring this stuff to the market. It is just a delivery mechanism that the traditional industry is very naive about. They don't have a clue really. **MInUK(2)46**

In some cases the limitations placed on access to data were self-imposed by researchers who internalised the expectation that operators would not wish to make public 'commercially sensitive data' and therefore did not ask to see anything that they were not already being shown.

We talked about seeing data, but I mean I didn't push it too hard because I wouldn't expect them to give us anything that was commercially sensitive really. They gave us enough general information, more than we might have expected, talking in general terms about where the money comes from given that it's a multi-purpose facility. Quite free. I don't remember anyone saying to us you can't see that, but at the same time we didn't push to see documents that might be commercially sensitive, so it was anecdotal. **FRaUK(2)58**

This researcher did not explore the limits of access. Nor did she investigate what constitutes commercially sensitive data and how it differs from other kinds of data, or who gets to make this distinction.

gambling market is more developed, awareness of this need is also stronger. **MloSEE(20)8**

Both researchers and members of the industry described a clash between academic and business cultures.

They are business, we are academics. And so working back and forth to get the data in the shape we need it and working with the data warehouse has been difficult sometimes. And I'm sure they are often annoyed with the speed at which academic science progresses compared

with just about anything else in the world (laughs). Certainly, we proceed much slower and with much more caution than they would like, but they've stuck with us despite that. **FRaUS(11)66**

Every time I asked researchers about how they would execute the proposed project, I would just get silence. It is inconceivable for a private company to fund something without a clear purpose and a clear plan of delivery. This is the first and foremost rule of project management. This is also one of the obstacles to the academic-industry collaboration. Another might be the researchers' inertia and inability to present their projects to us in an intelligible way. Academics are just focused on science, but when it comes to budgeting and planning, they are lost. **MI-oSEE(20)8**

Our aim is not to judge whether gambling is good or bad, necessary or not. Our aim is to observe gambling processes from a perspective as objective as possible and to reach some conclusions. Maybe these conclusions won't be the ones the industry is hoping to get. They are a business whose goal is to portray gambling in the most positive light: that casino industry opens up jobs, that they pay taxes from which other socially useful things are funded. If the industry understood better what anthropology wanted, maybe cooperation would be easier. **MRaSEE(4)2**

At the moment researchers have very little social capital to use to negotiate access and industry has very little incentive to cooperate. We asked our participants to reflect on the terms of potential collaborations and who would set them.

54. Access and licensing

There have been a couple of recent high profile examples of collaboration between commercial operators and the research community: BWin / Harvard in the US and the RGT's machine research in the UK. However, ad hoc cooperation cannot provide the basis for a systematic, sustainable relationship between industry and researchers based on transparent principles. It is not repeatable or

I'll be happy to work with the gambling industry if they give us their data, but I don't think we should be working on any project where they have control or are funding it. **XXXXX**

The only real way is to have what might be constituted as evidence, housed and conducted and promulgated by an independent body. And it's very hard to find that independence, and as soon as you have the industry saying on what conditions and for which projects it will cooperate, and usually its cooperation is just very very peripheral, ummm, then what's going to come out of it? **XXXXX**

Setting the terms of collaboration often turned into a discussion of what the industry could tolerate.

Can the industry accept harmful research? Yes, they may. I think that if you sat down with one or two sensible people in the industry they'd say, 'Oh interesting', share with them. That's about ownership, getting them behind what you are trying to do, even though some of it might be uncomfortable for them. We are back to the human condition, we've all got to get something out of our relationship, that's the way human beings are. So I'd like to see more balance, the industry to have more ownership of it. I'd like to see less focus on problem gambling and more on social gambling and let's have something about the positives about gambling as well as the negatives, what does it give. **XXXXX**

This approach, described by a veteran treatment provider and policy user, shows how access is also conceptualised as a gift from the operator to the researcher, producing the same problems as voluntary contributions to funding.

predictable and is dependent on particular individuals and the relationships between them. The idea that access is a gift conferred by the industry is left untouched. Any broader discussion of a new set of principles on which access should be based is deferred. Instead of being negotiated in the back rooms of gambling conferences rights to access should be enshrined within the formal codes of

licensing agreements, as was the case for the 2005 casino licenses in the UK.

Research should be built into licensing, without a shadow of a doubt. It's the easy option to have no obligation, and sure, we might have been able to negotiate with some companies, but another could be more adversarial. The legal requirement has given us some teeth. Don't get me wrong I don't think we've been abusing that. We are not asking for the world from operators. One sentence in Hansard! It was almost an off-the-cuff statement by the minister in the House, but we would have pushed for it anyway. It has helped us out. **MUpUK(10)85**

Even when access is a licensing condition, regulators must have both the technical knowledge to know what to ask for, and also the courage to ask for it.

In the first case we requested data from the industry and they refused to participate and we eventually got the data from the regulator. It was very unsatisfactory because the regulators didn't request all the data that the industry could technically have provided. So we were left with data which was inadequate. **XXXXX**

Appendices

1. Methodology and scope of report

How could we begin to capture the shared concerns and important differences that existed within the gambling research community? We chose to adopt an ecological approach – while our primary focus has been the UK-based community in which we ourselves are immersed, this milieu exists within a broader context of competing and complementary models in other mature gambling jurisdictions, including the rest of Europe, the United States, Canada, Australia and New Zealand. In addition, we recognised that new traditions were emerging in less mature jurisdictions including south-east Europe and Macau. These markets recently opened to greater competition, and research traditions are relatively new. We had a unique opportunity to witness this growth and to speak to those involved.

