



*Final report to the Department of Justice & Equality*

## **Developments in the Gambling Area**

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# **Report: Emerging trends and issues supporting the development of policy and legislation in Ireland**

## **Contents**

1. Executive Summary .....	4
2. Introduction .....	6
2.1 Research Objectives .....	6
2.2 Research Approach .....	6
2.3 Work Package 1: Literature Review and Analysis .....	7
2.4 Work Package 2: Consultation with Experts and Stakeholders .....	7
3. Research Ethics .....	8
4. Project Outputs .....	9
5. Analysis of Trends in the Gambling Area.....	10
5.1 Trends and Developments in International Legislation on Gambling, 2013-2016 .....	10
5.1.1 Licensing Online Gambling.....	10
5.1.2 The Legalisation of Sports Betting .....	13
5.1.3 Harm Reduction & Problem Gambling .....	14
5.1.4 Self-exclusion.....	16
5.1.5 Advertising .....	17
5.1.5.1 Advertising Standards .....	19
5.2 Trends in the Gambling Industry .....	20
5.3 Service Provision .....	21
5.4 Developments in Technology .....	24
5.4.1 Online Gambling .....	24
5.4.1.1 Online Risks and Responsible Gaming Features .....	25
5.4.1.2 Regulating Online Gambling.....	26
5.4.1.3 Social Media .....	27
5.4.1.4 Social media gaming/ social casino gaming.....	29
5.4.1.5 Apps .....	34
5.4.1.6 Data Protection.....	35
5.4.2 Land-based Gambling Technology .....	35

5.4.2.1 Bingo Halls .....	36
5.4.2.2 Virtual Racing .....	36
5.4.2.3 Fixed Odds Betting Terminals .....	37
5.4.2.4 Pre-Commitment System .....	38
5.4.2.5 Self-exclusion .....	39
5.4.2.6 Limit Setting .....	40
5.4.2.7 Transaction History Statements .....	40
6. Conclusion .....	41
7. References .....	42
8. Appendix A: Bibliography .....	51
9. Appendix B: Stakeholder & Expert Submissions & Analysis.....	119
9.1 Stakeholder & Expert Submissions.....	119
9.1.1 Irish Amusements Trade Association (John Roche).....	119
9.1.2 Problem Gambling Ireland (Barry Grant, CEO) .....	120
9.1.3 Gaming and Leisure Association of Ireland (David Hickson) .....	130
9.1.4 Irish Bookmakers Association (Sharon Byrne).....	134
9.2 Analysis of stakeholder opinions.....	139

# 1. Executive Summary

This report provides a summary of literature which has been published on developments in gambling since 2013, in addition to an analysis of the responses from consultation with gambling industry stakeholders and experts. The aims of the report are to highlight emerging trends and developments in gambling since 2013, with a focus on the following specific areas: international legislation, gambling industry mergers, services provided to problem gamblers and gambling technology.

Examination of gambling legislation internationally looked at how international legislation has been dealing with emerging issues such as online gambling, sports betting, harm reduction, problem gambling and advertising.

Gambling industry mergers, which have become increasingly common in recent years, are discussed with regard to the reasons for these mergers.

Services which are available both in Ireland and internationally for problem gamblers and those affected by problem gambling were also examined. Issues which have arisen include service providers which are funded by the gambling industry itself and the usage levels of gambling services online versus land-based gambling support services as well as a lack of support services for families affected by problem gambling.

The review of technological developments in the gambling industry covers both online gambling developments and land-based technological developments. New research into the risks of both online gambling and machine based gambling as well as aspects necessary for successful use of pre-commitment systems in managing the risks associated with both are summarised. The emergence and popularity of social media and social media gaming, and how the gambling industry is embracing this technology, was a

common theme in much of the literature surrounding online gambling. An important factor that is looked at is the blurring of lines between online gambling and social media games which simulate gambling. This is a continually evolving area and as such requires monitoring.

## 2. Introduction

Gambling addiction affects not only the gambler, but also the people around the gambler. In July 2013, the Department of Justice and Equality published the General Scheme of the Gambling Control Bill to address the updating of legislation in Ireland around gambling. This piece is currently under revision.

This report summarises literature around gambling published since the General Scheme of the Gambling Control Bill 2013 and provides expert and stakeholder commentary around policy and legislative development. The material gathered here is intended to provide information about issues affecting policy and legislative development.

### 2.1 Research Objectives

There were two specific research objectives for this work:

- To identify developments in the area of gambling, inclusive of all aspects of gambling such as technological innovation and international legislation.
- To identify new or emerging legislative and policy issues in the area of gambling not currently represented in the original General Scheme of the Gambling Control Bill 2013, which may need to be addressed in new legislation.

### 2.2 Research Approach

The research project was comprised of two work packages:

1. A comprehensive literature review and analysis, including academic databases and sources and official publications.

2. Consultation with relevant experts and stakeholders in the area of gambling, including service providers, representatives of the gambling industry in Ireland, and individuals working in the field of gambling education and members of research and policy groups in this area.

Both work packages followed a “desk research” approach, in which records have been used for analyses, as opposed to a research design involving field research (e.g., Fulton, 2015).

## 2.3 Work Package 1: Literature Review and Analysis

A comprehensive literature review was conducted, using scholarly and official publications, sources and databases. Several important themes arose in the recent national study of the impact of problem gambling (Fulton, 2015), such as a need for public education, services for families, etc. The current project pursued changes and emerging themes in the national and international literature around gambling from 2013 forward, in particular topics relevant to policy and legislative development. Items found have been compiled, including bibliographic details and abstracts, in a bibliography (see Appendix A).

## 2.4 Work Package 2: Consultation with Experts and Stakeholders

A brief timeframe for the project enabled consultation with experts and stakeholders via a desk research approach to gathering submissions. Experts and stakeholders were contacted by email and invited to submit a statement about policy and legislation development in the context of the General Scheme of the Gambling Control Bill 2013. Because experts and stakeholders around problem gambling were recently consulted in Fulton (2015), the focus was

specifically the development of the General Scheme of the Gambling Control Bill 2013.

Experts and stakeholders included:

- Service providers, including gambling addiction treatment providers, general health services providers, and addiction support groups
- Representatives of the gambling industry in Ireland
- Individuals working in the field of gambling education and members of research and policy groups in this area

A summary of experts' and stakeholders' submissions appears in this report. Submissions, de-identified as requested by participants, appear in Appendix B.

### 3. Research Ethics

As academic research, this project is governed by the research standards held by University College Dublin.

UCD's Code of Good Research Practice (2010) states:

*UCD maintains the highest standards of integrity in its research activity. Ethical standards are given paramount importance in the University's Research Policy and Strategy and imbue its research culture: "All research should be conducted within an ethical framework consistent with the traditional principles of academic freedom.*

*(UCD Research Ethics Committee, 2010)*

This project was submitted to UCD's Research Ethics Committee for vetting, according to formal protocols governing all research in the university.



## 4. Project Outputs

The following project outcomes are presented:

1. Report outlining analyses of emerging trends and issues supporting the development of policy and legislation in Ireland. A summary of experts' and stakeholders' views will appear as a section of this report.
2. Appendix A: Bibliography, including abstracts, of literature found.
3. Appendix B: Compilation of stakeholders' submissions. In keeping with Research Ethics standards, submission will necessarily be de-identified unless a stakeholder specifically opts to be identified.

## 5. Analysis of Trends in the Gambling Area

### 5.1 Trends and Developments in International Legislation on Gambling, 2013-2016

A large body of literature exists around international legislation on gambling. This section contains the findings of a literature review in this area. The literature review examined academic and official publications, sources and databases for material relating to new policy and legislation within the following geopolitical entities: Australia, Canada, the European Union, the United States and the United Kingdom.

While 2013-2016 saw many important developments in the field of international gambling legislation, individual instances of new legislation and regulation can be seen as evidence of larger trends. The most significant trends emergent in the literature concern legislation and policy development within the following broad topics: new online gambling licensing measures; the legalisation of formerly illegal forms of land-based gambling; harm reduction and problem gambling; self-exclusion; and advertising.

#### 5.1.1 Licensing Online Gambling

The international legislative landscape of 2013-2016 has been dominated by steps to regulate online gambling and, in so doing, provide clarity on the legality or illegality of the many, quickly-changing manifestations of internet-based, often offshore, gambling. Legislation pertaining to online gambling has been proposed in several countries, on both provincial and federal levels; as such, this loosely connected body of legislation has been varied both in its aims and in terms of its success in entering law.

In the United States in 2013, Congress introduced a bill entitled the Internet Gambling Regulation, Enforcement, and Consumer Protection Act (2016). The bill aimed to prohibit unlicensed online gambling operations in the United States, with key exceptions afforded to lottery operators and services offered by recognised Native American tribes. The bill proposed that licensing and regulation would fall under the remit of a new organisation, the Office of Internet Gambling Oversight. However, the bill never progressed in Congress.

In 2014 the United Kingdom passed an act amending the 2005 Gambling Act entitled the Gambling (Licensing and Advertising) Act 2014. Whereas remote operators before 2014 required a license only if they held equipment in Great Britain, the 2014 Act shifted regulation from the point of supply to the point of consumption (Miers, 2015). As of 2014, then, offshore operators require a license from the Gambling Commission, and must pay a duty of 15% on any profits from UK customers (Gambling (Licensing and Advertising) Act (2016)).

In November 2016 Australia's Parliament introduced a similar piece of legislation, the Interactive Gambling Amendment Bill 2016, which was geared towards creating an online gambling licensing structure. The bill aims to implement the recommendations of an earlier report (O'Farrell, 2015) by tightening restrictions on offshore operators and consequently clarifying an issue that is not covered by existing legislation. To this end, the bill states that it is illegal for overseas operators to offer gambling or gambling products to Australians unless they possess a local (that is, state- or territory-issued) license. In cases where a license is absent or used fraudulently, the bill enables the Australian Communications and Media Authority (ACMA) to issue warnings, civil penalties and injunctions (Interactive Gambling Amendment Bill 2016 (2016)).

Attempts by various international legislatures to produce legislative change have also occurred at the level of territory, province and state. In the United States, since 2013, three states and one territory – Delaware, Nevada, and New Jersey and the US Virgin Islands – have implemented online gambling programmes. This initial push has been attributed to an earlier decision by the US Department of Justice (United States Department of Justice, 2011) stating that existing legislation governing communication prohibits only sports gambling. The successful implementation in these states of gambling programmes paved the way for several other state legislatures – those of California, Illinois, Massachusetts, Mississippi, New York, Pennsylvania and Washington – to attempt to legalise online gambling within their borders. As of December 2016, none of these has proven successful, in part due to the resistance these bills have met by operators of traditional, land-based gambling, whose business could be affected by the empowerment of their online competitors (Berzon & O’Keeffe, 2016).

The states of the US have continued to adopt a patchwork approach to forms of online gambling which currently operate within legal “grey areas”, such as daily fantasy sports (DFS). A relatively recent innovation, DFS have been defined by the Massachusetts Attorney General as follows:

Any contest in which the offer or award of a Prize is connected to the statistical performance or finishing position of one or more persons participating in an underlying amateur or professional competition, but does not include offering or awarding a Prize to the winner of or participants in the underlying competition itself. (Healey, 2016)

The field of DFS is a fast-moving one: the last two years have seen no less than thirty-two state legislatures proposing to legislate on the legality of DFS, with mixed success. In March 2016, for example, the Indiana State legislature passed a bill (Senate Bill 339, 2016) setting out, among other things, that daily

fantasy sports is a game of skill rather than chance, and is therefore exempt from the 2006 Unlawful Internet Gambling Enforcement Act (UIGEA 2006), the existing legislation exempting skill-games and fantasy games from prohibited forms of online gambling. However, in other states, particularly those where land-based gambling is common (such as Arizona and Louisiana), similar legislative efforts aiming to legalise DFS failed at an early stages (Barclay, 2016).

Within the countries of the European Union, recent developments have seen a relaxation of restrictions on online gambling. In a pronouncement made in early 2016 (Case C-336/14, 2016), the Court of Justice for the European Union (CJEU) ruled against Germany's prohibition of gambling via the earlier First German Interstate Treaty on Gambling (Staatsvertrag zum Glücksspielwesen in Deutschland, 2011). The CJEU decided that the current state of German legislation restricted the freedom of other EU countries' to provide services across the bloc.

### 5.1.2 The Legalisation of Sports Betting

Alongside efforts to legalise newer, online-based forms of gambling, steps have been taken in recent years in both Canada and the United States to legalise forms of sports betting. Although illegal in both countries, sports betting proliferates (Rutsey, 2016; Silver, 2016). Some estimates place the amount illegally gambled per year in the United States at \$400 billion (Silver, 2016).

In 2011, the Canadian Parliament approved a private member's bill (Safe and Regulated Sports Betting Act, 2011) seeking to permit betting on the basis of a single sporting event or athletic contest. (To date, Canada's Criminal Code permits only parlay betting on multiple events.) Having faced opposition from

lobbyists and all major parties, however, the bill was voted down in the House of Commons (CBC, 2016).

In the United States several attempts have been made to overturn existing legislation, which permits sports betting in only four states (Delaware, Montana, Oregon and Nevada). The state of New Jersey's most recent attempt to legalise sports betting met with failure in August 2016; however, a piece of legislation introduced that same month (New Jersey Assembly Bill A4303, 2016) seeks to fully repeal the state's ban on sports betting. Despite the defeat of previous such measures, the Washington Post saw fit to declare in late 2016 that "the national consensus on legalized sports gambling seems to be changing" (Bonesteel, 2016).

### 5.1.3 Harm Reduction & Problem Gambling

As noted, several of the above-mentioned laws seeking to liberalise gambling within countries have met with opposition and failure. The failure of such legislation can be seen at least in part to be a consequence of industry stakeholders (particularly land-based gambling operators) wishing to protect their economic interests (Halcoussis & Lowenberg, 2015). However, the principle of harm reduction is equally important in considering these developments.

Harm reduction in regard to gambling has become an important concern in light of the 2013 reclassification, within the fifth edition of the Diagnostic and Statistical Manual for Mental Disorders (DSM, 2013), of pathological gambling from an impulse control disorder to a non-substance-based addictive disorder. Notwithstanding this recognition, research examining how policy and legislation can reduce the harm caused by problem gambling lags behind that of other public health concerns (Gainsbury, Blankers, Wilkinson, Schelleman-Offermans & Cousijn, 2014). For this reason a number of reports

and studies have called for governments to build on existing legislation to tackle the perceived growth in “problem gambling” (Forrest & Mchale, 2011; Fulton, 2015; Gainsbury, Blankers, Wilkinson, Schelleman-Offermans & Cousijn, 2014). Indicative of the timeliness, if not the urgency, of further development in the area of problem gambling is the *UNLV Gaming Law Journal*’s publication of a two-part symposium devoted to this topic (Issues 1 & 2, 2015-2016).

In respect of current legislation, of note is a bill tabled to be introduced in the Canadian province of Newfoundland and Labrador which addresses addiction among young people. The bill (An Act Respecting Secure Withdrawal Management for Young Persons, 2016), though yet to be formally released, intends to allow provincial authorities to apprehend, detain, assess and treat young people (aged 12-18) with drug and alcohol addictions without their informed consent. While the bill does not appear to include gambling addiction among the addictions with which it is concerned, it is significant in that it may pave the way for further interventions in respect of this and other forms of addiction.

Although, as the academic studies cited above attest, the legislative base for harm reduction in respect of gambling is inconsistent, countries such as Australia and Canada boast multiple government-funded services whose remit is harm reduction and harm prevention. For example, the organisation GameSense, which is affiliated with the British Columbia Lottery Corporation, provides an extensive programme of preventative and harm-reduction-orientated measures such as offering access to an array of tools and resources online and in-person guidance to gamblers in casinos. GameSense participates in outreach activities, such as exhibiting at responsible-gambling orientated conferences (New Horizons, 2016). In 2015, GameSense went

international, having been taken up in the responsible gambling programme of the state of Massachusetts. (For more on services, see p. 20 below.)

#### 5.1.4 Self-exclusion

There is evidence that self-exclusion, in a variety of forms and across a range of jurisdictions, is a useful means of combating problem gambling (Miller, 2015). The burgeoning and evolving role of self-exclusion as a harm-reducing measure is indicated by its recurrence in both academic research (see, for example, a paper at the biennial 2016 International Gambling Conference by Christoforou, Campbell, Loach & Penford (2016)) and within legislation.

At present the Australian Parliament is processing a second federal gambling bill. Entitled the Gambling Harm Reduction (Protecting Problem Gamblers and Other Measures) Bill 2016, this piece of legislation, if passed, will enact laws allowing gamblers to self-exclude from gambling. In particular, the bill targets so-called “pokies”, or a poker-based type of electronic gaming machine (EGM). Although subject to provincial and territorial laws, pokies proliferate across Australia (Lye & Hirschberg, 2014). The bill imposes a limit (\$20) on the amount that these machines can accept per bet, while also limiting jackpots to \$500. Other measures would see transaction limits placed on ATMs located in establishments which feature pokies, and oblige operators to impose a “precommitment” system to allow users to limit losses (Gambling Harm Reduction (Protecting Problem Gamblers and Other Measures) Bill 2016)).

Other recent legislation has required self-exclusion by minors and other vulnerable groups. In 2013 the Parliament of Singapore created regulations which automatically exclude from casinos citizens who have filed for bankruptcy or who are in receipt of benefit payments (Casino Control Act, 2013). A 2016 bill passed in New York which regulates daily fantasy sports (New York State Assembly Bill A10736) likewise requires operators to ensure



that customers are able to permanently self-exclude themselves from DFS competitions.

### 5.1.5 Advertising

Research has shown there to be a direct correlation in several countries (including Australia, Spain and Sweden) between vulnerable populations' exposure to gambling advertising and positive attitudes towards both gambling operators and the intention to gamble itself (Buil, Moratilla & Ruiz, 2015; Hing, Vitartas, Lamont & Fink, 2014; Parke, Harris, Parke, Rigbye & Blaszczynski, 2014). In keeping with the above-mentioned emphasis on tighter regulation, various international legislatures have sought to restrict the forms of gambling-related advertising which are to be permitted in their jurisdictions.

In the UK, for example, the Gambling (Licensing and Advertising) Act 2014, in addition to requiring offshore operators wishing to do business in the UK to hold licenses, creates the new offence of advertising remote gambling in the UK (including Northern Ireland) in the absence of a licence issued by the Gambling Commission.

In August 2016, the Minister for Consumer Affairs, Gaming and Liquor Regulation of the state of Victoria, Australia, opened a public consultation on proposed legislation which would prohibit the placement of advertisements on public transport and within distance of schools. It is suggested that the proposed reforms will be a measure to reduce the association, by vulnerable populations and problem gamblers, between sports and betting (Sports Betting Ad Crackdown, 2016).

Notwithstanding these efforts to regulate traditional forms of gambling-related advertising, many gambling regulations and standards do not account for

developments in the area social media advertising (Gainsbury et al., 2015). Gainsbury et al. (2015) argue that a lack of clarity surrounds current Australian gambling regulations in respect of social media advertising and whether or not gambling operators must include responsible gambling messages in their social media advertisements. Due in part to the lack of a clear regulatory framework, Gainsbury et al. suggest, gambling operators have begun to “experiment with these platforms more liberally than they may use traditional advertising media” (Gainsbury et al., 2015, p. 128).

The lack of regulation of online advertising can present problems for at-risk and problem gamblers. Participant statements from the research study conducted by Hing et al. suggest that “online gambling promotions represent a trigger for strong temptations” and could be successful in undermining resolutions set by recovering problem gamblers (Hing et al., 2014, p. 403). As identified by Gainsbury et al. (2015), one method used by gambling operators on their social media was the posting of tips from supposed experts. Hing et al. show that participants are more likely to gamble more due to these expert tips; tips encouraged participants “to believe they had inside information on credible betting options” (Hing et al., 2014, p. 402). Gambling operators also advertise services to their users via email. One participant in a research study who was receiving treatment for gambling problems felt that once they had opened an online account the promotions kept pouring in until the stage where addiction had set in, after which point offers and promotions stopped (Hing et al., 2014). Gamblers who had self-excluded from websites have received emails offering promotions after a certain period of inactivity on their account (Hing et al., 2014). Overall, gambling promotions can be harmful insofar as they may cause individuals to increase their expenditure or their time spent gambling online (Hing et al., 2014). Advertising alone is unlikely to encourage non-gamblers to become internet gamblers; however, there is strong evidence suggesting that online advertising can encourage problem gamblers to increase

their spending, even causing some problem gamblers seeking treatment to relapse (Hing et al., 2014). What is more, the advertising of online gambling services in traditional media can be successful in enticing gamblers away from land-based venues, or alternatively, to gamble online as well as offline (Hing et al., 2014).

#### 5.1.5.1 Advertising Standards

The code of the Advertising Standards Authority of Ireland, under Section 10, states that: “All marketing communications for gambling services or products shall contain a message to encourage responsible gambling and shall direct people to a source of information about gambling and gambling responsibly” (ASAI, 2016). The Broadcasting Authority of Ireland’s (BAI) own code allows for the advertising of gambling with few applicable guidelines, with the exception of a ban on messages which may be seen as encouraging gambling, such as promotions, reference to odds and so on (Broadcasting Authority of Ireland, 2011). By comparison, the UK’s gambling industry has a code (The Industry Code for Socially Responsible Advertising) to ensure responsible advertising standards. This code was intended to go “over and above the extensive requirements already placed on them by the gambling and advertising regulators” (Industry Group for Responsible Advertising, 2015). However, this is a voluntary code and while advising a degree of commonality between responsible advertising messages, it is ultimately up to the business doing the advertising. It is advised that gambling advertisements are to include the website of Gamble Aware UK. The Industry Code requires that:

- “For television advertising that Gamble Aware must remain on the screen for at least 10% of the advert’s length.
- For print advertising that it should be clearly legible in proportion to the advertising script.

- For digital advertising it should be a minimum of 100px across” (Industry Group for Responsible Advertising, 2015).

Additionally the watershed time for advertising of new gambling products is 9:00pm. Exception is made for the advertising of sports gambling during sporting events (Industry Group for Responsible Advertising, 2015).

## 5.2 Trends in the Gambling Industry

The prevalent trend over the last number of years has been the merger of companies. Many of the mergers are in response to the increased costs of running gambling businesses: the UK now requires a 15% point of consumption tax along with a duty on machine games (Davies, 2016b; Gerrard, 2015a; Gerrard, 2016a). Numerous gambling companies have indicated that their profits have been negatively affected by this tax, prompting the consideration of mergers to help offset this (Murad & Megaw, 2016).

Merging companies provides opportunities to reduce debt, expand reach, offer more services and improve profits (Davies, 2016b; Gerrard, 2015a; Gerrard, 2015b; Gerrard, 2016b). For companies with a heavy UK customer base, service expansion to other countries is becoming necessary to counteract the stricter and more expensive UK regulations that have come into effect in recent years (Gerrard, 2016a; Murad & Megaw, 2016).

Paddy Power merged with Betfair in January 2016 to form one of the largest betting companies in the world (Moore, 2015). This was followed in February by GVC Holdings taking over bwin.party (Paddy Power Betfair plc, 2016). Ladbrokes merged with Coral in 2015, while William Hill has been in talks to merge with multiple companies over the past two years (Davies, 2016a; Gerrard, 2015c).

The merger trend is set to continue in the next year throughout the world. The daily fantasy sports company FanDuel in Scotland is to merge with DraftKings in America, and in Australia Tabcorp and Tatts are in talks to join forces in the face of increasing costs (Australia gambling giants Tabcorp and Tatts plan merger, 2016; Eccles, 2016). More in depth and expansive reviews of the current and expected trends in the gambling industry are detailed in the reports of Aruvian's Research (2016) and TechNavio (2016).

### 5.3 Service Provision

In the UK the Gambling Commission promotes responsible gambling and works closely with the Department for Culture, Media and Sport and the Responsible Gambling Strategy Board (RGSB) to research problem gambling and to create policies that require gambling companies to be as socially responsible as possible (The Gambling Commission, 2015). While the RGSB works closely with the Commission in the above capacities, it gives advice to those suffering from gambling separately to any services offered by the Commission (The Gambling Commission, 2015).

The Gambling Commission requires gambling companies with UK customers to donate money to fund research on problem gambling along with services that provide education and aid to those suffering from gambling problems (The Gambling Commission, 2015). Currently the majority of these funds are given to GamCare, the Gordon Moody Association, and the Gamble Aware website (The Gambling Commission, 2015). Gamble Aware provides the National Gambling Helpline in the UK and aims to prevent gambling problems through education and to provide swift and effective help for those in need of it (Gamble Aware, 2016). The Gordon Moody Association and Gam Care provide similar services with the Gordon Moody Association also providing online support that can be availed of even by those not based in the

UK (Gam Care, n.d.; Gordon Moody Association, n.d.). Other problem gambling services available in the UK are Gam Anon (for those affected by a friend or family member's problem gambling) and Gamblers Anonymous (for those suffering from problem gambling) (Gam-Anon, n.d.; Gamblers Anonymous, 2013).

