AN INVESTIGATION OF EMPLOYEE AND CONSUMER PERCEPTIONS OF RESPONSIBLE INTERNET GAMBLING

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Glossary of Terms

Age Verification   Before allowing an individual the opportunity to gamble using the Internet, operators must a) carry out initial checks for all forms of payment (verifying that a person of that name and address holds that form of payment); and b) carry out additional checks for 'at-risk' forms of payment, including all forms of debit cards (more commonly issued to children) and e-wallets.

Deposit limit   Consumers must be able to track and/or limit the amount of money they are able to deposit onto the medium over a given period of time, excluding monies won during play.

Self-exclusion   There must be a facility to enable consumers to be rendered incapable of accessing gambling products and services at any time when the account holder has entered a self-exclusion agreement in respect of the specific operator. Activation and de-activation of such facility must require action by the site operator.

Abbreviations

CHIS   Coalition on Internet Safety
CSR   Corporate Social Responsibility
DSM-IV   Diagnostic and Statistical Manual of Mental Disorders
DSM-IV   Diagnostic and Statistical Manual of Mental Disorders, 4th. Edition.
eCOGRA   eCommerce Online Gaming Regulation and Assurance
GBGC   Global Betting and Gaming Consultants
KMO   Kaiser-Meyer-Olkin
OCB   Organisational Citizenship Behaviour
PCA   Principal Component Analysis
PGSI   Problem Gambling Severity Index

Acknowledgements

Abstract

Within the UK, the Gambling Act 2005 remains the primary piece of legislation that governs how the gambling industry is regulated. The Act established the following licensing principles upon which gambling practices should be based: that gambling should not be a source of crime or disorder, be associated with crime or disorder or be used to support crime; gambling should be conducted in a fair and open way; and children and other vulnerable people should not be harmed or exploited. Reflecting the general principles of corporate citizenship, the Gambling Act 2005 implies that those organisations which provide gambling products and services should integrate ethics and social responsibility within their operational and strategic frameworks and within their corporate governance. This thesis focuses on employee and consumer perceptions of responsible gambling in general, and specifically in terms of the utility of responsible gambling tools that are available to them. It reviews literature relating to corporate social responsibility and responsible gambling from a variety of perspectives ranging from those who propose that the ultimate responsibility rests with the consumer to those who recommend that gambling organisations should be able to demonstrate compliance with responsible gambling initiatives.

The primary data analysis is based on two studies: one focusing on responsible gambling perceptions of 17 employees from a leading Internet gambling provider; and a second study based on 425 consumer perceptions of responsible gambling provisions which were elicited using an Internet based questionnaire. The interviews were analysed using thematic analysis whilst statistical applications including linear regression and multinomial regression were used to analyse questionnaire responses.

The analysis highlights factors that undermine the current approach of responsible gambling which is based on the principle of self-identification, self-help and self-regulation by the consumer. For example, it proposes that employee and consumer perceptions of responsible gambling are based on the following four components: perceptions of potential conflicts of interest with a system; willingness to engage with responsible gambling tools; the perceived effectiveness of the responsible gambling systems and the level of responsibility associated with marketing activities. In addition, it distinguishes between financial motives in terms of those who gamble to earn income and those who gamble to win money and it highlights that human factors, such as the need for autonomy and mastery are as significant as social, financial, escape and arousal factors in influencing an individual's decision to gamble. The study recommends a review of the way in which gambling addiction is diagnosed and research and treatment are funded. This will include challenges for policy makers and providers of gambling products and services in terms of how responsible gambling may further be improved in the future.

Chapter 1   Introduction

1.1   Introduction

There is general agreement that there has been a significant growth in Internet gambling and that this growth is likely to continue as technological and Internet developments occur (Global Betting and Gaming Consultants (GBGC), 2007, 2009, 2010). Alongside the growing interest in Internet gambling has been an increased awareness of its negative aspects and the need to promote responsible gambling. Within this context customer service literature has placed significant importance on the relationship between customer contact personnel and the organisations customers and consumers. Although studies have been undertaken into the cause of gambling addiction in both employees and customers, no study has concentrated on establishing employee and consumer perceptions of responsible gambling and the factors that influence their approach to responsible gambling. As such, this study seeks to identify and evaluate operational aspects relating to responsible gambling practices that encourage and discourage positive responsible gambling behaviour by employees and consumers.

The chapter commences with an outline of the context, background and justification for the study. This is followed by the research aim, objectives and hypotheses. The chapter concludes by presenting a brief explanation of the methodology to be adopted, the expected contribution to knowledge and the structure of the thesis.

1.2   Context

Whilst Internet gambling has increased in significance and popularity over recent years it is still relatively under-researched. In part this may be due to the fact that there is no government funding in the UK for research into problem gambling or for education and training in responsible gambling, (Ranworth, 2012). The lack of funded research is despite acknowledgement that: there has been a significant growth in the Internet gambling market which has seen the number of sites increase from 15 online sites in the mid 1990's, to an estimated 2,500 sites today (Williams, Wood and Parke, 2012); there has been increased interest in the links between Internet gambling and problem gambling, (Vaughan Williams, Page, Parke and Rigbye, 2008; Griffiths 2009a, 2009b, 2012; Griffiths and colleagues 2009b, 2009c; and Wood and Williams 2011); and governments have shown an increased interest in their ability to generate additional revenue streams from gambling (Campbell and Smith 1998; Griffiths 1999, 2003; Hing 2003a,b; Eadington 2004; Schellinck and Schrans 2007 and Hancock, et al., 2008).

The increased interest in Internet gambling has been accompanied by an increasing awareness of the social responsibilities placed on gambling organisations and especially their responsibilities to vulnerable groups and those who are susceptible to develop problems with gambling (Griffiths, 2003, 2008, 2009b, 2012; Griffiths and colleagues 2007, 2009c; Hing 2003a,b; Eadington 2004; Messerlian et al., 2005; Rockloff and Dyer 2007; Sartor, 2007; Schellinck and Schrans 2007; Gambling Commission 2008, 2012; Hancock et al., 2008). Such an awareness of the social responsibilities of organisations to vulnerable groups have also been extended to other sectors of the e-economy including Internet shopping, Internet gaming and Internet pornography. Whilst these sector have not been examined within this study there are similarities between them and the Internet

gambling sector in terms of: extreme use of the internet for shopping, gaming, pornography and gambling may adversely interfere with an individuals daily life, (Hauge and Gentile, 2003; Black, 2007; Benson 2008), and that in some cases the individuals behaviour is subject to a vicious cycle of escalation, where individuals experience the highs and lows associated with other addictions. In addition, Internet based shopping, gaming, pornography and gambling include the isolation of the individual and the behaviour becoming a more secretive act, (Catalano and Sonenberg, 1993). Benson (2008) also suggests that where behaviours are associated disorders such as anxiety, depression and poor impulse control individuals are likely to treat symptoms of low self-esteem through compulsive behaviours. As such, the outcomes from this study may also be applicable to other sectors of the e-economy where addiction may be created. For Griffiths (2010, p36) this is where there are opportunities for "constant rewards and reinforcement" and where the following components of addiction can be developed and maintained: salience, mood modification, tolerance, withdrawal, conflict, and relapse.

The increased significance placed on gambling operators to promote and manage responsible gambling practices has taken place in the UK within an era where the role of business, in conjunction with government, is seen to include an obligation as a guardian and guarantor of citizenship (Cochran and Wood 1984; Wood 1991; O'Dwyer 2003; Meehan et. al., 2006; and Cochran 2007). This means that business organisations are accountable for the resources they use and for minimising their impact on society in relation to current and future products, markets and stakeholders. For gambling organisations this obligation is manifested in its legitimacy as a leisure activity where it seeks to satisfy multiple stakeholder needs within an environment of responsible gambling.

Responsible gambling obligations between a gambling organisation and its stakeholders are, at a minimum, reflected in the implied and expressed framework of regulation and control which focuses on self-regulation at an industry level (Kingma, 2004; Power, 2004 and Hancock et al, 2008). Whilst this regulatory framework, as it relates to the gambling industry through the Gambling Act 2005, does not establish a definitive list of stakeholder obligations, it is founded on the following principles: preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime; ensuring that gambling is conducted in a fair and open way; and protecting children and other vulnerable people from being harmed or exploited by gambling, (Gambling Commission 2008, 2012). This suggests that within the framework of responsible gambling those who provide and use gambling products and services have, at a minimum, an obligation to ensure that what they do and, equally as important, what they fail to do is not irresponsible or the cause of harm. Equally, gambling organisations need to determine if their products and services have addictive aspects and if they do, they need do to establish where the obligations to promote and manage responsible gambling lies, (Young 1999; Griffiths and Parke 2002; Griffiths 2003, 2005; 2009a; and Cooper 2004).

Within Internet gambling the consumer-employee relationship is critical as employees have an operational responsibility for promoting and implementing responsible gambling systems. The way in which consumers perceive that employees fulfil this responsibility may affect the consumers approach to responsible gambling and it may undermine the implicit trust that underpins all consumer transactions (Giddens 1991, 1994; Griffiths 1999, 2003, 2009b, 2012; Griffiths and colleagues, 2002, 2009c, 2009c; 2012 Hing and McMillan 2002; Hing 2003a,b; Eadington, 2004; Messerlian, Dervensky and Gupta, 2005; Parke, Griffiths and Parke, 2007; Rockloff and Dyer, 2007; Sartor, 2007; Schellinck and

Schrans 2007; Gambling Commission 2008, 2012; Hancock, Schellinck and Schrans, 2008; Hing and Breen 2008 and Gainsbury, Parke and Suhonen, 2012). As such, the purpose of this study is to evaluate critically factors that may affect both employee and consumer perceptions of responsible gambling and how providers of Internet gambling products and services can support and encourage responsible gambling behaviour in their consumers and staff.

1.3   Background and previous studies

This study is rooted in corporate social responsibility (CSR) and the initial part of the discussion will review the changing role of CSR from a philanthropic activity to one where organisations have a key responsibility for the concept of citizenship and the social reporting of activities they undertake (Hing and McMillan 2002; O'Dwyer 2003; Matten and Crane 2005; Meehan, Meehan and Richards, 2006; Griffiths 2009b, 2012; and Blaszcznski, Collins, Fong, Ladouceur, Nower, Shaffer, Tavares and Venisse, 2011). This discussion will consider the concept of a gambling organisation as a 'corporate citizen'; the obligation that this places on them with specific reference to key stakeholders; and the factors that influence the relationship between the employing organisation and its employees and consumers in meeting its corporate social responsibilities for responsible gambling.

Given the significance of the consumer-employee relationship in service delivery systems, this study will specifically focus on how factors affect consumers and employees in terms of their approach to encouraging and maintaining responsible gambling behaviours. In terms of consumers, the majority of previous studies on responsible gambling have

concentrated on the problems they experience as a result of developing problems with their gambling, (Griffiths, 1999, 2003, 2008, 2009a, 2009b, 2012; Griffiths and colleagues 2002, 2009a, 2009b; Hing 2003a,b; Eadington, 2004; Messerlian, et al., 2005; Rockloff and Dyer 2007; Sartor, 2007; Schellinck and Schrans 2007 and Hancock, Schekkinck and Schrans, 2008). In relation to consumer attitudes towards responsible gambling tools and their way they use such tools, Griffiths, Wood and Parke (2009b) carried out a study for Svenska Spel where they examined consumers attitudes towards using social responsibility tools within PlayScan. Whilst they highlighted the positive approach that consumers had towards responsible gambling tools, they raised concerns over the voluntary requirement for using such tools, the relatively low uptake in using the tools when they are voluntary and they questioned whether those in most need of the self-help tools actually use them. This study will develop on some aspects of the work of Griffiths et al., (2009b) by determining employee and consumers general perceptions of current responsible gambling tools and the factors that motivate and inhibit them from engaging with such tools.

The main peer reviewed articles relating to employees of gambling organisations include the work of Collachi and Taber (1987); Shaffer, Vander Bilt and Hall (1999); Shaffer and Hall (2002); Hing 2003b; Hing and Breen (2008) and Griffiths (2009a). As the majority of these studies have concentrated on assessing gambling addictions within those who work for gambling organisations and the effect of gambling within the workplace in general, no research has been undertaken on how an employee's personal approach to responsible gambling affects the way they promote responsible gambling to their consumers. As such, this study will seek to fill this gap by determining the factors that encourage or inhibit employees from promoting and maintaining responsible gambling practices.

The focus of this study will be to develop on relevant secondary research, and to evaluate responsible gambling strategies and practices that have been adopted by UK Internet gambling providers. Based on one UK Internet gambling organisation, an exploratory study will be undertaken of employee perceptions of the meaning of responsible gambling within their organisation and sector; their evaluation of current practices; and establishing their perceptions of stakeholder responsibilities in promoting and maintaining responsible approaches to gambling. Based on these findings a second study will seek to determine consumer perceptions of current responsible gambling practices and tools, and the factors that inhibit or motivate them to gamble responsibly. The second study will involve consumers who use products and services from a variety of Internet gambling providers. Emphasis will be placed on establishing consumer and employee perceptions of responsible gambling tools and practices and highlighting the factors that encourage and discourage them from adopting positive responsible gambling behaviour. In turn this will enable operational policies to be proposed to operators and policy makers.

1.4 Justification

The increasing popularity of Internet gambling has been accompanied by the development of responsible gambling strategies which are based on the principle of 'self-regulation' at an industry level and 'self-identification', self-help' and 'self-regulation' by the consumer at an operational level, (Hansen, 2003; Kingma, 2004; Power, 2004; Blaszczynski and colleagues, 2008, 2011; Hancock et al, 2008). This places increased emphasis on the level of trust between customer contact employees and consumers as a consumer must identify their problem and then seek help from the organisation through its personnel. As such, a distinguishing aspect of this research is that it seeks to evaluate employee and consumer perceptions of current responsible gambling practices and the factors that motivate and

inhibit them from engaging and promoting such practices. In addition, this study is different from previous studies as it evaluates the extent to which an employee's and consumer's personal beliefs and behaviour influence their approach to responsible gambling. From such evaluations recommendations will be made to improve responsible gambling practices within the Internet sector of the gambling industry.

1.5   Research aim, objectives and hypotheses

The aim of this study is to investigate employee and consumer perceptions of responsible Internet gambling practices. In order to achieve this aim, the objectives of this study are to:

a.   Evaluate critically the strengths and weaknesses that employees and consumers perceive characterise the current systems of responsible gambling.

b.   Identify whether employees require an additional duty of care relating to responsible gambling.

c.   Evaluate critically the role that employees should undertake in promoting and implementing responsible gambling.

d.   Identify factors that employees and consumers of online gambling venues perceive inhibit and motivate them to act in a socially responsible way?

e.   Identify factors which predict Problem Gambling Severity Index (PGSI) as a measure of problem gambling.

f.   Propose how responsible gambling may be managed more effectively.

Based on these objectives the study seeks to determine the following hypotheses:

1.   Employees and consumers both perceive the current system of responsible gambling to be fair and transparent.

2.   Employees require additional duty of care in terms of training and monitoring given their close proximity to gambling products and services.

3.   Employees feel that they are equipped with the knowledge and skills to fulfil their responsible gambling obligations to their requirements.

4.   Personal characteristics of the employee and consumer are influential in governing their approach to responsible gambling.

1.6   Anticipated contribution to knowledge

Contributions from this study can be divided into academic and applied aspects. Academic contributions are generally associated with amending models of corporate social responsibility and responsible gambling so that they acknowledge the significance of an employee's personal beliefs and behaviour in influencing their approach to work and their interactions with consumers; they acknowledge that there are differences in a consumers gambling behaviour based on the motive 'to win money' and motives associated with the need 'to earn income'; and they acknowledge that human factors, such as the need for autonomy and mastery are as significant as social, financial, escape and arousal needs in influencing gambling choices. An additional academic contribution is that employee and consumer perceptions of the integrity of responsible gambling systems are dependent on the following four factors: perceptions of potential conflicts of interest with a system; willingness to engage with responsible gambling tools; the perceived effectiveness of the

responsible gambling systems and the level of responsibility associated with marketing activities.

In terms of applied contributions this study has identified the need for external audit and accreditation to promote minimum standards for operators and the licensing of customer service staff in a similar way those dispensing alcohol are licensed. In addition, this research has highlighted a number of operational processes that would improve responsible gambling including: the use of standard terms and conditions; the use of standard images for responsible gambling tools on all websites in a similar way that warnings on cigarettes are standardised; and placing buttons for terms and conditions and responsible gambling tools in a similar position on all Internet websites.

The research recommends the need to finance research and treatment of gambling addiction in a similar way to drug addiction and alcohol addiction, thus removing the need for such activities to be dependent on a voluntary levy from within the industry.

1.7   Methodology

The nature of a research study is the main factor that should dictate the methodology that should be applied in the collection and analysis of data, (Saunders and colleagues, 2007, 2012). This study aims to investigate employee and consumer perceptions of responsible Internet gambling practices. To achieve this aim, two separate studies will be undertaken to collect and analyse the views of consumers and employees of Internet gambling organisations. The aim of the first study is to establish employees perceptions of responsible gambling practices employed in the Internet sector of the gambling industry.