The primary focus of this report is the qualitative data that we gathered between 2011 and 2013 using semi-structured interviews with 109 gambling research stakeholders, including research users (policy makers, treatment providers, regulators), research producers (in academia, the gambling industry and in research institutes) and members of the gambling industries, both traditional (including sports betting and casinos) and new (including social gaming and mobile gambling). Although literature reviews are a common method used to scope and assess research areas in gambling (see for example, the Auckland Review,⁵⁷ and *Map the Gap*),⁵⁸ we felt that there was a need for an approach that provided a ‘thick description’⁵⁹ and emphasised how research is experienced and perceived by a variety of stakeholders.

This data can be used alongside literature reviews to help explain why particular research projects are undertaken, how they are formed within the particular constraints of the research industry and

its relationship with the gambling industry, and how they take shape within a changing mesh of relationships and networks that are sometimes closely managed and at other times serendipitous and based on individual, perhaps unrepeatable, encounters. We wanted to dispel the idea that there is a singular research industry or gambling industry (an idea that has long been viewed as problematic), a single way in which to conduct, manage or fund research, or a single, predictable outcome to gambling inquiries.

Our primary research method was semi-structured interviews with active participants in gambling research, whether as user, commissioner or producer. We selected an initial group of participants based upon their participation in senior positions in the gambling and / or gambling research industries in their jurisdiction. This included sitting on boards, contributing important pieces of authoritative work, or being supported by prestigious funding bodies, including national research councils. Further selection was based on the snowball technique; each participant was invited to recommend others they felt might make a valuable contribution to the study. This was complemented by a random element, used to ensure that we consulted members of different networks at different stages of their careers, and gathered what might be called ‘outlier’ experiences. We used a random number generator to select participants from, for example, a list of participants at a conference. We triangulated our findings with other sources and kinds of data, including industry and research publications, communications from research centres, research councils, regulators, government departments and funding bodies, and participant observation at conferences and meetings.

⁵⁷ Abbott, M., Volberg, R., Bellringer, M. and Reith, G. 2004. *A Review of Research on Aspects of Problem Gambling*. Auckland University of Technology.

⁵⁸ Disley, E., Pollitt, A., Culley, D.M. & Rubin, J. 2011. *Map the Gap: A Critical Review of the Literature on Gambling-related Harm*. RAND Europe. Sponsored by the RGF.

⁵⁹ Geertz, C. 1973. ‘Thick Description: Toward an Interpretive Theory of Culture’, in *The Interpretation of Cultures*. New York: Basic Books.

At the start of our project we conducted a focus group consisting of four research users (a treatment provider, a policy maker and two members of the gambling industry) and four research producers (an anthropologist, two psychologists and a historian). The focus group generated a pool of 40 questions of interest to all parties. They included:

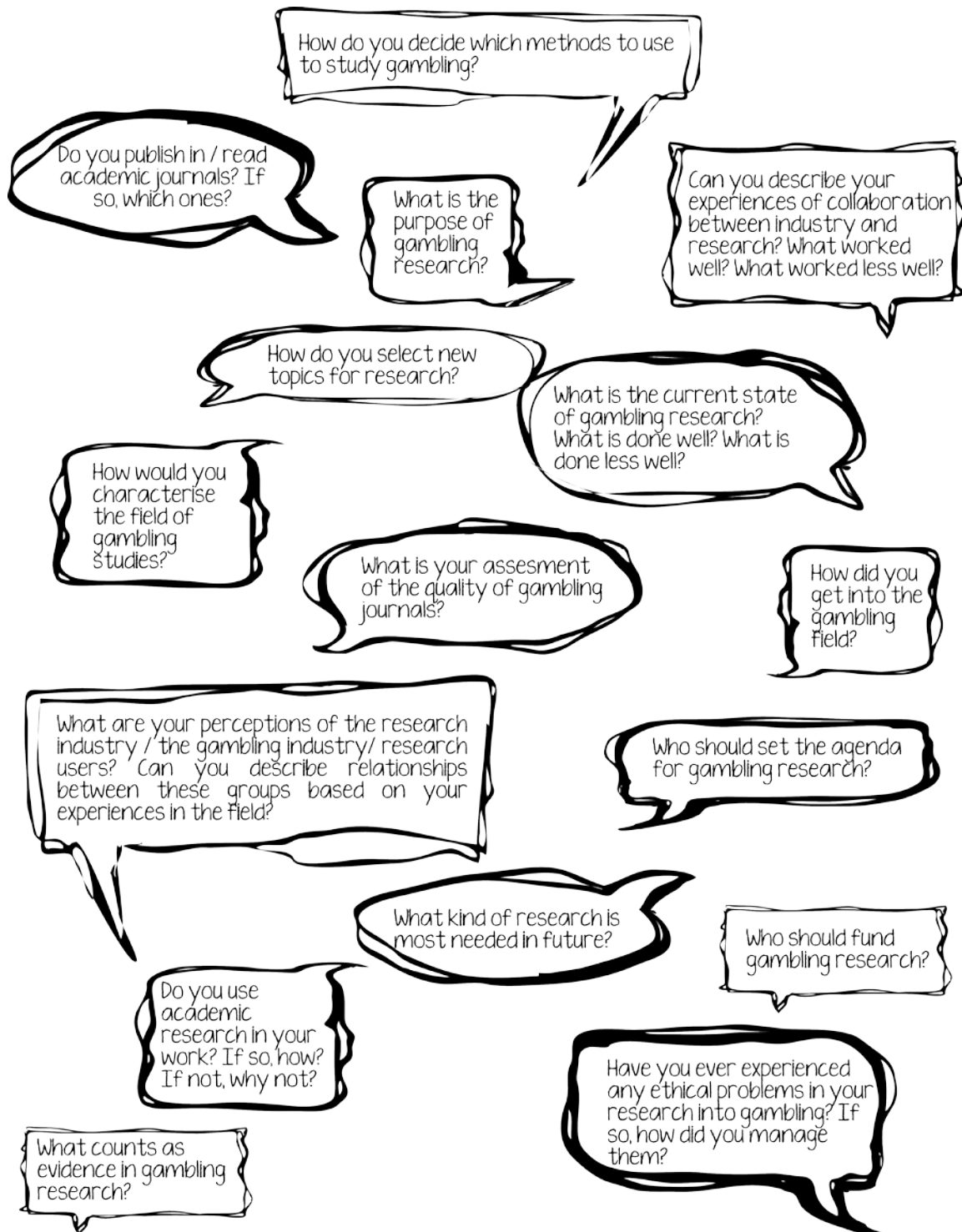
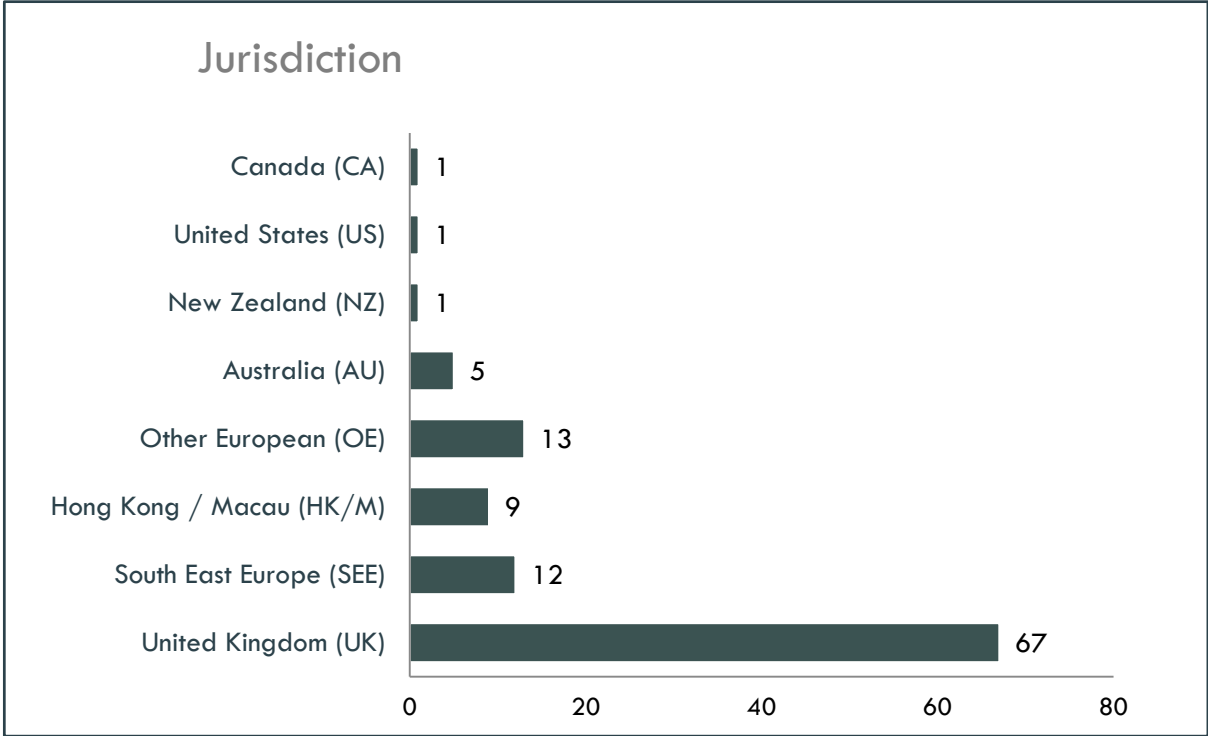