The Commission, and similar boards in other countries, consists of members who all have past experience on similar boards, councils and panels and includes civil servants, accountants, watchdogs, solicitors, providers of citizens advice, and magistrates (The Gambling Commission, 2016).

Gambling is legal throughout Canada but provinces are responsible for enforcing federal legislation and can implement their own legislation in regard to gambling (Gambling Control Act, 2002). Many provinces have government-funded problem gambling services; one of these, GamTalk (a nationwide service helping those with gambling problems which also serves the United States and provides information on international services) is funded by lotteries and other gambling corporations from across Canada (Gamtalk, 2015). The aim of the government-funded services tends to be providing information on responsible gambling and providing support services. Similarly, in Australia state and territory governments fund services that provide information and help to gamblers, those suffering from problem gambling, and their loved ones (Gambling Help Online, 2016).

In Ireland the gambling industry funds the Irish Responsible Gambling Board which in turn provides the service Gamble Aware. Gamble Aware, similar to comparable services in Australia, Canada, and the UK, aims to provide education on responsible gambling as well as raising awareness of problem gambling and the services available to those suffering from it (Gamble Aware, 2011). The Responsible Gambling Board also funds research into problem

gambling. Problem Gambling Ireland is an independent company set up in 2016 to provide information on problem gambling and problem gambling resources that is not influenced by the gambling industry (About problem gambling Ireland, 2016).

Many of the services on offer to those suffering from a gambling problem are funded by the gambling industry, resulting in services that are “underdeveloped” and “geographically patchy” (George & Bowden-Jones, 2014, p.7). Rogers (2013) argues that gambling addiction should be included with other addictions that are treated by social workers as early, effective treatment has been shown to drastically help those suffering from problem gambling. A similar stance is taken by George and Bowden-Jones (2016) who highlight the lack of resources available to those suffering from problem gambling, particularly within local public health departments. It has been observed that those who have an alcohol or drug problem are more likely to be affected by problem gambling than those who do not, providing further justification for including problem gambling services in local public health departments (Sherba & Martt, 2015). Including gambling in the range of addictions treated would allow those who are already obtaining help for a separate addiction to receive multiple forms of treatment in one location.

Hing, Russell, Gainsbury and Blaszczynski (2015) discovered that those who gamble almost exclusively on the internet are less likely to seek help than those who partake of more traditional forms of gambling. They also observed that all types of gamblers were less likely to make use of online problem gambling services than land-based services. Such results indicate a need to make online services more inviting to those with a gambling problem as well as an increased awareness of the difference between those who exclusively gamble online and those who avail of multiple types of gambling services.

While there is often a shortage of readily available help for those suffering from problem gambling, more expansive problem gambling services and reduced levels of gambling do not always lead to reduced levels of problem gambling: further preventative measures are required to help stem the issue of problem gambling (Abbott, Stone, Billi, & Yeung, 2016; Binde, 2014). Abbott, Stone, Billi, and Yeung (2016) advocate for services to be expanded and to target those who are at risk – not merely those who already suffer from or have suffered from problem gambling.

Multiple services offer help and treatment to those suffering from problem gambling, but little is available for the friends and family of those with an addiction. Gam-Anon meetings are held throughout the UK and Ireland, but they run in conjunction with Gamblers Anonymous and not all Gamblers Anonymous chapters will have a Gam-Anon group (Gam-Anon, n.d.; Gamblers Anonymous, 2013). The RISE Foundation in Dublin offers help exclusively to the family of those suffering from addiction; however, their services are limited to those who are able to travel to one of their centres in Leinster (About us, n.d.).

## 5.4 Developments in Technology

### 5.4.1 Online Gambling

Online gambling (also referred to as interactive, remote or internet gambling) is a mode of gambling available through computers, smartphones, tablets, gaming consoles and interactive TVs (Gainsbury, Russell, Wood, Hing and Blaszczynski, 2014). The gambling industry has changed significantly since the arrival of online gambling, in part as a result of the industry's tendency to be an early adopter of new and sophisticated technologies (Albarrán Torres & Goggin, 2014; Gainsbury et al., 2014; Rossi, 2016). Online gamblers have been found to take part in a greater number of gambling activities than land-



based gamblers, and to do so in multiple modes, which may suggest that the “convenience and ease of access through the Internet facilitates increased involvement in multiple forms of gambling” (Gainsbury et al., 2015, p. 13). The same accessibility and ease of use which has helped internet gambling attain its level of success may also be a cause of addiction among vulnerable populations (Gainsbury, et al., 2014). Notably, most online gamblers migrate to online gambling rather than having their first gambling experience online (Hing, Cherney, Blaszczynski, Gainsbury, & Lubman, 2014; Gainsbury, et al., 2014).

#### 5.4.1.1 Online Risks and Responsible Gaming Features

In Gainsbury et al.’s (2014) study, just over a quarter of moderate-risk and problem gamblers identified online gambling to be the main contributor to their gambling problem. Meanwhile, 11.7% of these problem and moderate-risk gamblers identified gambling via a mobile phone as the main contributor to their gambling. Additionally, Gainsbury et al. (2014) found that of the respondents about one fifth of those who had gambled over the previous year reported some negative consequences due to the gambling. Another study indicated that over half (53.5%) of the respondents had gambling problems prior to their gambling online. However, 87.9% of these same respondents suggested that online gambling had in some way contributed to their problem (Gainsbury et al., 2014).

Some online gamblers have indicated that they would find the inclusion of responsible gambling features (RGFs) to be beneficial (Gainsbury, Parke, & Suhonen, 2013). In this study, respondents indicated that an RGF which featured a gambler’s financial transaction statements would be most useful, while indicating that an RGF focused on self-set time limits would be least useful. It was reported that “players who chased their losses were more likely

to report RGFs as at least quite useful indicating that RGFs may be valuable for those who have the most need for them” (Gainsbury et al., 2013, p. 242).

#### 5.4.1.2 Regulating Online Gambling

It is suggested that a lack of regulatory standards online “leaves players vulnerable without appropriate consumer protection” (Philander and Mackay, 2014, p. 223). This lack of consumer protection is also highlighted by Gainsbury et al. (2013) whose study indicated that over a third on online gamblers may have disputes with online gambling sites. These disputes include: accounts being locked out, staff being unhelpful, being disconnected, not being paid promptly, not being paid at all, not receiving bonuses, spam, software malfunction, and unfair software (Gainsbury et al., 2013). To avoid these problems some players will seek out only well-known sites, pay attention for any unusual behaviour, or look for third-party assurance that the site in question is regulated. Large numbers expressed distrust with the fairness of operations and software integrity of online gambling sites and saw the need for “reputable independent third party reports on randomness and percentage payout”(Gainsbury et al., 2013, p. 242).

In regulating online gambling and increasing consumer protection regulators must be aware of “potential unintended consequences . . . such as players choosing to move to less regulated sites to avoid any restrictions on gambling” (Gainsbury, et al., 2014, p. 876). Awareness of online gambling regulations is reported to be low, and in order for regulated sites to be successful they “must compete with offshore sites and encourage players to use these sites, which include strong customer protection measures.” (Gainsbury, et al., 2013, p. 244). It is suggested in respect of regulation and operators’ policy that they must:

- “minimize player disputes by clearly displaying customer policies and contact methods to solve customer queries before they escalate into complaints”
- “act to reduce disputes experienced by online gamblers by increasing public education of the risks associated with gambling on offshore sites”
- “enhance public awareness of the importance of gambling only on regulated sites, which offer a safe playing environment and operators are subject to strict codes of conduct”
- “take continuous actions to ensure that consumer protection measures are sufficiently rigorous and appropriate” (Gainsbury et al., 2013, p. 244).

In the UK the Gambling Act 2005 regulates the operations of overseas remote gambling venues. In order to operate within the UK these offshore remote venues must be licenced by the Gambling Commission ensuring that consumer protection is given to UK users of both domestic operators and international operators (Department for Culture, Media & Sport, 2014).

#### 5.4.1.3 Social Media

The use of social media by gambling operators is a highly discussed topic in current literature on online gambling. Due to social media’s rapid and continuing development gambling operators are now able to interact with current and potential customers in new and evolving ways.

The messages that gambling operators can provide through different social media platforms is varied. In an Australian study of 101 different gambling operators across varying social media platforms, information that was shared included: “information about the venue/operator; promoting gambling products and special offers; competitions and promotions; promoting

gambling wins by customers; features to assist betting; betting tips; sports and racing news; in-venue events; food and beverage; encouraging customer engagement; links to sports teams; promoting community engagement, as well as non-gambling related content” (Gainsbury et al., 2015, p. 131). Social media posts were found to often reference current topics to maximise on their visibility. Much of the non-gambling content posted on these sites aims to be humorous or prompts the sharing of information with users, including those not following the gambling operator, by generating a larger amount of likes, retweets or similar (Gainsbury et al., 2015). Many social media posts try to appeal to new customers by promoting the ease, enjoyment or possible winnings available with gambling (Gainsbury et al., 2015). Advertising on social media is done by both land-based gambling venues and online gambling venues, and can occur in two ways: through posts made by the operator or through posts made by players (Dickins & Thomas, 2016). Users are often encouraged to share information about the game through social media, or by inviting friends, and in doing so can be rewarded with in-game prizes (Dickins & Thomas, 2016).

Features common among gambling operators’ social media were, on the one hand, a lack of responsible gambling messages and, on the other, an overwhelmingly positive image of gambling as a “glamorous, exciting, fun and action-packed” opportunity (Gainsbury et al., 2015, p. 135). Latent messages identified across the social media include: raising awareness (about gambling), glamorising gambling, ease of use, encouraging new use, emphasising winning, encouraging venue patronage, encouraging betting, aligning gambling with sport, brand engagement, promoting community benefits of gambling, and limited warning messages (Gainsbury et al., 2015).

An additional issue with social media usage and the gambling industry is children being exposed to advertising and promotions via these digital

platforms. Several countries aim to employ different methods to accurately verify the age of a user when they attempt to access an age-restricted website. Online age verification presents both technical and legal difficulties, and has led some to argue that “parental responsibility and education for user responsibility must . . . be the primary focus of awareness raising efforts” (O’Neill, 2013, p. 256).

#### 5.4.1.4 Social media gaming/ social casino gaming

An emerging trend identified in the literature is a connection between online gambling and social media gaming, also commonly referred to as social casino gaming. Abarbanel & Rahman (2015, p. 51) describe the differences between the two models as follows:

In standard online gambling, conducted via websites, apps, and social networking, real money is wagered for monetary prizes. In social, freemium, and free-to-play (social casino) gambling games, no money is paid out for wagers and thus no real-world financial benefit is gained from winning social casino games. Many social casino sites adopt the freemium model, in which microtransactions are completed to unlock additional play features. In the social casino setting, for example, a player can purchase chips with which to gamble on more games, but these chips have no real world value and cannot be redeemed for cash. Players also may complete a microtransaction to purchase access to a new level or game that is otherwise locked.

Since social casino gaming does not meet the legal definitions of gambling, it is not regulated by the same laws to which gambling are subject. With the increasing popularity of social casino gaming concerns have been raised about the blurring of lines between social media gaming and online gambling (Abarbanel & Rahman, 2015; Gainsbury et al, 2014). The development of social gambling is thought to have the potential to radically alter the “casinos and gambling environment” and to “transform norms of gambling” in order to

cater to the preferences and behaviours of “new, desirable demographics” (Albarrán Torres & Goggin, 2014, p. 105).

Other features of social media casinos include the ability to invite other users to games or tournaments, the ability to display achievements, bonuses for having other users accept invites to begin playing, and also algorithm usage which provides high win-rates to maintain games’ entertainment value (Abarbanel & Rahman, 2015; Gainsbury et al., 2014). The higher win rate of social casino games over online gambling raises the possibility that crossover gamblers may develop a falsely inflated sense of their ability to win (Abarbanel & Rahman, 2015; Gainsbury, et al., 2014).

Young people, who are often in the literature deemed more digitally literate, and consequently are more likely to include technology usage in their daily lives, are especially exposed to online gambling, particularly if they play social casino games. Increased engagement with simulated gambling activities is likely to result in increased exposure to gambling-related advertising on social media and other online media (Dickins & Thomas, 2016, p. 6). According to the Gambling Commission 9% of the 11-15 year olds it surveyed had played social casino style games, while 63% had seen gambling advertising on social media (Gambling Commission, 2016).

#### 5.4.1.4.1 Blurring of Lines between Social Casino Games and Online Gambling

Social casino gaming has been described as “[falling] into the realm of the make believe” in that it is introduced to users merely as a game, ostensibly similar to other social media games and playable in much the same way (Albarrán Torres & Goggin, 2014, p. 104). While no real money is at stake, players invest “time, personal information, and free labour” which the games’ operators turn into a profit (Albarrán Torres & Goggin, 2014, p. 104).

“Gambling” and “playing” become blurred, as “gambling adopts the procedures, aesthetics and dynamics of digital forms of interactive entertainment” (Albarrán Torres & Goggin, 2014, p. 104).

The blurring of online gambling and social casino games occurs in many forms, such as in social casino games which realistically look and feel like real gambling, and in the form of in-game purchases which can enhance the experience of social casino games. (As noted above, players can only spend money: social media gaming yields no monetary winnings.) Online gambling is beginning to incorporate features of social media gaming such as achieving new “levels” and increased interactions between the player and the game (Dickins & Thomas, 2016).

Social casino games can “serve as a segue strategy by operators prior to government regulation of online gambling and the later launch of real-money sites, and can reinforce current land-based marketing and branding strategies” (Abarbanel & Rahman, 2015, p. 59). Social gambling has also been described as being “akin to a market incubator, where players are fashioned and primed for lucrative future practices of consumption” (Albarrán Torres & Goggin, 2014, p. 102). What further blurs the line between social casino gaming and online gambling is the fact that users can accrue loyalty points on the one account from both social gaming usage and gambling usage. This crossover occurs not only between social casino gaming and online gambling but also between them and live gambling venues. Illustrative of this crossover is that loyalty points earned online may be “redeemed for live shows, food and beverage credit, hotel rooms, and retail rewards” (Abarbanel & Rahman, 2015, p. 59).

The individual’s motivations for playing represents a final point which blurs the distinctions between social gaming and gambling. It has been suggested

that people play social casino games for many of the same reasons as people gamble, namely, for entertainment, to relax, to pass time and to relieve negative emotion (Dickins & Thomas, 2016). Dickins & Thomas (2016) further note that some individuals play social casino games in order to practise for real-money gambling.

#### 5.4.1.4.2 Who operates social casino games?

While most social casino games are operated by social media gaming operators, some social gambling games are created by established gambling operators who use the games as an extension of their already existing online and/or land-based gambling venues (Albarrán Torres & Goggin, 2014). While the exact cost of the creation of these games is difficult to discern, multiple sources indicate that the development and marketing of successful social media games generally costs hundreds of thousands of dollars (Boyd Myers, 2013; Hurd, 2016; Klubnikin, 2016). Social casino games can be made available to play on social media, mobile apps, or hosted on websites (Abarbanel & Rahman, 2015; Gainsbury et al., 2014).

Dickins and Thomas report that, as of 2016, no detailed research has been done on gambling operators' purchasing of social casino games or on their partnering with social media gaming operators; notwithstanding the lack of published studies in this area, these links do exist, and, as Dickins and Thomas (2006) suggest, are indicative that there is potential profit for gambling operators in the social casino sector (Dickins & Thomas, 2016). While social networks can gain a share of the profits for games hosted on their sites the gaming operators benefit from a ready-made network from which they can mine data and advertise their product (Willson & Leaver, 2015).



#### 5.4.1.4.3 How are they being profiled – what issues arise from this profiling

A common feature of social media gaming, whether being accessed via app or online website, is the ability to log-in with a social media account (commonly Facebook), Google account, or as a guest (Albarrán Torres & Goggin, 2014). An estimated 173 million people worldwide (over three times as many as online gamblers) play social casino games and therefore provide information about themselves for operators to use (Gainsbury et al., 2014).

Gambling businesses have the ability to “extract, aggregate, and commercialise” data produced by players when using social media games (Willson & Leaver, 2015, p. 147). Players expose information on their “friends, their likes, their desires, and their consumption habits” in exchange for use of these social games (Willson & Leaver, 2015, p. 147). To social gaming and gambling operators alike, this data is “complex, useful, and importantly marketable information” (Willson & Leaver, 2015, p. 147).

Further issues arise in regard to users exchanging personal information for gaming access. It is reported that users are largely unaware that their personal data is being used in this way. Research suggests that even users who are aware of some usage of their information do not understand the “full range of ways in which data they have generated is being stored, aggregated, and analysed” (Willson & Leaver, 2015, p. 152). For example, when users play a game on a social media platform they must agree to terms and conditions not only of the game and its owners but also to those of social network. Deciphering the relationship between these sets of terms and conditions can be confusing and leads to users not understanding what information is being used and for what purpose (Willson & Leaver, 2015). Additionally data that is being shared does not necessarily come just from the user but from their wider social network.

#### 5.4.1.4.4 How are players' data used?

Information-rich data sets are an extremely valuable resource for a commercial business (Willson & Leaver, 2015). When social media sites are connected to an individual's online gambling or social casino gaming, information about age, education, marital status and so on can be found out and can assist companies in targeted promotions. In turn, the companies can encourage players to migrate from social casino gaming to playing gambling games, or simply to encourage users to spend more money on games (Abarbanel & Rahman, 2015; Willson & Leaver, 2015). Not only can operators use the information to which they have access to increase the profits of their own games, but the selling of "aggregated data containing personal information and social practices can also be a valuable source of income when sold to those who make their business out of the on-sale of tailored data sets (e.g. companies such as Axciom)" (Willson & Leaver, 2015, p. 150).

#### 5.4.1.5 Apps

The use of mobile apps has made gambling more accessible. It has allowed for more frequent usage, and for forms of gambling to be accessed by a potentially wider group of participants (Albarrán Torres & Goggin, 2014; Codagnone, Bogliacino, Ivechenko, Veltri, & Gaskell, 2014). It has been reported that mobile gambling usage has doubled each year for the past five years (Rossi, 2016). At present in social media gambling on mobile devices stakes are relatively low, and payment is easy and convenient; due to the 24/7 nature of mobile gambling, gambling can easily fit into daily life wherever and whenever is convenient for the user (Albarrán Torres & Goggin, 2014). Also highlighted is the importance of recognising simulation of wagering on mobile devices, where no money is exchanged, as a *de facto* gambling practice which, one study notes, effectively turns mobile devices into "portable theme parks of risk" (Albarrán Torres & Goggin, 2014, p. 103).

#### 5.4.1.6 Data Protection

In Ireland the Data Protection Commissioner's office provides a code of practice. However, companies are not obliged to adhere to this code, and the commissioner has no authority to impose fines against a breach in data protection (Mulligan, 2014). How online gambling operators deal with users' data in the EU will soon come under the regulation of the General Data Protection Regulation, which will be put into action on 25 May 2018. This will be the main piece of EU legislation to deal with data protection. On top of this the ePrivacy Directive, intended to complement the Regulation, which will provide "rules concerning the processing of personal data in the electronic communications sector" (Van Eecke & Dierick, 2016).

An example of how data protection in online gambling is addressed in France is given by Coppolani (2016). The French Online Gaming Regulatory Authority is responsible for the processing of online gamblers' data in accordance with French law. In France online gamblers can oppose the commercial use of their personal data. The French Data Protection and Privacy Authority can impose sanctions on companies who have breached its users' personal data. The French Online Gaming Regulatory can use data "for the purposes of preventing problem gambling, fraud and money laundering" (Coppolani, 2016).

#### 5.4.2 Land-based Gambling Technology

While a large amount of development in gambling is centred on online practices, land-based gambling venues, too, are embracing technological developments as measures of retaining old customers, and encouraging increased spending from them, as well as attracting new customers.

#### 5.4.2.1 Bingo Halls

One new development in bingo halls is the electronic bingo machine, which can allow for players to play interactively in land-based bingo venues. With the popularity of bingo halls diminishing, new technology can be used to revitalise this previously popular game (Blackwell, 2015). Players can play live games electronically or pay money to play their own virtual game on these electronic bingo machines. Concern has been raised that these electronic methods of playing bingo could be just as addictive as slot machines (Blackwell, 2015; Harrigan, Brown, & MacLaren, 2015). In some international bingo venues slot machines and other electronic gaming machines have been introduced alongside the electronic bingo terminals (Blackwell, 2015). Furthermore, multiple types of bingo games are available on these machines. What has been highlighted is that the electronic bingo terminals have many of the same features which have proven to contribute to gambling addiction in slot machines. Some games on these electronic bingo machines, like slot machines, can be played at a much faster rate than paper bingo (Harrigan et al., 2015). Players have some control over the amount of money to bet and the number of cards to play, which can contribute to a false sense of control over a game which relies on chance (Harrigan et al., 2015). Motivation for continued risk-taking after near misses and the listing of past wins are all areas which are highlighted as possibly encouraging problem gambling on electronic bingo terminals.

#### 5.4.2.2 Virtual Racing

Virtual races are computer generated races, or matches, which are played out “live” on digital screens available in both bookmakers’ offices and casinos. The virtual games are “algorithmically controlled, with outcomes determined through the same random-number generation model used in slot machines”, and are not “skilled-based gambling” given that the display of information (such as a horse’s strength or past performance) is considered “largely window

dressings” (Kramer, 2016). Gambling operators claim the banning of virtual racing in Ireland would result in the closure of betting venues and the layoffs of staff. However, gambling support groups claim that gambling on virtual races is highly addictive. While at real racing events there could be up to 6 races an hour, it is claimed that up to 20 races an hour can play out with virtual racing (O’Connor, 2015). A representative for Paddy Power stated that all of their 600 shops in Ireland and the UK have virtual racing, going on to claim that it is an extremely popular form of gambling, generating high revenue for the firm (Kramer, 2016).

#### 5.4.2.3 Fixed Odds Betting Terminals

“Fixed odds betting terminals (FOBTs) are electronic machines, sited in betting shops, which contain a variety of games, including roulette. Each machine accepts bets for amounts up to a pre-set maximum and pays out according to fixed odds on the simulated outcomes of games” (Woodhouse, 2016, p. 3). The most commonly played game on these FOBTs is roulette although other games are available, such as poker and blackjack, electronic slot games and virtual racing (Campaign for Better Gambling, 2015; Local Government and Regeneration Committee, 2015). These touch screen electronic gaming machines have been described as “hard core gambling” by the Campaign for Better Gambling (2015). In the UK operators who obtain a licence for FOBT machines can have up to four in a venue (Campaign for Better Gambling, 2015; Woodhouse, 2016).

While the gambling industry claims there are no causal links between FOBTs and problem gambling, these machines have faced criticism due to the possibility that players may lose large amounts of money in short periods of time thanks to a high-frequency spin rate (three per minute) and the possibility to place large bets (Codagnone et al., 2014; Harris & Parke, 2016; Local Government and Regeneration Committee, 2015; Miers, 2015; Woodhouse,

2016). The speed of play, illusions of player control, irrational player beliefs and the capacity for high stakes gambling make FOBTs highly problematic; even among non-problem gamblers there is a strong likelihood for gamblers to chase losses on EGMs (Harris & Parke, 2016). The use of FOBTs is reported to contribute to financial, social and health problems (Department for Culture, Media & Sport, 2016; Local Government and Regeneration Committee, 2015).

A 2014 study showed that moderate-risk gamblers were more likely to bet on EGMs than non-problem gamblers (Gainsbury et al., 2014). This study showed that approximately half of the respondents who were categorised as problem or moderate-risk gamblers identified EGMs as the main contributor to their problem gambling. This included both land-based gamblers and online gamblers (Gainsbury et al., 2014).

Due to the links between FOBTs and problem gambling, Scotland is currently working to ban FOBTs, while the Campaign for Fairer Gambling is seeking to reduce the maximum bet permitted on FOBTs in the rest of the UK to £2 per spin. This opinion is shared by other organisations such as Hippodrome Casino (Campaign for Better Gambling, 2015; Campbell, 2015; Local Government and Regeneration Committee, 2015).

#### 5.4.2.4 Pre-Commitment System

Pre-commitment systems can allow for individuals to have more control over their gambling through self-exclusion, transaction history statements, and limit setting. Pete Lunn and Colin O’Gara are two individuals in Ireland who believe that gambling operators should allow for gamblers to enter into limit setting contracts (Oakley, 2015). Oakley (2015) also illustrates that gambling operators, while they hold the information needed for transaction history statements, are reluctant to share this information – Oakley himself having needed to apply under the data-protection law in order to view his account

details in their entirety. Research has shown that the setting of monetary limits, combined with alerts during the gambling session, can reduce the number of bets placed in a session and the amount of money placed on each bet (Codagnone et al., 2014). Pop-up messages during gambling (either online or at a terminal) can also be beneficial, as they can “disturb the ‘flow in the zone’ that typically captures the mind of those who gamble” (Codagnone et al., 2014, p. 21).