This will be achieved through the use of semi-structured interviews where the interview questions will, in part, be based on literature. The study will be based on the critical realism approach as Saunders, Lewis, and Thornhill (2007, 2012) and Collis and Hussey (2008) suggest that the critical realism approach is suitable to research which deals with attitudes, perceptions and beliefs and research involving business and management. In addition, the critical realism approach is appropriate to this study as it is an exploratory study that seeks to provide descriptions from stakeholders about their understanding of their natural settings (Patton 2002). The study also applies both a deductive approach and inductive approach. The former is applied in establishing the factors which literature highlight as inhibiting or motivating employees of Internet gambling organisation to engage in responsible gambling activities and the inductive approach will be used in applying employee and consumer responses to the topic and achieving the aim of the study.

The data from the employee study will be collected by using a case study approach based on a leading international Internet gambling organisation that is based in the UK. Although single case studies are less common than multiple case studies and have a number of disadvantages in terms of generalizability, as outlined in section 4.5.1, they are suitable where the issues being researched are 'real life' as opposed to issues that are purely academic, (Yin, 2003. 2009). In addition, they are suitable in gambling research given the difficulty in reaching gambling populations, (Collis and Hussey, 2008; Griffiths 2009a). The use of a single unit case study approach in study 1 is further justified as Saunders et al., (2007, 2012) propose that such case studies allow for a deeper understanding of a subject area that is specific to a given context and Creswell (2003)

suggests that the results from single case studies are not diluted as may occur in the use of multiple case studies.

In terms of actual data collection techniques, a semi structured interview will be used. The main advantage of this is that it will enable meanings that interviewees give to specific practices and events to be established, (Saunders et al., 2007, 2012).

The second study will be based on the positivist approach using a semi-structured questionnaire. The questionnaire will be hosted using SurveyMonkey and the use of this medium has been argued by Wood et al., (2007) and Griffiths et al., (2009a) as being an appropriate method to collect data on Internet gambling behaviour. The use of a positivist approach in study 2 is justified in terms of the objectives of the study and the online questionnaire was designed acknowledging the advantages and disadvantages of using questionnaires to collect data raised by Hussey and Hussey (1997), Saunders et al., (2007, 2012) and Milne (2010).

The participation rate was maximised by offering participants the opportunity to win an i-Pad 2. The use of non-material (additional information sources on responsible gambling) and material (potential to win an i-Pad2) incentives were seen to maximise the response rate. Griffiths (2009a) highlighted that where non-monetary incentives are offered they have negligible effects on encouraging gambling by those who participate and as such they are a legitimate and non-addictive incentive to improve response rates in gambling research.

1.8   Validity and reliability of study 1 and 2

The lack of an agreed definition of validity has resulted in it being divided into a number of different components. For example, Saunders et al., (2007, 2012) classified validity into internal and external validity categories where internal validity relates to how confident one can be on the findings in a research project whereas external validity assesses whether the research findings can be applied to other contexts or other groups of people in addition to the people and context in which the research was conducted.

Although there is no universally agreed definition of reliability, a common theme in most definitions is the extent to which the findings of the research can be consistently repeated. For Kvale (1995) and Saunders et al., (2007, 2012), there is no absolute way of determining that validity and reliability exists in qualitative studies as it is the participants who determine the 'truth' of any research process. They further suggest that given the focus of qualitative research is human beings and human activity, it is unlikely that absolute certainty in knowledge will ever exist.

In order to improve the validity and reliability of the qualitative study undertaken in study 1, the following four principles, proposed by Lincoln and Guba (1985) were used to evaluate the study: 'credibility' (how truthful particular findings are); 'transferability' (the extent to which findings are applicable to another setting or group); 'dependability' (the consistency and reproducibility of the findings) and 'confirmability' (neutrality of the findings). The application of these principles is outlined in sections 4.6.1.

A number of models have been proposed to improve validity in quantitative research including face validity, (where the questions posed relate to the subject and are viewed as an acceptable way of collecting data for a specific topic.); criterion related validity, (where the data collection and analysis method(s) have the ability to deliver the same results as an established method); content validity (the extent to which the content of the data collection tool measures the variables); and construct validity, (the extent to which theoretical relationships between variables are met). The application of these principles is further developed in section 4.6.2.

In general the validity and reliability of this study were increased by the use of the following techniques:

a. Based on the principles of critical realism, a mixed approach to data collection, including a semi-structured interview and a semi-structured questionnaire, was adopted. This approach ensured that any disadvantages associated with a specific method were limited (Collis and Hussey, 2008).

b. Data collection and analysis techniques in study 1 were subject to approval by the University of Salford Ethics Committee and the participating organisation.

c. Data collection and analysis techniques in study 2 were subject to approval by the University of Salford Ethics Committee and the Manchester Evening News who promoted the survey on their webpages.

d. All interviews were recorded and the transcripts were validated independently to ensure they reflected the content of the interview.

e. The questionnaire was subject to protocol analysis and two pilot studies before it was presented.

f.   Statistical analysis of questionnaire responses was undertaken.

g.   The use of stakeholders from a variety of academic, industry and support agencies were on the supervisory team.

h.   Triangulation of responses between the literature review, study 1 and study 2

1.9   Structure of the thesis

This thesis will be presented in the following format:

1.9.1   Introduction

This chapter provides a justification for the study, the aims, objectives and research questions. A summary of the proposed methodology is included and the aims of each of the chapters will be outlined.

1.9.2   Literature review
Chapter 2   Corporate Social Responsibility
& Chapter 3   Key Stakeholder Obligations for Responsible Gambling

The literature review is divided in to two chapters. The first, chapter 2, evaluates the development of CSR from a philanthropic activity to one where all organisations are responsible for the concept of citizenship and the social reporting of the activities they undertake (O'Dwyer 2003 and Meehan et al., 2006). This will consider the concept of a gambling organisation as a 'corporate citizen', the obligation that this places on them with specific reference to key stakeholders and the factors that influence the relationship between the employing organisation and its employees and consumers in meeting its corporate social responsibilities for responsible gambling. Chapter 3 concentrates specifically on responsible gambling as a factor that distinguishes corporate social

responsibilities of gambling organisations from other organisational types. This chapter evaluates the corporate social responsibilities of the government, consumer, employee and gambling organisation. The chapter concludes by linking contemporary approaches to CSR with the notion of organisational citizenship behaviour and highlights the implications that these developments have for stakeholder responsible gambling obligations.

1.9.3   Chapter 4 Methodology

This chapter will outline and justify the research philosophy and strategy adopted in this research. It will assess the strengths and weaknesses of each of the methods used to collect and analyse data and evaluate the implications of the chosen research methods on the validity and reliability of the thesis.

1.9.4   Chapter 5 Results and Discussions – Study 1

The results and discussions relating to the first study will be presented in this chapter. It will contain an introduction; brief explanation of the methodology employed and a review of the results obtained from the employee interviews. Where appropriate, comparisons will be made with the literature review.

1.9.5   Chapter 6 Results and Discussions – Study 2

The results and discussions relating to the second study will be presented in this chapter. It will contain an introduction, a brief statement of the methodology used and a review of the

results obtained from the consumer online questionnaire. Where appropriate, comparisons will be made with the literature review.

1.9.6   Chapter 7 Discussions

This chapter will provide a discussion of the key points raised in the two studies. Where appropriate reference will be made to secondary data and a plenary section will provide a general overview of how the studies have contributed to knowledge.

Chapter 2   Corporate Social Responsibility

2.1   Introduction

With increased opportunities and access to gambling, has come increased responsibilities for those who provide gambling services to ensure that they act in a responsible way and recognise that they have a role to play in ensuring that they do not exploit their consumers, (Griffiths 1999, 2003, 2008, 2009a, 2009b, 2012; Hing and McMillan 2002; Hing 2003a,b; Eadington 2004; Smeaton and Griffiths 2004; Schellinck and Schrans 2007; Hing and Breen 2008; Hancock et al., 2008; Griffiths et al., 2009b; Griffiths, Wood and Parke 2009c; Gainsbury et al., 2012). This responsibility on gambling providers comes in an era of general CSR where the state and all organisations have a responsibility for the concept of citizenship and the social reporting of their activities, (O'Dwyer 2003, Matten and Crane 2005; Meehan 2006).

Although CSR has no universally accepted definition, at its basic level it is about a business behaving "ethically", (O'Dwyer 2003, Matten and Crane 2005; Meehan 2006). This is important for gambling organisations where there is increasing pressure for such organisations not only to act in a socially responsible way but for them to be perceived as acting in that way due to the potentially addictive nature of the products and services they offer. As such, the focus of this chapter is to explore what is meant by CSR with the implications for responsible gambling policies and practices being developed in subsequent chapters. The chapter will trace the development of CSR from the 1960's through to the present day with particular focus being placed on the factors that affect employer and employee behaviours. The way that organisations interpret such obligations

and expectations of their behaviour will be reviewed with specific reference to the obligations that the concept of the "corporate citizen" places on gambling organisations in introducing and managing prevention and harm minimisation strategies.

2.2   Developments within Corporate Social Responsibility

Models of CSR that emerged in the 1960's typically stressed organisational responsibilities above and beyond the organisations economic and legal obligations, (Carroll 1979, Waddock 2004, Matten and Crane 2005). Within such models, emphasis was placed on voluntary and philanthropic acts by business organisations which sought to reduce the impact of social problems and/or benefit disadvantaged groups identified by the organisation. Carroll's (1979) pyramid of CSR, as outlined in Figure 1, reflects this trend in that it implies responsibilities move form economic and legal responsibilities through to ethical and philanthropic responsibilities.

Figure 1 Carolls Pyramid of Corporate Social Responsibility
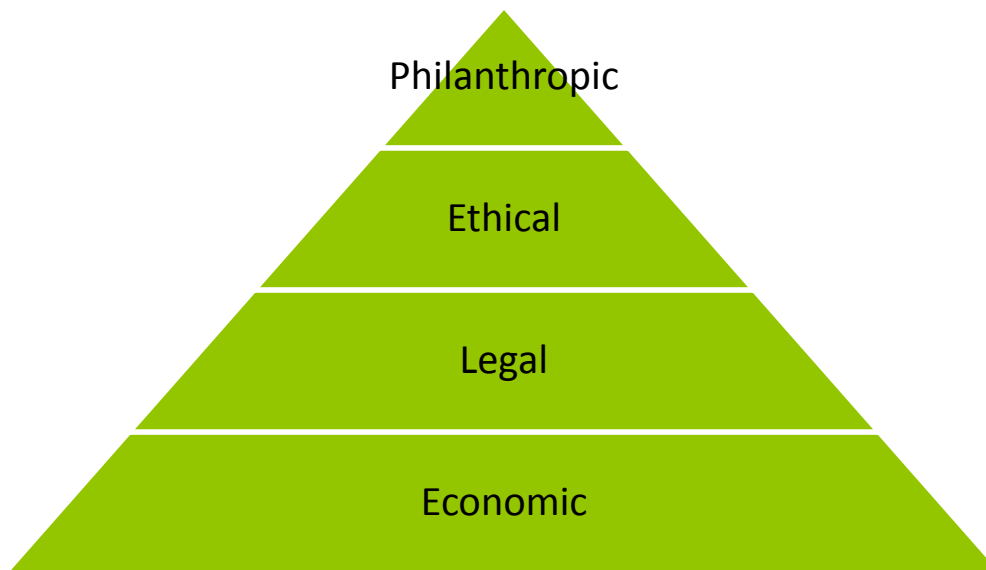
Source: Carroll, A.B., (1999) The Pyramid of Social Responsibility

The pyramid was subject to criticism partly because it implied a hierarchy similar to that of Maslows 'hierarchy of needs' with an organisations economic and legal responsibilities requiring satisfactory outcomes before ethical and philanthropic needs could be met. The relationship between elements was later represented as a Venn diagram by Schwarz and Carroll (2003), see Figure 2, as this enabled the interrelated nature of economic, legal and ethical factors to be represented.

Figure 2 Venn Diagram of Corporate Social Responsibility
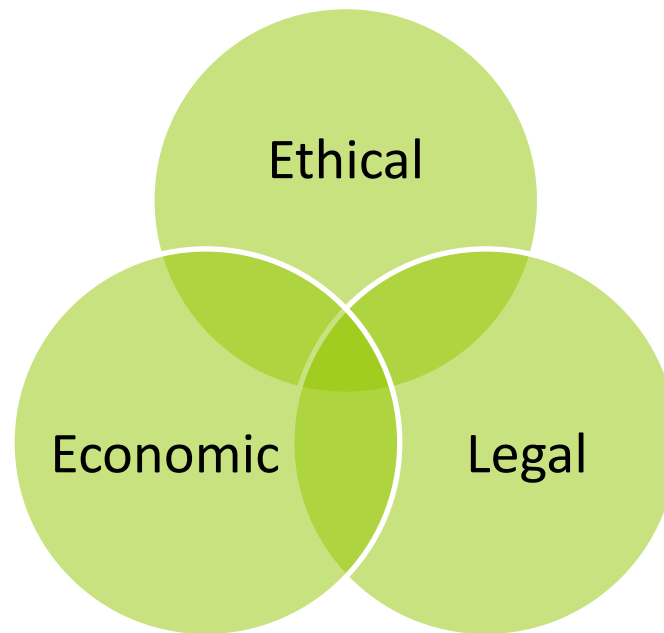
Source: Schwarz, M.S. and Carroll, A.B., (2003) Corporate Social Responsibility: a
               three-domain approach".

The model proposed by Schwarz and Carroll (2003) removed the philanthropic category as

it suggested that organisations have a choice whether or not to engage in such activities.

For Schwarz and Carroll (2003) organisations no longer have this option as they suggest

that such activities are a prerequisite for business survival. This modification reflects other

views of CSR which suggests that an organisation's social responsibilities should be

integrated within its strategies as opposed to being imposed upon them, (O'Dwyer 2003;

Power 2004; Carmeli and Gefen 2005; and Cochran 2007).

Models of CSR in the 1970's changed emphasis from one where business organisations

had to demonstrate their socially responsible actions to the wider society to one where

organisations were required to be more socially responsive. This new era required

organisations not only to anticipate changes in their environment but also to promote

changes to their products and practices in response to such changes. Frederick (1978,

1986 and 1994), as cited in Cochrane (2007), classified the former as CSR1 and later as CSR2. O'Dwyer (2003) saw this change from CSR1 to CSR2 as placing greater accountability on organisations and specifically on managers to be more accountable for their actions, omissions and decisions. He suggested that such accountability was evidenced in the auditable social accounting practices and documents of organisations. Based on his work with managers in the exploration/extractive, printing, retail and leisure sectors he concluded that the nature of an organisations business was a driving force which encourages them to engage in CSR. This may be as a result of the need for organisations to be more accountable for the resources they use and for the impact that their business operations have on the environment in which they exist. For gambling organisations, which form part of the retail and leisure sectors, being perceived as acting socially responsibly may be an essential part of their strategy as the nature of their business could include factors associated with gambling addiction and the potential harm caused by addiction, (Griffiths 2005, 2009b, 2012; and ; Gainsbury et al., 2012). In order to be perceived as 'legitimate' businesses which are socially responsible, it may be implied that gambling organisations must be perceived as engaging in strategies and practices that stakeholders perceive are socially responsible, (Harridge-March, 2006; Griffiths, 2005, 2009b, 2012; Gainsbury et al., 2012). The importance of management accountability and the perception of management decisions by stakeholders were also highlighted by Meehan et al., (2006) as being a characteristic of the change from CSR1 to CSR2.

Within the 1980's and 1990's CSR models emphasised social performance and the joint responsibilities of business and society in being guardians and guarantors of corporate citizenship. For Matten and Crane (2005) the emergence of corporate citizenship resulted from the impact of globalisation which resulted in organisations as well as governments

taking responsibility for the concept of 'citizenship'. This responsibility for organisations to engage in and protect corporate citizenship was seen by O'Dwyer (2003) and Meehan (2006) as requiring them to manage their actual performance and the way that performance was reported and perceived by stakeholders. Whilst O'Dwyer (2003) referred to this practice as 'management capture', reflecting the view that managers of businesses were responsible for deciding the level of its social response which was likely to be financially influenced, Meehan et. al., (2006) suggested that this change in emphasis required an organisation to integrate their principles and processes of corporate social responsiveness within their actual behaviour. Within the gambling industry this is reflected in the requirement for organisations to have codified policies and procedures relating to responsible gambling and for actual behaviour to be audited against such policies. In doing this they should be able to demonstrate how their policies, processes and actions are achieved on an individual, unit and organisational level. For organisations such as those involved in gambling where legitimacy is important, this stresses the need not only to engage in socially responsible strategies but to ensure that stakeholders such as employees, consumers and the wider society perceive the organisation is engaging in such strategies, (Griffiths 2009b and Gainsbury et al., 2012). For Meehan et al., (2006) this engagement also extends to other organisations that the gambling operation is linked to, including, sister companies and suppliers.

In the first decade of the twenty first century, Meehan et al., (2006) proposed a 3C-SR model in which 'corporate resources' provide a vehicle to develop corporate responsibilities as a strategy which delivers corporate citizenship. They defined social resources as consisting of the following interrelated elements:

i.	Ethical and social commitments. These commitments are reflected in the mission of the organisation and reflect the standards that the organisation aspires and subscribes to. They provide stakeholders with a benchmark against which to judge the effectiveness of the business in meeting its stated aims and thus its legitimacy.

ii	Connections with partners in value networks. Meehan (2006, p394) suggests that value is not created in isolation but from a 'value creating system' and that "it follows from this contemporary notion to "value" creation that any commitment to a socially orientated business model is doomed to failure if a strategic approach across the value constellation is not embraced."

iii	Consistency of behaviour over time to build trust. This refers to a consistency in approach and behaviour by all stakeholders in the 'value creating system'. It implies a stakeholder approach to strategy development and implementation if an organisation is to be perceived as being legitimate. Lafferty, Goldsmith and Newall, (2002) suggested that such social networks imply that failure by any one of the organisations in the network to conform to an agreed standard will have implications for their perceived credibility and for the perceived credibility of those associated with it.