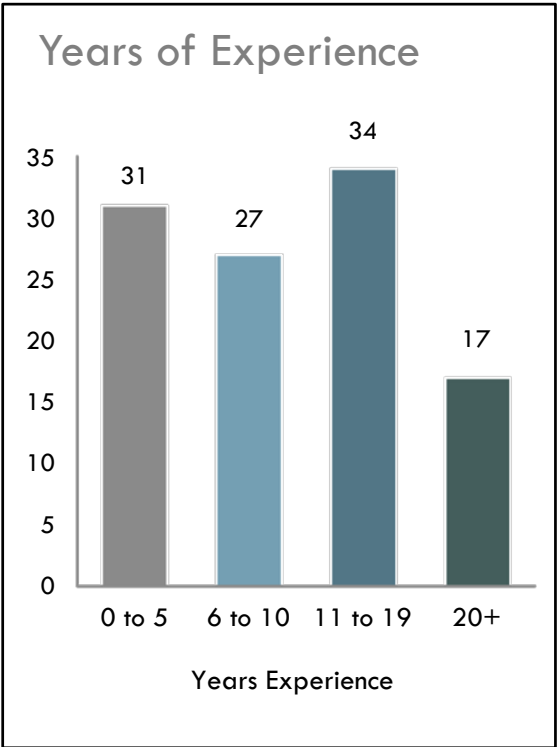
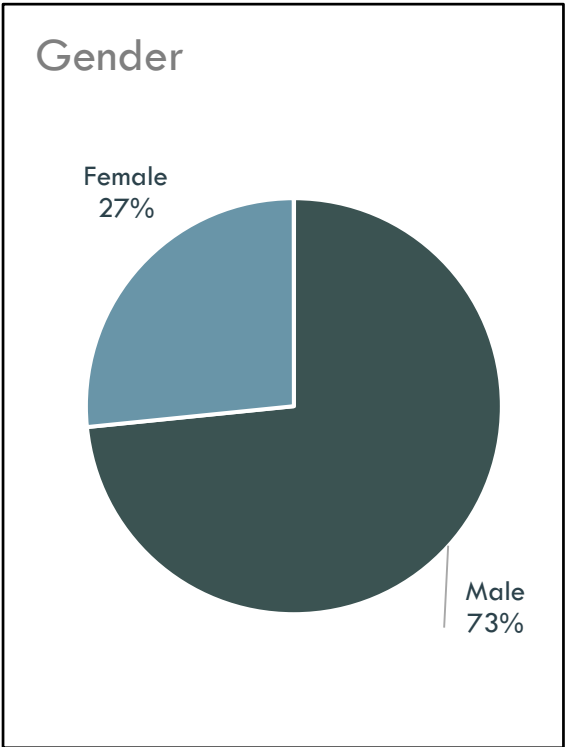