#### 5.4.2.5 Self-exclusion

Self-exclusion can help gamblers by allowing them to regain a sense of control over their gambling, avoid gambling urges that may be felt in gambling venues, and reduce the negative consequences associated with betting (Thomas, Carson et al., 2016). However, there are many barriers to successful self-exclusion. These include: the complexity of self-exclusion agreements, the inability of exclusion agreements to exclude from multiple venues simultaneously, gamblers’ using multiple accounts, the shame felt when enquiring about self-exclusion, an unwillingness or inability to admit the existence of a gambling problem, and a lack of awareness about self-exclusion programmes. Thomas, Carson et al. (2016) make suggestions for improvements or necessary features for self-exclusion systems, including the option to exclude via online processes as well as face-to-face ones, the ability to anonymously self-exclude, a wider range of time periods for self-exclusion, easy links to counselling services, easy reinstatement after an expiration, information on self-exclusion made widely available, industry involvement and staff training (Thomas, Carson et al., 2016). Self-exclusion, they suggest, will work only if gambling premises are committed to the system. Reports have noted that individuals who have self-excluded from gambling venues have still been let into these same venues during the self-exclusion period (Local Government and Regeneration Committee, 2015).

#### 5.4.2.6 Limit Setting

Limit setting is the ability to set monetary or time limits on an individual's gambling. Limit setting can help reduce a gambler's spending, increase awareness of spending, and reduce problem gambling (Lucar, Wiebe, & Philander, 2013; Thomas, Christensen et al., 2016). However, limit setting under a voluntary system has been found to have a low participation rate – in part because many people perceive themselves to be non-gamblers. Thomas, Christensen et al. (2016) suggest that it is through mandatory systems, with non-exceedable limits and wide reach, where limit setting has been most successful. However, they caution that too restrictive a system will be rejected by the gambling community, and that, consequently, people will look to other ways to gamble or make use of multiple accounts. Other issues, such as the lack of information about monetary limit setting, when it is available on websites, can result in low usage of the feature. Additionally it is reported that limit setting is most successful when used in conjunction with other responsible gambling features such as transaction history statements, pop-up warnings, and so on (Lucar et al., 2013).

#### 5.4.2.7 Transaction History Statements

A common problem among gamblers is their tendency to underestimate their expenditure on gambling (Thomas, Rintoul et al., 2016). Issuing transaction history statements is a means of providing gamblers with information of their expenditure per session or over a fixed period of time. Thomas, Rintoul et al. (2016) claim that providing gamblers with their transaction history would allow for them to make better decisions about gambling and help them to determine whether or not to use other pre-commitment systems. Statements must be easy to read, and Thomas, Rintoul et al. (2016) suggest that important aspects to successful transaction history statements include not only a clear statement of content but frequent transmission of statements to customers as well as multiple methods of accessibility.



## 6. Conclusion

The literature review and stakeholder consultation identified numerous gambling developments and legislation trends. Online gambling has become more prominent over the last number of years, prompting the gambling industry to expand into different platforms and governments to create legislation that specifically targets online gambling, particularly online providers requiring a license from their users' country. A stipulation of many gambling licenses is that the gambling provider must make a contribution towards the services that provide on information on problem and responsible gambling and assistance to those suffering from a gambling problem. The stand-out trend in the gambling industry has been the mergers between companies to combat the increased licensing costs and online competition.

While there has been further restrictions on advertising gambling, this does not always extend to online adverts or promotions through social media which can be used to send positive messages about gambling. Multiple gambling activities are available online, through social media, and through apps with little regulation, increasing the exposure to those at risk.

The services on offer to those with a gambling problem are sparse and most often funded by the gambling industry. Services for those whose loved ones have a gambling problem are even sparser, and in many areas non-existent. Self-exclusion, limit settings, and pre-commitment systems have been shown to reduce problem gambling and have become more prominent in recent years; however, more needs to be done to successfully combat the issue.

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## 8. Appendix A: Bibliography

### 1. International Legislation

#### 1.1. Legislation, Judgements & Commentary

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## 1.2. Academic & Official Materials

### 1.2.1. Australia

- Gainsbury, S. M., Blankers, M., Wilkinson, C., Schelleman-Offermans, K., & Cousijn, J. (2014). Recommendations for International Gambling Harm-Minimisation Guidelines: Comparison with Effective Public Health Policy. *Journal of Gambling Studies*, 30(4), 771-788. doi: 10.1007/s10899-013-9389-2

Problem gambling represents a significant public health problem, however, research on effective gambling harm-minimisation measures lags behind other fields, including other addictive disorders. In recognition of the need for consistency between international jurisdictions and the importance of basing policy on empirical evidence, international conventions exist for policy on alcohol, tobacco, and illegal substances. This paper examines the evidence of

best practice policies to provide recommendations for international guidelines for harm-minimisation policy for gambling, including specific consideration of the specific requirements for policies on Internet gambling. Evidence indicates that many of the public health policies implemented for addictive substances can be adapted to address gambling-related harms. Specifically, a minimum legal age of at least 18 for gambling participation, licensing of gambling venues and activities with responsible gambling and consumer protection strategies mandated, and brief interventions should be available for those at-risk for and experiencing gambling-related problems. However, there is mixed evidence on the effectiveness of limits on opening hours and gambling venue density and increased taxation to minimise harms. Given increases in trade globalisation and particularly the global nature of Internet gambling, it is recommended that jurisdictions take actions to harmonise gambling public health policies.

Hing, N., Vitartas, P., Lamont, M., & Fink, E. (2014). Adolescent exposure to gambling promotions during televised sport: an exploratory study of links with gambling intentions. *International Gambling Studies*, 14(3), 374-393. doi:10.1080/14459795.2014.902489

Young people are exposed to gambling promotions while watching televised sports; however, little research has examined how this influences gambling attitudes and intentions. This paper developed and tested a research model underpinned by the Theory of Reasoned Action and specifically aimed to examine (1) adolescents' exposure and attitudes to, and recall and perceptions of, gambling promotions during televised sport; (2) associations between adolescents' exposure and attitude to these gambling promotions, and their intention to gamble on sports and other gambling activities once of legal gambling age. An online survey was conducted of 131 Australian adolescents. Greater intention to gamble both on sports and non-sports was associated with higher frequency of watching televised sports, and more positive attitudes to gambling operators, to gambling promotions during televised sport and to promotional techniques used. Regression analysis indicated that the strongest predictors of sports betting intention were male gender and a more positive attitude to gambling sponsors and their promotions during televised sport. Strongest predictors of gambling intention were male gender, subjective norms and a more positive attitude to promotion of gambling during televised sport. Findings can inform advertising restrictions for gambling during general television viewing times, and health promotion messages countering promotion of gambling to adolescents.

Lye, J., & Hirschberg, J. (2014). Gambling with stimulus payments: Feeding gaming machines with federal dollars. *Journal of Gambling Studies*, 30(3), 713-27. doi: 10.1007/s10899-013-9377-6

In late 2008 and early 2009 the Australian Federal Government introduced a series of economic stimulus packages designed to maintain consumer spending in the early days of the Great Recession. When these packages were initiated the media suggested that the wide-spread availability of electronic gaming machines (EGMs, e.g. slot machines, poker machines, video lottery terminals) in Australia would result in stimulating the EGMs. Using state level monthly data we estimate that the stimulus packages led to an increase of 26 % in EGM revenues. This also resulted in over \$60 million in additional tax revenue for State Governments.

McAllister, I. (2014). Public opinion towards gambling and gambling regulation in Australia. *International Gambling Studies*, 14(1), 146-160. doi: 10.1080/14459795.2013.861001

In recent years, public opinion towards gambling has become a more important factor in shaping public policy. Using a national public opinion survey conducted in Australia in 2011, this paper examines public opinion towards gambling in general and towards the government regulation of gambling in particular. Australia is an important case study because of the internationally high prevalence of gambling among the public, combined with a strong regulatory framework. Public opinion is measured by a reduced form of a scale first developed in Britain. The results confirm the generally negative views that the public holds towards gambling, which have been found internationally. In addition, the Australian public is open to the introduction of further restrictions on gambling. Overall, the public views the liberalization of gambling as having moved as far as most citizens find acceptable; to meet public expectations, future policies need to address more adequately the negative social consequences associated with problem gambling.

Nettleton, J., & Huang, M. (2013). Review of the Interactive Gambling Act 2001: Implications for Internet Gambling in Australia. *Gaming Law Review & Economics*, 17(2), 129-133. doi: 10.1089/glre.2013.1728

The article discusses the developments in the gambling industry in Australia. It focuses on the Interactive Gambling Act of 2001 (IGA) that regulates the

provision of Internet gambling services to Australian customers. The IGA is implemented by the Department of Broadband, Communications and the Digital Economy (DBCDE). The states of online gambling in such Australian territories as Victoria, New South Wales and Western Australia were also examined.

O'Farrell, B. (2015). *Review of Illegal Offshore Wagering Report*. Canberra: Commonwealth of Australia (Department of Social Services). Retrieved from [https://www.dss.gov.au/sites/default/files/documents/04\\_2016/review\\_of\\_illegal\\_offshore\\_wagering\\_18\\_december\\_2015.pdf](https://www.dss.gov.au/sites/default/files/documents/04_2016/review_of_illegal_offshore_wagering_18_december_2015.pdf)

Across the global gambling market, online games and wagering are the fastest growing market segments over recent years. These sectors of the gambling market are also subject to a range of regulatory restrictions in a number of Australian jurisdictions. Wagering is the fastest growing gambling sector in Australia. Fast growth in a market of this size, particularly where the platforms are largely online, raises concerns about the harmful impacts on our community, especially on the largely young male audience to whom these interactive products are marketed. As operators in these markets are operating outside the regulatory reach of Australian law enforcement and regulators, strategies to mitigate harm are particularly important.

Schneider, S. (2013). Australian I-Gaming. *Gaming Law Review & Economics*, 17(6), 404-405. doi:10.1089/glr.2013.1763

The article examines the state of Internet gambling in Australia. The Aus. Model is discussed along with how politics prevented its successful implementation. A review of the 2001 Interactive Gambling Act (IGA) is presented together with its key recommendations. A study by a student at the University of Adelaide is mentioned to have fuelled the debate regarding online gaming.

Schneider, S. (2016). I-Gaming Regulation and Enforcement in Australia. *Gaming Law Review & Economics*, 20(2), 143-144. doi:10.1089/glr.2016.2023

The article presents an overview of the enforcement and regulation of Internet gaming (I-gaming) in Australia. The topics discussed include the development of I-gaming policy in the country, the creation of the Illegal Offshore Wagering

Group by the Australian government, and the vital roles of wagering revenues on the funding of sports and racing facilities.

Sports Betting Ad Crackdown. (2016, August 21). Retrieved December 18, 2016, from <http://www.premier.vic.gov.au/sports-betting-ad-crackdown/>

Sports betting ads on public transport and near schools would be banned under proposed reforms put forward by the Andrews Labour Government. Minister for Gaming and Liquor Regulation, Marlene Kairouz today called for submissions for a public consultation on proposed restrictions on wagering advertising.

#### 1.2.2. Canada

Bowal, P., & Brunet, A. (2014). Canadian Regulation of Contests, Prizes and Games. Retrieved from: <http://hdl.handle.net/1880/50393>

This article identifies and highlights the federal and provincial regulation of contests, games and prizes.

Hinchliffe, S. A. (2014). Defining the Defined - Problem Gambling, Pathological Gambling, and Gambling Disorder: Impact on Policy and Legislation. *Barry Law Review*, 20, 221-278.

This paper highlights the shifts in regulatory priorities and identifies that, with the emergence of more complicated methods of gambling and related activities, coupled with an affluent health policy sphere (vis-à-vis with respect to mental health and disability law), and consumer protection laws, regulation of gambling providers has become a logistical nightmare for both problem gamblers and providers alike. Drawing on cross-disciplinary intercepts between law and psychology, this paper highlights the deficiencies and strengths that exist in an attempt to classify pathological gambling, and the recently renamed gambling disorder, as a disability. At present, this intercept is underrepresented in research, and yet is paramount for the purpose of legislative and policy development.



Mathen, C. (2013). Precarious Chancy Situation: Aboriginal Gaming Rights in Canada. *U.B.C. Law Review*, 46(2), 349-396.

This article investigates Aboriginal gaming as a protected right under section 35 of the Canadian Constitution (1982). It looks at the rich diversity of gaming practices and their significance for Aboriginal peoples. It then examines the legal recognition of aboriginal gaming against the context of Canadian federalism, criminal law and rights reconciliation.

Smith, G. (2014). The nature and scope of gambling in Canada. *Addiction*, 109(5), 706-710. doi:10.1111/add.12210

This paper provides a historical review of gambling in Canada and examines the benefits and shortcomings of present-day Canadian gambling policies and practices. This includes a discussion of provincial and federal government roles in gambling regulation and an overview of problem gambling prevention and treatment initiatives.

### 1.2.3. Europe

Binde, P. (2014). Gambling in Sweden: the cultural and socio-political context. *Addiction*, 109(2), 193-198. doi:10.1111/add.12103

To provide an overview, with respect to Sweden, of the cultural history of gambling, the commercialization of gambling, problem gambling research, the prevalence of problem gambling and its prevention and treatment. A review of the literature and official documents relating to gambling in Sweden; involvement in gambling research and regulation. Gambling has long been part of Swedish culture. Since about 1980 the gambling market, although still largely monopolistic, has been commercialized. At the same time, problem gambling has emerged as a concept in the public health paradigm. Debate regarding whether or not Sweden's national restrictions on the gambling market are compliant with European Community legislation has helped to put problem gambling on the political agenda. Despite expanded gambling services, the extent of problem gambling on the population level has not changed significantly over the past decade. The stability of problem gambling in Sweden at the population level suggests a homeostatic system involving the gambling market, regulation, prevention and treatment and adaption to risk and harm by gamblers. We have relatively good knowledge of the extent and characteristics of problem gambling in Sweden and of how to treat it, but little

is known of how to prevent it effectively. Knowledge is needed of the effectiveness of regulatory actions and approaches, and of responsible gambling measures implemented by gambling companies.

Buil, P., Moratilla, M., & Ruiz, P. (2015). Online gambling advertising regulations in Spain. A study on the protection of minors. *Adicciones*, 27(3), 198-204.

This article examines the online gambling advertising regulations in Spain currently in effect to assess the actual protection of underage youth. In recent years, online gambling among youth has increased. Through advertising, online gambling companies incite and encourage an involvement that can be harmful for vulnerable audiences. Some studies have demonstrated that advertising influences youths' assessment of gambling by increasing its appeal. We demonstrate that the shortcomings of the legal framework in force results in effective vulnerability of minors. We claim that society should seek to implement a regulatory framework to protect children from the risk of developing an addiction.

Chóliz, M. (2016). The Challenge of Online Gambling: The Effect of Legalization on the Increase in Online Gambling Addiction. *Journal of Gambling Studies*, 32(2), 749-756. doi: 10.1007/s10899-015-9558-6

It is possible that the growth and promotion of online gambling will result in substantially increased use of these types of games in countries where they are legal. This may be especially true for young people due to their interest in such games. In this context, it is important to note that online gambling is more addictive than any other type of game due its structural characteristics, such as immediacy, accessibility, ease of betting, and so on. This study examined the effect of online gambling in Spain 2 years after its legalization. The sample included 1277 pathological gamblers in recovery at 26 gambling addiction treatment centers. Our results showed a significant increase in young pathological gamblers since the legalization of this activity. This is a very relevant issue because, as in the case of Spain, many countries are currently in process of legalization of many types of online games. Scientific research can be useful to adapt the adequate gambling policies in order to prevent the gambling addiction.

EGBA. (2014). Special Edition Commissioner Barnier, (14), 1–4. Retrieved from <http://www.egba.eu/media/EGBA-Newsletter-14th-Edition-final-version1.pdf>

Featuring an editorial by Commissioner Michel Barnier on Online Gambling: Results and Challenges for the Future.

Fulton, C. (2015). Playing Social Roulette: The Impact of Gambling on Individuals and Society in Ireland. Retrieved from <http://hdl.handle.net/10197/6796>

This scholarly research study explored gambling behaviour in Ireland, specifically the issue of problem gambling and its impact on the individual, the gambler's relationships with social connections, and the wider impact of problem gambling behaviour on community and society. The project followed an exploratory, ethnographic approach to enable participants to express themselves fully from their perspective, to facilitate in-depth understanding of gambling behaviour, and to provide a foundation for future research projects in this area. The research was conducted as four work packages, involving data collection with critical stakeholders: 1) Addiction Service Providers, 2) Gamblers, 3) Gamblers' Social Connections, and 4) the Gambling Industry. Data were collected using semi-structured, in-depth interviews. Problem gambling not only affects the individual who participates in gambling opportunities, but also that person's family members, friends, and wider community. There are multiple areas where stakeholders' needs can be facilitated, including regulation and policy development to protect those vulnerable to negative outcomes associated with gambling. Importantly, collaboration among all stakeholders should be initiated. Findings suggest that development of a regulatory framework and a social policy framework is urgently needed. A national strategy for service provision is essential. Further research into gambling behaviour and approaches and services is urgently needed in Ireland.

Goudriaan, A. E. (2014). Gambling and problem gambling in the Netherlands. *Addiction*, 109(7), 1066-1071. doi:10.1111/add.12213

To provide an overview of gambling in the Netherlands, focusing on historical background, policy, legislation, prevalence of problem gambling, availability of treatment options and research base.

Jensen, C. (2016). Money over misery: restrictive gambling legislation in an era of liberalization. *Journal of European Public Policy*, 24(1), 1-16. doi: 10.1080/13501763.2016.1146326

Gambling is a major industry in all European countries, generating billions in revenue to commercial actors and governments alike. It is also a source of addictions adversely affecting millions of individuals. The little research that exists on the politics of gambling legislation indicates a process of convergence towards a common policy standard. Yet, while policy convergence is the general trend, there are still significant national differences and, indeed, even divergence. A powerful example of this is the policy trajectories of Denmark and Norway. These two countries not only resemble each other in terms of political system and social model; they also shared virtually identical gambling policies for most of the 20th century. Notwithstanding these similarities, in recent years Norway has restricted access to gambling, whereas Denmark has become one of the most liberalized gambling regimes in Europe. The article presents an explanation of these diverse policy trends.

Jiménez-Murcia, S., Fernández-Aranda, F., Granero, R., & Menchón, J. M. (2014). Gambling in Spain: update on experience, research and policy. *Addiction*, 109(10), 1595-1601. doi:10.1111/add.12232

To describe the current situation of gambling in Spain, sketching its history and discussing the regulations and legislation currently in force within the framework of the European Union (EU), and to review the epidemiology of gambling in Spain, the self-help groups and professional treatments available, and their potential effectiveness.

Laffey, D., Della Sala, V., & Laffey, K. (2016). Patriot games: the regulation of online gambling in the European Union. *Journal of European Public Policy*, 23(10), 1425-1441. doi:10.1080/13501763.2015.1105281

The recent economic crisis has brought into focus how even open and highly interdependent economies in the European Union try to govern their economies according to territorially defined interests. The aim of this article is to examine an area, online gambling, with the technological and legal conditions that challenge approaches that favour economic patriotism. The article compares two cases, the United Kingdom and Italy, which represent

two different models of economic governance to argue that they are similar in which interests they seek to protect and at which level.

Papadopoulos, T. (2013). Member States versus the European Union - The Regulation of Gambling. *Common Market Law Review*, 50(4), 1187-1189.

Member States versus the European Union -- The Regulation of Gambling, by Allan Littler, is reviewed.

Planzer, S., Gray, H. M., & Shaffer, H. J. (2014). Associations between national gambling policies and disordered gambling prevalence rates within Europe. *International Journal of Law and Psychiatry*, 37(2), 217-229. doi: 10.1016/j.ijlp.2013.11.002

Policymakers and other interested stakeholders currently are seeking information about the comparative effectiveness of different regulatory approaches to minimising gambling-related harm. This study responds to this research gap by exploring associations between gambling policies and disordered gambling prevalence rates. We gathered information about gambling policies for thirty European jurisdictions and past-year prevalence rates for disordered gambling for twelve of these jurisdictions. We present policy trends and prevalence rates and then describe the level of association between policy and prevalence. We observe one statistically significant association between policy and prevalence: rates of sub-clinical (i.e., Level 2) disordered gambling were higher within environments that mandated less strict regulation of advertising for online gambling. Finally, we discuss the implications of our research in the context of the current process regarding the pan-European regulation of gambling. Our findings do not offer evidence for certain assumptions made in the past by the European judiciary.

#### 1.2.4. United Kingdom

Coles, T. (2014). Great Britain Introduces a Second Wave of Internet Gambling Regulation. *Gaming Law Review and Economics*, 18(1), 37-41. doi:10.1089/gltre.2013.1816

In 2005 following a long period of investigation and consultation in particular The Budd Report and the response thereto by the then government as well as

an enquiry by an expert parliamentary committee the UK parliament passed into law the Gambling Act 2005. At the time, the act was said by the then government to be a measure of updating and consolidating the statutory provisions governing all gambling and introduce what was to be a modern, indeed, forward looking approach to the regulation of the industry in Great Britain.

(\*) Forrest, D., and Mchale, I. G. (2011). Gambling and problem gambling among young adolescents in Great Britain. *Journal of Gambling Studies*, 28(4), 607-622.

International evidence suggests that problem gambling tends to be 2-4 times higher among adolescents as among adults and this proves to be true of Great Britain according to the latest adolescent prevalence survey. 8,958 British children (11-15) were surveyed in 201 schools during late 2008 and 2009. The questionnaire included a standard screen, DSM-IV-MR-J, to test for problem gambling. Our regression models explore influences of demographic, home and school characteristics on probabilities (both unconditional and conditional on being a gambler) of a child testing positive for problem gambling. More than 20% of children participated in gambling and, of these, nearly 8% tested positive. Age-group prevalence of problem gambling was 1.9%, compared with 0.6-0.9% in the most recent official adult surveys. Boys were much more likely than girls to gamble and to exhibit symptoms of problem gambling if they did. Generally, home characteristics, particularly parental attitude and example, dominated school characteristics in accounting for risks. Unanticipated findings included significantly elevated probabilities of problem gambling among Asian children and among children who live in a home without siblings. Child income was also a potent predictor of gambling and problem gambling.

Forrest, D. (2013). An Economic and Social Review of Gambling in Great Britain. *The Journal of Gambling Business and Economics*, 7(3), 1-33. doi: 10.5750/jgbe.v7i3.816

The paper considers the nature and scale of the benefits and costs of gambling, with special reference to machine gaming. Although the industry is argued to be unlikely to have a significant macroeconomic impact, evidence is consistent with it generating considerable benefits to individual (responsible) consumers, whether measured by consumer surplus or through the pattern of responses to a wellbeing question. At the same time, a minority of users of

gaming facilities, problem gamblers, appear to make consistently flawed decisions such that those with gambling disorder experience exceptionally low wellbeing. Public policy and regulatory decisions should consider the effects, on the margin, on both the net benefits to recreational gamblers and the net costs to problem gamblers. Many policy decisions may involve a trade-off between the welfare of recreational gamblers and the welfare of problem gamblers. Contemporary interest in targeted policies appears to represent an attempt to avoid the need to confront such a trade-off by searching for policies which are aimed very explicitly at problem gamblers alone.

Gambling Commission. (2015). 2014/15 Annual Review. Retrieved from <http://www.gamblingcommission.gov.uk/pdf/Gambling-Commission-Annual-Review-2014-15.pdf>

Forward: Over the past year the Gambling Commission has made some significant progress in furthering our three key strategic aims of empowering and protecting consumers, raising standards, and building partnership and understanding. We continue to invest in building our skills and our evidence base to improve efficiency, for example by the introduction of e-services which enables operators to complete many activities online. Our major review of the social responsibility provisions in our Licence conditions and codes of practice (LCCP) resulted in some significant strengthening of player protection measures, both in terms of empowering players to manage their gambling better and in ensuring operators work harder to identify and help those at risk of gambling related harm.

Miers, D. (2014). The Gambling Market in Great Britain. In F. Gobet & M. Schiller (Eds.), *Problem Gambling: Cognition, Prevention and Treatment* (pp. 140-155). London: Palgrave Macmillan UK.

The market in Great Britain is perhaps the most diverse of any single jurisdiction in which gambling is regulated: a National Lottery, on- and off-course horse race and greyhound betting, sports betting, casinos, a hierarchy of gaming machines whose stakes and prizes vary from the substantial to the minimal, bingo and a wide portfolio of non-commercial lotteries. Many of these publicly available gambling opportunities are accessible both on- and offline; private gambling, though not directly regulated, is also permitted by law. These various forms of primarily commercial and good-cause gambling media are regulated by two major pieces of legislation, each of which established a regulatory body having responsibility for licensing operators and

enforcing the conditions under which their licences were granted. The Gambling Act 2005 established the Gambling Commission, which is responsible for the entire gambling market in Great Britain with the exception of spread betting, which is a financial product regulated by the Financial Conduct Authority (Loussouarn, 2013). Following their organisational merger on October 2013 the Commission is now also responsible for the National Lottery Commission (NLC), established by the National Lottery etc. Act 1993 to regulate the National Lottery (Gambling Commission, 2013d, p. 5; House of Commons, 2012, paragraphs 46-47; National Lottery Commission, 2013, p. 5).