Developing the theme of corporate citizenship and governance, Wilson (2000), O'Dwyer (2003), Kingma, (2004), Power (2004) and Cochran (2007) all conclude that organisations have obligations that extend beyond their current and immediate domain and beyond its current stakeholders. For Cochrane (2007) this is captured in organisational strategies which emphasise resource utilisation and sustainability as reflected in the emphasis in

social venture capitalism, community investment and social entrepreneurship. Also highlighting the notion that organisations have wider obligations beyond their current domain and stakeholders, Wilson (2000), suggested that with greater freedom for corporations comes greater responsibility and higher expectations. This in turn necessitates the integration of ethics and social responsibility within an organisations strategic framework and its corporate governance which outlines the rights and expectations of stakeholders, (Kingma, 2004 and Power, 2004). To achieve this aim Wilson (2000), Griffiths (2005, 2009b, 2012), Gainsbury et al., (2012) and Zborowska, Kingma and Brear, (2012), propose that organisations must behave in an acceptable manner; be legitimate in terms of providing goods and services that are needed by society and be active in helping to solve social problems rather than the seeking to maximise the organisations profits. As such, profit within contemporary models of CSR is important but it is not the main purpose of the business existence. This view is not universally accepted as O'Dwyer (2003) concluded that it is businesses who decide the level of its response to social problems and economic issues take precedence. As such, there "is a tendency for managers to interpret CSR in a constricted fashion consistent with corporate goals of shareholder wealth maximisation", (O'Dwyer 2003, p523). Supporting this view, Meehan et al., (2006) conclude that despite the increased prominence of the corporate citizen in contemporary literature, in general, managers still prefer the narrower economic orientation of CSR.

In demonstrating the viability of corporate citizenship, organisations must be aware of what their stakeholders expect of them. Consequently, those who manage organisations must develop the concept of citizenship within their corporate governance and this must be perceived by stakeholders if the organisation is to be regarded as legitimate and socially

responsible, (Wilson 2000, O'Dwyer 2003; Kingma, 2004; Power, 2004; Cochran 2007; Griffiths 2009, 2012; Griffiths and colleagues 2009b, 2009c, 2012; Gainsbury et al., 2012; and Zborowska et al., 2012). For the gambling industry this creates a need for organisations to have valid and reliable policies and practices for dealing with responsible gambling and for them not to be perceived as maximising their profits at the expense of their consumers and other stakeholders. This need for legitimacy, combined with the high consumer/employee contact requires gambling organisations to understand the relationship between the social responsibility expectations that stakeholders have of them and the significant role that employees have in satisfying such expectations. The role of employees is further highlighted as significant as responsible gambling strategies place emphasis on the consumer to identify with an employee that they require help (Hansen, 2003; Blaszczynski et al., 2008; and Hancock 2008).

2.3   CSR developments for those providing gambling products and services

Although there are no universally agreed models of CSR for those providing gambling products and services, key CSR practices in the gambling sector have concentrated on managing the negative aspects of gambling activity, the development of self-regulatory standards and managing 'reputational risk' as a means of promoting the legitimacy of the gambling industry, (Zborowska et al., 2012). This view was previously outlined by Kingma, (2004), Power (2004), Cosgrave, (2006) and Gainsbury et al., (2012) who suggested that as markets, such as gambling, become legal and more liberal they become more accepted. Where this occurs, they suggest that the regulatory focus shifts from a rule-based system to a risk management based system where the focus is on the implications of the commercial activity, rather than on constraining and controlling the operation. For

Power (2004) the risk management approach to regulation focuses on the undesirable side effects of activities and the management of risks forms part of internal management responsibilities. He suggests that this approach represents a new phase in corporate governance where internal controls become as important, and sometimes takes precedence over, external controls and regulations. In such a system, self-regulation and compliance to organisational standards forms the foundation of audit tools used by external control agencies.

For Hutter (2006) 'enforced self-regulation' is evident in the gambling industry as government broadly outlines standards which the private sector are expected to meet. As such, private sector organisations and professional bodies are co-creators of risk management and regulation systems where they develop risk-management systems and the rules to be used to secure and monitor compliance, as well as the process that deal with non-compliance. In such a system operational compliance is the responsibility of the organisation whilst regulatory officials oversee the process.

2.4   Conclusions

From the above discussions it is evident that there is no universally accepted definition of CSR and this in part has resulted in a lack of agreement in respect of the actual role and responsibilities that organisations have to current and future stakeholders. Even where organisations believe they have a social responsibility, there is disagreement on the form that this responsibility should take. Organisations and academics appear to have adopted a variety of approaches which at one extreme sees businesses being frustrated and constrained by unnecessary obligations that have resource implications, whilst at the other

extreme is the approach where organisations have a duty to anyone who is "touched" directly or indirectly by their activities. Within the central ground is the view that organisations can be commercially affected by the approach they take to socially responsible practices. As such, managers must determine the organisations socially responsible practices and the way it is communicated to stakeholders so that it is consistent with their corporate goals which often have an economic emphasis, (O'Dwyer 2003). Despite such differences in approach to CSR, what all approaches acknowledge is that society and/or organisations have a responsibility to protect vulnerable groups to ensure that they are not exploited by any organisation. This is one of the fundamental principles of the Gambling Act 2005.

Contemporary models of CSR, such as those proposed by Hancock et al., (2008), view CSR as being about more than what the organisation invests in a community. It involves an assessment of the way an organisation rules itself in terms of its regulations and corporate governance. This approach, which is referred to as corporate citizenship, implies that organisations have a moral and ethical responsibility to help solve social problems as they exist and use resources from an environment. It also implies that managers are today aware of the need for them and their agents to act in a socially responsible way. Consequently, managers need to be aware that it is in their commercial interests and the commercial interests of their organisation to engage in CSR. This means that it is not only important for an organisation to engage in responsible strategies but also to be perceived as engaging in such activities.

2.5   Implications for this study

For gambling organisations one aspect of CSR relates to responsible gambling and problem gambling.   Where gambling has become more acceptable the focus of the discussion has shifted away from whether or not individuals should gamble to one that concentrates on distinguishing between acceptable and unacceptable forms of gambling, (Black and Ramsay 2003). This change in emphasis is reflected in contemporary views of CSR which emphasise the role of business, in conjunction with government as guardians and guarantors of citizenship. This joint responsibility for citizenship is reflected in the practice of viewing problem gambling as a public health issue which places greater emphasis on strategies which stress improved social responsibility and the provision of services to assist the individual gambler by gambling providers, (Hing and McMillan 2002; Hing 2003a,b).   Within the next chapter specific reference will be made to responsible gambling strategies adopted by gambling providers and how they embed principles of CSR and citizenship within their operation and governance given the potentially addictive nature of the product they offer.   The chapter will also review the responsibilities that key stakeholders have for each other in developing, managing and delivering responsible gambling practices.

Chapter 3   Key Stakeholder Obligations for Responsible Gambling

3.1   Introduction

Just as there is no universal definition of problem gambling or responsible gambling there is no universally accepted way of implementing it. This problem is further compounded as the Gambling Act 2005 fails to provide definitions or minimum standards and practices that could be applied to the gambling industry in the UK. In addition, the problem of researching and treating those with problem gambling is intensified because unlike drug addiction or alcohol addiction, gambling addiction within the UK is not recognised as a public health issue, (Ranworth, 2012). As such, there if no public finance for research and education into responsible/problem gambling and there is limited NHS funding for treating those with gambling addiction. Such activities are financed by a voluntary levy within the industry which amounted to £5m in 2011, (Ranworth, 2012). For Orford (2012) this is inadequate as the industry receives over £150m per year from problem gamblers. Griffiths (2012a) further suggests that with only one NHS clinic for gambling addiction, there is insufficient provision for those suffering with problems associated with their gambling. He further suggests the GP's are ill equipped to deal with gambling addiction.

Although gambling organisations have similar social responsibilities to other non-gambling organisations, it is the potential addictive and harmful nature of their products which primarily distinguishes them from other business organisations. This requirement has resulted in a review of gambling from a variety of perspectives including the addictive nature of gambling products (Griffiths 1999, 2003, 2008, 2009a, 2009b, 2012; Griffiths and Parke 2002; Hing 2003a,b; Eadington 2004; Smeaton and Griffiths 2004; Schellinck

and Schrans 2007; Hancock et al., 2008; Griffiths and colleagues 2009b, 2009c); its legal and regulatory framework implications (Hancock et al., 2008; Griffiths, 2009b, 2012; Zborowska, et al., 2012); the responsibilities of the individual gambler (Volberg 2002; Blaszczynski, Dumlao, and Lange 1997; Blaszczynski, Ladouceur, Goulet and Savard 2006; Blaszcznski, Ladouceur, and Shaffer 2008 and Blaszczynski, Collins, Fong, Ladouceur, Nower, Shaffer, Tavares, and Venisse, 2011; Gainsbury et al., 2012; and the social responsibilities of gambling organisations (Griffiths 1999, 2003, 2008, 2009b, 2012; Griffiths and Parke 2002; Hing and McMillan 2002; Hing 2003a,b; Hing and Breen 2008; Hancock et al., 2008; Griffiths et al., 2009c; Gainsbury et al., 2012).

Responsible gambling obligations between a gambling organisation and its stakeholders are, at a minimum, reflected in the implied and expressed framework of regulation and control which is managed by government, (Kingma, 2004; Power 2004, Griffiths 2009b, 2012; Griffiths et al., 2009c and Zborowska, et al., 2012). In the UK, the Gambling Act 2005 requires gambling organisations to develop strategies in relation to responsible gambling that, at a minimum, acknowledges how the products and services they offer may harm their consumers so that they can minimise the negative impact of their operation. As such, this chapter aims to evaluate the responsibilities of each of the main stakeholders: government, consumers, gambling organisations and employees and evaluate the responsible gambling obligations between them. Where possible the chapter will make specific reference to the online aspects of the gambling industry as this sector will be the focus of the primary data collection.

3.2   Developing responsible gambling strategies

Reflecting other risk management based regulatory systems, the Gambling Act 2005, highlights a number of licensing objectives which form the basis of operational policies within organisations. Licensees must put into effect policies and procedures that will promote responsible gambling and enable them to fulfil the following licensing objectives:

a.   prevent gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;

b.   ensure that gambling is conducted in a fair and open way, and

c.   protect children and other vulnerable people from being harmed or exploited by gambling.

Gambling Commission 2008, 2012

Volberg (2002) supported the need for gambling organisations to develop socially responsible practices which she suggested involves balancing the responsibilities of individuals and the gambling organisation in order to prevent or at least minimise problem gambling. Griffiths (2005, 2009b, 2012), also highlights the significance of developing trust between the consumer and online gambling provider if the organisation is to be perceived as being responsible. In addition, he suggests that responsible gambling is not only about ethical and regulatory issues but it involves developing a business model which is based on low impact mass market applications.   To assist in achieving this aim he proposes that good social responsibility practices should concentrate on:

1.   the design of venues and games;

2.   transparency including information about games, consumer behaviour, advertising and self-control; and

3.   customer support including staff training, referral processes and staff intervention.

These principles have also been highlighted in other studies by Griffiths, Wood, Parke, and Parke, (2007), Griffiths et al., (2009b, 2009c) and Gainsbury et al., (2012), as they suggest that organisations should be aware of the addictive nature of the products and services they offer and to be proactive in managing their relationship with those who come into contact with their operation. This view reflects contemporary models of CSR which stress the need for organisational and societies aims to be interwoven, with profit being just one of the aims of an organisation (Wood 1991, Meehan et al., 2005). It also complies with the notion of the "corporate citizen" identified by Matten and Crane, (2005) and the need for perceived corporate legitimacy which was identified by Harridge-March (2006).

Hancock et al., (2008) investigated whether the risk of legal liability has resulted in more interventionist public policies by the state and industry. They cite the Anns Test, Anns v London Borough of Merton (1977), in which the House of Lords established that a duty of care exists between an organisation and its stakeholders based on the following conditions:

1   Where the harm experienced and complained of is a reasonable foreseeable consequence of an alleged breach of a duty of care. This suggests that gambling organisations have a responsibility to all those who have contact with their products and services and the duty of care increases with the level of contact and more specifically where an individual has identified themselves as being affected through the process of self-identification as reflected in practices such as self-exclusion.

2   Where there is sufficient proximity between the parties to justify a duty of care. This may be experienced and trained employees observing consumers who exhibit

problems resulting from their gambling and acting on such information and consumer actions.

3   Where there are no policy reasons that would justify the removal or restriction of the   duty of care.

<div align="right">Hancock et al., (2008)</div>

According to Hancock et al., (2008), the Ann's Test ruling suggests that organisations must adopt a proactive and interventionist approach based on risk management. The interventionist approach is explicit within the Gambling Act 2005 as reflected in the primary licensing objectives and the provision of general statements upon which organisations and enforcement agents develop auditable operational standards. Within the gambling sector such auditable operational standards include requirements for staff training, responsible marketing activities, age verification checks, restricted methods of payments, setting credit limits, options for self-exclusion and reference to help lines. Although the Gambling Act, fails to place specific quantifiable obligations on all gambling providers, it is clear that the legislation reflects and promotes the principles of due diligence and a duty of care as it places an obligation on gambling providers to be aware of the addictive and potential harmful aspects of their products and services and for them to be proactive in establishing responsible policies and practices that minimise addiction and harm. In order to achieve this aim gambling organisations need to establish whether gambling products and services have addictive aspects and if they do, for them to establish where responsibility for responsible gambling lies.

3.3   Addictive nature of gambling and Internet gambling

Although it is generally accepted that rates of problem gambling are relatively low in most jurisdictions, it has been suggested that some types of gambling may be inherently more risky or dangerous than others, (Williams, Wood and Parke, 2012). This view is reflected in a number of studies which have highlighted that whilst those who use the Internet as a means of gambling are more likely to experience gambling problems, the extent to which problem gambling is facilitated by Internet use is less clear, (Griffiths et. al., 2007 and Griffiths and Barnes, 2008). As such, there is debate over whether Internet gambling is inherently a more risky form of gambling, or whether other variables associated with Internet gambling, such as ease of access, convenience, ability to play when intoxicated, the solitary nature of the play, playing with 'electronic' cash, security, low stakes, free plays and the ability to play multiple sites/games simultaneously are the primary causes of harm, (Griffiths, 1999, 2003, 2009a; Griffiths and Parke, 2002; Wood, Williams, and Lawton, 2007 and Corney and Davis, 2010).

Supporting the link between Internet gambling and problem gambling, Vaughan Williams, Page, Parke and Rigbye, (2008) conclude that Internet gamblers engage in a larger number of gambling activities and Wood and Williams (2011) conclude that Internet gambling is one of the forms most often identified by problem gamblers as contributing to their problem. The link between problem gambling and Internet gambling is also supported by Griffiths (2009a, 2009b, 2012) and Griffiths and colleagues (2009b, 2009c) who concluded that some items on the DSM-IV, including gambling preoccupation and gambling to escape, were more heavily endorsed by Internet gamblers and as such, the Internet may be more likely to contribute to problem gambling than gambling in offline

environments. Wood et al., (2011) also suggest that just as participation in a wide variety of gambling types may be a contributory factor for problem gambling, then it may be suggested that use of a variety of gambling locations or administration formats, such as online and land-based venues, may also be a risk factor. As such, they conclude that Internet gambling leading to problem gambling is more common than problem gambling leading to Internet gambling.

In contributing to the discussion relating to gambling addiction and problem gambling, Griffiths (2003, 2009a, 2009b) sees addiction as being multifaceted in that it results from the relationship between the individual's biological and/or genetic predisposition, their psychological make-up, the environment in which they are based and the actual activity they are or may be addicted to. With reference to gambling addiction, he distinguishes between situational and structural characteristics which he believes are factors that may influence an individual in developing problems with gambling. He suggests that situational factors refer to the situation or environmental factors that encourage the individual to gamble and include things such as location of the outlet, the number of gambling outlets in an area and the use of advertising etc. In comparison, he suggests that structural characteristics include factors that reinforce, satisfy and facilitate excessive gambling. Such structural characteristics may include: frequency of play; stake size; amount of money lost in a given period; prize structures; the probability of wining; size of jackpots; near misses; light and colour effects; sound effects; the social and asocial nature of the game; accessibility; type of gambling establishment; advertising and the rules of the game. Griffiths (2003, 2009a, 2009b) concludes that situational characteristics impact most on an individuals' propensity to develop problems with their gambling, whilst structural characteristics impact most on the development and maintenance of gambling

problems. These conclusions were further supported by work undertaken by Griffiths and Parke (2002), Delfabbro, Osbourn, Nevile, Skelt and McMillan, (2007) and Wood, Griffiths and Parke, (2007).