Figure 9 – Sample of focus group questions

Altogether, 143 individuals were invited to contribute to the report. Of these, 109 agreed, 34 (24%) refused (21 from industry, 7 researchers and 6 research users.) The 109 interviews entered into Nvivo (software designed to identify common themes in qualitative data) break down as follows:



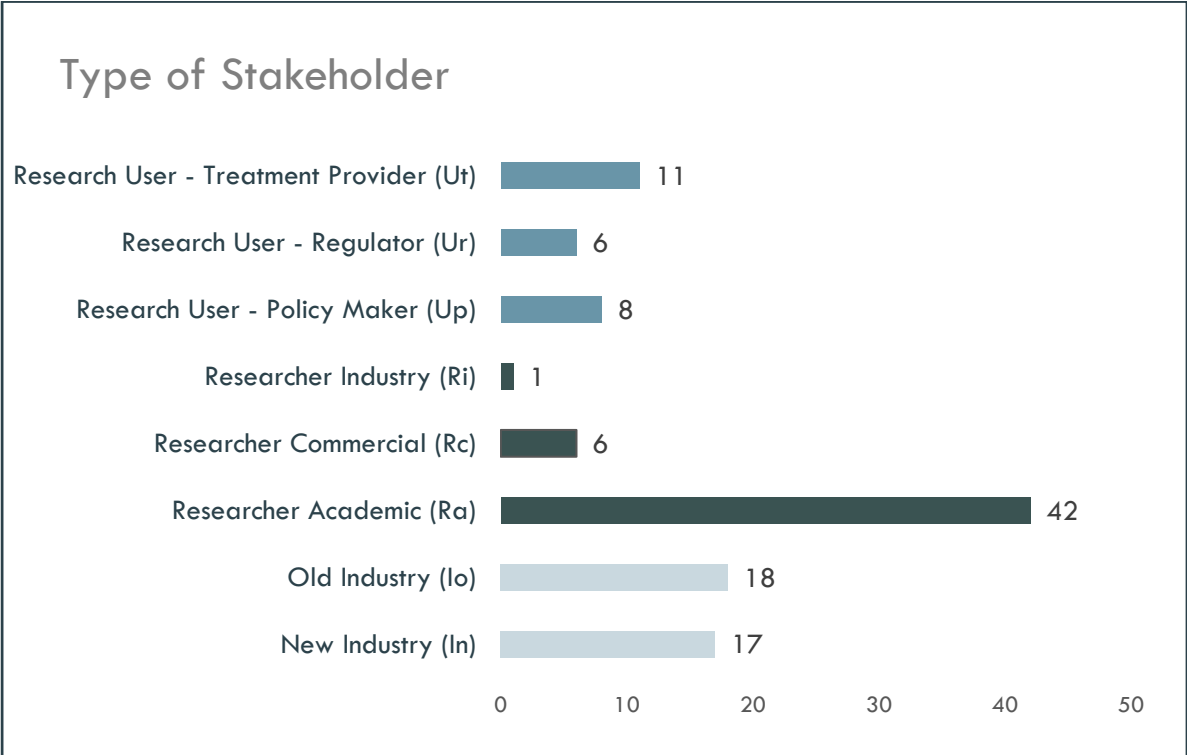
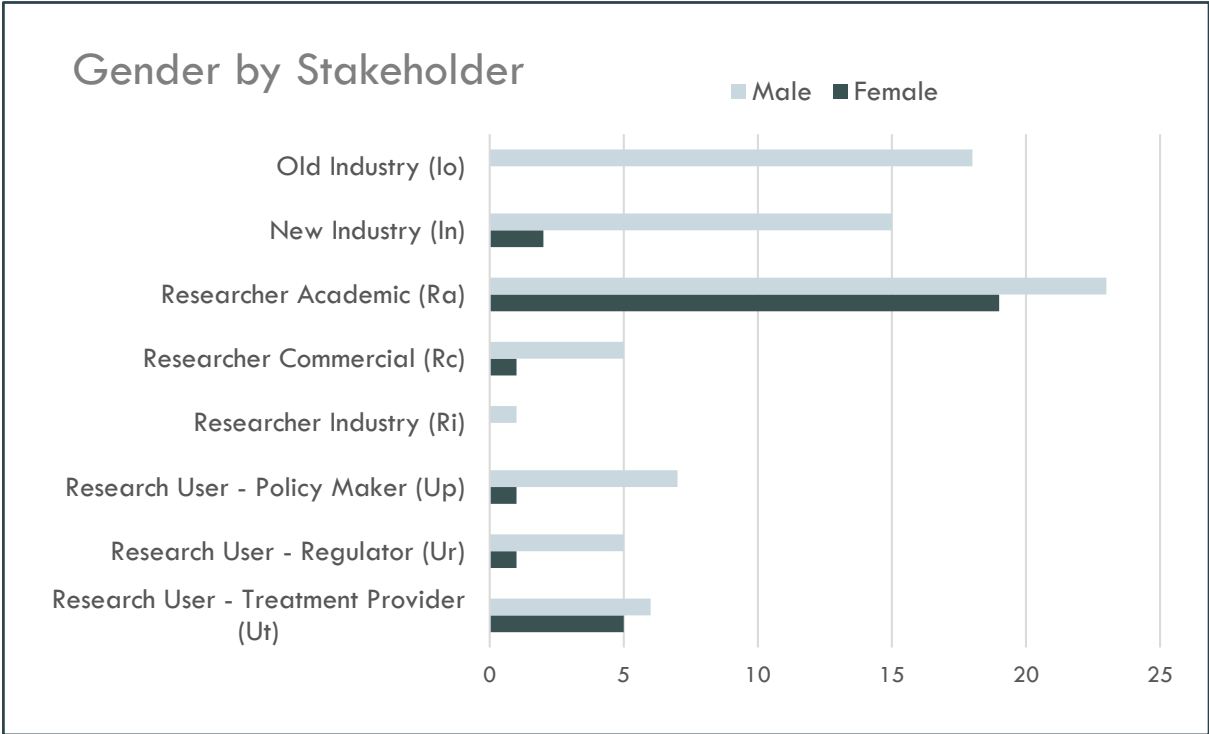


Figure 10 – Interviewee data.

Significantly more male industry stakeholders were interviewed. This reflects the gender balance in the industry. Women were more strongly represented in the categories of researcher and treatment provider.

The majority of respondents were from the UK (67 out of 109). This enabled us to drill down into a particular case study and to understand the distinctive history and nuances of a fairly small community of research producers and users. In addition, we chose to conduct interviews in south-eastern Europe (primarily Slovenia and Croatia) and Hong Kong and Macau. These jurisdictions were selected due to their relative immaturity, contrasting socio-political contexts and different models of gambling regulation. At all times, however, it should be stressed that just as these gambling markets are not isolated from the rest of the world, nor are their relatively youthful research traditions. We used ethnography, discourse analysis and mapping of data transfer to understand how knowledge about the conduct of research

flows across boundaries. Two of the team attended the inaugural meeting of the Asia and Pacific Gambling Studies Network in Macau in 2012, where ideas about research were in the process of being formed in conversation with guests from Hong Kong, China, Australia, North America and Europe.

Including data from Macau / Hong Kong and south-eastern Europe enabled us to consider relationships between emerging and mature research cultures, different models for funding and commissioning research, how gambling fits into contrasting academic traditions, and to increase our knowledge of the affordances and constraints operating in less well-known research communities. We also considered whether the progress of research cultures in these jurisdictions differed from or reproduced experiences in mature jurisdictions. These differences support the idea, central to this report, that gambling research is a political activity that emerges from local concerns in conversation with wider traditions.

Participation

Our aim throughout this report has been to represent a wide range of views from a variety of positions and jurisdictions. The participation graph illustrates the percentage of interviewees who have been quoted in the report. It shows that the percentage of participants quoted from each category is between 80% and 100%.