Miers, D. (2015). Regulation and the management of risk in commercial gambling in Great Britain. *International Gambling Studies*, 15(3), 422-434. doi: 10.1080/14459795.2015.1068352

The regulation of commercial gambling in Great Britain is the responsibility of the Gambling Commission, the regulatory agency created by the Gambling Act 2005. This article examines the risk model that it has developed in order to assess operator risks to the Act's licensing objectives. These are to prevent gambling from becoming a source of crime, to ensure that gambling is fair and open, and to protect children and other vulnerable people from being harmed or exploited by gambling. The article discusses four factors that affect the implementation of this model: operator compliance, the regulatory environment, the regulatory toolkit and the Commission's approach to its regulatory responsibilities. Its regulatory ideology sits squarely within the neo-liberal mode of regulation that has been pursued in Great Britain since the 1980s. By reference to political and public disquiet concerning gaming machines, the article analyses the tensions between the state, the regulator, the gambling industry and its consumers to which this mode of regulation gives rise. The article examines the challenges that the Commission faces in seeking to adopt a regulatory stance that is defensible both in terms of the protection of the public and the demands of a liberal market economy.

Parke, A., Harris, A., Parke, J., Rigbye, J., & Blaszczynski, A. (2014). Responsible marketing and advertising in gambling: a critical review. *The Journal of Gambling Business and Economics*, 8(3), 21-35.

Marketing and advertising play a significant role in the adoption of attitudes and societal norms, which have been shown to have a direct impact on behavioural intentions, ultimately leading to behavioural execution.



Concurrent with other attempts to inform policy strategy with respect to harm minimisation in gambling there is a paucity of evidence pertaining to the impact that gambling advertising has on gambling behaviour, gambling related harm, and the efficacy of advertising regulations to minimise harm. There appears to be an overwhelming portrayal of gambling as a normative, legitimate social activity, at the expense of highlighting the potential risks involved. Furthermore, new marketing techniques utilising the social media platform are able to instil emotive and positive attitudes towards gambling brands and products, as well as enabling consumers to widely share and recommend gambling products across their online community, sometimes exposing under-age and vulnerable populations to gambling. The following paper critically reviews existing research investigating the impact of current gambling advertising and marketing campaigns on both vulnerable (i.e. adolescents and problem gamblers) and normal adult populations, looking specifically at the impact of exposure, the positive framing of gambling, and the transparency of marketing techniques. It is concluded that marketing and advertising in gambling needs to facilitate more informed choice for consumers, and a more balanced approach in the framing of gambling. It is suggested that risk information is presented asynchronously to gambling promotions, as opposed to being delivered as peripheral information, and moreover future strategies need to be based on robust empirical evidence demonstrating the impact of responsible gambling advertising and marketing on behaviour.

#### 1.2.5. United States

Akee, R. K. Q., Spilde, K. A., & Taylor, J. B. (2015). The Indian Gaming Regulatory Act and Its Effects on American Indian Economic Development. *The Journal of Economic Perspectives*, 29(3), 185-208. doi: 10.1257/jep.29.3.185

The Indian Gaming Regulatory Act (IGRA), passed by the US Congress in 1988, was a watershed in the history of policymaking directed toward reservation-resident American Indians. IGRA set the stage for tribal government-owned gaming facilities. It also shaped how this new industry would develop and how tribal governments would invest gaming revenues. Since then, Indian gaming has approached commercial, state-licensed gaming in total revenues. Gaming operations have had a far-reaching and transformative effect on American Indian reservations and their economies. Specifically, Indian gaming has allowed marked improvements in several

important dimensions of reservation life. For the first time, some tribal governments have moved to fiscal independence. Native nations have invested gaming revenues in their economies and societies, often with dramatic effect.

Barclay, P. (2016). A Law Student's Perspective-Daily Fantasy Sports: Confronting the Frontier of Legal Gambling. *The Entertainment and Sports Lawyer*, 32(3), 34.

The days of uninhibited growth and the lack of governmental intervention and regulation are over. So what should daily fantasy companies do to survive and prosper? This article explores the birth and explosion of the daily fantasy sports industry, federal and state gambling law restraints and other legal issues, and provides recommendations for how daily fantasy companies and shareholders should confront a rapidly changing legal landscape.

Caldwell, K. N. (2013). The Shifting Tide in Internet Gambling-Survey of Recent Developments. *The Business Lawyer*, 69(1), 291-299.

In 2011, the Department of Justice (DOJ) opined that language in the 1961 Wire Act that criminalized certain activities related to the "placing of bets or wagers on any sporting event or contest" did not also encompass "non-sporting events" within its scope. The direct result of the DOJ's thirteen-page opinion (DOJ Opinion) was to green-light proposals by Illinois and New York to proceed with in-state lotteries that rely on the interstate transmission of data to serve their in-state customers. The indirect effect of the DOJ Opinion was to green-light Internet gambling for "non-sporting events," particularly online poker, which, for the most part, had been banished due to the uncertainty of criminal prosecution under previous interpretations of the Wire Act. The ambiguity in the Wire Act has now been clarified, the floodgates have been lifted, and many of the market participants are now jockeying for position in the new legal landscape without fear of prosecution.

Halcoussis, D., & Lowenberg, A. D. (2015). All in: An empirical analysis of legislative voting on internet gambling restrictions in the United States. *Contemporary Economic Policy*, 33(1), 17. doi: 10.1111/coep.12054

In 2006, the U.S. Congress passed the Unlawful Internet Gambling Enforcement Act (UIGEA) which prohibited financial institutions from processing transactions arising from online gaming activities, thereby severely hindering U.S. residents from participating in online casino games, primarily

poker. Enactment of this legislation followed lobbying and political pressure from a variety of interest groups. By examining House roll call votes, we identify empirically the sources of political influence that resulted in passage of the internet gambling legislation. We find that party affiliation was of primary importance, with Republicans more likely to vote in favor of the bill. The percentage of constituents who are Evangelical Christians and also the number of gambling establishments in the district were positively associated with votes for the bill. However, contributions from the gaming industry decreased the probability a congressman would vote for the bill.

Hawk, R. M. W. (2015). A new formula for tribal internet gaming. *Jurimetrics*, 56(1), 47-78. Retrieved from [www.americanbar.org/content/dam/aba/.../fall2015/p47\\_78whitehawkc omment.pdf](http://www.americanbar.org/content/dam/aba/.../fall2015/p47_78whitehawkc omment.pdf)

Tribal gaming is an industry that generates more than \$27 billion a year. It comprises forty percent of all gaming in the United States, and has provided more than 628,000 jobs for Native and local communities. While tribal brick-and-mortar casinos contribute numerous economic, cultural, and social benefits to Native communities, Internet gaming profits are a potential boon. Internet gaming is well positioned for rapid growth because tens of millions of Americans use computers, cell phones, and tablets for shopping, games, and entertainment. Furthermore, with the advent of increasingly accurate geolocation technology, filtering, and blocking systems, the age and location of gamblers can be monitored, thus facilitating legal Internet gaming within state borders. Moreover, the potential for tax and licensing revenue from Internet gaming is immense, and states may enter into revenue-sharing agreements with tribes while offering exclusivity for tribal operators. For instance, in California, tribes contributed \$467 million to state revenue in 2012 from brick and mortar casinos. States such as Delaware and New Jersey have legalized intrastate Internet gaming to reap tax revenue. California, however, has not yet legalized intrastate Internet gaming. Rather than wait for states to legalize intrastate Internet gaming, some tribes are launching their own online poker and bingo rooms to accept bets from players not located on Indian lands, asserting that doing so is legal under the Indian Gaming Regulatory Act (IGRA). However, some states disagree that it is legal under IGRA. To prevent impending expensive and time-consuming litigation and to support tribal economic development, Congress should reform the current regulatory patchwork of federal Internet gaming legislation by legalizing interstate Internet gaming, allowing states to opt out of the federal interstate Internet

gaming scheme, and adding a new category specifically for Internet gaming to IGRA.

Miller, K. C. (2013). The internet gambling genie and the challenges states face. *Journal of Internet Law*, 17(1), 1-35.

Internet gambling has captured the attention of everyone in the gaming industry. The technology for offering poker and casino games online has been a shining light of development and innovation. Additionally, many voices warn that the "next generation" of gamblers will not be as inclined to go to land-based casinos. Proposals to legalize Internet poker have been introduced in Congress several times, but have not gained political traction. This article will examine some of the more prominent obstacles to the adoption of Internet gambling, and the policies that inform these issues. Internet gambling may be the genie that can't be put back in the bottle, but the genie is getting an uneven reception in the US. At this transformational period in the regulation of gaming in the US, legislators and policy makers have a great deal to consider.

Miller, K. C. (2015). The Utility and Limits of Self-Exclusion Programs. *UNLV Gaming Law Journal*, 6, 29-117.

The scourge of problem gambling is a stain on the gaming industry. While there is considerable disagreement regarding the incidence of problem gambling, and even the proper terminology to use in describing the phenomenon, it is indisputable that persons unable to control their gambling can bring ruinous consequences upon themselves and others.

Platzer, M. D. (2016). *Internet Gambling: Policy Issues for Congress*. Washington, D.C.: Congressional Research Service. Retrieved from <https://fas.org/sgp/crs/misc/R44680.pdf>

Gambling, once widely outlawed, is now a regulated, taxed activity that is legal in some form—bingo, card games, slot machines, state-run lotteries, casinos, and even online—in all states except Hawaii and Utah. Like so many other industries, the gambling industry is being transformed by technology that has begun to shift patronage from casinos, bingo halls, or stores selling lottery tickets to desktop computers and tablets connected to the Internet and to mobile devices that may communicate by telephone or direct satellite links. According to one private estimate, annual revenue in the global Internet gambling market, less gamblers' winnings, is around \$50 billion.

Prince, C. A. (2013). Gaming law. *GPSolo*, 30(2), 30-33. Retrieved from [http://www.americanbar.org/publications/gp\\_solo/2013/march\\_april/gaming\\_law.html](http://www.americanbar.org/publications/gp_solo/2013/march_april/gaming_law.html)

The term "gaming law" touches many areas of practice. Among the many applications, there are poker clubs, charitable bingo, sweepstakes, essay contests, casinos, dog racing, horse racing, sports betting, raffles, Internet gaming, and lotteries. Guidelines on gaming law are chiefly at the state or tribal jurisdictional level, leading to a wide variation in permissible practices and pitfalls for each jurisdiction. Aside from the jurisdictional patchwork, a federal level of oversight covers some interstate activities such as nationwide sweepstakes, interstate Internet-based gaming operations, and Indian gaming. Federal agencies including the Federal Trade Commission (FTC) and Federal Communications Commission (FCC) have particular registration requirements for some operations that may be otherwise unregulated.

### 1.3. Non-peer reviewed material

Berzon, A., & O'Keeffe, K. (2016, Sep 28). Gambling industry emerges from the political shadows; once on the defensive in national politics, the gambling industry is now playing a highly public role in U.S. elections. *Wall Street Journal*). Retrieved from <http://www.wsj.com/articles/gambling-industry-emerges-from-the-political-shadows-1475055002>

During a recent appearance on a political talk show, casino executive Jim Murren spoke of his support for Democratic presidential candidate Hillary Clinton, while investor Carl Icahn, who owns several casinos, voiced his approval for Republican candidate Donald Trump, himself a former casino owner.

Bonesteel, M. (2016, Oct 21). U.S. Congress to take first concrete step toward legalizing sports gambling. *Washington Post*. Retrieved from [https://www.washingtonpost.com/news/early-lead/wp/2016/10/21/u-s-congress-to-take-first-concrete-step-toward-legalizing-sports-gambling/?utm\\_term=.aa921a61bcab](https://www.washingtonpost.com/news/early-lead/wp/2016/10/21/u-s-congress-to-take-first-concrete-step-toward-legalizing-sports-gambling/?utm_term=.aa921a61bcab)

Calling the federal laws that mostly prohibit sports gambling “obsolete” and “in desperate need of updating,” U.S. Rep. Frank Pallone Jr. announced Friday that his congressional committee will conduct a review of the laws and introduce new legislation that also will cover daily fantasy sports.

CBC. (2016, Sept 21). Single-event sports betting quashed in House of Commons. *CBC News*. Retrieved from <http://www.cbc.ca/news/canada/windsor/single-sports-betting-quashed-1.3773417>

All bets are off for single-event sports betting in Canada. The House of Commons killed a private member's bill on single-event sports betting, meaning Canadians will still have to place a bet on multiple sporting events if they want to gamble on sports.

Christoforou, N., Campbell, L., Loach, E., & Penford, A. (2016). Multi Venue Exclusion (MVE) review – evaluating the evolution of a strategy for harm prevention in the shifting gambling environment [Slideshare]. Retrieved from <http://www.internationalgamblingconference.com/sessions/multi-venue-exclusion-mve-review-evaluating-the-evolution-of-a-strategy-for-harm-prevention-in-the-shifting-gambling-environment/>

Literature on gambling harm prevention and minimisation identifies self-exclusion as an effective tool in the treatment of harmful gambling. Since 2003, when gambling laws in New Zealand were introduced so a person could self-exclude from a gambling venue, the process of self-exclusion has been evolving. In 2011 an administrative process for Multi Venue Exclusion (MVE) was developed to enable gamblers to exclude from multiple venues without having to be present in person. A MVE working group was established to set up a sustainable national framework and support the smooth implementation of MVE in regions across the country. Over the next few years an almost nationwide coverage was achieved. Now in 2015 MVE has

evolved and expanded to exist in most parts of New Zealand and it is timely that the process be evaluated. The purpose of the MVE evaluation is to identify which aspects of the current framework are operating effectively and what amendments are required for MVE to function to best serve the continuing needs of all stakeholders. To inform the evaluation a broad stakeholder survey was carried out. A primary feature of the evaluation included sharing initial survey findings with service provider stakeholders and sector industry stakeholders to ascertain an agreed workable MVE process going into the future. This collaboration with industry represents an important element in the ongoing evolution of the MVE process. As the final stage of this evaluation, recommendations drawn from the survey's key theme outcomes were presented to the Department of Internal Affairs and the Ministry of Health to be considered within the policy context. The recommendations will be incorporated into the MVE national framework and form the basis of a new operating model to be implemented nationwide.

Clark, M. (2013, June 12). States race to trump federal online gambling law. *New Orleans CityBusiness*. Retrieved from <http://neworleanscitybusiness.com/blog/2013/06/12/states-race-to-trump-federal-online-gambling-law/>

New Jersey, which recently passed legislation permitting online gambling, hopes to avoid potential federal law conflicts by allowing only established land-based casinos in the state to conduct online betting.

DeTar, J. (2014 Feb 05). Online Gambling Momentum Grows; Wynn, Sands Push Back. *Investor's Business Daily*. Retrieved from <http://search.proquest.com/docview/1494552325?accountid=130717>

At least 10 states are considering legalizing or expanding online gambling this year, but the CEOs of casino giants Las Vegas Sands (LVS) and Wynn Resorts (WYNN) are trying to hold back the building momentum. In 2013, three states launched legal online gambling: New Jersey, Nevada and Delaware. Gambling Compliance said 10 states are either mulling legislation to legalize online gambling or plan to expand their online gambling franchise.

Rutsey, B. (2016, Jun 14). We need modern gaming laws. *National Post*. Retrieved from <http://news.nationalpost.com/full-comment/bill-rutsey-we-need-modern-gaming-laws>

This week, the House of Commons will once again debate a private member's bill that, if passed, would amend the Criminal Code to permit betting on the outcome of a single sporting event. C-221, The Safe and Regulated Sports Betting Act, is identical to a private member's bill from the last Parliament, when it was known as Bill C-290. That bill passed the House of Commons with all-party support. It was studied and debated in the Senate over a three-year period, but was never voted on and died on the order paper when Parliament was dissolved for the general election. The current government stated it would not back The Safe and Regulated Sports Betting Act this time, even though the Liberals in the last Parliament were a major advocate for C-290. Reasons given for the party's opposition are: the lack of consultation with the provinces; the resistance of American professional sports leagues; and concerns that the "expansion" of the availability of gaming would cause harm to those with gambling issues. The reality couldn't be more different.

Silver, A. (2014, Nov 14). Legalize and Regulate Sports Betting. *New York Times*. Retrieved from [https://www.nytimes.com/2014/11/14/opinion/nba-commissioner-adam-silver-legalize-sports-betting.html?\\_r=1](https://www.nytimes.com/2014/11/14/opinion/nba-commissioner-adam-silver-legalize-sports-betting.html?_r=1)

Allow Gambling on Pro Games. Betting on professional sports is currently illegal in most of the United States outside of Nevada. I believe we need a different approach. For more than two decades, the National Basketball Association has opposed the expansion of legal sports betting, as have the other major professional sports leagues in the United States. In 1992, the leagues supported the passage by Congress of the Professional and Amateur Sports Protection Act, or Pasma, which generally prohibits states from authorizing sports betting.

Scott, J. (2016, Sept 27). Gambling Disease Kills One Australian a Day, But It's Too Lucrative to Cure. *Bloomberg Businessweek* (4493), 24-25. Retrieved from <https://www.bloomberg.com/news/articles/2016-09-27/gambling-disease-kills-one-australian-a-day-but-it-s-too-lucrative-to-cure>

In 2012, after struggling with a gambling addiction for 13 years, Kate Seselja was ready to kill herself. The 37-year-old mother of six in New South Wales



was contemplating driving her car into a tree after losing more than A\$500,000 (\$384,000) playing slot machines. Australia is trying to come to grips with its gambling problem. Last year the country's \$761 (A\$585) in per capita gambling losses were the highest in the world, beating Hong Kong and Finland. Australian states and territories reaped A\$5.8 billion in taxes from gambling in 2015, easing the pressure on the federal government, which is presiding over a budget deficit made worse by low commodity prices and political gridlock.

## 2. Gambling Industry

### 2.1. Academic

Aruvian's Research. (2016). Analyzing the global online gambling industry. *Research and Markets*. Retrieved from [http://www.researchandmarkets.com/research/28rxv9/analyzing\\_the](http://www.researchandmarkets.com/research/28rxv9/analyzing_the)

The global online gambling industry is one of the biggest and most rapidly expanding market at the moment. Online gambling has proven to be the biggest phenomenon in recent years. The games that dominate are wagering, casino and poker. It is becoming ever popular and its growth is greatly driven by factors such as internet penetration. Countries still deal differently with online gambling, with legislations ranging between prohibitions to letting online gambling take place on the grey markets, to monopoly licenses for online gambling providers to entirely open markets. (Paper available for purchase.)

Loh, C. M., Deegan, C., Inglis, R., & Monroe, G. (2015). The changing trends of corporate social and environmental disclosure within the Australian gambling industry. *Accounting & Finance*, 55(3), 783-823. doi:10.1111/acfi.12075

This study examines how the corporate social and environmental disclosure (CSD) practices of a sample of gambling companies operating within Australia appears to change around the time of three specific interrelated Australian government initiatives; the *Productivity Commission, 1999, Australia's Gambling Industries, Report No. 10*, the subsequent establishment of the *Ministerial Council on Gambling* and the MCG-initiated *National Framework on Problem Gambling*. Drawing upon three complementary

theories, namely legitimacy, stakeholder and institutional theory, our analysis of the extent and type of CSD in the annual reports of gambling companies over a 15 year period suggests that CSD is a response to social pressures created around the time of these initiatives.

Paddy Power Betfair plc. (2016). Paddy Power Betfair plc: Leisure and arts - company profile, SWOT & financial analysis. *ICD Research Reports*.

Paddy Power Betfair plc (Paddy Power Betfair) is an online betting and gaming company, formed by the merger of Paddy Power plc and Betfair Group plc. The company primarily operates through four brands Paddy Power, Betfair, Sportsbet and TVG. Paddy Power Betfair operates retail betting shops, online horserace betting network, online casino sites and online sports betting sites. Its online sports betting and gaming products include Cash Out, Price Rush, Acca Edge, and Sportsbook. Apart from these, the company offers various business-to-business services across Europe. It has partnerships with horse racing pools operator PMU in France, British Columbian Lottery Corporation in Canada, Reta in Spain and Niké in Slovakia and Czech Republic. The company through its subsidiaries and licensing agreements operates across the UK, Australia, Ireland, Italy, Spain, Denmark, Bulgaria, Canada and the US. Paddy Power Betfair is headquartered in Dublin, Ireland.

TechNavio. (2016) Global online gambling market 2016-2020. *Research and Markets*. Retrieved from <http://www.researchandmarkets.com/reports/3846224/global-online-gambling-market-2016-2020>

The report covers the present scenario and the growth prospects of the global online gambling market for 2016-2020. To calculate the market size, the report considers the revenue generated from gambling activities on digital media such as betting, lottery, and casinos. (Paper available for purchase.)

## 2.2. Non-peer reviewed material

Australia gambling giants Tabcorp and Tatts plan merger (2016, October 2016), BBC News. Retrieved from <http://www.bbc.com/news/business-37700182>

Two of Australia's biggest bookmakers plan to merge, as they try to compete against the rise of online betting. Tabcorp and Tatts Group - the country's largest non-casino gambling firms - hope to form a business worth A\$11.3bn (\$7.1bn; £8.7bn).

Davies, G. (2016, August 10). A rapid rebuttal, but will suitors up bid for William Hill? *Investors Chronicle*. Retrieved from <http://www.investorschronicle.co.uk/2016/08/10/tips-and-ideas/share-tips/tips-of-the-week/a-rapid-rebuttal-but-will-suitors-up-bid-for-william-hill-xthtmCpq1kImiHjGS8qQxH/article.html>

The much anticipated much anticipated takeover offer for William Hill (WMH) from rivals 888 (888) and Rank Group (RNK) was made public on Tuesday, leaving the former's investors and board distinctly underwhelmed.

Davies, G. (2016, October 10). News & tips: William Hill, Amino Technologies, Mitie & more. *Investors Chronicle*. Retrieved from <http://www.investorschronicle.co.uk/2016/10/10/shares/news-and-analysis/news-tips-william-hill-amino-technologies-mitie-more-C1yjVnCiMQ9B0zelnP1zTK/article.html>

Bookie William Hill (WMH) is breaking away from the pack this morning and heading up the FTSE after it confirmed press speculation about a proposed merger with Canadian outfit Amaya.

Eccles, N. (2016, November 21). Scottish 'unicorn' FanDuel to merge with American rival. *Scottish Business News Network*. Retrieved from <http://www.sbn.co.uk/2016/11/21/scottish-unicorn-fanduel-merge-american-rival/>

Scottish 'unicorn' FanDuel has entered into a merger agreement with Fantasy sports technology competitor DraftKings. The transaction is expected to close

in 2017 but financial terms were not disclosed although the merger will also help the combined company accelerate its path to profitability.

Gerrard, B. (2015, August 26). Betfair and Paddy Power eye pounds 6.5bn merger. *Investors Chronicle*.

The particulars of the proposed deal announced so far mean Paddy Power shareholders would own 52 per cent while Betfair's would own 48 per cent of the combined group.

Gerrard, B. (2015, October 30). House! Gala Coral sells bingo business. *Investors Chronicle*. Retrieved from <http://www.investorschronicle.co.uk/2015/10/30/shares/news-and-analysis/house-gala-coral-sells-bingo-business-cjANcXJSiHEknVAW5FffKN/article.html>

The fact Gala Coral will reduce debt is positive for Ladbrokes' shareholders. The latter had Pounds 311.6m of net debt on its books at the end of September - giving gearing of 98 per cent based on June shareholder equity.

Gerrard, B. (2015, November 26). Ladbrokes deal clears final hurdle. *Investors Chronicle*. Retrieved from <http://www.investorschronicle.co.uk/2015/11/26/shares/news-and-analysis/ladbrokes-deal-clears-final-hurdle-xzRwQFOhsrM2e62xWJkJvN/article.html>

Since merger talks were confirmed by Ladbrokes in June the shares are down 9 per cent, which could be reticence about the deal on investors' behalf or uncertainty about Jim Mullen's turnaround strategy.

Gerrard, B. (2016, October 10). William Hill could push through pack if its mooted pounds 4.6bn merger clears the hurdle. *Investors Chronicle*.

Although management suggested it would go it alone after dismissing an approach from online gambler 888 (888) and bingo-focused Rank Group (RNK), it is now in discussions over a reverse takeover of its larger overseas rival.

Gerrard, B. (2016, October 18). It's no dice for William Hill as it folds on PokerStars owner Amaya. *Investors Chronicle*. Retrieved from <http://www.investorschronicle.co.uk/2016/10/18/tips-and-ideas/share-tips/it-s-no-dice-for-william-hill-as-it-folds-on-pokerstars-owner-amaya-hvQNld66qNnmZVjIXqndPK/article.html>

The mooted Pounds 4.6bn merger, which was criticised by the UK bookmaker's largest shareholder, will not go ahead. There was somewhat of a relief rally in bookie William Hill (WMH) after its mooted Pounds 4.6bn deal with Canadian rival Amaya was scrapped.