For Griffiths and Parke (2002), Griffiths (2003, 2005, 2009a, 2009b), Smeaton and Griffiths (2004), Williams et al., (2007) and Gainsbury et al., (2012) one of the most significant factors that contributes to the development of problem gambling behaviour is technological developments and their application in both land-based and online aspects of the gambling industry. They forecast that technological applications will have an increasing impact on both work and leisure activities in the future. For example, Griffiths (2003, 2005, 2009a, 2009b) proposes that the increased use of technology, the shortening in the gap between technological innovation and application and the changing nature of family entertainment where leisure activities become centred in the home, 'cocooning', will increase in the future. Such developments, combined with the increased realism offered within technological developments, allows for potential escape and provides the individual with a high from the "mood-modifying experience" which Griffiths (2003) suggests provides the potential for addiction. Such advances in technology are likely to create problems for certain vulnerable groups of society such as the youth market who are more familiar with the Internet and mobile phone technology. Griffiths and Parke (2002) highlight the following problems that may occur with increasing use of the Internet as a social network: protection of the vulnerable (especially those who would not be allowed to gamble off line); Internet gambling in the workplace which is legitimised by the solitary nature of Internet gambling; electronic cash which may lead to the suspension of judgement; unscrupulous operators embedding certain words and using meta tags; circle jerks which tend to appear as pop ups; online consumer tracking and the gradual erosion of

privacy.   They recommend that just as Internet providers use technology to develop the link between their products and the market, those involved in the identification, prevention, intervention and treatment of problem gambling must also use such technologies to meet their aims.

3.4   Approaches to responsible gambling

With the increasing availability and acceptance of at least certain gambling activities, Delfabbro et al., (2007) suggested that countries like the UK and Australia have adopted a public health approach to the treatment of problem gambling and the promotion of responsible gambling which acknowledges that gambling addiction can lead to adverse consequences for the gambler, their family, their friends, their work colleagues and for the general community. The public health model requires an interventionist and integrated approach by various stakeholders as it stresses improved social responsibility within gambling venues in addition to the provision of services to assist the individual gambler (Hing and McMillan 2002; Schellinck and Shrans 2004; Hafeli and Scheider 2006; Delfabbro et al., 2007; Gainsbury et al., 2012). In addition, for Hing and McMillan (2002) the change in emphasis to view problem gambling as a public health issue has resulted in pressure groups now concentrating on social problems such as crime as opposed to moral and religious factors which were their focus in the past.

Delfabbro et al., (2007) concluded that those who support the public health perspective suggest the following levels of intervention: primary (aimed at protecting people from harm before it develops), secondary (aimed at limiting the degree of harm once developed) and tertiary (aimed at assisting those who have developed significant problems).

Supporting this view they identify the following as being important approaches in identifying individuals who may have problems with their gambling:

Table 1 Summary of theoretical approaches in identifying individuals who may have problems with their gambling

Model Category	Main causes of problem	Manifestation within problem gambler	Visible signs of manifestations	Supporting work cited by Delfabbro et al., 2007
Medical and Mental Illness	Individuals neurophysiology, personality or genetic makeup	Increased action based on impulse, increased emphasis on reward rather than punishment, need for quick gratification, need to take risk, loss of control over behaviour	Rash, impulsive and uncontrollable betting, taking "risks" with gambling and/or tendency to keep playing despite losing large amounts of money	Productivity Commission 1999; Petry and Casarella 1999; Bechara 2001; Potenza 2001;
Traditional Addition	Addiction is similar to other forms of dependence	Physiological linked to risk taking, the process of gambling and the feeling of winning	Need to spend increasing amounts of money to maintain the level of arousal associated with gambling and demonstration of restlessness, anxiety and depression when denied the opportunity to gamble	Griffiths 1995; West 2005
Dispositional / Psychological Dependence	Individual qualities and characteristics	Greater need for risk taking and stimulation. Also seen as means to regulate emotions	High frequency of gambling, large amounts of time spent gambling, reduce social interaction and oblivious to real time	Jacobs 1988; Kuley and Jacobs 1998; Griffiths 1995
Behavioural and Economic	Behaviour is influenced by pattern of reward offered by gambling environment and gambling operation stimuli	Behaviour influenced/ conditioned by gambling environment and the stimuli of gambling environment	Reluctance to leave venue or game, robotic and repetitive fashion to gambling with limited emotions, chasing loses, expectation of payout, early starters and late finishers, frequent	Dickerson 1979, 1984, 1987, 1989; Lesieur 1984; Dickerson et al., 1992; Delfabbro and Winefield 1999; Blaszczynski et al., 2001; Loba et al., 2002; O'Connor et al.,

			visits to ATM, seek credit, borrow money or sell possessions	2003; Delfabbro and LeCouteur 2005.
Cognitive	Irrational beliefs and over-estimation of the probability of wining	Behaviour based on rituals	Talking to machines, rubbing machines, having rituals	Walker 1992; Griffiths 1995; Ladouceur 2002; Jefferson et al., 2003; Raylu et al., 2003; Joukhador et al., 2004; Delfabbro 2004
Socio-cultural	Based on social and cultural factors	Emphasis should not be placed on the amount of time or money spent gambling but on when and who is gambling and whether their behaviour is consistent with others using the venue	People who continue to gamble after their friends leave; people who are rude to venue staff, people who are unresponsive to requests by venue staff; people who gamble at off times given their appearance or life commitments.	Blaszczynski et al., 2002,
Continuum	Gambling behaviour lies on a continuum from no problem to severe problem	Gambling is not inherent or intractable as people move forwards and backwards along the continuum	As people move along the continuum, there is a need to consider the frequency of behavioural patterns	Delfabbro et al., (2007)
Harm	Gambling is not inherently a problem as it depends on the individual and their circumstances in absorbing the loss. It only becomes a problem only when it causes harm	Personal harm, interpersonal harm, vocational harm, legal impacts	Depressions, stress, anxiety, emotional disturbance, anger towards gaming machine or venue staff, break down in social relationships and lack of social commitments, suicidal tendencies, gambling in isolation, problems with work commitments	Battersby et al., 1996; Dickerson et al., 1997; Dickerson et al., 1997, Jackson et al., 1997 Productivity Commission 1999; MacCallum et al., 1999; Allcock 2002; Blaszczynski 2002, Earl 2002; Ladouceur 2002;

				Lesieur 2002; McCorriston 2002; Neal et al., 2005

Source: Delfabbro et al., (2007, modified)

Most of the above approaches have tended to concentrate on the following two factors: firstly a review of an individual's characteristics in terms of their biology and psychology and secondly they evaluate the environment in which gambling occurs including situational and structural characteristics of gambling, (Griffiths 2003).

Messerlian et al., (2005) see problem gambling resulting from a relationship between the individual's biology, social norms and existing laws. Consequently, they recommend that any strategy for dealing with problem gambling and responsible gambling must include intervention in addition to treatment and/or counselling.

3.5   Identifying problem gambling behaviour

One of the strengths of online gambling systems is that all activities are electronically recorded and can be linked to an individual. As such, online gambling sites generate a wealth of data from which behavioural patterns can be identified which provide the gambling organisation and the individual consumer with the opportunity to employ a number of responsible gambling tools such as exclusion, age verification and access to professional help.   Many of the responsible gambling practices offered by Internet gambling providers have been identified as systems of good practice.   For example the Children's Charities' Coalition on Internet Safety (CHIS, 2010) identified the online gambling industry as an example of best practice in child protection with age verification

systems that could be adopted within other e-commerce sectors. The tracking of data and the identification of behaviours offers opportunities for developing and implementing responsible gambling strategies which enable employees, consumers and organisations to fulfil their regulatory obligations.

Over the past decade, observational tracking tools, such as PlayScan and Observer, have been developed which are based on identifying observable behaviours associated with online problem gambling. For Griffiths et al., (2009c) and Griffiths (2012b), observable behavioural tracking tools use artificial intelligence, to identify problem gambling behaviours without the need to assess the negative psychosocial consequences of problem gambling which are characteristic of traditional methods previously used to identify problem gambling. Some of the behaviours that indicate problem gambling include: playing a variety of stakes; playing a variety of games; the rate and level of 'reload' within gambling sessions; frequent payment method changes; verbal aggression and constant complaints to customer services (Wardle et al., 2007; Griffiths and colleagues, 2007, 2009b, 2009c, 2012). Such behaviours reflect those proposed by Carnes (1991) who identified the following signs of addiction: behaviour that is out of control; severe consequences resulting from the behaviour; inability to cease the behaviour despite the consequences; continual engagement in self-destructive/high risk behaviour; on-going desire to limit behaviour; behaviour used as a coping strategy; increased amounts of behaviour because the current level is not sufficient; severe mood swings; large amounts of time spent in engaging in behaviour or recovering from it and a reduction in other social, occupational and recreational activities due to increase time being spent on other behaviours. The studies above also reflect the following "ten signs an employee may have an addiction" which was published in the Public Management Journal in June 2005: uses

the habit to improve their self-esteem or to escape their current situation; becomes irritable when denied the ability to engage in the behaviour; lies about the amount of time and/or money spent on the behaviour; engages in the behaviour in secret; misses school, work or other activates so as to engage in the behaviour; becomes argumentative with those around them; loses something important such as a job or relationship because of the behaviour; pays for the habit with money needed for other activities such as food, rent etc; borrows money to pay for the behaviour or to pay other bills; commits a crime to pay for the behaviour.

Although Griffiths (2012b) acknowledges that it is possible to identify problem gambling using online behavioural tracking data, he suggests that when comparing online behavioural tracked data against more traditional diagnostic tools then not all of the current behaviours which suggest problem gambling can be identified. He classified the (DSM-IV) criteria in terms of the likelihood that they could be identified online as reflected in the following Table:

Table 2   **Summary of problem gambling criteria (DSM-IV) and likelihood of identification of problem gambling behaviour online**

DSM-IV criterion	Likelihood of online identification
Chasing losses	Definitely
Experiencing salience/preoccupation	Very good possibility
Experiencing tolerance	Reasonable possibility
Experiencing relapse	Slight possibility
Other people providing a bail-out	Slight possibility
Experiencing withdrawal symptoms	Unlikely
Escaping from reality	Unlikely
Concealing involvement	Unlikely
Engaging in unsociable behaviour	Unlikely
Ruining a relationship/opportunity	Unlikely

Source: Griffiths (2012b, p233, modified)

In supporting the view that problem gambling can be identified online he suggests that there is a need to review current problem gambling screening instruments in the hope that screening instruments in the future may be able to be developed which concentrate specifically on gambling behaviour itself, rather than the associated negative consequences.

From such research it may be concluded that an individual's biological, genetic and psychological make-up and the environment in which they exist have an influence on their ability to develop problems with gambling. What these studies also suggest is that gambling providers are obliged to be aware of, and investigate the cause and effect relationship between situational and structural characteristics of gambling and demonstrate an interventionist approach to managing problem gambling. Explicit in all models of responsible gambling is the requirement that vulnerable groups should be protected and not exploited by any organisation. This requirement is explicit within the Gambling Act 2005, where gambling organisations are required to have policies and procedures which promote responsible gambling and to contribute to research in understanding, reducing and preventing gambling addiction. The lack of prescribed legal obligations and a regulatory system of audit means that each stakeholder has a duty of care for promoting and managing the process of responsible gambling. In order to demonstrate legitimacy of their responsible practices, many organisations have attempted to legitimise their operations by third part accreditation. However, the success of such third part accreditation is questionable as Gainsbury, (2012) suggests that there is conflicting evidence as to whether it is understood by consumers and whether it affects their gambling decisions.

3.6   Consumer responsible gambling obligations

With reference to responsible gambling practices, Blaszcznski et al., (2008, p104) proposed the Reno Model in which they suggested a "science based approach should form the foundation for effective socially responsible public policies designed to protect consumers, minimise social harm and maintain a sustainable gaming industry". They suggest, as did Volberg (2002) and Blaszcznski et al., (2004), that there is a need for informed choice which is based on sufficient, necessary and timely information. However, Blaszcznski et al., (2008, p105), acknowledged that "on its own, informed choice does not guarantee that decisions will be optimal." They suggest that whilst certain factors such as depression and anxiety may affect an individual's ability to make optimal decisions, "such factors do not diminish the need to provide relevant information nor do they eliminate an individual's inherent capacity to evaluate information" (p 105).

An underlying principle of the Reno Model is that the primary responsibility for promoting "responsible gambling behaviour within the scope of government regulation and community expectation" rests with the individual consumer and the gambling organisation (Blaszcznski et al., 2008, p105). The regulation of the relationship rests with government who they believe should adopt a system that is designed to minimise "paternalism and personal intrusion" (Blaszcznski et al., 2008, p105) and based on the following principles:

1.   Each individual is responsible for their own behaviour, choices and level of gambling activity;

2.   Informed choice is essential for responsible gambling as it prevents erroneous conditions that give the impression that gambling is an income generating

behaviour as opposed to a leisure activity and it highlights the benefits of responsible gambling and the costs of excessive gambling; and

3.   Scientific principles can help determine information that is necessary for informed choice.

In order for these goals to be realised, Blaszcznski et al., (2008) suggested that information should be aimed at specific groups and activities and the message should be communicated by a variety of mediums. They suggested that two other prerequisites of responsible gambling were competent employees and consumers who felt willing and able to disclose information.

The Reno Model acknowledges the importance of the individual in taking responsibility for their own actions and the responsibility of the organisation in providing sufficient and timely information to each individual so that they can make informed choices. Consequently, gambling organisations are responsible for those who have contact with their products and services and they are required to consider the impact of their operations on consumers, customers, employees and the wider society.

3.7   Gambling organisations and their responsible gambling obligations to customers and consumers

Whilst there may be differences in the way organisations interpret the obligations that CSR places on them and the way in which they manage it, what is generally agreed is an organisation must be able to report on how it manages stakeholder expectations of the way it performs it's business and the resources it uses, (O'Dwyer 2003; Meehan 2006). This is generally reflected with organisations integrating their social responsibilities within their

operational strategies as opposed to dealing with them as something separate (Wilson 2000; Lafferty et al., 2002; O'Dwyer 2003; Matten and Crane, 2005; Meehan 2006).

Although Hancock et al., (2008) suggested that those who view CSR from the utopian perspective would, by definition, define industries such as gaming, tobacco and alcohol as corrupting and unethical, Black and Ramsay (2003) suggest that the ethics of gambling goes beyond whether or not we should gamble as they suggest that more is to be gained from distinguishing between acceptable and unacceptable forms of gambling. In an attempt to define acceptable and unacceptable gambling, they pose the following two questions: what is fulfilling for us to pursue? and are our choices reasonable? In determining fulfilment they accept that different social and cultural contexts will produce different responses in which a gambling activity is acceptable or unacceptable. In terms of whether gambling is a reasonable choice for achieving fulfilment and whether it is the best alternative to satisfy this need, Black and Ramsay (2003) suggest that an individual needs to examine the reasons they use to justify their gambling. They suggest that rational gambling is where an individual has a reason to gamble which may include: hoping and dreaming; social interaction; recreation; to make money and charity. Given an individual's reasons for gambling, they propose that a gambling organisation has the following obligations to their consumers and customers:

1.   Promote the common good. This can be achieved by offering gambling activities
      that promote social interaction, recreation, dreams and hopes. Such activities
      should not exploit individuals for whom gambling may create personal and
      financial problems.

2. Respect the rationality of all individuals. This involves supporting the individual's right to control and choice and can be achieved by activities such as providing and displaying information to enable informed choice by the individual consumer. The information presented should be transparent and enrich and enable choice.

3. Respect the freedom of all individuals. This can be achieved by operating activities that encourage and support self-control and reasonable choice. Gambling organisations should avoid exploiting individuals who have low self-control by providing adequate warnings and support for those who require help from suitably qualified persons.

4. Take responsibility for the negative impact of gambling on the common good. This involves providing help to those who have or may develop problems with their gambling and can be achieved by activities such as participating in and contributing to research on problem gambling.

<div align="right">Black and Ramsay (2003)</div>

These principles are evident in the Gambling Act 2005, which requires all gambling operators to have policies and procedures which promote responsible gambling including age verification, the ability to self-exclude, the conduct of marketing activities and the interaction of staff with consumers.

In evaluating gambling organisation's responsibilities towards the provision of services for problem gambling, Hing and McMillen (2002) distinguished between corporate social issues management and corporate social performance. They suggest that corporate social issues management "generally takes a longitudinal perspective to explain how social issues evolve as a function of social policy and stakeholder and organizational changes" whilst "corporate social performance literature has concentrated on snapshot methods and

analyses of corporate social principles, processes and outcomes by which an organizations social performance is judged" (Hing and McMillen, 2002, p 457). Consequently, corporate social performance evaluates how an organisation has responded to corporate social issues. Whilst they believe that corporate social issues management and corporate social performance are often treated as separate concepts they recommend that they should be treated as one if an organisation is to be successful in managing the social impacts of their operation.

Hing and McMillen (2002) saw social performance resulting from the consistency between the organisation's practices and the expectations and perceptions that key stakeholders had of the principles and practices that the organisation should adopt to address problems associated with gambling. They suggest that this involves stakeholders assessing the relationship between the economic, legal, ethical and discretionary variables proposed by Carroll (1979). Whilst their study identified a positive, although weak, relationship between the importance organisations placed on ethical principles and the number of venue level strategies that deal with problem gambling, they also identified a relationship between stakeholder expectations and the actual practices implemented by club managers in terms of practices that should be adopted to reduce problems associated with gambling. They suggested that managers preferred self-regulation and saw economic factors as more important than other factors in the decision making process. For these reasons, they concluded that the self-regulated approach adopted by New South Wales clubs resulted in clubs tending to adopt a minimalist approach to the treatment of those with gambling problems. Consequently, a state wide system was adopted to regulate clubs in New South Wales.

The use of a standard approach which often has its basis in legislation enables not only a consistent approach across organisations but also enables the production of auditable data upon which better practices can be developed. Shaffer, LaBrie and LaPlante, (2004) suggested that this is important within industries such as gambling where individuals and the general population, over time, develop a degree of resistance to problem products. Consequently, new strategies are continually needed to help those who have developed or may develop problems with their gambling.