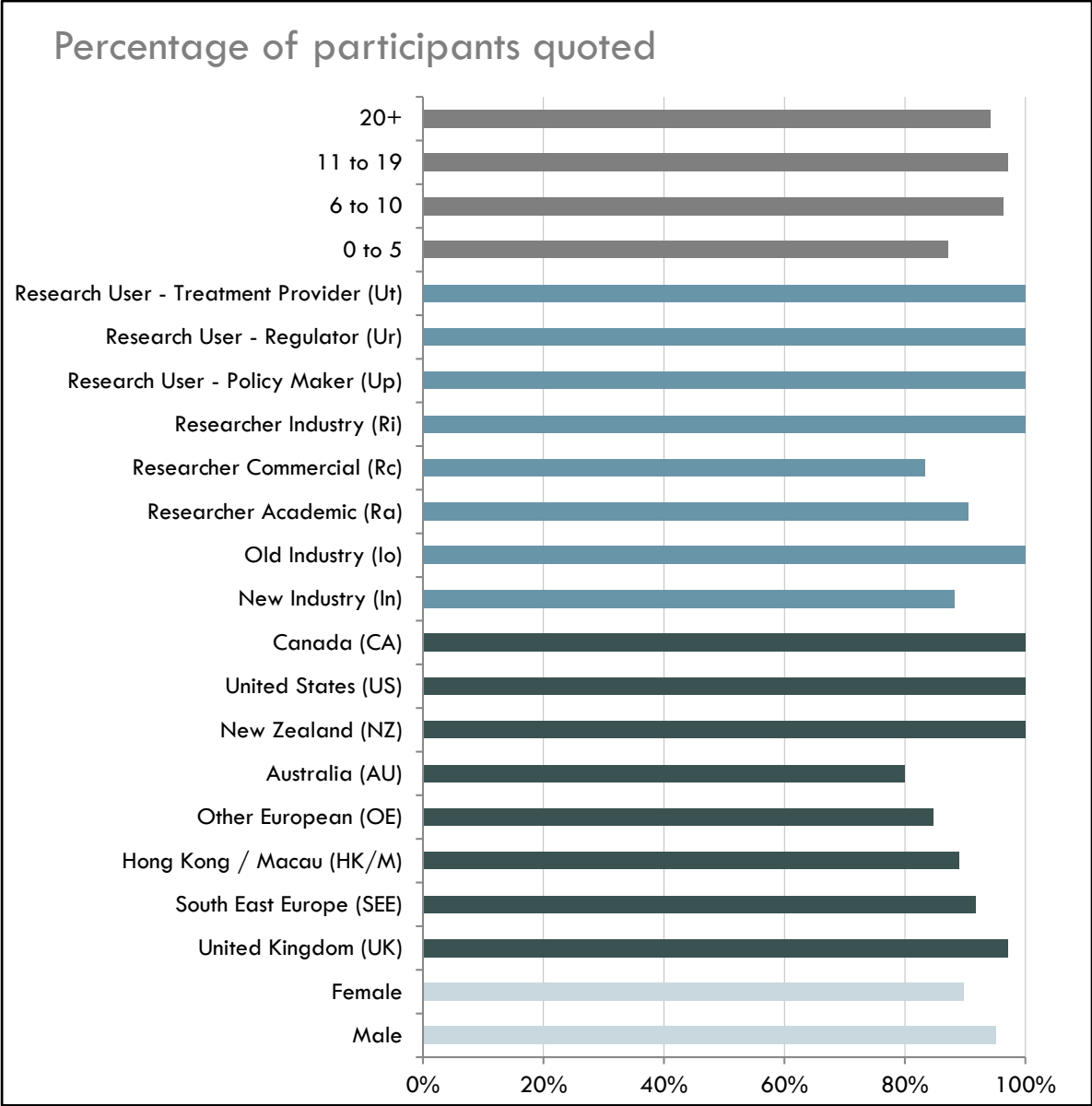


Figure 11 – Percentage of participants quoted, by category

The second graph illustrates the number of quotes used in the report relative to the number of quoted participants, from each category. The skew towards higher frequencies occurs where there are relatively few participants in a category. For example, there is only one participant from New Zealand.