Moore, M. (2015, August 27). Corcoran nets big win with 'Betty Power': Rivals let at odds as uniquely placed chief bets on Paddy Power - Betfair deal. *Financial Times*.

Former Paddy Power chief operating officer will head Paddy Power Betfair once the two companies merge in January 2016.

Murad, A. & Megaw, N. (2016, October 21). Online gambling industry faces inquiry into unfair practices. *The Financial Times*. Retrieved from <https://www.ft.com/content/09fbf882-9764-11e6-a1dc-bdf38d484582>

Online gambling companies in the UK are facing a regulatory investigation into potentially unfair practices, such as the cancellation of winning bets and tough conditions around receiving pay-outs.

### 3. Services

#### 3.1. Academic

(\*) Abbott, M., Stone, C. A., Billi, R., & Yeung, K. (2015). Gambling and problem gambling in Victoria, Australia: Changes over 5 years. *Journal of Gambling Studies*, 32(1), 47-78. doi:10.1007/s10899-015-9542-1

Rates of gambling and gambling-related harm fluctuate over time, influenced by availability, adaptation and demographic change, among other things. Assessing change is compromised by methodological variation. The main aim of this paper is to assess change in gambling participation and problems in

adult Victorians over a 5 year period. Data are from the Victorian Gambling Study (VGS) 2008–2012 (n = 15,000) and the 2003 Victorian Longitudinal Attitudes Survey (n = 8479). An additional aim was to determine the impact of methodological differences on prevalence estimates. Despite gambling availability increasing and more activities being included participation rates declined substantially. Decreases occurred across almost all demographic groups and gambling activities. When adjustments were made for methodological differences there were no significant changes in problem, moderate risk and low risk gambling. Males and people with lower education had higher rates in both surveys. In the latter survey, two groups that experienced large participation reductions, namely young adults and metropolitan residents, emerged as additional groups with higher rates of problem and moderate-risk gambling. Further research is required to discover why overall rates of harm may have plateaued when participation continues to fall and why some groups with reduced participation experience increased harm. The findings suggest that availability and total consumption models are over-simplistic. They further suggest that to be effective prevention programmes will need to extend beyond gambling availability to include interventions directed towards individuals at risk and wider environmental determinants of vulnerability and harm. Additionally this study found that restricting administration of the problem gambling measure to subsets of gamblers generate significantly lower prevalence estimates, implying that many previous surveys under-portray gambling-related harm and that without appropriate adjustment for methodological variation findings cannot be validly compared across studies.

Donaldson, P., Rockloff, M. J., Browne, M., Sorenson, C., Langham, E., & Li, E. (2015). Attitudes towards gambling and gambling reform in Australia. *Journal of Gambling Studies*, 32(1), 243-259. doi: 10.1007/s10899-015-9529-y

The Attitudes Towards Gambling Scale (ATGS) is a 14-item survey instrument examining general attitudes towards gambling (Orford et al. in *Int Gambl Stud* 9(1):39–54, 2009). The current study examined the validity of this scale in an Australian community sample of 1794 adults (52.8 % female). As well as considering measures of internal consistency and factor loadings, we examined the functional utility of the scale as a mediator of gambling activity, problem gambling status, and consequent opinions on national gambling-reform legislation. We found internal consistency and factor loadings of the ATGS within the Australian sample to be comparable with those observed in the original UK study. Additionally, ATGS scores were found to be a

relatively robust predictor of attitudes towards gambling reform and harm minimisation. Further, the ATGS mediated the relationships between experiences with gambling and attitudes towards harm reduction. The findings suggest that the ATGS is a useful tool for examining general attitudes towards gambling within an Australian context. Australian adults were found to hold generally unfavourable attitudes towards gambling while generally being in support of harm minimisation and gambling reforms. The least negative attitudes towards gambling were held by younger males, those with moderate-to-high levels of disposable income, those who gamble frequently and had gambled recently, individuals whom purchase a broad variety of gambling products, and people whom began gambling at a young age. However, even within these cohorts, attitudes remained generally negative, with only a small proportion of participants (12.5 %) indicating favourable attitudes. Thus, overall, the majority of the sample held that gambling does more harm than good.

Gambling control act, (2002). Retrieved from

[http://www.bclaws.ca/EPLibraries/bclaws\\_new/document/ID/freeside/00\\_02014\\_01#division\\_d2e4620](http://www.bclaws.ca/EPLibraries/bclaws_new/document/ID/freeside/00_02014_01#division_d2e4620)

Gambling is legal throughout Canada but provinces are responsible for enforcing legislation and can implement their own legislation in regards to gambling.

George, S. and Bowden-Jones, H. (2014) *Gambling: the hidden addiction*. Faculty of Addictions Psychiatry, Royal College of Psychiatrists. Retrieved from <http://www.rcpsych.ac.uk/pdf/FR%20AP%2001-for%20websiteApril2014.pdf>

Summary:

Taking responsibility

- The government needs to take more responsibility for services that treat adult problem gamblers.
- Funded almost exclusively by the gambling industry, current services are underdeveloped, geographically ‘patchy’, or simply non-existent.
- A treatment response is needed to match the expansion of gambling in Britain. Research indicates that the overall number of adults gambling in Britain is increasing, and the number of adult problem gamblers is also rising with around 450000 in Britain today.

Significant concerns also exist about the heightened exposure of adults in Britain to gambling – betting shops are now reportedly visibly clustering together on the high street, fixed-odds betting terminals have been linked with problem gambling, and online and smart phone gambling is now regularly advertised on television.

#### The treatment gap

- Taken together, a gap potentially exists between the prevalence of gambling problems and the provision of treatment for gambling disorders.
- Presently, there is one specialist National Health Service (NHS) clinic in Britain providing treatment for adults with gambling disorders.
- Consequently, with at least 450000 adult problem gamblers in Britain today, most will not be getting the help and treatment they need.
- Left untreated, adults with a gambling disorder can experience negative consequences (including higher rates of physical illness, mental health conditions, financial difficulties and involvement in criminal activity).
- Furthermore, an estimated 8 to 10 other people in the gambler's social network will be seriously affected, while there will also be wider societal costs.

#### Closing the treatment gap

- The government can, however, change this situation. By recognising gambling disorder as a public health responsibility, treatment could potentially begin to be provided from England's existing and experienced network of community drug and alcohol services.
- Commissioned by local authorities, these services already treat more than 300000 adults experiencing drug and alcohol addiction. Expert and experienced in the medical treatment of addictions, these services could play an important role in tackling adult gambling disorder.
- If the government takes this action, it will help address an acute and increasingly visible public health challenge. Without government action, however, the increasing availability and public visibility of gambling provides the perfect conditions for a new generation of problem gamblers – a future trend in addictions that we are ill equipped to treat.



George, S., & Bowden-Jones, H. (2016). Treatment provision for gambling disorder in Britain: Call for an integrated addictions treatment and commissioning model. *BJPsych Bulletin*, 40(3), 113. doi: 10.1192/pb.bp.114.050401

Treatment provision for individuals with gambling problems in Britain is at best inadequate. Here we call for gambling treatment provision to be integrated into mainstream drug and alcohol services, and for its commissioning responsibilities to fall under local public health departments. Gambling disorder sits alongside more traditional substance addictions in DSM-5.<sup>1</sup> This is the only behavioural addiction in this position, the argument being that only gambling disorder had the research evidence base supporting the transition.<sup>2</sup> In Britain there is currently insufficient help for people with gambling problems and those affected by someone else's gambling such as family members.<sup>3</sup> In this editorial we argue for an integration of gambling treatment service provision into existing drug and alcohol treatment services, and also for the commissioning of such services to be included within the local public health departments' remit, mirroring drug and alcohol treatment services. We believe that such a model will positively improve the status quo, wherein almost all of the gambling treatment services in Britain are funded by voluntary contributions from the gambling industry.

Hing, N., Russell, A. M. T., Gainsbury, S. M., & Blaszczynski, A. (2015). Characteristics and help-seeking behaviors of internet gamblers based on most problematic mode of gambling. *Journal of Medical Internet Research*, 17(1), e13. doi:10.2196/jmir.3781

**Background:** Previous studies of problem Internet gamblers have failed to distinguish whether their problem gambling relates to Internet or land-based gambling modes. Therefore, characteristics and help-seeking behaviors of people whose gambling problems relate specifically to Internet gambling are unknown, but could inform the optimal alignment of treatment and support services with the needs and preferences of problem gamblers.

**Objective:** This study aimed to compare (1) characteristics of problem Internet gamblers and problem land-based gamblers and (2) uptake of different types and modes of help between problem Internet gamblers and problem land-based gamblers. Hypothesis 1 was that problem Internet gamblers are less likely to seek help. Hypothesis 2 was that problem Internet gamblers are more likely to use online modes of help.

**Methods:** A sample of 620 respondents meeting criteria for problem gambling was drawn from an online survey of 4594 Australian gamblers. Respondents were recruited through advertisements on gambling and gambling help websites, Facebook, and Google. Measures consisted of gambling participation; proportion of gambling on the Internet; most problematic mode of gambling; help seeking from 11 different sources of formal help, informal help, and self-help for gambling problems; psychological distress (Kessler 6); problem gambling severity (Problem Gambling Severity Index, PGSI); and demographics.

**Results:** Problem Internet gamblers were significantly more likely than problem land-based gamblers to be male ( $\chi^2_1=28.3$ ,  $P<.001$ ,  $\phi=0.21$ ), younger ( $t_{616.33}=4.62$ ,  $P<.001$ ,  $d=0.37$ ), have lower psychological distress ( $\chi^2_1=5.4$ ,  $P=.02$ ,  $\phi=0.09$ ), and experience problems with sports and race wagering ( $\chi^2_4=228.5$ ,  $P<.001$ ,  $\phi=0.61$ ). Uptake of help was significantly lower among problem Internet compared to problem land-based gamblers ( $\chi^2_1=6.9$ ,  $P<.001$ ,  $\phi=0.11$ ), including from face-to-face services, gambling helplines, online groups, self-exclusion from land-based venues, family or friends, and self-help strategies. Both problem Internet and problem land-based gamblers had similarly low use of online help. However, problem land-based gamblers (37.6%, 126/335) were significantly more likely to have sought land-based formal help compared to problem Internet gamblers (23.5%, 67/285;  $\chi^2_1=14.3$ ,  $P<.001$ ,  $\phi=0.15$ ).

**Conclusions:** The findings suggest that more targeted and innovative efforts may be needed to increase use of gambling help by problem Internet gamblers. Alternatively, their lower PGSI and K6 scores suggest Internet problem gamblers may have less need for gambling-related help. This is the first known study to classify problem Internet gamblers as those whose problem gambling specifically relates to Internet gambling. Further research is needed to better understand why help-seeking rates are lower among Internet problem gamblers.

Rogers, J. (2013). Problem gambling: a suitable case for social work?  
*Practice*, 25(1). doi: 10.1080/09503153.2013.775234

Problem gambling attracts little attention from health and social care agencies in the UK. Prevalence surveys suggest that 0.6% of the population are problem gamblers and it is suggested that for each of these individuals, 10-17 other people, including children and other family members, are affected. Problem gambling is linked to many individual and social problems including: depression, suicide, significant debt, bankruptcy, family conflict, domestic

violence, neglect and maltreatment of children and offending. This makes the issue central to social work territory. Yet, the training of social workers in the UK has consistently neglected issues of addictive behaviour. Whilst some attention has been paid in recent years to substance abuse issues, there has remained a silence in relation to gambling problems. Social workers provide more help for problems relating to addictions than other helping professions. There is good evidence that treatment, and early intervention for gambling problems, including psycho-social and public health approaches, can be very effective. This paper argues that problem gambling should be moved onto the radar of the social work profession, via inclusion on qualifying and post-qualifying training programmes and via research and dissemination of good practice via institutions such as the Social Care Institute for Excellence (SCIE). Adapted from the source document.

Thomas Sherba, R., & Martt, N. J. (2015). Overall gambling behaviors and gambling treatment needs among a statewide sample of drug treatment clients in Ohio. *Journal of Gambling Studies*, 31(1), 281-293. doi: 10.1007/s10899-013-9406-5

Casino gambling in Ohio became available for the first time in May 2012. This gambling expansion led the Ohio substance abuse monitoring (OSAM) Network, Ohio's drug abuse surveillance system that collects drug trend data on an ongoing basis, to amend its protocol in June 2011 to include collection of data related to problem and pathological gambling to inform *current* treatment and prevention needs. OSAM collected gambling data from July 2011 to June 2012 via focus group interviews of 714 drug users recruited from alcohol and other drug (AOD) treatment programs throughout Ohio. Participants who reported gambling during the past 6 months ( $N = 412$ ) completed the South Oaks gambling screen. This study found a prevalence estimate of 12.1 % for probable pathological gambling among its statewide sample. Sizeable proportions of participants reported that they gambled more when using AOD (23.5 %) and used more AOD when gambling (19.4 %). A majority of study participants (59.2 %) reported participation in at least one type of gambling during the past 6 months, and of those participants, only 22.2 % reported ever having been asked about gambling while receiving AOD treatment services, with just 12.5 % reporting ever having had gambling treatment services offered to them. Men were 4.1 times more likely to screen positive for probable pathological gambling than women; non-Whites were 61.0 % more likely to screen positive than Whites. Findings presented in this report have the potential to help shape and strengthen problem and pathological gambling prevention and treatment measures in Ohio.

### 3.3. Websites

About AFM. (n.d.). Addictions Foundation of Manitoba. Retrieved from <http://afm.mb.ca/about-afm/>

Government organisation which provides addiction services for those with gambling problems (as well as alcohol and drug problems)

About gambling: help and referral. (n.d.). Gambling: Help and Referral. Retrieved from [http://www.jeu-aiderreference.qc.ca/www/about\\_gambling\\_help\\_referral\\_en.asp](http://www.jeu-aiderreference.qc.ca/www/about_gambling_help_referral_en.asp)

In the fall of 1993, at the time the Québec government established the first casino, a wide range of measures for the protection of gamblers were put into place, including *Gambling: help and referral*, because of the need to make people aware that gambling is, for some, not a game anymore. The helpline soon became the reference when one was looking for help for gambling-related problems. The service, provided by the Information and Referral Centre of Greater Montréal, has been financed by Loto-Québec from 1993 to 2001, and since April 2001, by the *ministère de la Santé et des Services sociaux du Québec*. *Gambling: help and referral* offers information, listening and support on compulsive gambling, as well as referral for all available help in the field. The helpline is available 24 hours a day and 7 days a week, throughout Québec.

About problem gambling Ireland. (2016). *Problem Gambling Ireland*. Retrieved from <http://www.problemgambling.ie/about.html>

This website was launched in January 2016. It is operated on a voluntary basis and is not funded by the gambling industry. According to the latest report into gambling in Ireland, there are estimated to be between 28,000 and 40,000 people who suffer from a gambling disorder. This site has been created in order to provide some independent supports and resources to anyone whose life has been negatively impacted by problem gambling.

About us. (2016). Ontario Problem Gambling Helpline. Retrieved from <http://www.problemgamblinghelpline.ca/Home/About>

Funded by Ontario government. Provides information about assistance services for problem gambling.

About us. (2014). British Columbia Responsible & Problem Gambling Program. Retrieved from <https://www.bcreponsiblegambling.ca/about-us>

The BC Government provides British Columbians with free information and resources to support informed choices and healthy behaviours with respect to gambling participation. Free treatment and support services are also available for anyone struggling with their own or a loved one's gambling.

About us. (n.d.). The RISE Foundation. Retrieved from <http://www.therisefoundation.ie/about-us>

Our Aims:

- Educate families about addiction and addictive behaviour
- Support families in their own recovery
- Break the cycle of addiction by helping the family member to care for themselves
- Help the family member to emerge from their powerlessness with strength and courage
- Raise awareness about the impact of addiction on families.

We help families understand the nature of addiction and teach self-help mechanisms to those who are impacted by a loved one's addictive behaviour.

Gam-Anon. (n.d.). Retrieved from <http://gamanon.org.uk/>

Support for those affected by a loved one's problem gambling. Meetings held usually held on the same night as GA meetings, but in separate, confidential rooms. Meetings are also held throughout the Republic of Ireland as well as the UK.

Gam Care. (n.d.). Retrieved from <http://www.gamcare.org.uk/>

Gam Care is the leading national provider of information, advice, support and free counselling for the prevention and treatment of problem gambling.

Gamble aware. (2011). Retrieved from <http://www.gambleaware.ie/>

The IRGB provides an industry funded resource in the Republic of Ireland to deliver a gateway to education of responsible gambling, increasing awareness and treatment of problem gambling. This initiative acts as a hub for industry funding of research, education and treatment. It also delivers Gamble Aware in Ireland to provide advice, education, awareness and support for gamblers, their families and any gambling related problems. The IRGB has a simple underlying principle governing our direction: To ensure that those who need assistance, support and treatment for problem gambling issues can get the help they need.

Gamble Aware. (2016). Retrieved from <http://about.gambleaware.org/>

Gamble Aware is the leading charity in Britain committed to minimising gambling-related harm. As an independent national charity funded by donations from the gambling industry, Gamble Aware funds education, prevention and treatment services and commissions research to broaden public understanding of gambling-related harm. The aim is to stop people getting into problems with their gambling, and ensure those that do develop problems receive fast and effective treatment and support.

Gamblers Anonymous. (2013). Retrieved from <http://www.gamblersanonymous.org.uk>

Support for those suffer from problem gambling. Multiple meeting types - not all groups have a Gam-Anon meeting.

(\*) Gambling Act 2005 (c 19). The Parliament of the United Kingdom. (2005)  
Retrieved from <http://www.legislation.gov.uk/ukpga/2005/19/contents>

The licensing objectives:

In this Act a reference to the licensing objectives is a reference to the objectives of—

- (a) preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,
- (b) ensuring that gambling is conducted in a fair and open way, and
- (c) protecting children and other vulnerable persons from being harmed or exploited by gambling.

Gambling awareness Nova Scotia. (2016). Retrieved from

<http://novascotia.ca/dhw/gans/>

In 1998, Gambling Awareness Nova Scotia (GANS-formerly the Nova Scotia Gaming Foundation) was formed as a not-for-profit, arms-length government organization for the purpose of receiving and distributing funds that would support communities to reduce the harmful effects of gambling. These funds are generated from a percentage of VLT revenues, matched by the Nova Scotia Provincial Lotteries and Casino Corporation (NSPLCC). Gambling Awareness Nova Scotia (GANS) is accountable to the Minister of Health and Wellness. In March 2011, the Nova Scotia government released a five-year gaming strategy that recommended integrating GANS with the Nova Scotia Health Research Foundation. In anticipation of this integration, GANS's volunteer board of directors was dissolved and was replaced by the following staff from the Department of Health and Wellness: Chair: Associate Deputy Minister Tracey Barbrick; Members: Chief of Policy and Planning Christine Gibbons.

Gambling information line. (n.d.). New Brunswick. Retrieved from

[http://www2.gnb.ca/content/gnb/en/departments/health/services/services\\_renderer.20076.Gambling\\_Information\\_Line.html](http://www2.gnb.ca/content/gnb/en/departments/health/services/services_renderer.20076.Gambling_Information_Line.html)

Information on problem gambling and referrals to other services.

Gamtalk. (2015). Retrieved from <http://www.gamtalk.org>

Welcome to Gamtalk. We are a supportive community helping people with gambling issues share their experiences and ideas. Do you have a gambling problem or know someone who does? Do you have a gambling problem or know someone who does? Do you have some concerns about your gambling or are you trying to stop gambling completely? Gamtalk is here to help.

Gordon Moody Association. (n.d.). Retrieved from

<https://www.gordonmoody.org.uk/>

We provide advice, education and high quality innovative therapeutic support to problem gamblers and those affected by problem gambling, through residential, online and outreach services. We also run a unique service offering online support and advice to problem gamblers outside Great Britain.

Humberwood treatment centre. (2016). Western Health. Retrieved from <http://westernhealth.nl.ca/index.php/programs-and-services/services-a-z/humberwood-treatment-centre>

The Humberwood Treatment Centre is a provincial inpatient addictions program located in Corner Brook, Newfoundland and Labrador. This program offers services to individuals with a substance abuse and /or gambling addiction. Humberwood Centre operates from a philosophy that views the treatment of addiction from a holistic perspective. The approach addresses the individual's physical, social, psychological and spiritual health. The overall goals of the Humberwood program are to help individuals reduce their risk of relapse and achieve healthy, balanced lifestyles. Admission to Humberwood Centre is voluntary. The service is available to men and women over the age of nineteen who are experiencing a substance abuse or gambling problem. Individuals must be referred to the program by an addictions counsellor or other community professional who will complete an assessment which explores the extent of the addiction and treatment goals. A medical assessment is also required.

Responsible Gambling Strategy Board. (2016). Retrieved from <http://www.rgsb.org.uk/>

Provides advice on research, education and treatment programmes required to follow the national responsible gambling strategy and the funding required for such ventures to the Gambling Commission and the Department for Culture, Media and Sport.

The Gambling Commission. (2015). Responsible gambling. *The Gambling Commission*, Retrieved from <http://www.gamblingcommission.gov.uk/Useful-links/Responsible-gambling.aspx>

The Responsible Gambling Trust raises funds, mainly from the gambling industry through voluntary donations, to support research, education and treatment of problem gambling. Fundraising targets for the gambling industry are agreed with the government and with the Responsible Gambling Strategy Board. However, in the event that the voluntary system fails to generate sufficient funds, the Gambling Act 2005 provides for a levy to be introduced on licensed operators.” - Donations do not have to be to the Trust.



The Gambling Commission. (2016). Board of commissioners - biographies.

*The Gambling Commission*, Retrieved from

<http://www.gamblingcommission.gov.uk/About-us/Board-of-commissioners/board-of-commissioners-biogs.aspx>

12 commissioners sit on the board, ensuring that the Commission carries out its duties as required. The commissioners are chosen by the Secretary of State for Culture, Media and Sport. Members have previous experience as trustees, board members, council members, panel members, members of auditing boards. Members include civil servants, accountants, watchdogs, solicitors, providers of citizens' advice, and magistrates.

Who are we. (2016). Gambling Help Online. Retrieved from

<http://www.gamblinghelponline.org.au/who-we-are>

Gambling Help Online is funded as part of an agreement between all State and Territory Governments and the Australian Government. This service complements and increases the range of services available in responding to problem gambling issues. It provides Australians with a new opportunity to access counselling and information services when they are unable or reluctant to access face-to-face services provided in each jurisdiction. Informed by extensive research and expert advice, Gambling Help Online is a world first to provide:

- Free 24/7 chat and email counselling and support services
- Professional counsellors with expertise in problem gambling and online services
- A stepping stone for further help-seeking, including telephone and face-to-face gambling services
- Extensive website content, self-help information and web links for additional support.

## 4. Technology

### 4.1 Online Gambling

#### 4.1.1. Academic

Abarbanel, B. L. (2013). Mapping the Online Gambling e-Servicescape: A Conceptual Model. *UNLV Gaming Research & Review Journal*, 17(2), 27–44. Retrieved from <http://digitalscholarship.unlv.edu/grrj/vol17/iss2/3>

A conceptual model is proposed that examines the potential influence of an online casino's atmospheric cues and functional qualities on consumer behavioural response. A stimulus-organism-response (S-O-R) model, often used to frame other servicescape research, is adapted as the basis of the theory that the online casino environment will influence the organismic effects of cognitive and affective states, which in turn influence gamblers' approach or avoidance behavioural intentions. Theorized elements of the virtual stimulus include high and low task-relevant cues, financial trust, and gambling value. Personal and situational factors, as well as demographic characteristics, are proposed to moderate the relationship between the servicescape and organismic responses. Propositions are presented and research implications are presented.

Deans, E. G., Thomas, S. L., Daube, M., & Derevensky, J. (2016). "I can sit on the beach and punt through my mobile phone": The influence of physical and online environments on the gambling risk behaviours of young men. *Social Science and Medicine*, 166, 110–119. doi: 10.1016/j.socscimed.2016.08.017

Gambling is rapidly emerging as an important public health issue, with gambling products causing considerable health and social harms to individuals, families and communities. Whilst researchers have raised concerns about online wagering environments, few studies have sought to explore how factors within different gambling environments (both online and land-based) may be influencing the wagering, and more broadly the gambling risk behaviours of young men. Using semi-structured interviews with 50 Australian men (20e37 years) who gambled on sport, we explored the ways in which online and land- based environments may be risk-promoting settings for gambling. This included the appeal factors associated with gambling in these environments, factors that encouraged individuals to gamble, and factors that

encouraged individuals to engage in different, and more harmful types of gambling. Interviews were conducted over the course of a year (April 2015 e April 2016). We identified a number of situational and structural factors that promoted risky gambling environments for young men. In the online environment, gambling products had become exceedingly easy to access through mobile technologies, with young men subscribing to multiple accounts to access industry promotions. The intangibility of money within online environments impacted upon risk perceptions. In land-based environments, the social rituals associated with peer group behaviour and sport influenced risky patterns of gambling. The presence of both gambling and alcohol in pub environments led individuals to gamble more than they normally would, and on products that they would not normally gamble on. Land-based venues also facilitated access to multiple forms of gambling under the one roof. We identified a number of factors in both land and online environments that when combined, created risk-promoting settings for gambling among young men. By exploring these contextual conditions that give rise to gambling harm, we are better able to advocate for effective public health responses in creating environments that prevent harmful gambling.