The problems of gaining consistency across organisations was highlighted by Smeaton and Griffiths (2004) who concluded that whilst half of the 30 websites they investigated made meaningful efforts to verify age, only 7 made explicit reference to the risks of uncontrollable gambling. Supporting this view, a number of studies have highlighted the wide variation in the type and extent of responsible gambling features used within the online sector and more alarmingly the fact that many sites do not have effective responsible gambling policies in place nor do they promote responsible gambling features, (Wiebe, 2006; Wood & Williams, 2007; Griffiths, 2009b, 2012; Jawad & Griffiths, 2008; Monaghan, 2009; Khazaal, Chatton, Bouvard, Khiari, Achab and Zullino 2011; Gainsbury et al., 2012). Griffiths, (2009b, 2012) and Gainsbury et al, (2012) both suggest that where the use of responsible gambling features is voluntary their use by consumers is very low. In addition, Gainsbury et al, (2012) suggest that consumers expect such responsible gambling features to be present and where they are not, this may impact on the level of trust the individual consumer has with the site.

In an attempt to develop a consistent approach to responsible gambling, Wood et al., (2007) recommended that gambling organisations should provide the following:

1.   The presence of mechanisms to try and ensure that people under 18 do not play.

2.   A clearly identified self-exclusion programme that operates for a minimum of six months with no promotional materials going to that person during that time period and the option for a third party to make an application.

3.   A link to a consumer protection and responsible gaming page which provides an acceptable and simple self-assessment process to determine problem gambling links and other details about self-exclusion, deposit limits and other responsible gambling practices offered by the site.

4.   The ability for consumers to make limitations on their daily, weekly or monthly deposits.

5.   A clock on the screen at all times.

6.   The domination of each credit is clearly displayed.

Within online businesses there is increased opportunity for the organisation to collect and analyse data specific to the activities and behaviour of the consumers. The extent to which this information is incorporated in training and or strategies to manage responsible gambling is not documented. Equally the extent to which organisations share this information with consumers is not established in regulation. It does however represent a significant data source that could be used to enable consumers to manage their own behaviour and employees and organisations to audit the level of responsibility in their operations.

3.8 Gambling organisations and their responsible gambling obligations to their employees

As well as an obligation to consumers, organisations also have an obligation to their employees to ensure their health and welfare is not adversely affected by work activities. The first part of the employee organisation relationship starts with the attraction of an organisation to an individual. Employees use the organisations record on social responsibility as a means of forecasting how the organisation will act in terms of both explicit and implied aspects of the employment contract, (Hollinger and Clark 1983; Turban and Greening 1996; Viswesvaran, Deshpande and Milman 1998; Greening and Turban 2000, and Jones and Busch and Dacin 2003). Consequently, organisations publicise aspects of their performance record on CSR as a means of attracting suitable candidates.

Once in employment, employers have a legal responsibility for the health and safety of their employees. This has resulted in some studies evaluating the addictive aspects of certain products and services on the behaviour of employees. For example, McAuliffe (1991), as cited in Shaffer et al., (1999), concluded that doctors, nurses and pharmacists may be more familiar with and have greater access to psychoactive substances than other health professionals but they are no more likely to abuse substances than other professional groupings. Studies specific on the addictive nature of gambling products and services and the behaviour of employees of gambling organisations have been restricted primarily to a study by Hing and Breen (2008) on 'how working for a gambling organisation can result in problem gambling for the employee'. Other studies on how gambling affects employees generally include the study into 'Internet gambling in the workplace', in which Griffiths

(2009a) identified positive and negative implications of some forms of workplace gambling as identified in the following table:

Table 3   Organisational implications of workplace gambling

Form of Gambling	Implications for Organisation
Office sweepstake	- May have beneficial effects on team morale
National lottery syndicates	- Work morale may be positively and/or negatively affected by small or large wins - Work morale may be affected if the syndicate win only to find out tickets were not purchased - Minor disruption to work due to collecting money and purchasing tickets - Rival syndicates - Potential for the organisation to lose a group of employees in "one go"
Telephone betting	- As it is a solitary activity it may go un-noticed by an individuals' manager and work colleagues - Work costs for telephone calls and non-productive time
Internet gambling	- Increasing access at work due to increasing numbers of employers having unlimited Internet access - Solitary experience that may occur without an individuals' manager or co-workers noticing
Spread betting	- Can be done over the Internet or by telephone - Has time and cost implications for the organisation - May go undetected by an individual's manager or co-workers due to the solitary nature of the activity
Card Schools	- Usually occur during breaks or down times - Implications may occur where debts occur

Source: Griffiths 2009a (modified)

In addition to the types of gambling in table 3, Griffiths (2009a) identified some of the consequences that gambling can have on the working efficiency of an organisation as including: poor time keeping; poor productivity; telephone and Internet gambling; criminal acts in the workplace (for example, theft from an employer, colleague or consumer); increased gambling dependency; and effects on other people including co-workers, family and friends.   Acknowledging that detecting Internet gambling maybe more difficult, because of its 'hidden' aspect, Griffiths (2009a) recommends that all organisations should take the issues of workplace gambling seriously and be aware of the potential risks it has for the organisation.   In raising awareness of gambling in the workplace, he recommends

that organisations should develop policies and procedures that are supportive to employees who may be vulnerable to developing problem gambling and he recommends that employees are active in identifying their own problems and needs and those of their colleagues through being vigilant and being given access to diagnostic tests. He suggests that organisations should check monthly telephone bills and Internet bookmarks.

An interesting point raised by Griffiths (2009a) was the effect that employee gambling can have on gambling industry personnel. He points out that gambling organisations have facilities that may be used/abused by employees and this creates a problem for both the organisation, employees and an employee's colleagues in that "problem gamblers often seek out employment where they can additionally gamble" (Griffiths, 2009a, p 660). The practice of those with gambling problems seeking employment in gambling venues was also highlighted by other studies, (Shaffer, 1999, 2002; Hing and Breen, 2008). Shaffer (2002) suggested that this was because of the employees increased knowledge and understanding of gambling and their increased access to gambling. This concern is also implied by Griffiths (2009a) who states that the "problem gambling prevalence rate was significantly higher among Internet gamblers (5%) than non-Internet gamblers (0.5%), (Griffiths 2009a, p659), and as such, the Internet sector may pose an additional threat to those who work in the sector and who also gamble using this method.

Hing and Breen (2008) investigated the relationship between the gambling organisation and the propensity for its employees to develop problems with gambling. In their analysis of interviews with six casino organisations employees they highlight the following factors as being significant in 'how working in a gambling venue can lead to problem gambling':

1. Close interaction with gamblers – they are more likely to interact with gamblers and therefore hear about wins more than losses, receive tips and payout money to winners.

2. Frequent exposure and access to gambling and in particular those who gamble heavily normalises their own gambling as their gambling habits may not seem that bad when compared to others. Hing and Breen (2008) support their findings with those of Perese, Bellringer and Abott (2005) who suggested that an individual's attitudes towards gambling directly influences their behaviour and knowledge of gambling combined with their acceptance and familiarity of it may nurture gambling habits. They also support their conclusion with evidence from the Productivity Commission (1999, p831) that there "is sufficient evidence from different sources to suggest a significant connection to greater accessibility to gambling....and the greater prevalence of gambling problems".

3. Influence of fellow employees. They suggest that gambling venue staff create strong bonds with their colleagues due to their working hours.

4. Influence of management especially where they endorse gambling.

5. Workplace stress.

6. Hours of work means that often employees only socialise with their colleagues.

7. Frequency of exposure to marketing. Supporting the work of Griffiths and Parke (2003) they support the link between light, colour, sound effects, internal environment and promotions on gambling behaviour.

8. Responsible gambling training and responsible gambling measures.

They concluded that training and signage had no effect on employee's behaviour.

In addition to the above, Hing and Breen (2008) also highlighted the opportunity to generate income from gambling, the ease of access to gambling, the ability to spend wages, the lack of alternative employment opportunities and the difficulties and embarrassment associated with self-exclusion also affected the gambling venue employees propensity to gamble.

The link between working in a gambling venue and developing problem gambling behaviour was also highlighted by Shaffer et al., (2002, p.407) who suggested that "if gambling is the cause of adverse health, then those with the greatest gambling exposure should experience more health problems than those with less exposure".   They also concluded that individuals working in the gambling industry "evidenced decreased gambling related symptoms over time" (p417), suggesting that they develop an immunity and protection to the addictive and harmful aspects of gambling products. However, the question is whether this immunity is sufficient to protect those employees who are vulnerable.

Whilst there are no specific organisations that deal with additions for those who work in the gambling industry similar organisations do exist for those working in other industries where the products and services they offer are considered addictive. For example, the Ark Foundation was established by Crossland who developed a drink problem whilst he worked as a waiter. The foundation seeks to educate hospitality students, employees and managers on the dangers of drink and drug dependency. For Crossland, as cited in Lewis (2008), employers have two choices when dealing with dependency in their employees "either if it's a problem for any of our employees we would like to help them or we don't want to know about it in which case it's a hidden problem and the business is vulnerable"

(Lewis, 2008, p55).   Based on the work of Crossland, Lewis (2008), suggests that organisations need strategies to deal with individuals who develop any form of addiction or dependency and he maintains that whilst making such individuals redundant may force them to take their problems elsewhere the lack of a strategy for dealing with such individuals means that the company is not protected from individuals joining an organisation who may have been made redundant or had their employment terminated by another employer because of their problem behaviour.

The Ark Foundation propose a strategy based on explicit organisational policy, management training and employee awareness. Crossland (2008) highlights the obvious benefits of such a strategy as "a lot of people forget the effects on morale. Addicts are very good at manipulating people with arm-twisting. A good member of staff will sort their own problems and continue to be a good member of staff – actually they're even better because they've put a problem behind them, are grateful and loyal and don't have that dirty secret". This is made more difficult in the case of problem gambling as Griffiths (2009a) suggests that identifying individuals with problem gambling, particularly where it is based on Internet gambling, may be more difficult than identifying other forms of addiction as the individual may appear to be performing as a normal employee in terms of time keeping and productivity.

Whilst Collachi and Taber (1987), Shaffer et al., (1999), Shaffer and Hall (2002) and Hing and Breen (2008) have evaluated the link between working in a gambling venue and the propensity to develop problem gambling behaviour, no study has evaluated the link between working in an online UK gambling venue and an employee's willingness to engage with and promote responsible gambling practices. This is more concerning given

the consequences of work based gambling activities of employees identified by Griffiths (2009a) and the potential addictive aspects of technological applications identified by Griffiths and Parke (2002); Griffiths (2003, 2005, 2009); Smeaton and Griffiths (2004); Wood et al., (2007) and Williams et al., (2007). This will be the focus of the primary data collection section of this study.

3.9 Gambling organisation employees and their responsible gambling obligations to their employers

Studies on the employee-organisation relationship show a variety of conclusions with the majority of studies concentrating on the level of work commitment that an individual has towards their employer. Whilst the lack of an agreed definition and model of work commitment makes comparisons between such studies complicated, Morrow (1983) and Bolino (1999) suggest that differences in such models appear to be primarily based on the tensions related to the personal characteristics of the individual, such as: their reason for working; their work ethic; their career commitment; and the organisational context of the role including position, progression, authority, accountability and responsibility. Such studies have provided the basis for evaluating the employer and employee relationship in terms of organisational citizenship behaviour, (Organ, 1988; Graham, 1991; Organ and Ryan, 1995; Netemeyer, Boles, McKee and McMurrian, 1997; Castro, Armario and Ruiz, 2004).

Although there is no agreed definition of organisational citizenship behaviour, (OCB), Bienstock, De Moranville and Smith (2003, p360) stated that "the primary interest of OCB was the identification of employee responsibilities and behaviours that were often overlooked or inadequately measured in traditional assessments of employee job performance, but none the less, enhanced organizational functionality or organisational

effectiveness". Despite the lack of agreed terminology Lee, Nam Park and Lee, (2006) summarises the general view that organisational citizenship behaviour involves dividing the individuals work role into its role-prescribed behaviour and extra roles. Role prescribed behaviour is the formal role requirements that are explicit in documents such as job descriptions and appraisal reviews and implied in the 'working relationships' an individual develops with colleagues in the organisation. Extra roles are discretionary and subject to individual choice. It is such extra roles that Lee et al., (2006) highlighted as resulting in both benefits and costs to the organisation and consumer in terms of perceived value and the actual cost of providing a service. It is this distinction between prescribed roles and extra roles that may be important in enabling a gambling organisation to motivate employees so enabling them to meet their social responsibilities. For Guest and Conway, (2002), the prescribed and extra role behaviours need to reflect organisational aims if the organisation is to reach its full potential.

Despite a lack of agreement on nomenclature, there is broad consensus that organisational citizenship behaviour does involve the following factors: it is in addition to the formal role, it requires the individual to use their initiative and discretion, it is not recognised in the formal organisational structure and formal reward system and it is an important factor for an organisation to meet its aims, (Brief and Motowidlo, 1986; George and Brief, 1992; Van Dyne, Graham and Dienesch, 1994; and Gonzalez and Garazo, 2005). In addition, there is agreement that organisational citizenship behaviour does have positive effects for an organisation's internal and external stakeholders. For example, internal benefits include improving group performance, improving job satisfaction, increasing perceived fairness, improving organisational commitment and improving support for the leader, (Organ 1988; Organ and Ryan 1995; Podsakoff, MacKenzie and Bachrachl 2000; and Rotenberry and

Moberg 2007). External benefits include reputation with stakeholders, improved profitability, improved customer satisfaction and improved customer behaviour intentions, (Castro et al, 2004).

The positive effects of organisational citizenship behaviour are seen to be directly related to and dependent on the individual employee's perceived level of job involvement. Both Castro (2004) and Rotenberry and Mobery (2007) believe the level of job involvement an employee experiences affects not only their working relationships with all colleagues but it can also affect a consumer's perceived satisfaction and their behaviour intentions. This may in both cases be due to recognition and esteem and could be significant in the gambling industry where an employee is in direct contact with the consumer and consequently may be involved in preventing or minimising the risk of gambling related problems.

The effect of an organisation's behaviour on its employees behaviour has been further developed by studies which evaluate the factors that affect an individual's commitment to their occupational role and whether this affects, or is affected by, their commitment to their organisation. Randall and Cote (1993) proposed that an individual develops a commitment to their role before developing a commitment to their organisation. Consequently, individual employees in the gambling industry firstly develop commitment to their work skills and generic work role and once this is developed they then develop commitment to their employing organisation. This reflects Brown (1996) and Jarrar and Zairi's (2002) conclusion that an individual's perception of their personal situation influences their job involvement and thus their commitment to their organisation. This view is also supported by the work of Somers and Birnbaum (1998), Cohen (1999, 2000) and Hackett, Lapierre

and Hausdorf, (2001) who concluded that social exchange between an individual and colleagues and other stakeholders is central in establishing a link between job involvement and organisational commitment. This implies that in order for employees, in the gambling industry and elsewhere, to make a commitment to their organisation they must perceive that they have established a network of contacts within their organisation. For this reason, Ashford and Mael (1989) and Castro et al., (2004) highlight the importance of employee socialisation in the workplace and its culture. This may be achieved formally through induction and training and informally through informal work groups. It is also important, in the achievement of organisational commitment, that managers understand new employee's perceptions of their colleagues and employers organisational citizenship behaviour as this in turn will shape their own work behaviour. This is essential in industries such as gambling where employees are in direct contact with consumers and often achieve organisational aims as part of a team. As such, consumers and colleagues have a direct influence on the new employees work behaviour and attitudes. The management of this socialisation is important especially where it has the potential for individuals to develop unacceptable behaviour patterns or where it encourages behaviour that may lead to addiction. This is true in gambling where individuals may engage in gambling activities such as in office betting syndicates in order to be accepted within the work environment. For Griffiths (2009a) the problem is further intensified where an organisation deals in products and services that may be addictive as individuals may seek employment with organisations that further support their addiction.

The importance of an employee's perceived level of job involvement has resulted in the process of employee socialisation being central to many studies which seek to establish how organisational citizenship behaviour is established. For example, Ashford and Mael

(1989) and Castro et al., (2004) suggest that in developing organisational citizenship behaviour there is a need to merge an individual's attitudes and beliefs with the behaviour that the organisation perceives is essential for the role to be successfully performed. Where there is tension between these two factors, he suggested that the individual's attitudes and beliefs take precedence as they are discretionary and specific to them. The significance of aligning individual and organisational behaviour through a process of socialisation was also highlighted by Somers and Birnbaum (1998) who concluded that work related commitment variables such as job involvement are more important than factors such as task proficiency in developing organisational citizenship behaviour because factors such as task proficiency are reflected in the organisations reward and control systems. The significance of socialising the individual into the organisational culture emphasises the need to balance the organisational context of the role and the personal characteristics of the individual. This in turn necessitates an understanding of the reasons why an individual chooses to work for an organisation because not all employees want to be empowered or to develop their abilities within their organisations environment. For some individuals, work is a means to an end as opposed to a way of gaining satisfaction, engagement and fulfilment. This doesn't not mean individuals should be excluded from employment but the organisations needs to understand such factors if they are to ensure that all employees are effectively socialised and inducted within the organisation so that they can help achieve organisational goals, (Somers and Birnbaum, 1998).