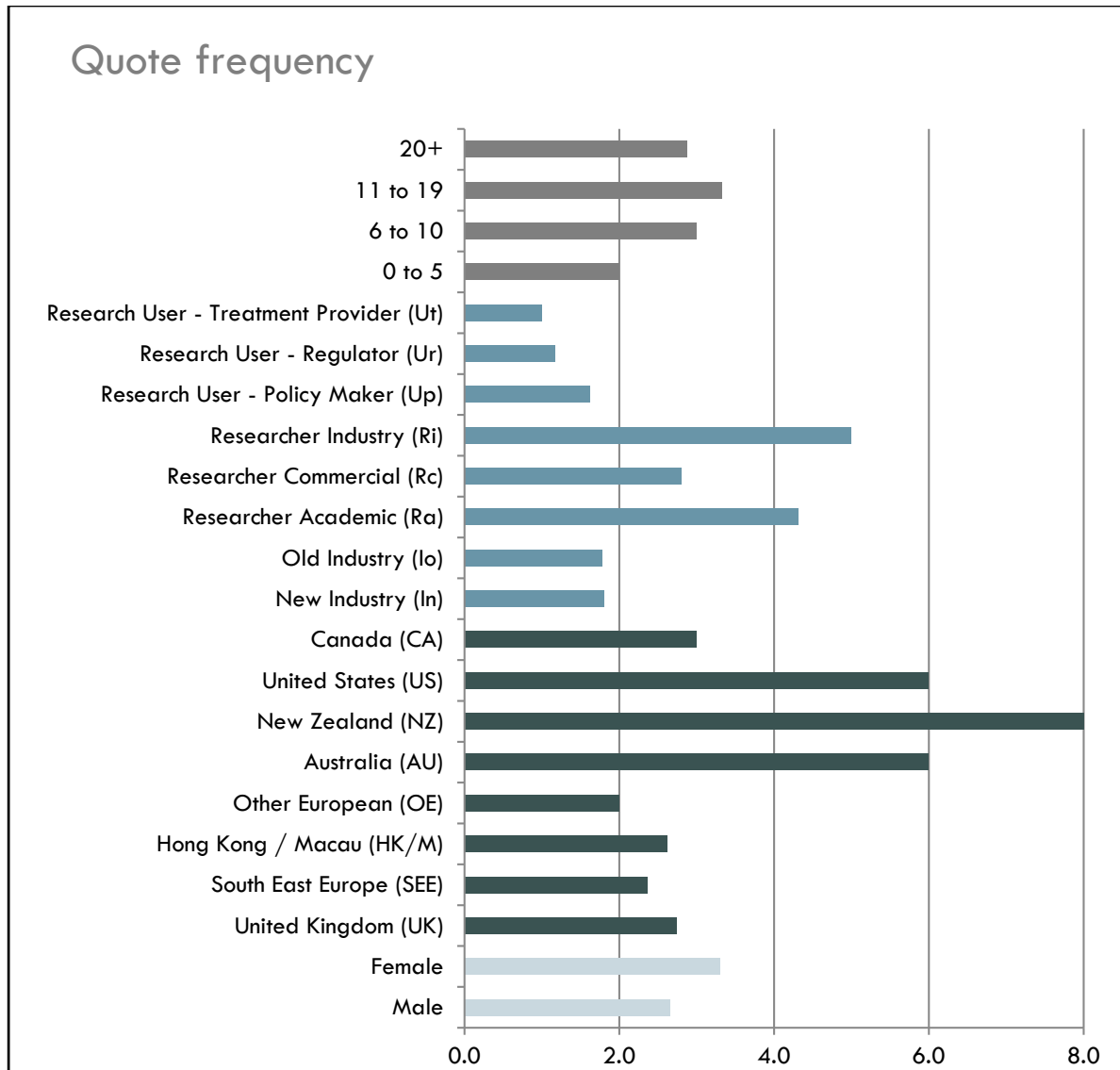


Figure 12 – Quote frequency. Number of quotes in a category, divided by the number of quoted participants in that category.

Illustrations

Data on the editorial boards of the *Journal of Gambling Studies* and *International Gambling Studies* has been drawn from their respective online publishers' pages. Data on the primary academic disciplines of the editorial board members has been drawn from individual staff pages on host institute webpages where available, and from wider web searches where necessary.

Data on journal articles – titles, keywords – has been drawn from three recent issues of the *Journal of Gambling Studies* and *International Gambling Studies*.⁶⁰ Details on the papers given at the University of Nevada, Las Vegas's 15th International Conference on Gambling and Risk Taking, and the European Association for the Study of Gambling's 9th European Conference on

Gambling Studies and Policy Issues were drawn from the conference websites.⁶¹

Data on the global gambling gross win in 2012 was taken from an article by H2 Gambling Capital.⁶²

Data on annual gambling research funding for the UK was taken from the Responsible Gambling Trust website.⁶³ Data on the annual research funding for Australia was taken from the Australian government's Budget Paper 2.⁶⁴

Where *Wordle* has been used to express the frequency of keywords, the count of these keywords has been weighted to ensure that less frequent words are legible. That weighting is $(n \times 0.5) + 1$.

⁶⁰ *International Gambling Studies* 12 (3) (2012) to 13 (2) (2013). *Journal of Gambling Studies* 29 (1) to 29 (3) (2013).

⁶¹ UNLV Web Pages, 2013. 'Schedule', URL: <http://tinyurl.com/p6rm29h>. Accessed 15 October 2013. EASG Web Pages, 2013. 'Agenda' URL: <http://tinyurl.com/odasu5u>. Accessed 15 October 2013.

⁶² H2 Gambling Capital, 2012. 'Leading global gambling nations – Asia and egaming continue to out perform'.

⁶³ Responsible Gambling Trust Web Pages, 'Commissioning plan'.

⁶⁴ Australian Government, 2013. Budget Paper No.2, Part 2, Expenses Measures, URL: <http://tinyurl.com/mv7rqb8>. Accessed 30 October 2013.

2. Ethics

The project focused on sensitive information that could affect career progression, reputation and commercial practices. Our responsibilities to our participants were therefore extensive and included guaranteeing that we would not discuss their participation or the content of their interview with any other members of the target group and that they would not be identifiable in the report.

We used an on-going procedure of verbal informed consent. The consent process began with an invitation to participate. If participants were willing in principle then they were briefed about the purpose of the study, and how their data would be used. After a period of no less than 24 hours, we answered any questions about the study. Throughout the process participants were assured that they were free to decline the invitation to interview at any point. They were given an opportunity to reflect on our discussion before we conducted the interview.