Gainsbury, S. M., Russell, A., Blaszczynski, A., & Hing, N. (2015). The interaction between gambling activities and modes of access: A comparison of Internet-only, land-based only, and mixed-mode gamblers. *Addictive Behaviors*, 41, 34–40. doi: 10.1016/j.addbeh.2014.09.023

Research suggests that Internet-based gambling includes risk factors that may increase gambling problems. The current study aimed to investigate subgroups of gamblers to identify the potential harms associated with various forms and modes of gambling. An online survey was completed by 4,594 respondents identified as Internet-only (IG), land-based only (LBGs), or mixed-mode (MMG) gamblers based on self-reported gambling behaviour in the last 12 months. Results showed significant socio-demographic differences between groups, with the LBGs being the oldest and MMGs the youngest. MMGs engaged in the greatest variety of gambling forms, had the highest average problem gambling severity scores, and were more likely to attribute problems to sports betting than the other groups. IGs were involved in the lowest number of divergent gambling activities, most likely to gamble frequently on sports and races, and attribute problems to these forms. Compared to the other groups, LBs had a higher proportion of problem gamblers than IGs and were most likely to play electronic gaming machines weekly, with this form of gambling contributing to problems at a substantially greater rate. This study

confirms the importance of considering gambling involvement across subgroups of Internet or land-based gamblers. There is a need to consider the interaction between forms and modes of gambling to advance our understanding of the potential risk of mode of gambling to contribute to problems.

Gainsbury, S. M., Russell, A., Hing, N., Wood, R., Lubman, D., & Blaszczynski, A. (2015). How the Internet is changing gambling: findings from an Australian Prevalence Survey. *Journal of Gambling Studies*, 31(1), 1–15. doi: 10.1007/s10899-013-9404-7

Interactive gambling as a regulated activity, coupled with easy accessibility to offshore providers represents a new mode and format of gambling superimposed on traditional land-based opportunities. This paper aimed to investigate the prevalence of gambling among Australian adults and the relationship between various gambling activities and interactive modes of access. A second aim was to compare interactive and non- interactive gamblers in terms of socio-demographic characteristics, attitudes and beliefs about gambling and gambling participation. In a nationally representative telephone survey, 15,006 Australian adults completed measures assessing past 12-month gambling participation and a subsample completed questions about interactive gambling and beliefs. The majority of participants (64.3 %) reported gambling at least once, with 8.1 % having gambled online. Interactive gamblers gambled on a greater number of activities overall and more frequently. Interactive gamblers were more likely to be male, younger, have home Internet access, participate in more forms of gambling and have higher gambling expenditure. Almost half of the interactive gamblers preferred land-based gambling although a small proportion also noted a number of disadvantages of interactive gambling. This study shows that the nature of gambling participation is shifting with interactive gambling having a significant and growing impact on overall gambling involvement.

Gainsbury, S. M., Russell, A., Wood, R., Hing, N., & Blaszczynski, A. (2014). How risky is Internet gambling? A comparison of subgroups of Internet gamblers based on problem gambling status. *New Media & Society*, 17(6), 861–879. doi: 10.1177/1461444813518185

Internet gambling offers unique features that may facilitate the development or exacerbation of gambling disorders. Higher rates of disordered gambling have been found amongst Internet than with land-based gamblers; however little

research has explored whether Internet disordered gamblers are a distinct subgroup. The current study compared problem with non-problem and at-risk Internet gamblers to understand further why some Internet gamblers experience gambling-related harms, using an online survey with a sample of 2799 Australian Internet gamblers. Problem gambling respondents were younger, less educated, had higher household debt, lost more money and gambled on a greater number of activities, and were more likely to use drugs while gambling than non-problem and at-risk gamblers. Problem gamblers had more irrational beliefs about gambling, were more likely to believe the harms of gambling to outweigh the benefits, that gambling is morally wrong and that all types of gambling should be illegal. For problem gamblers, Internet gambling poses unique problems related to electronic payment and constant availability, leading to disrupted sleeping and eating patterns. However, a significant proportion of Internet problem gambling respondents also had problems related to terrestrial gambling, highlighting the importance of considering overall gambling involvement when examining subgroups of gamblers. It is argued that policy makers should consider carefully how features of Internet gambling contribute to gambling disorders requiring the implementation of evidence-based responsible gambling strategies.

(\*) Gainsbury, S. M., Russell, A., Wood, R., Lubman, D. I., & Blaszczynski, A. (2014). The Prevalence and Determinants of Problem Gambling in Australia : Assessing the Impact of Interactive Gambling and New Technologies. *Psychology of Addictive Behaviors*, 28(3), 769–779. doi: 10.1037/a0036207

New technology is changing the nature of gambling with interactive modes of gambling becoming putatively associated with higher rates of problem gambling. This paper presents the first nationally representative data on the prevalence and correlates of problem gambling among Australian adults since 1999 and focuses on the impact of interactive gambling. A telephone survey of 15,006 adults was conducted. Of these, 2,010 gamblers (all interactive gamblers and a randomly selected subsample of those reporting land-based gambling in the past 12 months) also completed more detailed measures of problem gambling, substance use, psychological distress, and help-seeking. Problem gambling rates among interactive gamblers were 3 times higher than for non-interactive gamblers. However, problem and moderate risk gamblers were most likely to attribute problems to electronic gaming machines and land-based gambling, suggesting that although interactive forms of gambling are associated with substantial problems, interactive gamblers experience significant harms from land-based gambling. The findings demonstrate that

problem gambling remains a significant public health issue that is changing in response to new technologies, and it is important to develop strategies that minimize harms among interactive gamblers.

Philander, K. S., & Mackay, T. (2014). Online gambling participation and problem gambling severity: is there a causal relationship? *International Gambling Studies*, 14(2), 214–227. doi: 10.1080/14459795.2014.893585

Studies of Internet gambling have consistently shown that online gamblers are more likely to report disordered gambling behaviour than offline gamblers. However, little research has focused on whether this is a causal relationship or whether this risk factor is capturing a relationship with one or more missing variables. To address whether there is a strong causal argument for the effect of online gambling participation on problem gambling severity, we use a secondary data method that corrects for potential omitted variable bias. Once this issue is addressed, we find that past-year participation in online gambling is related to a decrease in problem gambling severity, which is the opposite of the popular view in current literature. The estimates in this study are found to be robust to various forms of online gambling, control variables and problem gambling measurement instruments. The findings were also consistent when using a representative sample from the United Kingdom and when using an online research panel from Ontario, Canada. As a primary force against the widespread adoption of Internet gambling has been public health concern over problem gambling, this study provides evidence that such decisions should be more closely considered by policymakers.

## 4.2. Social Media & Social Media Gaming

### 4.2.1. Academic

Abarbanel, B., & Rahman, A. (2015). eCommerce Market Convergence in Action: Social Casinos and Real Money Gambling. *UNLV Gaming Research & Review Journal*, 19(1), 51–62. Retrieved from <http://digitalscholarship.unlv.edu/grrj/vol19/iss1/4>

Online social casinos and real-money gambling industries, including gambling at online and live venues (such as casino resorts), are quickly converging (H2

Gambling Capital & Odoobo, 2013). Using data collected from 339 online real money gamblers, the relationship between player demographics and gambling preferences and frequency of online social casino participation is examined. Frequency of play in social casino games varied depending on gender and education, similar to patterns in real money gambling. Players who participated more frequently in social casino games were also more likely to spend more time participating in real money online gambling. Findings provide consumer insight for online gambling and social casino companies working toward convergence of the two game types, including implications for target markets for crossover play, loyalty programs, and corporate social responsibility.

Albarrán Torres, C., & Goggin, G. (2014). Mobile social gambling: Poker's next frontier. *Mobile Media & Communication*, 2(1), 94–109. doi: 10.1177/2050157913506423

In this paper, we provide a history, analysis, and theorization of the emergence of mobile social gambling—a new form of media and cultural practice that fuses “social gambling” and “social gaming,” with the affordances of mobile platforms and social networking sites. Through the use of apps in mobile devices, the consumption of risk is experiencing a shift from space-bound betting to itinerant practices that open new spaces for leisure and socialization. Focusing on a case study of the mobile app Zynga Poker, this paper attempts to identify and describe these “leakages” in the “magic circle” of gambling, which bring together social gaming and longstanding gambling cultures and practices. Our argument is that mobile gambling on smartphones and tablets extends earlier cultural practices associated with gambling activities such as poker, and much deeper into the realm of the everyday. The expansion of gambling practices into the realm of the everyday, however, poses manifold ethical, cultural, and political implications: the availability of gambling products to minors and other vulnerable populations; increased normalization of wagering as entertainment; and the merging of gambling and mobile gaming industries and markets. Digital gambling is a pressing area for future study in mobile media and communication.

Bramley, S., & Gainsbury, S. M. (2014). The role of auditory features within slot-themed social casino games and online slot machine games. *Journal of Gambling Studies*, 31(4), 1735–1751. doi: 10.1007/s10899-014-9506-x

Over the last few years playing social casino games has become a popular entertainment activity. Social casino games are offered via social media platforms and mobile apps and resemble gambling activities. However, social casino games are not classified as gambling as they can be played for free, outcomes may not be determined by chance, and players receive no monetary pay-outs. Social casino games appear to be somewhat similar to online gambling activities in terms of their visual and auditory features, but to date little research has investigated the crossover between these games. This study examines the auditory features of slot-themed social casino games and online slot machine games using a case study design. An example of each game type was played on three separate occasions during which, the auditory features (i.e., music, speech, sound effects, and the absence of sound) within the games were logged. The online slot-themed game was played in demo mode. This is the first study to provide a qualitative account of the role of auditory features within a slot-themed social casino game and an online slot machine game. Our results found many similarities between how sound is utilised within the two games. Therefore the sounds within these games may serve functions including: setting the scene for gaming, creating an image, demarcating space, interacting with visual features, prompting players to act, communicating achievements to players, providing reinforcement, heightening player emotions and the gaming experience. As a result this may reduce the ability of players to make a clear distinction between these two activities, which may facilitate migration between games.

(\*) Gainsbury, S. M., Delfabbro, P., King, D. L., & Hing, N. (2015). An Exploratory Study of Gambling Operators' Use of Social Media and the Latent Messages Conveyed. *Journal of Gambling Studies*, 32(1), 125–141. doi: 10.1007/s10899-015-9525-2

Advertisements for gambling products have historically been restricted due to their potential to normalize gambling and contribute to excessive gambling behaviours among vulnerable populations. However, social media enables gambling operators to promote products and brands with fewer constraints than in traditional forms of media. This study investigated how social media is used by gambling operators to promote gambling activities including an analysis of the latent messages that are conveyed. A representative sample of



major land-based and online gambling venues and operators, including casinos, clubs, hotels, lottery and wagering operators (n = 101), was obtained. Websites and social media profiles of gambling operators were audited to investigate the types of social media used, content of promotions, and prevalence of responsible gambling messaging. The results showed that Facebook and Twitter were the dominant platforms used, most commonly by casinos and online wagering operators. A key finding was that online gambling operators included gambling content in conjunction with related news and events, as well as unrelated content, as way of normalizing gambling within a broader social context. Unlike land-based gambling promotions, responsible gambling information tended not to feature in operators' posts and profiles. The key messages propagated in social media gambling promotions were positively framed, and tended to encourage gambling using a range of cross-promotional tactics to emphasize the winning aspect of gambling. The implications of freely accessible and pervasive gambling promotions via social media are discussed with respect to the general community as well as vulnerable populations.

(\*) Gainsbury, S. M., Hing, N., Delfabbro, P. H., & King, D. L. (2014). A taxonomy of gambling and casino games via social media and online technologies. *International Gambling Studies*, 14(2), 196–213. doi: 10.1080/14459795.2014.890634

The increased popularity of casino games on social media platforms has prompted international jurisdictions to consider the extent to which these games may be similar to Internet gambling activities and therefore subject to regulatory action. Gambling themes are popular in video and computer games, and simulated-gambling activities are commonly offered by gambling operators as a way of enticing users to gamble online with money. However, little research has evaluated the impact of the digital convergence of gambling and gaming. The lack of a clear definition of online gambling-themed activities to guide such research undertakings represents a significant hurdle to the fields of gambling and gaming. Based on a review of the extant literature, this article proposes a taxonomy to distinguish between many types of online activities with gambling-themed content. This taxonomy suggests that the principal features that differentiate online gambling games include the requirement for payment, the role of skill, the type of platform and the centrality of the gambling theme. The proposed hierarchical framework aims to promote clear and consistent discussion to guide ongoing investigation of new and emerging Internet gambling and gaming technologies.

Gainsbury, S. M., Russell, A., & Hing, N. (2014). An investigation of social casino gaming among land-based and Internet gamblers: A comparison of socio-demographic characteristics, gambling and co-morbidities. *Computers in Human Behavior*, 33, 126–135. doi: 10.1016/j.chb.2014.01.031

Social casino games are free-play online games that feature gambling themes, but do not pay-out winnings in monetary form. These games are distinct from Internet gambling; however, the crossover between these consumer markets is not well understood. This study compared the use of social casino games among a population of 2010 Australian adult Internet and land-based gamblers who completed a nationally representative telephone survey. The most popular social casino games were poker, gaming machines and casino table games and this popularity differed by gender. Social casino game players were more likely to be younger than non-social casino game players and had more similarities with Internet than land-based gamblers. Internet gamblers were more likely to also play social casino games than land-based gamblers, and use of these games was related to high engagement with gambling. Social casino gamers were more likely to smoke and use illicit drugs, and to have higher levels of psychological distress and gambling problems compared to non-social casino game players. This study is highly significant as it is one of the first comprehensive studies to examine the relationship between social casino game play and gambling in a representative adult population. Consumer protection measures should be strengthened where social casino games are offered in close proximity to gambling and when social casino players are encouraged to migrate to gambling opportunities.

#### 4.2.2. Official Reports

Dickins, M., & Thomas, A. (2016). *Is it gambling or a game? Simulated gambling games: Their use and regulation*. Melbourne: Australian Gambling Research Centre, Australian Institute of Family Studies. Retrieved from <https://aifs.gov.au/agrc/publications/is-it-gambling-or-game>

Simulated gambling games mimic the characteristics of gambling games but do not provide an opportunity to stake, win or lose real-world money. People who play simulated gambling games are more likely to gamble commercially and report gambling problems. The convergence of gambling and gaming alongside an increase in advertising has led to increased exposure to, and

possible normalisation of, gambling. It is the conclusion of this paper that strengthening and standardising classification of games, and adding advisory warnings, would provide more protections to users.

Gainsbury, S. M., King, D., Delfabbro, P., Hing, N., Russell, A., Blaszczynski, A., & Derevensky, J. (2015). *The use of social media in gambling*. Lismore, NSW: Centre for Gambling Education and Research. Retrieved from <https://www.responsiblegambling.vic.gov.au/information-and-resources/research/recent-research/gainsbury-s-et-al-2015-the-use-of-social-media-in-gambling>

The purpose of this project was to identify and describe the availability and promotion of gambling and social casino game opportunities via social media; whether there has been a transition between social casino game play and gambling; and the potential for social media to be used to promote responsible gambling.

#### 4.2.3. Non peer reviewed material

Boyd Myers, C. (2013, December 3). How much does it cost to build the world's hottest startups? *The Next Web*. Retrieved from <http://thenextweb.com/dd/2013/12/02/much-cost-build-worlds-hottest-startups/>

Could \$100,000 and the right developer skills make you an overnight billionaire? How much does it really take to build a product like Twitter or Instagram? With mobile development agencies and product incubators on the rise and more corporate “labs” spinning out each day, there’s no shortage of talent to help you build the next great Web or mobile app.

Hurd, M. (2016, June 1). How Much Does it Cost to Develop an App: The Ultimate Guide. *Fuelled*. Retrieved from <https://fuelled.com/blog/how-much-does-it-cost-to-develop-an-app/>

Are you considering building an app? The costs could surprise you. There’s lots of ways to go about the process, this article will take you through the ins and outs of the app development process so you can make sure you don’t make critical mistakes along the way. It’s official: mobile apps are now

integral parts of life (even old ladies gossip about them at country clubs). Formerly a millennial phenomenon and currently a multi-billion dollar industry that is clearly here to stay, the mobile app industry is the way of the future (and the present).

Klubnikin, A. (2016, January 21). How Much does it Cost to Develop a Mobile Game? *R- Style Lab*. Retrieved from <http://r-stylelab.com/company/blog/mobile-technologies/how-much-does-mobile-game-development-cost>

By 2018, less than 0.01% of mobile apps will generate enough revenue to cover development and marketing expenses. The growing adoption of smartphones drives competition among vendors, and very few companies will eventually succeed. However, 2016 is going to be a turning point for indie developers – provided they bring their bright app ideas to life. What factors impact mobile game development and design cost?

### 4.3. Online Regulation & Data Protection

#### 4.3.1. Academic

Codagnone, C., Bogliacino, F., Ivechenko, A., Veltri, G. A., & Gaskell, G. (2014). *Study on online gambling and adequate measures for the protection of consumers of gambling services. Final Report*. Luxembourg: European Commission. Retrieved from <http://ec.europa.eu/DocsRoom/documents/9785/attachments/1/translations/en/renditions/pdf>

The main objective of the study was to assess the behavioural response of consumers of online gambling services to protective measures tested in experimental settings. The measures tested in two behavioural experiments included: a) measures that exist in some Member States and/or are adopted by some of the online gambling operators (hereafter ‘existing measures’ such as for instance warnings about the risks of addiction, the logo of the national information provider, etc.); b) new measures that could be introduced in the future (such as for instance fixed or self-defined monetary limits and various forms of pop up alerts). While online gambling is cross-border by nature, consumers’ protective measures are fragmented across Member States, there are no common EU level measures, and not all consumers and citizens may be

sufficiently protected across the EU. An objective of the Commission is to work with Member States to achieve a common set of measures that: a) ensure the general protection of consumers and b) deter the emergence of problem gambling. This study was launched in light of the lack of evidence on the effectiveness or adequacy of existing measures that are intended to protect online consumers.

Gainsbury, S., Parke, J., & Suhonen, N. (2013). Consumer attitudes towards Internet gambling: Perceptions of responsible gambling policies, consumer protection, and regulation of online gambling sites. *Computers in Human Behavior*, 29(1), 235–245. doi: 10.1016/j.chb.2012.08.010

There is an insufficient understanding of consumer attitudes towards Internet gambling, which contributes to difficulties in developing policies to encourage the use of regulated online gambling sites. This research aimed to generate knowledge about consumer attitudes towards online gambling, specifically concerning the issues of player protection, regulation, and responsible gambling. An online survey was completed by 10,838 online casino and poker players from 96 countries. Responsible gambling features were generally viewed positively, particularly by casino game players, those who chased losses, and younger adults. Over one-third of participants reported having experienced a dispute with an online gambling operator. Respondents reported high levels of mistrust and concerns regarding online gambling and confusion regarding the appropriate regulation of Internet gambling. Consumer attitudes play a significant role in driving behavior and must be considered if regulators and operators are to effectively encourage online gamblers to use regulated gambling sites that include consumer protection and harm minimization measures. The results suggest that responsible gambling features, such as the ability to set spending limits, should be implemented on Internet gambling sites to increase consumer trust and favorable attitudes towards online gambling operators, and reduce disputes associated with excessive gambling.

Miers, D. (2015). Regulation and the management of risk in commercial gambling in Great Britain. *International Gambling Studies*, 15(3), 422–434. doi: 10.1080/14459795.2015.1068352

The regulation of commercial gambling in Great Britain is the responsibility of the Gambling Commission, the regulatory agency created by the Gambling Act 2005. This article examines the risk model that it has developed in order

to assess operator risks to the Act's licensing objectives. These are to prevent gambling from becoming a source of crime, to ensure that gambling is fair and open, and to protect children and other vulnerable people from being harmed or exploited by gambling. The article discusses four factors that affect the implementation of this model: operator compliance, the regulatory environment, the regulatory toolkit and the Commission's approach to its regulatory responsibilities. Its regulatory ideology sits squarely within the neo-liberal mode of regulation that has been pursued in Great Britain since the 1980s. By reference to political and public disquiet concerning gaming machines, the article analyses the tensions between the state, the regulator, the gambling industry and its consumers to which this mode of regulation gives rise. The article examines the challenges that the Commission faces in seeking to adopt a regulatory stance that is defensible both in terms of the protection of the public and the demands of a liberal market economy.

Willson, M., & Leaver, T. (2015). Zynga's FarmVille, Social Games and the Ethics of Big Data Mining. *Communication Research and Practice*, 1(2), 147–158. doi: 10.1080/22041451.2015.1048039

The increasing necessity of engaging in social interaction through online commercial providers such as Facebook, alongside the ability of providers to extract, aggregate, analyse, and commercialise the data and metadata such activities produce, have attracted considerable attention amongst the media and academic commentators alike. While much of the attention has been focused on the data mining of social networking services such as Facebook, it is equally important to recognise the wide- spread adoption of large-scale data mining practices in a number of realms, including social games such as the well-known FarmVille and its sequels, created by Zynga. The implicit contract that the public who use these services necessarily engage in requires them to trade information about their friends, their likes, their desires, and their consumption habits in return for their participation in the service. This paper will critically explore the realm of social games utilising Zynga as a central example, with a view to examine the practices, politics, and ethics of data mining and the inherent social media contradiction. In determining whether this contradiction is accidental or purposeful, this paper will ask, in effect, whether Zynga and other big data miners behind social games are entrepreneurial heroes, more sinister FarmVillains, or whether it is possible at all to draw a line between the two? In doing so, Zynga's data mining approach and philosophy provide an important indicator about the broader integration of data analytics into a range of everyday activities.

#### 4.3.2. Official Reports

Department for Culture, Media & Sport, United Kingdom. (2014). *Gambling Protections and Controls*. London: Department for Culture, Media & Sport.

The 2005 Gambling Act was introduced by the then Government with the aim of liberalising the gambling market in Great Britain. Nearly seven years on from the Act's implementation, the gambling industry has developed in innovative ways, with new products now marketed and made available on a greater scale than ever before. We have already taken action to ensure regulation keeps pace with these developments. This Government has passed legislation extending the British system of gambling regulation to remote gambling operators based overseas. For the first time, all remote gambling operators wishing to transact with, or advertise to, British based consumers will require a Gambling Commission licence to do so, ensuring robust and consistent regulation.

#### 4.3.3. Non-peer reviewed

Coppolani, C. (2016). The treatment of gambling data in France. *Online Gambling and Data Protection*, (21), 1–2. Retrieved from <http://www.egba.eu/news-centre/egba-news/>

In this edition of EGBA news, Charles Coppolani, chairman of the French Regulatory Authority for Online Gambling (ARJEL) gives his insights on the treatment of customers' personal data and what it can be used for.

Mulligan, J. (2014, July 31). Massive data breach at Paddy Power bookmakers. *The Irish Independent*. Retrieved from <http://www.independent.ie/business/irish/massive-data-breach-at-paddy-power-bookmakers-30474614.html>

THERE'S been a massive data breach at gambling firm Paddy Power, with personal details of over 649,000 customers having been stolen. About 120,000 of the customers are based in Ireland. The stolen data includes personal information entered by customers signing up to the Paddy Power online

service in 2010 and the years prior to that. The information includes names, addresses, dates of birth, and even the maiden names of mothers, which are often used to verify account details. The stolen data does not include any personal financial information.

Oakley, R. (2015, March 8). What your bookmakers knows about you. *The Sunday Times*, pp. 12. Retrieved from [https://www.google.ie/url?sa=t&rct=j&q=&esrc=s&source=web&cd=4&cad=rja&uact=8&ved=0ahUKEwjB5lib9fbQAhVLBsAKHQOtOBEYQFggvMAM&url=http%3A%2F%2Fwww.drcolinogara.com%2Fassets%2F2%2F0FE2A152-E6E5-404E-B04BC6FA03294BE8\\_document%2FRichard\\_Oakley\\_Issue\\_8\\_03\\_15.pdf&usg=AFQjCNHUHWSSvWNsWx8eQmv6jg-WNyGi5w&sig2=EbUX-cn9iDUFW4f-v\\_MXeg](https://www.google.ie/url?sa=t&rct=j&q=&esrc=s&source=web&cd=4&cad=rja&uact=8&ved=0ahUKEwjB5lib9fbQAhVLBsAKHQOtOBEYQFggvMAM&url=http%3A%2F%2Fwww.drcolinogara.com%2Fassets%2F2%2F0FE2A152-E6E5-404E-B04BC6FA03294BE8_document%2FRichard_Oakley_Issue_8_03_15.pdf&usg=AFQjCNHUHWSSvWNsWx8eQmv6jg-WNyGi5w&sig2=EbUX-cn9iDUFW4f-v_MXeg)

I started betting online with the country's favourite bookmaker in July 2008 and I stopped last December. It has been 68 days since my last wager. In that time I laid 2,216 bets, staking €17,377.33. This might seem excessive, but it includes bets made with earlier winnings. The amount of cash I transferred into my Paddy Power account was much smaller. On average, I made six bets a week of about €8 each. Unlike many gamblers, I regularly withdrew some of winning amounts— as any future loan application process will hopefully confirm. In short I was a tiny fish in the €80bn sea of international gambling. I carefully maintained a “low-staking” customer profile, but I wasn't so insignificant that I went unnoticed.