Studies that evaluate whether an individual can exert an influence on the organisation tend to conclude that, at best, the influence is limited and unlikely to be widespread, (Owen, Swift, Humphrey and Bowerman 2000; Owen and Swift 2001 and O'Dwyer 2003). Jarrar and Zairi (2002) raise concerns with this view as they conclude that employees are an

organisations only source for sustainable competitive advantage and as such, they suggest that human development is a viable alternative to traditional organisational development. This view reflects in part the need to socialise individuals into the culture and operational activities of the organisation. However, the way in which this is achieved by the organisation, combined with the way it is perceived by the individual employee, may have positive or negative implications for job satisfaction, organisation commitment and organisational performance, (Organ and Ryan 1995; Organ 1988; Harel and Tzafrir 1999; Maiser 2001; and Gonzalez and Garazo, 2005; Lee et al., 2006). One potential tension of increasing the discretion and empowerment of employees within modern service delivery systems is the process of industrialising the service delivery system. Reflecting the need to simplify tasks, establish a clear division of labour and substitute equipment and systems for employees appears to have reduced the opportunities for employees to have discretion in the decision making process. This is probably more evident in online aspects of the gambling industry where technological applications allow for the specialisation of job tasks.

3.10 Gambling organisation employees and their responsible gambling obligations to their customers and consumers

The significance of employees in helping their employing organisation meet their social responsibilities means that employers must manage effectively their relationship with their prospective and current employees. This is more acute in service organisations, of which the gambling industry forms part, because the consumer and customer contact employees are integral to the service delivery system. Hansen (2003) suggested that all organisations need to develop long term relationships with their consumers and that this requires them to gain and use information from this stakeholder group. This places emphasis on the

importance of the employee and their relationship with their employer and consumers if they are to deliver the service quality expected by their customers and consumers.

For Kantor and Weisberg (2002) the need to elicit and use responsibly, information from consumers also involves an understanding of the employees perceptions of what they believe is expected of them. Where an employee misinterprets either what a consumer wants or what their organisation expects them to achieve in the service delivery system this may contribute one or more of the service quality gaps identified by Zeithaml et al., (1990,1993). Kantor and Weisberg (2002) suggest that the situation may be compounded by the fact that in general employees perceive that their own ethical attitudes/beliefs are higher than their peers ethical behaviour and that whilst managers may have similar ethics to themselves; employees believe that managers beliefs are higher than their actual behaviour. Kantor et al., (2002) conclude that if manager's act as role models then employee motivation is likely to improve. The significance of the employee manager role was also identified by and Hing and Breen (2008).

Employee perceptions of the expectations other stakeholders have of them may affect the way they identify and act with individuals who display behaviours that are associated with problem gambling. Cameron (2007) suggests that expecting staff to intervene with problem gamblers in a venue, presents a number of problems not least being able to identify who they are. As such, he questions whether gambling organisations have a duty of care given the difficulty in identifying problem gamblers. A further difficulty in placing a responsibility on venue staff to intervene where they identify an individual who displays characteristics associated with problem gambling was proposed by Delfabbro et al., (2007). They suggest that whilst most training programmes provide information on what

visible behaviours venue staff should be aware of when identifying problem gamblers, they are not provided with the training that would enable them to feel confident to intervene or help individuals that they believe have problem with their gambling. They highlighted the lack of such training as being significant in preventing venue staff from approaching individuals who demonstrate problems with their gambling. This was further reflected by a Panorama investigation which was presented on the BBC on the 6th November 2012, where staff form three leading bookmakers stated they had not trained sufficiently to deal with problem gamblers and the behavioural problems associated with problem gambling. An additional problem Delfabbro et al., (2007) identified with venue staff approaching problem gamblers related to stakeholder's perceptions of the desirability of frontline staff approaching and intervening where they believe a person may have problems with gambling. This requires an evaluation of the implications of such actions and a review of the current processes which places emphasis on the individual seeking help and advice through self-identification.

In order to reduce the potential for consumer exploitation, Hansen (2003) suggests that online gambling organisations must be aware of the factors that affect their consumers when making choices and imparting information. This in turn requires an understanding of the interaction between the consumer and the organisation and the way in which trust is established. In investigating the effects of benevolence, credibility, image and satisfaction on consumer's self-disclosure, he suggested two factors that have a positive effect on consumers disclosing intimate information include: the level of employee benevolence experienced by the consumer and the consumer's perception of the employee. This places increased importance on the quality of personnel, the training they receive and the level of empowerment within the organisation, (Bowen and Lawler 1992; Mohr and Bitner 1995;

Lee et at 2006; Blaszcznski et al., 2008). It also highlights the significance of employees in helping the organisation to meet its corporate social responsibilities, not only in data collection but also in policy formulation, implementation and audit.

3.11   Conclusions

Although there is no agreed definition of responsible gambling, benchmark statements or systems of audit there is general agreement that all of those involved in providing gambling products and services have a responsibility to ensure that vulnerable groups should not be exploited.   This places obligations on each of the stakeholders including government, gambling providers, employees of gambling organisations and the individuals who use or come into contact with gambling products and services to develop, implement, promote, monitor and evaluate systems of responsible gambling.

For government the main obligation is to provide the framework of regulation and control by which stakeholders interact with each other, (Blaszcznski et al., 2008).   Whilst government has outlined general aims and provisions of responsible gambling within the Gambling Act 2005, the Act fails to place explicit obligations on stakeholders. Despite this weakness, it is clear that legislation places an obligation on gambling providers to be aware of the addictive and potential harmful aspects of their products and services and for them to be proactive in establishing responsible policies and practices that minimise addiction and harm, (Griffiths 1999, 2003, 2008, 2009a, 2009b, 2012; Griffiths and colleagues, 2002, 2009b, 2009c; Hing 2003a,b; Eadington 2004; Smeaton and Griffiths 2004; Schellinck and Schrans 2007; and Hancock et al., 2008). This requires gambling providers to be aware of the link between an individual's biological, genetic and

psychological make-up and the environments in which gambling occurs, (Griffiths 2003; Mersserlian et al., 2005).

In accepting their obligation to develop and provide safe systems and places for gambling, organisations have acknowledged that they owe a responsibility not only to their consumers but also to their employees. This obligation is reflected in staff training which on one level aims to ensure that individuals are competent in delivering the organisations products and services and on another level to ensure that employees are aware of the factors that cause addiction and the way that these may manifest themselves in the behaviour of individual consumers.   Other related aspects of the employer and employee relationship include the effect of employee gambling on organisational performance, (Griffiths, 2009a) and more specifically the relationship between working in a gambling venue and developing problem gambling behaviour, (Collachi and Taber, 1987; Shaffer, Vander Bilt and Hall, 1999; Shaffer& Hall, 2002; Hing and Breen 2008). These areas are still relatively new in terms of research attention and will form part of the focus of the primary data collection in this study.

Studies on the employee-organisation relationship tend to concentrate on work commitment and developing organisational citizenship behaviour, (Organ, 1988; Graham, 1991; Organ et al, 1995; Netemeyer et al, 1997; Castro et al, 2004). This is seen as critical in service organisations where the employee is central to developing relationships with the consumer (Hansen 2003).   Whilst there is no universally agreed definition of organisational citizenship behaviour there is general agreement that it involves roles that are in addition to the formal role; it requires the individual to use their initiative and discretion and it is an important factor for an organisation to meet its aims, (Brief and

Motowidlo, 1986; George and Brief, 1992; Van Dyne et al, 1994; Gonzalez and Garazo, 2005).

In accepting that individual employees firstly develop commitment to their work skills and generic work role before developing commitment to their organisations, many studies have stressed the significance of employee socialisation and the need to merge an individual's attitudes and beliefs with the behaviour that the organisation perceives is essential for the role to be successfully performed, (Mael, 1989; Randall and Cote 1993; Brown, 1996; Somers and Birnbaum 1998; Cohen, 1999, 2000; Hackett et al., 2001; Jarrar and Zairi, 2002; Castro et al., 2004). This is significant in service organisations, such as gambling, where the level of job involvement an employee experiences affects not only their working relationships with all colleagues but it can also affect a consumer's perceived satisfaction and their behaviour intentions, (Hansen, 2003; Castro, 2004; Rotenberry and Mobery, 2007). The significance of socialising the individual into the organisational culture in order for them to assist in meeting organisational aims is further emphasised by studies that conclude that the influence that an individual can exert on their organisation is limited and unlikely to be widespread, (Owen et al., 2000; Owen and Swift 2001 and O'Dwyer 2003).

The role of information generated by online gambling organisations is immense and whilst not explicitly stated in regulation, it may represent a significant tool in terms of assisting organisations, employees and individual consumers in meeting their own social responsibilities in relation to problem gambling.

3.12   Implications for primary data collection

Current systems of corporate social responsibility and responsible gambling place emphasis on the principle of citizenship between the organisation and the environment in which it exits. This requires organisations to embed corporate social responsibility within their strategies and to develop monitoring and audit tools that enable them to take corrective actions where their systems fail to produce acceptable results. Within service industries the employee-consumer relationship is central to operational strategy and as such the primary data section of this research will include two studies. The first study is an exploratory study of employee perceptions of current practices that relate to responsible gambling. Using semi-structured interviews the employee study seeks: to establish their reasons for working within the gambling industry; to establish their perceptions of the strengths and weakness of current responsible gambling practices including the training they receive to fulfil their social responsibility obligations; and to establish reasons why employees and consumers fail to engage with responsible gambling practices and tools. Although reference will be made to previous studies, this study will seek to determine if employees use their own personal reference system or their employers codes of practice to determine their approach to managing consumer responsible gambling practices. Where there is a conflict, the study will seek to determine which reference point takes preference as this is central to the development of organisational citizenship behaviour.

Based on responses from the employee study, a second study will be conducted to establish consumer perceptions of the strength and weaknesses of current responsible gambling practices offered by gambling organisations. In addition, consumers will be asked about their frequency of play; games played; their motives, attitudes and behaviour

in relation to responsible gambling; and their perceptions of responsible gambling tools offered by providers including transparency, fairness, self-management tools, staff attitudes and provider help.

Figure 3 provides a schematic summary of how the primary data will develop on concepts identified in the secondary data.

Figure 3 Summary schematic flow of research process

Corporate Social Responsibility based on citizenship and the integration of corporate social responsibility principles within an organisations corporate social responsibility strategies

Responsible Gambling
(Based on the principle of individual biology and psychology, structural factors and situational factors)

Primary Data Collection
Aim: To evaluate employee and consumer perceptions of responsible gambling practices within the Internet sector of the UK gambling industry

Study 1 – Exploratory Study based on employee perceptions of responsible gambling processes within the UK Internet gambling industry

- Agree terms of reference with participating organisation
- Agree promotional material
- Recruit participants
- Conduct interviews
- Transcribe and analyse interviews

Study 2 Internet based consumer questionnaire

Objectives – to determine
- Types of games played (online and land-based)
- Frequency of play
- Behaviour and attitudes to responsible gambling
- Motives to gambling
- Consumer perceptions of transparency, fairness, self-management tools, staff and provider help
- Categorical data

- Agree terms of reference
- Ethical approval (University of Salford and Manchester Evening News
- Protocol analysis
- 1st pilot study
- Instrument modification
- 2nd pilot study
- Questionnaire placed on University of Salford student web-page and Manchester Evening News web-page
- Responses automatically collected via Surveymonkey

Data Analysis

- Descriptive statistics
- Chi-square test, Linear Regression, Stepwise Multinomial Regression, ANOVA, t-test and principal component analysis

Discussion
Conclusions
Recommendations

Chapter 4   Methodology

4.1   Introduction

This chapter begins with a review of the research philosophy that underpins and justifies the methods and approaches of data collection and analysis that have been adopted by this research.   The chapter also includes an evaluation of the advantages and disadvantages of each approach and how they affect the validity and reliability of the results that emerged from the studies undertaken. The chapter concludes with a justification of the samples used in each of the studies with an evaluation of the implications that the sampling methods have on the validity and reliability of data.

A summary of the methods adopted for each of the two studies in the research are included in chapters 5 and 6 respectively for the employee and consumer studies.

4.2   Philosophies and strategies underpinning the research strategy

4.2.1   Definitions and types of research

There is no one universally accepted definition of research. For example, Saunders et al., (2007, p.7) defines research as: *"something that people undertake in order to find out things in a systematic way, thereby increasing their knowledge",* whereas for Ghauri and Gronhaug (2005, p.3) research is, *"'a process of planning, executing and investigating in order to find answers to specific questions.''* Such definitions, although different, imply that if knowledge is to be valid, reliable and provide a platform on which decisions are to

be based, then it requires a systematic approach to the collection and analysis of data. For Creswell (2003) this process should be based on a philosophy that includes the coherent collection of ideas, theories and concepts which relate to a specific problem or academic discipline. Supporting this view, Collis and Hussey (2008) suggest that research which underpins knowledge generation can be classified into the following categories:

i.	exploratory research	This applies to studies where there are no or few relevant, previous studies that can be referred to. In addition, it refers to research where there may be few theories or a deficient body of knowledge.
ii.	descriptive research	This applies to research where the emphasis is on describing phenomena as they exist. Usually there is an emphasis on quantitative data and statistical analysis.
iii.	analytical/explanatory research	This approach seeks to analyse and explain reason behind descriptive research with an emphasis on answering 'why' and 'how' questions.
iv.	predictive research	This applies to research which seeks to predict occurrences based on hypothesised general relationships

This thesis starts with an exploratory study which aims to establish the perceptions that employees of Internet gambling organisations have of responsible gambling and the obligations that they and other stakeholders have in promoting and managing responsible gambling. Later, the research adopts an analytical/explanatory approach as it attempts to give meaning to the relationship between consumers and employees in terms of their

perceptions of responsible gambling initiatives and the factors that encourage and inhibit them from gambling responsibly.

4.3   Research philosophy

For Saunders et al., (2007, 2012) research philosophy is the process that the researcher adopts to develop knowledge. This in turn affects the way the research is conducted as it is driven by ontology (beliefs about the nature of the world and reality) which determines epistemology (how knowledge about that reality is discovered) which forms the justification for the methodology (the criteria used to select the research methods). For Saunders et al., (2007, 2012) it is these three elements that make up the research paradigm that drives the research process. This view was previously outlined by Burrell and Morgan (1979) who suggested that in addition to the research aims, the researchers own philosophical approach is also influential in shaping the research methodology as the methods used to collect and analyse data will be influenced by the assumptions that the researcher makes about the world they investigate and the nature of knowledge within that world.

In developing knowledge, many researchers, including Easterby-Smith, Thorpe and Lowe (2004), Saunders et al., (2007, 2012), and Collis and Hussey (2008), distinguish between research paradigms which lie on a continuum between the positivist and phenomenological approaches. For Saunders et al., (2007, 2012) the continuum can be categorised as consisting of the following three paradigms: positivism, realism and interpretivism.

The positivist perspective, also classified by Collis and Hussey (2008) as quantitative, objective, scientific, experimentalist and traditional, is based on the principle that both the natural and social sciences employ methods that identify and measure independent factors in the 'real' world. By subjecting factors to natural laws they suggest that researchers are able to understand them and as such, the aim of positivist perspective is to discover reality in the form of deductions from evidence that is value-free, and from which statistical generalisations can be made that will have meaning for all observers (Collis and Hussey 2008).

Robson (2002) suggested that positivism implies that only direct experience and observations provide the basis for knowledge in science. Supporting this view Amaratunga (2002) proposed that positivism uses quantitative and experimental methods to test hypothetical-deductive generalisations which require the researcher being independent of the subject being observed in order to reduce general elements to more specific elements in order to assist in the analytical process. Easterby-Smith et al., (2004, p.28) further explains the positive approach as assuming that: *"the social world exists externally, and that its properties can be measured through objective methods rather than being inferred subjectively through sensation, reflection, or intuition"*.

Milliken (2001) and Bryman (2004) also support the view that a fundamental principle of positivism is that the social world is based on objective measures, rather than being inferred subjectively through sensation or intuition. As such, positivism reflects the traditional scientific approach to developing knowledge which places emphasis on numerical values to verify and/or test existing theories and the strength of relationships between variables (Bryman, 2004). Within study 2, a questionnaire was used to elicit

views from consumers on their perceptions of responsible gambling tools and factors that motivate and inhibit them from adopting responsible gambling behaviours. The justification and analysis of this method is outlined in sections 4.5.4 and 4.5.5.

For Saunders et al., (2007, 2012) realism is based on the principle that an external reality exists and that it can be studied. They distinguish between direct realism which is based on the principle of 'what you see is what you get' and critical realism which is based on the principle that reality is based on experiences and sensations. Critical realism acknowledges that observations of reality are subject to error and that theory is revised as new research emerges. As such, reality is related to a specific time, place and context and knowledge is based not only on deductive approaches, but it is also based on an inductive approach where theory and knowledge are discovered and built through analytical generalisation rather than though statistical approaches (Riege, 2003). For these reasons, Riege (2003) and Saunders et al., (2012) suggest that the critical realism perspective is more suited to business and management research as reality is influenced by the belief system of the researcher and the participants, and the meaning they give to reality. Consequently, reality and knowledge are constantly evolving and critical realism enables factors affecting change to be identified. Within both studies, but more specifically study 1, qualitative responses were elicited from employees in relation to responsible gambling practices and factors that may encourage or inhibit responsible gambling behaviour by consumers and employees. The justification and analysis of these methods are outline in sections 4.5.1 and 4.5.2.