At the start of the interview we repeated the information, asked for permission to begin recording, and reminded them that data was to be recorded and stored as a voice file until after transcription,

at which point the voice file was to be destroyed. We asked permission to categorise them by gender, role, location and years of experience. They were also given the option not to be quoted, to speak entirely off the record, and to stop the recording at any time. They were of course also free to end the interview at any time. Following the interview, participants were asked to inform the team if they changed their mind about participation, in which case their data was removed from the study.

The project involved gathering and storing highly sensitive information. All data was managed and stored according to Goldsmiths policy on data protection which requires that it is secure, password protected, not communicated electronically or by any other means and inaccessible to everyone other than the researchers. We have endeavoured to make our participants unidentifiable. This raised many challenges, as the field is small. It is not our intention for quotes to be attributed to individuals, and we will not deny or confirm any inquiries about who said what.

3. Further reading

- Adams, P.J. (2009) 'Redefining the gambling problem: the production and consumption of gambling profits', *Gambling Research* 21(1): 51–54.
- Adams, P.J. (2011) 'Ways gambling researchers receive funding from gambling industry sources' (invited editorial), *International Gambling Studies* 11(2): 145–152.
- Adams, P.J. (2012) 'Should addiction researchers accept funding derived from the profits of addictive consumptions?' In A. Chapman (ed.) *Genetic Research on Addiction: Ethics, the Law and Public Health*. Cambridge: Cambridge University, 122–138.
- Adams, P.J. (2013) 'Addiction industry studies: Understanding how proconsumption influences block effective interventions', *American Journal of Public Health* 103(4): e35–e38.
- Blaszczynski, A., Ladouceur, R. & Shaffer, H. (2004) 'A science-based framework for responsible gambling: the Reno model', *Journal of Gambling Studies* 20(3): 301–317
- Borrell, J. (2005) 'The place of values in gambling research and policy', paper presented at the 4th Annual Alberta Conference on Gaming Research, University of Alberta, Edmonton, 31 March–1 April.
- Bunkle, P. & Lepper, J. (2004). 'What do we know about gambling in New Zealand?' *Social Policy Journal of New Zealand* 21: 178–201.
- Cosgrave, J. (2010) 'Embedded addiction: the social production of gambling knowledge and the development of gambling markets', *Canadian Journal of Sociology* 35(1): 113–134.
- Delfabbro, P. (2009) 'Gloom or pessimism? On the status of gambling research in Australia', *Gambling Research* 21(1): 43–46.
- Fabiansson, C. (2009) 'Why would anyone want to do gambling research?' *Gambling Research* 21(1): 25–27.
- Ferrar, R. (2009) 'Gambling research at the crossroads in 2009', *Gambling Research* 21(1): 40–42.
- Griffiths, M. (2009) 'Gambling research and the search for a sustainable funding infrastructure', *Gambling Research* 21(1): 28–32.
- Marshall, D. (2009) 'Building capacity for gambling research: a case for funding students', *Gambling Research* 21(1): 55–59.
- McDonald, J. (2009) 'The biggest challenge? Recognition of gambling as a public issue', *Gambling Research* 21(1): 47–50.
- Miller, R. & Michelson, G. (2012) 'Fixing the game? Legitimacy, morality policy and research in gambling', *Journal of Business Ethics*, online, September.
- Miller, P., Moore, D. & Strang, J. (2006) 'The regulation of research by funding bodies: an emerging ethical issue for the alcohol and other drug sector?' *International Journal of Drug Policy* 17: 12–16.
- Morrison, P. (2009) 'A new national framework for Australian gambling research: a discussion paper on the potential challenges and the processes involved', *Gambling Research* 21(1): 8–25.
- Orford, J. (2011) *An Unsafe Bet? The Dangerous Rise of Gambling and the Debate We Should Be Having*. Chichester: Wiley-Blackwell.
- Reith, G. (2007) 'Gambling and the contradictions of consumption: a genealogy of the pathological subject', *American Behavioral Scientist* 51(1): 33–55.
- Shaffer, H. (2012) Commentary, 'Considering a critique of pathological prevalence research', *Addiction Research and Theory*, online: 1–3.
- Stenius, K. & Babor, T. (2009) 'The alcohol industry and public interest', *Addiction* 105: 191–198.
- Toneguzo, S. (2009) 'Arguments in support of a national framework', *Gambling Research* 21(1): 33–36.
- Volberg, R. (2012) 'Beyond social control: prevalence research and the uses of expert knowledge' (Commentary), *Addiction Research and Theory*, online: 1–2.
- Young, M. (2009) 'Editorial: key challenges facing gambling research in Australia', *Gambling Research* 21(1): 3–7.

Young, M. (2012) 'Statistics, scapegoats and social control: a critique of pathological gambling prevalence research', *Addiction Research and Theory*, online: 1–11.

Young, M. (2012) "Following the money": the political economy of gambling research' (Response to

commentaries), *Addiction Research and Theory*, online: 1–2.

Windross, A. (2009) 'Ice meltdown', *Gambling Research* 21(1): 37–39.