Rossi, B. (2016, September). How technology has changed the gambling market. *Information Age*. Retrieved from <http://www.information-age.com/technology-changed-gambling-market-123461988/>

The internet has completely changed the face of gambling, and not just at a practical level. Historically speaking, the gambling industry has always been an early adapter. Even as far back as the dawn of the telegram, bookies were quick to take note of how such connectivity could widen the scope of their business. Over the last 20, online gambling has grown year on year, so much so that it has actually changed society's general perception. No longer has the preserve of smoky bookmakers and dishevelled tracks, technology made online gambling a mainstream leisure pursuit.



Van Eecke, P., & Dierick, A. (2016). The review of the ePrivacy Directive, the game is on. *Online Gambling and Data Protection*, (21), 3–4. Retrieved from <http://www.egba.eu/news-centre/egba-news/>

As of 25 May 2018, the General Data Protection Regulation (GDPR) will be the main piece of EU legislation dealing with data protection rules. The GDPR is complemented by the ePrivacy Directive, which provides a specific set of rules concerning the electronic communications sector. This ePrivacy Directive, which some claim should have been integrated as part of the GDPR, was recently the subject of a European Commission consultation until July 2016.

#### 4.4. Land-Based Gambling

##### 4.4.1. Academic

Hamilton, L. E., Malcom, K., Brunswick, N., Gallagher, T. M., & Nicki, R. M. (2013). Problem and Nonproblem Gamblers' Attraction to Different VLT. *Journal of Research for Consumers*, (23), 5–9. Retrieved from [http://www.jrconsumers.com/Academic\\_Articles/issue\\_23/](http://www.jrconsumers.com/Academic_Articles/issue_23/)

This study investigated the opinions of problem and non-problem Video Lottery Terminal (VLT) gamblers. Specifically, two separate focus group sessions were conducted with problem and non-problem gamblers in which they discussed their opinions on two different kinds of VLT games: entertainment-focused and winning-focused games. Four major themes emerged that differentiated problem versus non-problem gamblers. The findings suggested that the selection of new VLT games for the marketplace should not be based on the preferences for problem gamblers. New VLT games should be entertainment-focused rather than winning-focused.

Harrigan, K., Brown, D., & MacLaren, V. (2015). Gamble While You Gamble: Electronic Games in Ontario Charitable Gaming Centres. *International Journal of Mental Health and Addiction*, 13(6), 740–750. doi: 10.1007/s11469-015-9557-y

Electronic Bingo games have recently appeared in Ontario Charitable Gaming Centres. Here we summarize the characteristics of this novel form of electronic gambling, and give a detailed characterization of one game. We

contend that these games have structural characteristics that make them similar to modern Electronic Gaming Machines (EGMs) that feature multiline slots games. These features include a fast and continuous gaming experience, with player adjustable win size and reinforcement rate, a high frequency of losses disguised as wins, and highly salient near misses. Some of these games also have bonus rounds and provide players with a list of recent wins. We conclude that provincial and state gaming authorities should be aware that the placement of Bingo EGMs in existing Bingo facilities may increase problem gambling among an already well-established community of Bingo enthusiasts.

Markham, F., Young, M., & Doran, B. (2014). Gambling expenditure predicts harm: Evidence from a venue-level study. *Addiction*, 109(9), 1509–1516. doi: 10.1111/add.12595

The Total Consumption Theory of gambling suggests that gambling expenditure is positively associated with gambling-related harm. We test the hypothesis that electronic gaming machine (EGM) expenditure predicts gambling-related harm at the level of the EGM venue. Design Cross-sectional analysis of survey and administrative data. Setting General urban adult population of the Northern Territory of Australia. Participants - The sample consisted of 7049 respondents to a mail-survey about venue visitation and gambling behaviour across 62 EGM venues. Measurements Gambling-related harm was defined as the endorsement of two or more items on the Problem Gambling Severity Index. We obtained venue-level EGM expenditure data from the local licensing authority for all venues in the study area. We compared the prevalence of gambling-related harm among patrons aggregated at the venue level with the estimated mean EGM expenditure for each adult resident in the venue's service area using a Huff model, correlation analysis and multivariate binomial regression. Findings Aggregated to the venue level ( $n = 62$ ), per-capita EGM expenditure was correlated significantly with rates of gambling-related harm ( $r = 0.27$ ,  $n = 62$ ,  $P = 0.03$ ). After adjusting for venue type and number of EGMs, an increase in mean per-capita monthly EGM expenditure from \$AU10 to \$AU150 was associated with a doubling in the prevalence of gambling-related harm from 9% (95% CI = 6–12%) to 18% (95% CI = 13–23%). Conclusions As suggested by the Total Consumption Theory of gambling, aggregate patron electronic gaming machine expenditure predicts the prevalence of gambling-related harm at the venue level.

Pickernell, D., Keast, R., Brown, K., Yousefpour, N., & Miller, C. (2013). Taking the Gamble: Local and Regional Policy Issues of Access to Electronic Gaming Machines (EGMs): a Case Study of Victoria Australia. *Australasian Journal of Regional Studies*, 19(1), 274–295. Retrieved from <https://search.informit.com.au/documentSummary;dn=587052948475725;res=IELHSS>

Gambling activities, and revenues derived, have been seen as a way to increase economic development in deprived areas. However, there are also concerns about gambling in general and Electronic Gaming Machines (EGMs) in particular, and the effects of access to these activities on the localities in which they are situated. This study explores issues of accessibility as they relate to EGM products in Victoria, focusing specifically on interactions between the location of, and demand for, EGM products. Results highlight potential two- way relationships between gambling and volunteering. Volunteering (and social capital more generally) may help protect against gambling. Alternatively and/or additionally volunteering may itself be damaged by increased gambling activity. This highlights the need for further exploration, particularly into how detrimental effects of EGMs may be mitigated in localities and beneficial impacts maximised by policy both related to the access to EGMs themselves and also the revenue and resources they generate.

#### 4.4.2. Official Reports

Campbell, A. (2015). *Local Government and Regeneration Committee: Fixed odds betting terminals - Summary of written submissions*. Edinburgh: SPICe. Retrieved from <http://www.parliament.scot/parliamentarybusiness/CurrentCommittees/91126.aspx>

On 8 July 2015 the Committee launched a call for written evidence on the proposed devolution of powers over B2 Gaming Machines, generally referred to as “Fixed-odds Betting Terminals” (FOBTs). The Committee received 36 submissions, broken down as follows:

- 6 submissions from bookmakers and representative bodies;
- 9 submissions from other gambling businesses (casinos, arcades etc.);
- 4 submissions from local government bodies; and

- 7 submissions from individuals and other bodies.

This paper provides a summary of the main points raised in the submissions, and is structured around the questions asked in the call for evidence.

Collins, P., Barr, G., & Scott, L. (2016). *Report on the results of research into the likely effects of substantially reducing the maximum permitted stake of £100 per 20-second spin on category B2 gambling machines in UK betting shops*. London: Bacta. Retrieved from <http://www.bacta.org.uk/details.cfm?page=news&codeid=492>

This research was commissioned in response to the UK Government's statement in 2015 that there is insufficient evidence to warrant reducing the maximum permitted stake on a B2 machines or Fixed Odds Betting Terminals (FOBT) in betting shops from £100 per 20-second spin, if registered with the bookmaker, or £50 if not registered. The brief was to gather information which would remedy this lack of evidence one way or another, and so support the government in making an evidence-based decision on whether or not to maintain the status quo.

Department for Culture Media & Sport. (2016). *Review of Gaming Machines and Social Responsibility Measures: Call for Evidence*. London: Department for Culture, Media & Sport. Retrieved from <https://www.gov.uk/government/consultations/call-for-evidence-review-of-gaming-machines-and-social-responsibility-measures>

The Gambling Act 2005 sets out how gambling in Great Britain should be regulated, including arcades, betting, bingo, casinos, gaming machines, society lotteries and remote gambling operations. The Gambling Act 2005 came fully into force on 1 September 2007. The Gambling Commission was set up under the Gambling Act 2005 to regulate gambling in Great Britain. It shares the job of regulating gambling with local authorities (and licensing boards in Scotland), who concentrate on localised issues. The British gambling industry is a significant part of Great Britain's leisure economy and gambling an important leisure pursuit. It employs over 100,000 people and in 2015 contributed £10.3bn to the economy, 0.6% of GVA (Gross Value Added). In 2013 the Government re-established the Triennial Review of the maximum stakes and prizes for gaming machines. This resulted in changes across several different categories of gaming machines to allow for healthy growth in the gambling industry, balanced with player protections. Following this, and recognising specific concerns with sub-category B2 gaming machines, in 2015

the Government took action to introduce a new requirement that those accessing higher stakes (over £50) must load cash via staff interaction or use account-based play. The Government's objective for this review is to look across the industry and determine what, if any, changes are needed to strike the right balance between socially responsible growth and the protection of consumers and wider communities.

Department for Culture, Media & Sport, United Kingdom. (2016). *Evaluation of Gaming Machine (Circumstances of Use) (Amendment): Regulations 2015*. London: Department for Culture, Media & Sport.

On 6th April 2015 the previous Government implemented the Gaming Machine (Circumstances of Use) (Amendment) regulations 2015. The policy objective of these regulations is to assist people who use sub-category B2 gaming machines (commonly known as fixed odds betting terminals or FOBTs) to stay in control of their gambling behaviour by requiring that those accessing higher stakes (over £50) load cash via staff interaction or use account based play. There were three expected effects of the policy:

- An improvement in the information players have about their playing habits via verified accounts leading to greater player control and more conscious decision making;
- Increased opportunities for interaction and intervention with appropriately trained staff, leading to greater player control; and
- A reduction in industry revenue as a result of changing player behaviour causing a fall in stakes over £50 and a smaller increase in stakes under £50. The reduction in industry revenue means a corresponding reduction in player losses. This would be due to either player's exercising more control through more conscious decision making (players now have to actively unlock over £50 staking) or having a preference for playing with anonymity

Local Government and Regeneration Committee. (2015). *Inquiry into fixed odds betting terminals* (Vol. 862). Edinburgh: The Scottish Parliament. Retrieved from <http://www.parliament.scot/parliamentarybusiness/CurrentCommittees/95014.aspx>

The Scotland Bill, introduced to the House of Commons on 28 May 2015, seeks to make a number of amendments to the Scotland Act 1998 and devolve further powers to the Scottish Parliament. In the UK Parliament, the Bill has

completed its passage through the House of Commons and is, at the time of the Committee's agreement of this report (9 December 2015), under consideration at Committee Stage in the House of Lords. It is expected that the Bill will complete its passage through the UK Parliament in the first months of 2016. In the Scottish Parliament, the lead committee considering the provisions of the Scotland Bill is the Devolution (Further Powers) Committee which will report to Parliament on the Bill and make a recommendation with regard to any legislative consent memorandum which may be laid with regard to the Bill.

Woodhouse, J. (2016). *Fixed odds betting terminals*. London: House of Commons. Retrieved from <http://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN06946>

Fixed odds betting terminals (FOBTs) are electronic machines, sited in betting shops, which contain a variety of games, including roulette. Each machine accepts bets for amounts up to a pre-set maximum and pays out according to fixed odds on the simulated outcomes of games. The Gambling Act 2005 classified FOBTs as B2 gaming machines. Up to four machines can be sited on betting premises. The maximum stake on a single bet is £100, the maximum prize is £500. B2 machines have proved controversial since they first appeared. Critics point out that it is possible to lose large amounts of money and that the machines have a causal role in problem gambling.

#### 4.4.3. Non-peer reviewed

Blackwell, T. (2015, December 28). Bingo's new addicts: High-tech machines quicker at parting players from their money. *National Post*. Retrieved from <http://news.nationalpost.com/news/bingos-new-addicts-high-tech-machines-quicker-at-parting-players-from-their-money>

The vast interior of Toronto's Delta St. Clair bingo hall looks like a cross between mission control and a low-rent Las Vegas. Scores of video terminals line the tables, letting enthusiasts play the live event electronically, or pump money digitally into individual, virtual bingo games that begin and end in seconds. Adjacent to them are banks of what are called electronic break-open ticket devices, but appear and behave much like slot machines. Bingo was once gambling's innocent, slow-paced genre — the place where bored

grandmothers came to wager a few dollars of pension money in a genial setting. That bygone era, however, is quickly vanishing.

Campaign for Better Gambling. (2015). WHAT ARE FOBTs? Retrieved December 5, 2016, from <http://www.stopthefobts.org/what-are-fobts/>

Fixed Odds Betting Terminals are touch screen electronic gaming machines found in betting shops across the United Kingdom. On FOBTs you will find a variety of games, ranging from casino games such as Roulette, Poker and Blackjack, to electronic slot games and virtual racing. FOBTs maximum stakes could be reduced from £100 down to £2, in line with all other Category B machines, without primary legislation. The Department for Culture, Media & Sport has the power to do this RIGHT NOW and make these changes throughout every betting shop in the UK.

O'Connor, F. (2015, August 30). Banning virtual gambling would close a third of bookies'. *The Sunday Business Post*. Retrieved from <https://www.businesspost.ie/business/banning-virtual-gambling-would-close-a-third-of-bookies-272680>

Banning the highly profitable but controversial practice would have "a substantial negative impact on the betting sector, reducing industry profits by 64 per cent, putting 280 shops at risk of closure, risking 1,400 jobs and costing the exchequer EUR 7.33 million," the betting company warned in a secret presentation sent to Department of Justice officials.

Kramer, R. (2016, May 12). Atlantic City gets sports betting, virtually. *Press of Atlantic City*. Retrieved from [http://www.pressofatlanticcity.com/business/atlantic-city-gets-sports-betting-virtually/article\\_71ac1402-17cc-11e6-83c4-1f2076c56465.html](http://www.pressofatlanticcity.com/business/atlantic-city-gets-sports-betting-virtually/article_71ac1402-17cc-11e6-83c4-1f2076c56465.html)

Sports betting remains federally banned here and nearly everywhere else in the U.S. But "virtual sports," which looks a lot like sports betting, is expanding in New Jersey. Gamblers betting on virtual sports don't wager on real matches. They bet on the outcomes of simulated games such as soccer, greyhound races and cycling competitions. Golden Nugget recently inked a deal to become North America's first online virtual sports provider.

## 4.5. Pre-commitment Systems

### 4.5.1. Academic

Harris, A., & Parke, A. (2016). The Interaction of Gambling Outcome and Gambling Harm-Minimisation Strategies for Electronic Gambling: the Efficacy of Computer Generated Self-Appraisal Messaging. *International Journal of Mental Health and Addiction*, 14(4), 597–617. doi: 10.1007/s11469-015-9581-y

It has been argued that generating pop-up messages during electronic gambling sessions, which cause a player to engage in self-appraisal of their gambling behaviour, instil greater control and awareness of behaviour (Monaghan, Computers in Human Behaviour, 25,202–207, 2009). Consideration for the potential interaction between the messaging efficacy and gambling outcome (winning or losing) is lacking however. Thirty participants took part in a repeated-measures experiment where they gambled on the outcome of a computer-simulated gambling task. Outcome was manipulated by the experimenter to induce winning and losing streaks. Participants gambled at a significantly faster speed and a higher average stake size, which resulted in a greater betting intensity in the Loss condition compared to the Win condition. Computer generated self-appraisal messaging was then applied during the gambling session, which was able to significantly reduce the average speed of betting in the Loss condition only, demonstrating an interaction effect between computer generated messaging and gambling outcome.

### 4.5.2. Official Reports

Lucar, C., Wiebe, J., & Philander, K. (2013). *Monetary Limits Tools for Internet Gamblers : A Review of their Availability, Implementation and Effectiveness Online Responsible Gambling Council Responsible Gambling Council Final Report prepared for the Ontario Problem Gambling Research Centre*. Toronto: Responsible Gambling Council. Retrieved from <http://www.responsiblegambling.org/rg-news-research/rgc-centre/research-and-analysis/docs/research-reports/monetary-limits-tools-for-internet-gamblers>

The purpose of the study was to provide a comprehensive review of tools that are available to assist Internet gamblers in setting appropriate monetary limits,



and to review available evidence of the effectiveness of these tools in helping Internet gamblers stay within their monetary limits. The objectives were achieved through a thorough examination of the research literature, scans of actual Internet gambling sites, and a search of Internet gambling player discussion forums. The findings from this study are intended to inform the planning, policy, and program development of Internet gambling within Ontario.

Thomas, A., Carson, R., Deblaquiere, J., Armstrong, A., Thomas, A., Carson, R., Rintoul, A. (2016). *Review of electronic gaming machine pre-commitment features Self-exclusion machine pre-commitment features: Self-exclusion*. Melbourne. Retrieved from <https://aifs.gov.au/agrc/publications/pre-commitment-self-exclusion>

Local, state and federal governments and the gambling industry all have an important role to play in protecting the public from gambling-related harms. Achieving an appropriate balance between implementing effective harm minimisation measures and the continued enjoyment of gambling is a significant consideration for all governments (Productivity Commission, 2010). The Australian Institute of Family Studies (AIFS) was commissioned by the former Department of Families, Housing, Community Services and Indigenous Affairs (FaHCSIA) to research options for the introduction of self-exclusion features within a broader pre-commitment system. Self-exclusion options are designed to enable consumers to voluntarily halt access to gambling opportunities and give problem gamblers a means by which to limit or cease gambling. Regulators in Australia and around the world have called for more extensive application of self-exclusion options in electronic gaming machine (EGM) venues to improve consumer protection and harm reduction measures. The Productivity Commission (2010) likewise recommended wider implementation and greater cohesion of self-exclusion options. It was their view that self-exclusion is one of the more practical and cost effective pre-commitment options. This report examines existing evidence from research literature and opinions from regulators, academics, government officials and EGM venue operators relating to the optimum design of self-exclusion features within a pre-commitment system. These data were collected in 2013. The report provides analysis and options relating to the application of self-exclusion features to EGMs as a consumer protection or harm minimisation measure. The findings are designed to inform policy development, including any potential pre-commitment trials.

Thomas, A., Christensen, D., Deblaquiere, J., Armstrong, A., Thomas, A., Christensen, D., Rintoul, A. (2016). *Review of electronic gaming machine pre-commitment features Limit setting machine pre-commitment features: Limit setting*. Melbourne. Retrieved from <https://aifs.gov.au/https://aifs.gov.au/agrc/publications/pre-commitment-limit-setting>

Limit setting offers consumers a broad new set of choices for placing informed constraints on the time or money spent gambling on electronic gaming machines (EGMs) in gambling venues. Regulators in Australia and around the world have called for more extensive application of limit-setting technologies in EGM venues to improve consumer protection and harm reduction measures. The Productivity Commission (2010) likewise recommended the wider implementation and greater cohesion of limit-setting technologies. It was their view that limit setting was the most practical and cost effective pre-commitment option.

Thomas, A., Rintoul, A., Deblaquiere, J., Armstrong, A., Thomas, A., Rintoul, A., Christensen, D. (2016). *Review of electronic gaming machine pre-commitment features Transaction history statements machine pre-commitment features: Transaction history statements*. Melbourne. Retrieved from <https://aifs.gov.au/agrc/sites/default/files/publication-documents/agrc-precommitment-transaction-history>

The Australian Institute of Family Studies (AIFS) was commissioned by the former Department of Families, Housing, Community Services and Indigenous Affairs (FaHCSIA) to research options for the introduction of transaction history statement features within a broader pre-commitment system. The Australian Gambling Research Centre, which is housed at AIFS, undertook this work. A transaction history statement provides consumers with a summary record of gambling expenditure, loss limits and instances where the limits prevented further EGM use. It may also include information about the location and duration of gambling. Regulators in Australia and around the world have called for the introduction of transaction history statements for EGM users. The Australian Productivity Commission (2010) has likewise recommended that these account summaries be made available to all EGM users. It was the commission's view that transaction history statement provision was one of the most practical and cost-effective pre-commitment features. The recommendation comes as the impetus grows for the introduction of improved effectiveness of pre-commitment systems, and a greater emphasis on strategies to reduce harm and protect consumers.

## 4.6. Advertising

### 4.6.1. Academic

Hing, N., Cherney, L., Blaszczyński, A., Gainsbury, S. M., & Lubman, D. I. (2014). Do advertising and promotions for online gambling increase gambling consumption? An exploratory study. *International Gambling Studies*, 14(3), 394–409. doi: 10.1080/14459795.2014.903989

It remains unclear if gambling advertising and promotion increase demand for, and consumption of, gambling, or only affect market share distributions without increasing total consumption. Although this has been investigated in relation to land-based gambling, studies have not examined how such marketing influences behavioural patterns of Internet gamblers. The aim of this study, therefore, was to explore ways in which advertising and promotion of Internet gambling may contribute to increased consumption of gambling. Qualitative interviews were conducted with 50 Internet gamblers drawn from the general population, and 31 treatment-seeking Internet gamblers. In-depth analysis interview transcripts revealed limited reported effectiveness of advertising and promotions in converting non-gamblers to Internet gamblers. However, general population gamblers reported occasionally gambling more than intended (increased consumption) in response to free bet and deposit offers. A proportion of treatment-seekers reported increased gambling, particularly associated with bonus offers that required matched deposits and gambling before any winnings could be collected. Advertisements and promotions invoked urges to gamble among treatment-seeking gamblers, and appeared to some participants to be designed to target individuals who had taken steps to limit or cease gambling. Findings provide preliminary evidence of Internet gambling promotional activities increasing overall consumption amongst a subgroup of gamblers.

Johnston, M. A., & Bourgeois, L. R. (2015). Third-person perceptions of gambling sponsorship advertising. *Sports, Business and Management*, 5(5), 413–434. doi: 10.1108/SBM-04-2015-0015

Purpose – The purpose of this paper is to examine perceptual and behavioural components of the third-person effect for sport sponsorship marketing communications by legalised gambling companies. Specifically, this research examines judgements about the perceived influence of gambling sponsorship

on self, children, and other adults. It also investigates behavioural reactions towards the censorship of gambling sponsorship, and intentions to gamble with sponsors. Design/methodology/approach – An online survey was fielded to a commercial consumer database and yielded 511 usable responses. Four hypotheses were tested to examine perceptions of the effects of gambling sponsorship on self and on others, and whether perceived differences in self/other effects influenced pro-censorship behaviours and gambling intentions. Findings – Findings reveal a range of responses to sport sponsorship by gambling companies. Some individuals view gambling sponsorship positively, they are anti-censorship, and happy to bet with sponsors. Others, who bet on sports, but have no particular allegiance to gambling sponsors, appear highly protective of children, and endorse censorship. Research limitations/implications – This study focused on the perceived impact of gambling sponsorship on other adults and on children. Future research may consider targeting more specific groups such as other sports fans, others engaged in online sports betting, or primary/secondary school age children. Originality/value – This study provides new insights on sponsorship effects, specifically public perceptions of gambling sponsorship advertising and their associated behavioural consequences.

#### 4.6.2. Non peer reviewed

ASAI. (2016). Section 10: GAMBLING. Retrieved December 13, 2016, from <http://www.asai.ie/asaicode/section-10-gambling/>

The Advertising Standards Authority for Ireland (ASAI) section on the standards for advertising gambling in Ireland.

Broadcasting Authority of Ireland. (2011). *General Commercial Communications Code*. Dublin: Broadcasting Authority of Ireland. Retrieved from <http://www.bai.ie/en/codes-standards/>

Section 42 of the Broadcasting Act, 2009, provides that:

(1)The Authority shall prepare, and from time to time as occasion requires, revise, in accordance with this section, a code or codes governing standards and practice (“broadcasting code”) to be observed by broadcasters.

(2)Broadcasting codes shall provide – (h), that advertising, teleshopping material, sponsorship and other forms of commercial promotion employed in

any broadcasting service, other than advertising and other activities as aforesaid falling within paragraph (g), protect the interests of the audience.

The General Commercial Communications Code (“the Code”) has been developed by the Broadcasting Authority of Ireland in accordance with its statutory obligations.

Industry Group for Responsible Advertising. (2015). *Gambling Industry Code for Socially Responsible*. Retrieved from <http://www.gamblingcommission.gov.uk/Advertising.aspx>

The Industry Code for Socially Responsible Advertising (the ‘Industry Code’) was originally introduced on 1 September 2007. Its aim was to provide gambling operators with a range of measures that would enhance the social responsibility of their advertising and which went over and above the extensive requirements already placed on them by the gambling and advertising regulators.