For Saunders et al., (2007, 2012) interpretivism is rooted in phenomenology and symbolic interactionism and is based on the principle that differences in the social world require an

understanding of meaning attributed to actions by actors. As such, they suggest that an individuals' interpret their social world in terms of the meanings they, and others, give to a role. Knowledge generated from this perspective is not value-neutral but subject to a variety of influences that affect an individual's perception, such as culture, social background, gender etc. Given the exploratory nature of this research, and the emphasis placed on consumer and employee perceptions of responsible gambling practices and factors that may encourage or inhibit responsible gambling behaviour by consumers and employees, there is acknowledgement that their perceptions are based on how individual's interpret their social world in terms of the meanings they, and others, give to a role.

In comparing the two extremes of the paradigm continuum, positivist and phenomenological, Amaratunga (2002) suggested that the phenomenological approach requires the researcher to understand human experiences within a specific context and requires a qualitative or interpretative approach. This distinction is supported by Easterby-Smith et al., (2004, p.28) who suggested that the phenomenological approach: *"focuses on the way that people make sense of the world, especially through sharing their experiences with others via the medium of language"*.

In summarising the differences between the positivist and phenomenological approaches, Easterby-Smith (2004) suggested the following:

Table 4   Differences between positivist and phenomenological approaches

Factor	Positivism	Phenomenology
To observe	Must be independent	Is part of what is being observed
Human interest	Should be irrelevant	Are the main drivers of science
Explanation	Must demonstrate causality	Aim to increase general understanding of the situation
Research progress through	Hypotheses and deductions	Gathering rich data from which ideas are induced
Concepts	Need to be operationalised so that they can be measured	Should incorporate stakeholder perspectives
Units of analysis	Should be reduced to simplest terms	May include the complexity of whole situations
Generalisation through	Statistical probability	Theoretical abstraction
Sampling requires	Large numbers selected randomly	Small numbers of cases chosen for specific reasons

Source: Easterby-Smith et al, (2004, p.30, modified)

In comparing the implications of using a quantitative and/or qualitative approach,

Sarantakos (1998) propose the following summary:

Table 5   A Comparison between quantitative and qualitative research methods

Procedure	Quantitative Methodology	Qualitative Methodology
Preparation	Definition: precise, accurate and specific Hypotheses: formulated before the study Employs: operationalization	Definition: general, and loosely structured Hypotheses: formulated through/after the study Employs: sensitising concepts
Design	Design: well planned and prescriptive Sampling: well planned before data collection; is representative Measurement: mostly nominal	Design: well-planned but not prescriptive Sampling: well-planned but during data collection; is not prescriptive Measurement: employs all types
Data Collection	Uses quantitative methods; employ assistants	Uses qualitative methods; usually single-handed
Data Processing	Mostly quantitative and statistical analysis; inductive generalisations	Mainly qualitative; often collection and analysis occur simultaneously; analytical generalizations
Reporting	Highly integrated findings	Mostly not integrated findings

Source: Sarantakos, (1998)

Amartunga et al., (2002) suggested that all philosophical approaches have their own

strengths and weaknesses. In terms of the positivist approach, they suggest the following

strengths: they provide wide coverage of a range of situations; they provide the

opportunity to collect and analyse data in a fast and economical manner and they are suitable for statistical verification. They identify the following weaknesses of the positivist approach: the methods are inflexible and artificial; they are not effective in demonstrating the significance or meaning that people attach to actions; they are not helpful in generating theories; and because they concentrate on what is or has happened it is difficult for them to infer what changes are required to be made. With reference to the phenomenological approach they identify the following strengths: the methods of data collection are more natural; they enable a change process to be evaluated over time; they allow for meaning to be established; they are emergent in that new scenarios of phenomena can be considered as they emerge and they contribute to the development of theory. In terms of the weaknesses of the phenomenological method, Amartunga et al., (2002) identify the following factors; the methods require more resources and can be tedious; it may be difficult to analyse and interpret data; it is harder to control the process, pace and end point of the research; and policy makers may be apprehensive in using qualitative data as the basis for policy.

In developing the analysis of the applications of research paradigms Collis and Hussey (2008) provide the following assumptions of quantitative (positivist) and qualitative (phenomenological) methods to data collection and analysis:

Table 6   Assumptions of quantitative and qualitative methods

Assumption	Questions	Quantitative	Qualitative
Ontological	What is the nature of reality?	Reality is objective and singular, apart from the researcher	Reality is subjective and multiple as seen by participants in a study
Epistemological	What is the relationship between the researcher to that researched	Researcher is independent from that being researched	Researcher interacts with that being researched
Axiological	What is the role of values	Value free and unbiased	Value laden and biased
Methodological	What is the process of research?	Deductive process; Cause and effect; Static design categories; Isolated before study; Context free; Generalisations leading to prediction, explanation, and understanding; Accurate and reliable through validity and reliability	Inductive process; Mutual simulation shaping of factors; Context bound; Emerging design –categories identified during research process; Patterns, theories developed for understanding; Accurate and reliable through verification

Source: Collis and Hussey (2008)

Whilst there are differences in the content of the tables presented by Easterby-Smith et al., (2004) and Collis and Hussey (2008) what can be concluded from the tables is that the phenomenological approach focuses on subjective aspects of human activity by emphasising the meaning rather than the measurement of social phenomena (Hussey and Hussey, 1997; Amaratunga, 2002; Patton, 2002; and Creswell, 2003). What the tables also imply is that knowledge, from a phenomenological perspective, is subject to various influences that affect the perception of the researcher and those participating in the research. Such influences may include culture, upbringing, and gender etc., and as such, knowledge is not value–neutral and objective. By comparison, knowledge from a positivist perspective is objective, value free and based on deductive processes. The application of principles outlined in this discussion is included in sections 4.5, 4.5.1 and 4.5.4.

4.4   Inductive and deductive approaches to research

A number of researchers including Patton (2002), Creswell (2003), Bryman (2004), and Saunders et al., (2007, 2012) distinguish between inductive and deductive approaches to acquiring new knowledge.   The inductive approach aims to establish generalisations about factors that are being studied and Saunders (2007, 2012) suggested that the following are characteristic of inductive approaches to research: gaining an understanding of the meaning humans attach to events; having a good understanding of the research context; being aware of principles of qualitative data collection; having a flexible research structure which acknowledges the researcher is part of the research process; and placing limited emphasis on the need to generate a conclusion.   Consequently, the inductive approach builds theory as the research progresses.

The aim of a deductive approach is to test theory with the literature being the source of questions and themes.   In evaluating the deductive approach, Bryman (2004) suggested that the researcher deduces a hypothesis from what is known and this is then subjected to empirical research. Saunders (2007, 2012) suggested that this approach is characterised by the following: scientific principles; moving from data to theory; the need to explain causal relationships between variables; the use of quantitative data; the application of controls to ensure data validity; the practical application of concepts to ensure clarity of definition; a highly structured approach; researchers independence of what is being researched; and the necessity to select samples of sufficient size in order to generate conclusions.

Creswell (2003) proposed that one of the key differences between inductive and deductive approaches is how existing literature is applied in guiding the research. In the deductive approach the literature review is used to develop questions. As such, questions, themes

and relationships are identified before the primary data is collected. This view is supported by Hair, Money, Page, and Samouel (2007) who maintain that from a deductive approach, secondary data is fundamentally aimed at building a theoretical framework for the research under consideration, and defining the scope as well as limitations to the study. In comparison, the inductive approach establishes a theory as the research progresses and themes are identified.

Ghauri and Gronhaug (2005) supports the above distinctions between inductive and deductive approaches to acquiring knowledge and concluded that quantitative approaches are more suited to a deductive approach whilst qualitative methods are most useful for inductive and exploratory research as they can lead the researcher to build hypothesis and explanations. Qualitative data has the advantage of enabling actual meanings that an individual places on a specific event or process to be established. For these reasons Amaratunga (2002) and Saunders et al., (2007, 2012) suggested that qualitative data is the best strategy to discover and explore new areas.

Saunders et al., (2007, 2012) concluded that a combination of deductive and inductive methods is not only possible within the same piece of research, but is often a desirable approach. For that reason, the two approaches were adopted in this research. Deduction is used in identifying common perceptions from the literature review about what constitutes responsible gambling and the factors that may affect the relationships between stakeholders. An inductive approach is applied to collecting information from employees on what they perceive responsible gambling is, establishing what their role is in meeting organisational responsible gambling obligations and proposing how current policies and process can be developed, implemented, monitored and evaluated. Once these factors are

established a deductive approach will be applied in identifying consumer perceptions of current responsible gambling initiatives and how they can be made more effective.

Sarantakos (1998) explains that inductive and deductive methods can be used concurrently as in triangulation as it enables information on a single issue to be collected from various view points; it allows for a more valid and reliable approach as the deficiencies of one method are countered by the strengths of another; and they overcome the problems associated with a single method, single stakeholder approach. Hussey and Hussey (1997) also support this approach as it allows the researcher to take a broader and often complementary view of the research problem.

4.5   Research strategy

According to Creswell (2003) research design refers to the strategy and structure of the research framework that enables the research question(s) to be answered.

For Saunders et al, (2007, 2012) the research process can be viewed as a cross section of an onion where the outer skin is the research philosophy beneath which is the research approach, (see Figure 4). They suggested that before you can decide on the final instrument, other choices, as represented by layers of the onion need to be peeled. For example, such choices include the method of data collection, the period over which the data is to be collected and the breath of stakeholders involved.

Figure 4   The research onion
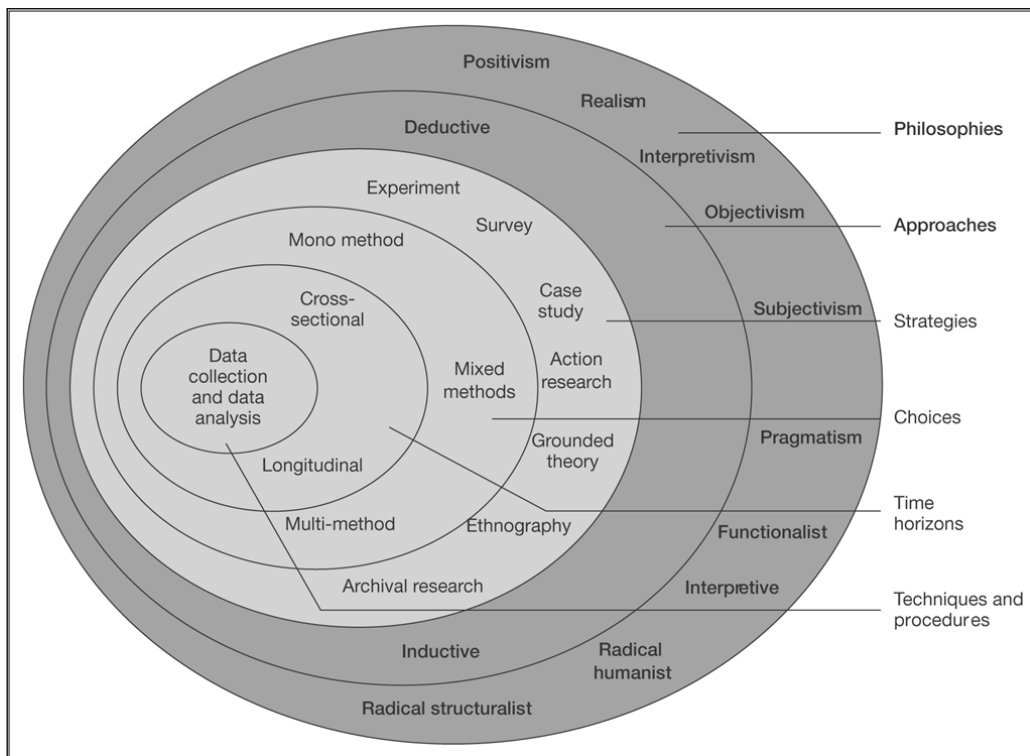
Source: Saunders et al, (2007, 2012)

Yin (2003) highlighted the following three factors that should be considered when designing the research strategy: i) the type of research question posed, ii) the extent of control an investigation has over actual behavioural events and iii) the degree of focus on contemporary as opposed to historical events.   Based on these conditions, Yin (2009) suggested the following five types of research strategies:

Table 7   Types of research strategies

Strategy	Form of research question	Requires control of behavioural events	Focus on contemporary events
Experiment	How, why	Yes	Yes
Survey	Who, what, where, how many, how much	No	Yes
Archival analysis	Who, what where, how many, how much	No	Yes/No
History	How, why	No	No
Case Study	How, Why	No	No

Source: Yin (2009)

Within this research, the research hypotheses underpinning the primary data collection were:

1.   Employees and consumers both perceive the current system of responsible gambling to be fair and transparent.

2.   Employees require additional duty of care in terms of training and monitoring given their close proximity to gambling products and services.

3.   Employees feel that they are equipped with the knowledge and skills to fulfil their responsible gambling obligations to their requirements.

4.   Personal characteristics of the employee and consumer are influential in governing their approach to responsible gambling.

This thesis utilised a mixed methodology where emphasis was placed on critical realism. This reflects the changing nature of the business environment and the fact that stakeholders interact with that environment. As such, individuals give meaning to reality based on their perceptions of that reality and their own personal characteristics. In addition, individuals have an ability to influence how reality is perceived by others. Consequently, knowledge

is discovered and built through analytical generalisation based on replication logic by participants rather than though statistical approaches (Riege, 2003).

In order to determine employee and consumer perceptions of responsible gambling, two studies were undertaken. The first study was an exploratory study based on employee perceptions of responsible gambling. The study aimed to establish employee perceptions of responsible gambling and also how they and consumers engaged with responsible gambling tools. This study was based on semi-structured interviews, (see section 4.5.1). The second study aimed to establish consumer perceptions of responsible gambling; the factors that they associated with motivating and inhibiting individuals to gamble responsibly and their personal gambling practices. Data for this study was collected through a web based questionnaire, (see section 4.5.4).

Figure 3 provides a summary schematic flow process of the research adopted in this research

4.5.1 Research strategy 1

Study 1 aimed to explore the perceptions of employees of Internet gambling organisations in terms of their understanding of responsible gambling and the factors that they believe motivate or inhibit them and consumers in meeting organisational standards for responsible gambling. As such, the study focused on establishing the meaning and understanding that employees of Internet gambling organisations gave to their working environment and how this was reflected in responsible gambling practices that they are expected to follow and those practices which they actually employ. As the study involved

establishing meanings that influence an employee's perceptions and actions at work, the focus of the data was on qualitative factors that the individual identified as affecting their behaviour and their interactions and relationships with other stakeholders. Consequently, and reflecting the conclusions of Amaratunga (2002); Creswell (2003); Ghauri and Gronhaug (2005) and Collis and Hussey (2008) a qualitative methodology was deemed the most appropriate method for this study.

Given the lack of information relating to employee perceptions of responsible gambling, the first study was an exploratory study based on the assumption that whilst there is one reality, it may be interpreted in a variety of ways due to the senses and minds of individual stakeholders. As such, there is no one best way to establish or evaluate if there is a cause and effect relationship between responsible gambling practices of the organisation and the actual behaviour of the individual consumer or employee. This reflects the critical realism perspective and by implication rejects the positivist assumption that scientific principles and a 'one best method' could be applied (Riege 2003, Saunders 2007, 2012). The critical realism perspective adopted for the first study is based on the principle that research about cause and effect in the social world can be undertaken, and the results achieved may be the result of many sources of data. As such, there may be many explanations of reality but these can be grouped into manageable and meaningful categories.

To meet the aims of study 1, participation was sought from providers of Internet gambling products and services. One organisation, from thirty five that were approached, responded positively which reflects the conclusions of previous studies which highlight the difficulty in engaging with gambling operators (Collis and Hussey, 2008; Griffiths 2009a). Yin (2003. 2009) suggested that the use of a case study approach is most appropriate

where the issues being researched are 'real life' as opposed to issues that are purely academic. The contemporary and emergent nature of responsible practices of Internet gambling websites combined with the exploratory nature of this study further supports the use of a case study approach in study 1, (Yin, 2003, 2009).

Voss, Tsikriktsis and Frohlich, (2002) suggested that although the use of a single case study, in terms of one organisation, could offer greater depth of study, it has limitations on the generalisation of the conclusions made. They suggested that where a single case is used there is a need for detailed interviews with those involved to ensure depth of observation. This view is also supported by Sobh and Perry (2006) who propose that case studies rely on analytical logic as opposed to statistical logic which is associated with positivist approaches. As such, analytical logic relies on detailed observations being obtained from multiple participants. To satisfy this requirement, in study 1, a total of 17 employees across a variety of managerial and operational roles volunteered to be interviewed allowing for multiple perspectives to be collected on the organisations operational practices.

Ghauri and Gronhaug (2005) suggested that where one organisation is the focus of the study, it should be a larger organisation. The organisation involved in study 1, enjoys a national and international reputation as a provider of a variety of Internet gambling services and products. For Skate (1995) and Ghauri and Gronhaug (2005) the purpose of using such a large organisation is that it allows for the study of complex issues as larger organisations experience complex problems and they have expertise that will enable detailed information to be recorded.

4.5.2   Data collection in Study 1

Yin (2003, 2009) suggested that evidence from case studies can be collected via documentation, archival records, interviews, direct observations, participant observation, physical artefacts and ethnography. The following table highlights the advantages and disadvantages that Yin (2003) suggested that results from each of the methods.