## 4.7. Children and Gambling

### 4.7.1. Academic

O’Neill, B. (2013). Who cares? Practical ethics and the problem of underage users on social networking sites. *Ethics and Information Technology*, 15(4), 253–262. doi: 10.1007/s10676-013-9331-4

Internet companies place a high priority on the safety of their services and on their corporate social responsibility towards protection of all users, especially younger ones. However, such efforts are undermined by the large numbers of children who circumvent age restrictions and lie about their age to gain access to such platforms. This paper deals with the ethical issues that arise in this not-so-hypothetical situation. Who, for instance, bears responsibility for children’s welfare in this context? Are parents/carers ethically culpable in failing to be sufficiently vigilant or even facilitating their children’s social media use? Do industry providers do enough to enforce their own regulations and remove those users they know to be underage? How far does a duty of care extend? Regulation of age restrictions has, it is argued, created unintended consequences that heighten online dangers for young people. While children are inevitably drawn to new online spaces for entertainment and fun, should their rights to participate in the social world around them be curtailed to

ensure their best interests and those of the wider community? Such questions now pose significant practical and ethical dilemmas for policy makers and other stakeholders involved in internet governance. It especially highlights the question of responsibility for protection of minors online and calls into question whether the current model of shared responsibility is working.

#### 4.7.2. Official Reports

Gambling Commission. (2016). *Young People and Gambling 2016*. Birmingham: Gambling Commission. Retrieved from <http://www.gamblingcommission.gov.uk/pdf/Young-people-and-gambling-2016.pdf>

The latest annual survey by the Gambling Commission to identify the incidence and frequency of gambling among young people in England and Wales indicates that 11-15 year olds' claimed rate of gambling has remained relatively static over time.

## 9. Appendix B: Stakeholder & Expert Submissions & Analysis

### 9.1 Stakeholder & Expert Submissions

#### 9.1.1 Irish Amusements Trade Association (John Roche)



The on-line sector has become much more aggressive in its advertising and promotion. The National Lottery in particular is ruthless in its promotion of its many games and competitions through its smartphone app with messages being delivered to phones from 8am each day.

The bookmakers continue to expand their gaming interests in bookmakers offices despite the fact that it is specifically contrary to the Betting Act 1931. The shops of one large chain actually advertise on its shopfronts – Casino-Gaming-Roulette-Betting. The only legal activity is betting yet the authorities close their eyes to it.

The Gaming and Amusement Sector are still awaiting a decent piece of legislation to enable it to compete with the online and bookies who are now effectively arcades.

The Gambling Control Bill must be introduced in its entirety without further delay. The proposal to introduce it piecemeal will not work because the entire gambling sector must be incorporated in the new regulations from day 1.

### 9.1.2 Problem Gambling Ireland (Barry Grant, CEO)



While the General Scheme of the Gambling Control Bill 2013 is wide-ranging and appears to cover all issues which existed at that time, the gambling landscape is constantly shifting. Here are some emerging issues, which we feel may not be covered by the Bill in its current form:

**“Skins” Trading (Skins Gambling):** This has been widely reported throughout 2016. It predominantly relates to a video game called Counter Strike: Global Offensive (CS:GO). The game is one of the most popular in the emerging e-sports sector. A CS:GO tournament in April of this year generated 71 million online views over 4 days. At any given time, there are roughly 380,000 people around the world, playing the game.

“Skins” are a way for the player to personalise their weapon, within the game. Players pay \$2.50 for the chance to open a crate, within the game. Each crate contains a random weapon “skin”. Since some skins are quite rare (and are, therefore, considered more valuable), a market has developed for skin trading. While the creators of the game, Valve, do not have a facility for gambling



within CS:GO, numerous third party sites have sprung up, which allow players to use their CS:GO skins as currency with which to gamble. Players can bet on the chance to win a more valuable skin or, alternatively bet skins on the outcome of a CS:GO tournament. According to research firm Eilers & Krejcik Gaming, more than 3 million people wagered \$2.3 billion worth of skins on the outcome of e-sports matches in 2015. The global skins gambling market for 2016 is projected to be in the region of \$4.9 billion. However, due to Valve issuing cease and desist orders to 23 skin gambling sites in July of this year, the projections for expected growth in this market have been severely downgraded, with predicted revenue for 2017 being around \$830 million.

The third-party gambling sites are unlicensed and unregulated, globally. As the sector is unregulated, minors, who make up a substantial percentage of CS:GO players, can easily access the gambling sites. The replacement of cash with “skins” creates a level of abstraction (similar to using chips in a casino) that would be likely to increase a person’s willingness to gamble.

Globally, gambling regulators are struggling to get to grips with this new variation on the online gambling theme. However, if legislative structures could be arrived at, through the Gambling Control Bill, there are clear potential benefits to children.

Source: Grove, Chris. E-Sports & Gambling: Where’s the Action? Eilers & Krejcik Gaming, 2016. Available at: <http://naruscope.com/wp-content/uploads/2016/11/Esports-White-Paper-v3.pdf>

**Cash Cards:** Earlier this year, Paddy Power launched their “Cash Card PPlus”, claiming that “the wait for your winnings online is finally over”, thanks to a pre-paid card which customers could use to make purchases with

their winnings, instantaneously. Previously, online players were required to wait 2-3 working days before their winnings could be withdrawn.

This development, while on the face of it appears to be beneficial to consumers, raises some concerns.

Firstly, if the consumer's winnings can be transferred to the Cash Card PPlus instantaneously, why is the consumer, who does not sign up for the card, required to wait 2-3 working days to access their own funds? If the technology exists for one, surely it is available for the other.

Secondly, consumers using the Cash Card PPlus never actually 'Cash Out' their winnings in the usual sense of the term. Their funds remain active within their Paddy Power account until they have withdrawn the full amount in cash, at an ATM, or made purchases up to the amount available in their account. This increases the opportunity for a vulnerable person to engage in un-safe (unhealthy) levels of gambling.

Thirdly, the Cash Card PPlus is branded in the Paddy Power colours and branded with their logo. For many vulnerable people, carrying the card around with them could be a trigger to gamble. Picture a parent going to the local shop to purchase groceries with funds from their Cash Card PPlus. They may feel self-conscious about using a gambling-company branded card in certain retail environments. If they opt to take out cash, to purchase essentials, they must first be subjected to an advertisement for a gambling company – the very company which has been kind enough to give them instant access to their own money.

Source: Powell, J. (2016). Instant access to your winnings. Retrieved December 19, 2016, from <http://blog.paddypower.com/paddy-power-news/2016/05/20/get-instant-access-winnings-courtesy-paddy-powers-cash-card-pplus/>

**Gambling becoming the ‘Gateway Vice’ of choice for children:** In the recently published ‘Young People and Gambling 2016’ report, by the UK Gambling Commission, they found that experimentation with gambling, among 11-15 year olds, was more popular than experimenting with cigarettes, alcohol or other drugs. In fact, at 16%, gambling was over three times more popular than cigarette smoking (5%), twice as popular as drinking alcohol (8%) and more than twice as popular as consuming other drugs (6%). In Ireland, the recent ESPAD 2015 survey found that 13% of Irish males, aged 15-16, had gambled online in the previous week.

Sources:

New report indicates 450,000 children gamble every week. (2016, November 30). *Gambling Commission*. Retrieved from <http://www.gamblingcommission.gov.uk/Press/2016/New-report-indicates-450000-children-gamble-every-week.aspx>

Taylor, K., Babineau, K., Keogan, S., & Whelan, E. (2015). *ESPAD 2015*. Dublin: Department of Health. Retrieved from [http://alcoholireland.ie/download/reports/alcohol\\_health/children\\_young\\_people/Irish-ESPAD-Report-20151.compressed.pdf](http://alcoholireland.ie/download/reports/alcohol_health/children_young_people/Irish-ESPAD-Report-20151.compressed.pdf)

**72-hour window, when opening an online gambling account:** Online gambling operators currently allow a 72-hour window before customers are required to provide photo-identification. This means that a new customer can gamble for 3 days without proving that they are over 18. There appears to be no limit set by the industry on the amount a customer can lose during this

period. However, if an underage customer accrues any winnings during this period, they will be unable to recoup them. The existence of this 72-hour window is contrary to key concepts of responsible gambling. Our society would never allow this situation to exist for other over-18 products and services.

**The voluntary contribution model has been shown to be a failure:** Shortly after the publication of the General Scheme of the Gambling Control Bill, in 2013, Paddy Power PLC made a submission to government. In their submission, they stated: “We are concerned however by the proposal to apply the contribution to the Social Fund based on turnover (Head 80) given the intense international competition for online gambling and the narrow margins which generally apply for gambling products. We would encourage the Department to explore models from other jurisdictions that have similar systems in place which are working effectively, for example the UK where operators contribute voluntarily to the Responsible Gambling Trust (RGT) on a flat rate based on scale.” Paddy Power/Betfair’s Group Operating Profits for 2015 were €180.4 million (€20.3 million from the Irish market – up 10% from 2014). Revenues at Paddy Power/Betfair rose by 18% in the first half of 2016. Earnings after day-to-day expenses (EBITDA) between January and June grew by 31% to €211m.

In the UK, where gambling industry contributions to the Responsible Gambling Trust are on a voluntary basis, only 63% of licence-holders contributed in 2014-2015. This equated to roughly £6.5 million in donations from an industry which had a Gross Gambling Yield (the amount retained by operators after the payment of winnings, but before the deduction of operating costs) of £10 billion over the same period (not including the National Lottery).

In her speech at the recent World Regulatory Briefing on Responsible Gambling Innovation (London, September 2016), Sarah Harrison, CEO of the UK Gambling Commission, made the following statement: “in 2015, under the current voluntary arrangements, the industry contributed over £6.5m to RGT for research, education and treatment under the voluntary funding arrangements. By contrast £120m was spend on TV advertising in the same year. That cannot be right. £6.5m is nowhere near enough. If the RGT were able to rely on a minimum of 0.1% of every operator’s GGY, that would provide a ballpark figure of £10-£11m - which is beginning to be a much more credible sum for such an important task. From the Commission’s perspective it doesn’t matter too much how the industry shares this funding responsibility but I would expect the industry itself to care very much about this. How can it be fair that some operators, large and small, contribute year in and year out while others get a free ride?”

To put the level of the UK gambling industry’s voluntary contribution into perspective, it could be useful to look at the example of New Zealand. New Zealand, at 4.2 million, has a population close in size to that of Ireland’s – and far smaller than the UK’s 64 million. Despite its relatively small size, the New Zealand government raised €35.85 million (\$55.3 million NZD), over the three years up to June 2016, in order to address gambling harm. This was raised in the form of a problem gambling levy. The levy is calculated using rates of player expenditure (losses) on each gambling subsector and rates of client presentations to problem gambling services attributable to each gambling subsector. The New Zealand government anticipate that they will collect a similar amount over the coming three years. The New Zealand Ministry of Health estimate that they have in the region of 24,000 problem gamblers.

We feel that a voluntary donation model would leave the Office of the Gambling Commission in Ireland in a position where it is beholden to the gambling industry for the funding it requires in order to operate. To put a Regulator in a position where they are, in effect, working for the industry which they are mandated to regulate, would appear to be a clear conflict of interest.

It is worth noting that, according to the Irish Institute for Public Health's 2010 report, "From an economic perspective, evidence suggests that the health and social costs of problem gambling exceed government revenue gained from gambling taxes and businesses".

A recent report by the UK's Institute for Public Policy Research found that the cost of gambling-related harm to the exchequer could be as much as £1.16 billion.

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Thorley, C., Stirling, A., & Huynh, E. (2016, December 13). Cards on the table: The cost to government associated with people who are problem gamblers in Britain. *IPPR*.

**The ‘Gamblification’ of sport has increased dramatically:** In a recent Australian study, it was found that 75% of children, aged 8-16, thought that gambling was a normal part of sport. The study also found that 75% of children in that age-group could name at least one gambling provider. In the UK, 10 out of 20 Premier League soccer teams have a gambling-industry sponsor.

In Ireland, gambling products and services (including the National Lottery) are currently advertised on an incessant basis on Irish radio and television (as well as print media and online) at all times of the day. No regard is given for the fact that all gambling products are only available to people who are over the age of 18. It would appear to be contradictory to basic public health concepts

to permit potentially addictive, over-18 products and services to be advertised pre-watershed, when children of all ages can be exposed to them.

In the UK, the media regulator, Ofcom, found that adults saw an average of 630 gambling adverts per annum on TV (2012 figures), while children under 16 saw an average of 211 (Sweeney, 2013).

The importance of advertising to the gambling industry can be seen in Paddy Power PLC's submission to government (paragraphs 3.4 & 3.5) in response to the publication of the General Scheme of the Gambling Control Bill (2013). In their submission, Paddy Power request ongoing government consultation with the industry and the implementation of Codes of Conduct in relation to advertising, rather than the proposed legislative measures and associated penalties.

It is our opinion, that voluntary Codes of Conduct for gambling industry advertising would reduce the ability of the Office of the Gambling Commission to effectively implement public health measures and protect children and vulnerable adults from gambling-related harm.

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### 9.1.3 Gaming and Leisure Association of Ireland (David Hickson)



#### **1- The Office of the Gambling Commissioner in Ireland (OGCI) must be an independent body**

A core and essential measure in the Gambling Control Bill will be to require all operators of gaming and betting services be licensed – ensuring accountability of all operators and assist in driving criminality and black-market activity out of the industry. The Bill will establish an Office for Gambling Control Ireland, to serve as a central regulator and administrator of gambling sector, however, we believe that the establishment of an independent regulatory body, removed from the sphere of political influence, is the most appropriate option here. While we acknowledge that there may be political reluctance to establish another ‘Quango’, we recommend that an independent regulatory body with a clear mandate to adhere to the key principles of good regulation, namely independence, openness, efficiency, clarity, and reliability be established. This is the best way to guard against the accusation of political favouritism regardless of its veracity, and to provide greater business certainty for would be international investors. Further, an independent regulatory authority is required, not only to enhance the reputation of the industry and to afford the consumer greater protection, but also to attract online operators to locate in Ireland, potentially creating in excess of 5,000 jobs within a short timeframe of this legislation being enacted. The independent regulator would have the ‘sole authority for the licensing of gambling’ and ‘exclusive authority

to grant, renew, revoke and revise any license’, rather than the Minister. The Gambling Commission in the UK is an excellent example of how this could be done and is more in keeping with international best practice.

## **2- Legal Definitions & Clarity of Tax Treatment**

Currently there is a distinct lack of clarity on the treatment of ‘gaming’ within a bookmaker’s environment. The recent convergence of ‘Betting’ and ‘Gaming’ – with betting shops and online bookmakers often offering identical services as found in traditional gaming outlets – such as virtual roulette, and gaming machines being found in public houses, has highlighted the need to introduce distinct and clear definitions of betting, gaming, and various machine types as a solid foundation of any legislation. Without such clarity, service providers will no doubt find a technical method to subvert the intent of the Bill, with ‘Fixed Odds Betting Terminals’ (FOBT’s) being a prime example. There is also a clear economic and tax compliancy benefit though such clarity, given the inadequacy of definitions has allowed for ambiguity over the applicability of betting tax (1%) or gaming VAT (23%) on various services. The Revenue Commissioners have stated that ‘Gaming’ is subject to VAT at the standard rate, currently 23% of the gross win (total bets placed less winning bets paid out). Accordingly gaming activities, such as roulette in gaming arcades and private member gaming clubs, is subject to VAT at 23%, whereas virtual roulette in a bookmaker’s premises is subject to a betting turnover tax of 1%.<sup>i</sup> Clearly this is in breach of the EU principle of fiscal neutrality which stipulates that goods and services that are identical or similar shall be treated in the same way for VAT purposes. The ECJ decision handed down in November 2011 (Commissioners for HMRC v Rank Group plc.) established that two products, which could be goods and/or services, will be similar if they are considered so by the consumer and meet the same needs of the consumer, as perceived by the average consumer. Further clarification

surrounding the principle of Fiscal Neutrality was also provided by the ECJ in their judgment when they determined that no account should be taken of the fact that two games fall into different licensing categories or are subject to different legal regimes relating to control and regulation. Accordingly, ‘gaming’ activities in bookmaker’s premises and online should be subject to the same tax treatment as that provided by other land based service providers. This lack of clarity has facilitated avoidance, with the consequence that the Exchequer is losing out on a potential revenue stream. Based on our knowledge of the sector, we estimate that the Exchequer is losing between €3 and €5 million per annum. It is worth noting that DKM in their report, an ‘Economic Assessment of a Regulated Gaming Sector’ estimate that a properly regulated land based gaming sector could generate an additional tax take of approx. €50 million per annum through payroll taxes, gaming tax, PAYE/PRSI, Corporation Tax, and commercial rates.

### **3- Duration of Casino License**

As profit margins in the casino sector are far lower than many assume, the proposed duration of a casino license needs to be lengthened from ten to fifteen years so as to enable operators to secure a return on the initial investment required to establish a casino. This will allow the casino sector to attract sufficient investment to facilitate the establishment of a casino offering that is comparable to that available in other regulated jurisdictions. Given the very high set up costs of fitting out a premises, purchasing appropriate equipment, and the highly labour intensive nature of the sector driving up operational cost, casinos typically achieve very modest net profit margins of between 3% - 4% thereby making it difficult to achieve a competitive return on investment in the shorter turn. We also have the additional problem of not being able to estimate the likely net profit margin as there are no clear indications of taxation levels, license fees, or stakes and pay-outs permitted.

#### **4- Casino Opening Hours**

The proposed restriction on opening hours for casinos from 11.00am – 4.30am, must be amended in recognition of the fact that land-based casino operators compete directly with their 24/7 online competitors. By restricting the opening hours of a casino as proposed, there is no benefit to the protection of the individual customer or society in general given that all forms of gaming and betting activity are available online 24 hours a day to anybody with internet access via mobile phones, PC, laptop or tablet. This paradigm shift in the accessibility to gambling services was acknowledged in the UK where they updated their legislation in 2005 to permit land based casinos to operate 24/7 alongside their online competitors if they so choose. Similarly, we disagree with the suggestion that casinos should be obliged to close two days in each calendar year, as again we would suggest that this is more about optics rather than being an effective tool to reduce the incidence of problem gambling.

#### 9.1.4 Irish Bookmakers Association (Sharon Byrne)



##### 1. Decline of Industry

The Irish retail betting sector has been in steep decline since 2008. This decline has continued since 2013, with approx. 200 betting shops closing since then. This has resulted in 2500 job losses since 2008. Apart from recessionary factors, Irish betting shops are trying to compete in an ever-evolving technical world, where online betting means there is more competition than ever. They are also trying to compete in a product driven industry where operating under archaic legislation impacts their ability to invest in their business and compete in an online world.

##### 2. Responsible Gambling

The Irish retail betting sector has been funding a National Gambling helpline for several years now, which is provided by an Independent charity – The Dunlewey Centre. It is the only service of its kind in Ireland, where qualified counsellors are available in the 32 counties, and provide free face-to-face counselling sessions for as long as is needed after the initial phone counselling sessions. With the assistance of The Dunlewey Centre, training days are available for all betting operators a couple of times a year, and they have helped and advised in developing our Social Responsibility Code of practice, which forms the basis of our staff training. Additionally, many operators have

introduced increased responsible gambling training to staff, so that they are trained to identify the indicators of potentially harmful play. In the larger operators, these efforts are supplemented by dedicated online responsible gambling teams, who can tailor messaging so that customers are receiving the best information in relation to RG tools, and identify those customers who might benefit from a responsible gambling interaction. The IBA and its members, have obtained agreement from the majority of online operators, to fund a new Independent Charity, which will be responsible for collecting and allocating funding from our Industry to the relevant qualified service providers. It will also be in the remit of the charity to seek to improve awareness, prevention and education about problem gambling. The charity will go live in Quarter 1 2017 with the first round of funding collection in place, and will be ready when the charity setup phase has been complete.

### 3. Underage Gambling

Some operators are allowed to offer their gambling products to persons under the age of 18. We would urge that this is reconsidered and that it is made illegal to offer any gambling product to persons under the age of 18. The betting shop sector introduced a 'Think 21' policy a number of years ago, and all staff are trained to ensure they question anybody that looks younger than 21. Any incidents of underage betting are recorded on an U18 log book, and shared with all members of staff in that shop, and their head office team. Most operators use an Independent 'Mystery Shopper' service now to test the effectiveness of this measure, and the IBA is in the process of brokering a deal to cover all betting shops by the Independent company providing these services

### 4. Illegal Gambling

The availability of other forms of gambling and gambling products which are unlicensed and unregulated is also having a detrimental effect on licensed operators. The instances of illegal gambling in Ireland have risen substantially over the last few years, despite best efforts by our sector to discourage and report. The prevalence of unlicensed bookmakers providing betting type services, screens and computers in public houses and other places has risen dramatically, and we would welcome specific regulation and enforcement to prevent same. Operators such as these pay no taxes, have no social responsibility measures in place and provide attractive opportunities for criminal activity.

## 5. Product Range

We have been trying to develop our product range for many years within the constraints of archaic legislation, as customers now have a large range of choices on their phone or on the internet which is shaping their preferences and expectations. Betting shops now offer a range of betting products to compete in this new world. However, the lack of enforcement and up to date legislation provides an opportunity for illegal operators to thrive and exploit any loopholes with technology and products.

## 6. Opening Hours

Irish Betting shops are now able to open until 10pm six nights a week, where traditionally they had to close at 6.30pm from September 1st each year until 30th April the following year. Increased opening hours have been a welcome development for our sector as customers are now able to bet in licensed premises with socially responsible control, and are not driven to unlicensed areas. Operators have increased their product ranges to fill this extended



trading period, and have done so while trying to abide by the current archaic legislation.

## 7. Online licensing

Since the 1st August 2015, online operators betting with Irish customers must be licensed in Ireland. This is a very welcome development, as it ensures that all operators have complied with the licensing requirements, are paying their betting tax and are practicing socially responsible betting procedures such as Self Exclusion, Time outs, Deposit limits, play limits, etc. We would welcome the introduction of the Gambling Control bill to ensure this level of detail is required from all gambling operators and not just the betting sector.

## 8. Enforcement

We believe that without appropriate and effective oversight, any legislation introduced will prove ineffective and in fact only harm responsible operators who are responsible and compliant. In the absence of appropriate enforcement mechanisms, which have proven difficult in other jurisdictions, well-intentioned regulation will only create incentives for rogue providers to operate outside the scope of the regulated, responsible regime we would like to see.

## 9. Tote & Lottery

We note that the Tote and National Lottery were left outside the scope of the Gambling Control Bill. We strongly urge this to be reviewed, as both offer a wide variety of gambling products, and operate in a relaxed regulatory environment with substantial betting opportunities at more premises for longer operating hours. In some cases, alcohol is available, or children are served at

counters where scratch cards are clearly visible and promoted. In an omnibus survey conducted by Behaviours and Attitudes at the end of 2014, it found that the primary channel for betting and gaming in Ireland is the local newsagent on the National Lottery. 82% of people gambling participated in the National lottery, compared to 26% who participated in a betting shop. It also found that the National Lottery was the most likely entry point for participation in gambling at 23%, with 15% saying a family fun bet on the Grand National was their first gambling activity.

## 9.2 Analysis of stakeholder opinions

Stakeholder opinions were varied, but across the body of responses a number of salient themes are emergent:

1. Several stakeholders express concern that bookmakers and other operators currently flout the law in offering services -- including casino-style gaming and roulette -- which are not permitted under current legislation. Stakeholders note that lack of clarity and enforcement in regard to prohibited forms of land-based gambling results in a loss of revenue for the Exchequer and presents a natural environment within which organised crime can flourish.
2. Multiple stakeholders emphasise that online gambling is of ever-increasing importance in the landscape of gambling and gaming, and further remark upon the speed with which developments in this sector occur.
3. Directly related to Theme 2, several stakeholders suggest that the land-based gambling sector is struggling in the current climate. They attribute this to three main causes: the wider economic climate; the growth of online competitors; and finally an increasingly restrictive legislative backdrop.
4. The stakeholders maintain that current legislation is wholly inadequate and archaic, particularly in the face of new technology (Theme 2) and regulatory loopholes (Theme 1).
5. Several stakeholders express concern that gambling may function in Ireland as a “gateway” vice for young people and other vulnerable populations, citing statistics drawn from other jurisdictions showing its

capacity to act as such. For this reason one stakeholder expresses concern regarding the omission from the 2013 Scheme of the National Lottery and Tote, citing statistics showing the popularity of each and suggesting that these forms of betting, while they largely escape notice by virtue of their ubiquity, are nevertheless avenues to other forms of gambling.

6. Two stakeholders note that developments in technology have allowed for a more intrusive style of advertising and promotion of gambling to occur.
7. All stakeholders acknowledge the primacy of harm reduction and social responsibility in respect of gambling operators' conduct. One stakeholder suggests that an extension to the proposed casino opening hours would act as a harm reduction measure insofar as round-the-clock gambling is already available at present via the internet.

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For the purposes of completing this report according to the methods outlined in the Research Approach (pp. 6-7), Work Package 1 has taken each of the above points into account.