Table 8   Six sources of evidence: strengths and weaknesses

Source of Evidence	Strengths	Weaknesses
Documentation	- Stable, can be reviewed respectively - Unobtrusive, not created as a result of the case study - Exact, contains exact names, references and details of events - Broad coverage, long time span, many events and many settings	- Retrieval can be low - Biased selectively, if collection is incomplete - Reporting bias, reflects (unknown) bias of the author - Access can be deliberately blocked
Archival records	- Stable, can be reviewed respectively - Unobtrusive, not created as a result of the case study - Exact, contains exact names, references and details of events - Broad coverage, long time span, many events and many settings - Precise and quantifiable	- Retrieval can be low - Biased selectively, if collection is incomplete - Reporting bias, reflects (unknown) bias of the author - Access can be deliberately blocked
Interviews	- Targeted, focuses directly on case study topic - Insightful, provides perceived causal inferences	- Bias due to poorly constructed questions - Responsive bias - Inaccuracies due to poor recall - Reflexivity, interviewee gives what interviewer wants to hear
Direct observations	- Reality, covers events in real time - Contextual, covers context of events	- Time consuming - Selectivity, unless broad coverage - Reflexivity, interviewee gives what interviewer wants to hear - Cost, hours needed by human observers
Participant observation	- Realistic, covers events in real time - Contextual, covers context of events - Insightful into interpersonal behaviour and motives	- Time consuming - Selectivity, unless broad coverage - Reflexivity, interviewee gives what interviewer wants to hear - Bias due to investigators manipulation of events
Physical artefacts	- Insightful into cultural features - Insightful in technical operations	- Selectivity - Availability
Ethnography	- Extremely effective for collecting large quantities of in-depth data - The researcher gains an understanding of the research	- Highly inefficient of researcher time as it requires researcher to spend long periods on site

Source: Yin 2003, p.86

The participating organisation set various parameters including restricted access to the site, no access to documentation or archived records and restricted access to operational areas. These factors meant that interviewing was the most appropriate and acceptable method for collecting qualitative data.

Robson (2002) explains that interviewing is a research method that involves interaction between a researcher and interviewee in which the expected outcome is to gain information from the interviewees. Yin (2003, 2009) suggested that interviewing is the most important source of case study information as it enables data to be collected where there is no established theoretical and methodological framework. Saunders et al., (2007, 2012) also acknowledge that a deeper understanding can be achieved when discussions are held on a particular subject matter through interviews.

According to Robson (2002) there are three types of interview: fully structured, semi structured and unstructured interviews. Easterby-Smith et al., (2004) recommend that semi-structured interviews are appropriate where:

1. It is necessary to understand the beliefs, culture norms and experiences etc. that the influence the interviewees perceptions;

2. The interview aims to develop an understanding of the participant's world;

3. A step by step logical situation is not clear;

4. The subject matter is highly confidential or commercially sensitive;

5 The interviewee may be reluctant to be truthful about the issue other than confidentially in a one to one situation.

Within study 1, the employee study, the semi-structured interview was chosen as the method of data collection as its flexibility allowed for questions and their sequence to be modified based upon the interviewers perceptions of what seemed to be most appropriate. This enabled a more detailed understanding of participant views to be achieved as identified by Robson (2002) and Saunders et al., (2007, 2012). Another advantage of this method is that it enables the interviewer to instantly detect when participants do not understand questions as evidenced by the response that they give (Saunders et al., 2007, 2012). This enables misunderstandings to be corrected and participants can be encouraged to provide detailed replies to support their comments. An additional advantage, noted by Saunders et al., (2007, 2012) and demonstrated in some interviews is intonation, body language and other social cues that suggest that the interviewee requires clarification of certain questions which has the added advantage of building involvement and rapport in the interview process. As such, they suggest that the interaction between interviewer and interviewee forms the foundation for improving the accuracy of data.

4.5.3   Analysis of interviews

Once the data had been transcribed and checked, it was subject to thematic analysis following the principles outlined in Table 9, which enabled themes and similarities and differences between transcripts to be established. Although there is no universally accepted definition of thematic analysis there is general agreement that it is a generic skill used in qualitative data collection and analysis, (Aronson, 1994 and Braun and Clarke, 2004). It is the level of general applicability across a number of established methods that has resulted in some, such as Boyatzis (1998) and Holloway and Todres (2003) suggesting that thematic analysis is not a method in its own right. This is contested by Braun and

Clarke (2004) who suggested that whilst it is independent of theory, its flexibility offers the opportunity to provide a detailed account of data. A second criticism of thematic analysis, proposed by Antaki, Billig, Edwards and Potter (2002) is that the lack of rules means that it potentially results in a system where anything goes. Braun and Clarke (2004) counter this criticism by proposing the following six stage approach which they suggested will also maintain the methods flexibility and validity.

Table 9   Six stages in using thematic analysis

Stage	Activity	Description
1	Familiarizing yourself with your data	Transcribing data (if necessary), reading and re-reading the data, noting down initial ideas
2	Generating initial codes	Coding interesting features of the data in a systematic fashion across the entire data set, collating data relevant to each code
3	Selecting the themes	Collating codes into potential themes, gathering all data relevant to each potential theme
4	Reviewing themes	Checking of the themes work in relation to the coded extracts (phase 1) and the entire data set (phase 2) generating a thematic 'map' of the analysis
5	Defining and naming themes	On-going analysis to refine the specifics of each theme and the overall story the analysis tells, generating clear definitions and names of each theme.
6	Producing the report	The final opportunity for analysis. Selection of vivid, compelling extract examples, final analysis of selected abstracts, relating back of the analysis to the research question and literature, producing a scholarly report of the analysis.

Source: Braun and Clarke (2004, p. 87)

For Braun and Clarke (2004) the use of the six stage approach allows thematic analysis to be used in at least one of three ways. Firstly, it can be used from a critical realism perspective where it is used to report an individual's experiences and meanings. Secondly, it can be used from a constructionist perspective where it is used to examine how one factor such as an event, meaning or experience affects another variable. Thirdly, it can be used as a contextualised perspective which acknowledges the way an individual develops meaning and how society reflect these meanings.   Within study 1, thematic analysis involved all three aspects in that it sought to establish the meanings that individuals

assigned to responsible gambling which were then compared with their perceived view of reality and how this in turn affected the individual's behaviour at work.

4.5.4   Data collection in study 2

Study two involved a questionnaire to establish consumer perceptions of responsible gambling initiatives employed by Internet providers of gambling products and services. The aim of the questionnaire was to establish: consumer views in general as they relate to the games they play; their gambling behaviour and its effect on themselves, their family and friends; their reasons for gambling; their perceptions on how fair gambling websites are; their perceptions on the codes of conduct of gambling websites; their views on how they manage their own gambling activity; and how they perceive gambling operators help them to manage their own gambling activity.

According to Hair et al., (2003) a questionnaire is a predetermined set of questions designed to capture data from the participants. This compares to the definition proposed by Saunders and Lewis (2012, pp141) that a questionnaires is "a general term that indicates all methods of data collection in which each person is asked to answer the same questions in the same order." The common theme within such definitions is the use of predetermined questions on various subjects or on a specific aspect of a subject to which selected members of a population are requested to react.

Questionnaires can be self-administered where each participant reads and answers the same set of questions in a predetermined way. Other alternative ways of collecting responses from a questionnaire include telephone based, researcher administered, Internet

and post. Capitalising on the increased popularity of the world-wide-web, the questionnaire in study 2 was administered through the Internet and was hosted by SurveyMonkey. The use of a web based questionnaires have been noted for their potential to reach very large audiences over a wide geographical area and the results are recorded as the participant types (Saunders and Lewis 2012). The use of electronic surveys is also convenient, cost effective, environmentally friendly and professional. Advice on the format and presentation of the survey was sought from technicians within Salford Business School as the questionnaire was placed on the University of Salford Student Webpage and the webpage of the Manchester Evening News. The survey conformed to protocols set by both the University of Salford and Manchester Evening News. The use of an Internet based questionnaire was also justified as previous studies into Internet gambling had used this approach and its use was generally seen as an appropriate method to collect data on Internet gambling behaviour (Wood et al., 2007 and Griffiths et al., 2009a).

In order to maximise the return rate, participants were offered the opportunity to win an I-Pad 2. The publicity material presented on the University of Salford website, for which ethical approval was granted, is outlined in Appendix 2. The publicity material sought to capitalise on the advantages of an introductory letter as highlighted by Easterby-Smith, Thorpe and Lowe., (1991) namely: to establish the purpose of the research, inform participants of the incentive, provide them with the link to the questionnaire and provide them with sources of data where they could access additional information on responsible gambling. The use of non-material (additional information sources on responsible gambling) and material (potential to win an i-Pad2) incentives were seen to maximise the response rate. Such incentives are considered to be an acceptable and a low risk method

for improving participating rates in gambling research (Parke, Griffiths and Parke, 2007 and Griffiths, 2009a).

For Saunders and Lewis (2007, 2012) the research objectives are the key driver for questionnaire design. Hussey and Hussey (1997) suggested the following as factors that should also affect questionnaire design: sample size; type of question; wording of questions; instructions to participants, wording of accompanying letters; method of distribution and return; validity and reliability tests; and methods for collating and analysing data.

According to Saunders et al., (2007, 2012) a unique characteristic of questionnaires is its standardized nature which reduces the need for the researcher to determine and decide on which questions to ask every participant. They suggest that this attribute makes the responses obtained standardised and objective even though participants have time to carefully consider their responses. They also suggest that questionnaires are a relatively cheap way of collecting relevant data.

Whilst the use of questionnaires continues to gain wide spread popularity, Saunders et al., (2007, 2012) raise a caution with the accuracy of data collected from questionnaires as they are always completed in hindsight. They also suggest that question format can be a potential weakness of questionnaires in that the standardised nature of questionnaires makes it impossible for any explanations to be given to questions which participants might misinterpret. In addition, open-ended questions in questionnaires might produce large amounts of data that will require lots of resources, time and skills to analyse. Collis and Hussey (2008) said that a valid sample is difficult to get and in some cases may require

incentives to get participants to respond to questionnaires. They also highlighted the following as potential factors that may impair the validity and reliability of data collected from questionnaires: participants not being able to recollect critical information about an experience; participants retrieving partial or erroneous information about an event and also a participant being able to only retrieve generic information.

The questionnaire in study 2 was designed with the above advantages and disadvantages in mind. In addition, the questionnaire design was influenced by the need to capture consumer perceptions on various aspects of responsible gambling provision offered by Internet gambling providers. As such, participants were not required to recall specific experiences as they could be impaired due to the passage of time (Collis and Hussey, 2008). Two pilot tests were also conducted, one following the protocol analysis, (see section 4.6.2), and the second following the instrument modification, to ensure that ambiguities and the tendency for misinterpretation of questions were reduced to a minimum. Once minor amendments were corrected, the questionnaire was issued using SurveyMonkey in Spring 2011.

The questionnaire contained 113 questions, combing both open and closed questions. Four questions were open-ended questions, which provided participants with an opportunity to disclose more detailed responses, examples and explanations (Saunders and Lewis 2012). The first part of the questionnaire focused on gaining participant consent and information on their playing habits. The second part focused on participant's perceptions and attitudes towards responsible gambling and currently used responsible gambling tools. The final part of the questionnaire related to personal information of the participant including their age and gender.

The format and specific questions were developed along the guidelines proposed by Hussey and Hussey (1997), namely:

1.	Explain the purpose of the study to all participants.

2.	Keep the wording in questions as simple.

3.	Avoid the use of jargon and specialist language

4.	Phrase questions so that they have only one meaning

5.	Avoid vague and descriptive words

6.	Avoid the use of negative questions

7.	Ask only one question at a time

8.	Include only relevant questions

9.	Include questions that allow cross checking with other questions

10.	Avoid questions that require calculations

11.	Avoid leading and value questions where a required answer may be implied

12.	Avoid questions that may cause embarrassment

13.	Avoid questions based on memory

14.	Keep the questions and schedule as short as possible

In addition to the guidelines proposed by Hussey and Hussey (1997) the design checklist for Research Questionnaire Design, proposed by Sarantakos (1998) was used to improve the structure, validity and reliability of the questionnaire (see Table 10).

Table 10 Checklist for research questionnaire design

Variable	Questions
Size of questionnaire	- Is the questionnaire too long or too short - Every questions should have a specific purpose, if not it has no place
Relevance of the procedure	- Is every question required? - Could some questions be omitted? - Is there any repetition of questions? - Is more than one question needed for each item? - Questions will be retained only if they have a certain purpose and if they are really necessary
Clarity	- Are the questions easy to understand? - Are the questions unambiguous?
Tone and content	- Is the tone of the questions acceptable? - Are the questions unethical, threatening, insulting, patronising or otherwise biasing? Such questions must be omitted or changed
Set up of the questionnaire	- Is sufficient space provided for recording answers given to open-ended questions?
Pre-coded questions	- Are the response categories for pre-coded questions easy to understand, exhaustive, uni-dimensional and mutually exclusive? If not they need to be restructured.
Adequacy	- Are all aspects of the topic adequately covered? If not new questions need to be added
Instructions	- Are sufficient instructions given for filling out the questionnaire and for proper use of probes?
Level of pitching	- Is the wording of the questions appropriate for participants linguistic ability, education, interest and intellectual capacity
Covering letter/statement	- Is the cover letter constructed adequately? - Does it offer the required information? - Are there any points missing - Is it too long or too short - Are the participants properly addressed in the cover letter?
Layout	- Are the layout of questionnaire, the colour of paper and the print size adequate and acceptable?
Pre-coding	- Is pre-coding recorded adequately and in accordance with the computer package used?
Statistical data	- Are all statistical data of the participants required? (age, education, occupation etc.) - Are they positioned in the right place on the questionnaire?
Guides	- Are the guides introduced to direct the participant through the questions clear and adequate?
Principles	- Have the methodological principles regarding the questionnaire construction been adhered to?
Legal responsibilities	- Are any questions likely to cause a violation of the rights of the participants or third parties?
Ethical considerations	- Is the questionnaire ethically sound
Overall impression	- Is the questionnaire easy to read and pleasant to follow overall?

Source: Sarantakos (1998)

4.5.5 Analysis of questionnaire

Field (2009) suggests that there are several modelling techniques that can be applied to questionnaire data but the appropriateness of a technique is determined by the research question. Within the second study, the following statistical techniques were applied: chi-square test, linear regression analysis, stepwise multinomial regression, ANOVA, *t*-test and principal components analysis.

4.5.6 Linear regression

Linear regression is a version of multiple regression which enables the simultaneous testing and modelling of multiple independent variables. It allows for the prediction of a score on one variable (dependent) on the basis of the scores on several other variables (independent), (Field 2009). Linear regression analysis was carried out on scale data including exact PGSI score and age.

Below is the equation for linear regression analysis

$$Y = \alpha + \delta_1 X_1 + \delta_2 X_2 + \cdots\cdots + \delta_n X_n$$

where,

$\propto$ = Intercept, a measure of the mean for the responses when all predictor variables are at value 0 (zero), δ = delta function or slope measuring the rate of change in Y (the dependent variable) given the change in X (the predictor variable) and $X_1, X_2,$ ...... and X_n are the predictor variables used in the analysis (Allison, 1999).

Section 6.6.1 provides specific reference to the liner regressions undertaken as part of this study.

4.5.7 Stepwise multinomial regression analysis

According to Gujarati (2003) stepwise multinomial regression analysis analyses variables from several categories and has a high likelihood of demonstrating relationships across categories irrespective of demographic influences such as age, gender, and work status etc.

This modelling technique was used to analyse ranking and likert-scale type questions against categories where there were at least 2 categories. For example comparing responses based on frequency of play (4 possible categories) and PGSI Categories against perceptions of factors that cause harm.

The stepwise multinomial regression formula is as follow:

$$1(\boldsymbol{\alpha}, \boldsymbol{\beta}) = \prod_{i=1}^{n} [\boldsymbol{\pi_1}\ (X_i)^{y_{1i}}\ \boldsymbol{\pi_2}\ (X_i)^{y_{2i}}\ \boldsymbol{\pi_3}\ (X_i)^{y_{3i}} \dots \dots \boldsymbol{\pi_n}\ (X_i)^{y_{ni}}]$$

Where:

> 1 is the usual indicator function; α and β are the model parameters; π1, π2 … πn are the probabilities of various attributes, respectively; Xi is the covariates of the i th attribute; y1i is an indicator variable which is 1 if the i th attribute is of type 1, or 0 otherwise, etc. (Hossain, Wright and Petersen, 2002).

Section 6.6.2 provides specific reference to the liner regressions undertaken as part of this study.

4.5.8 Factor analysis – Principal Component Analysis (PCA)

For Field (2009) factor analysis is used in social sciences where latent variables cannot be directly measured. As such, it is suitable for studies into the perceptions that individuals have of the social world they inhabit; as is the focus of this study. For Field (2009) the

successful implementation of this approach is dependent on understanding the variable(s) in a data set, developing a questionnaire that will measure underlying variables and constructing the data into valid categories without losing the original meaning attached to data.

Field (2009) outlines that Factor Analysis uses a correlation matrix, the *R* Matrix, to establish correlation coefficients between variables. For Field (2009, pp629) *"by reducing a data set from a group of interrelated variables to a smaller set of factors, factor analysis achieves parsimony by explaining the maximum amount of common variance in a correlation matrix using the smallest number of explanatory constructs".* In terms of establishing the level of commonality between variables, Field (2009) suggests that by using scree plots, those factors with values greater than 1 should be retained as they represent a substantial variation. He refers to this as the Kaiser Criterion which he suggested is accurate where the number of variables is less than 30 and the commonalities are greater than 0.7, and where the sample size is greater than 250 and the commonality is greater than 0.6. Within study 2, based on Internet consumer perceptions, the sample size was 425 but to ensure identification of appropriate variable commonalities of at least 0.7 have been used.

Field (2009) suggested that in general, most variables have a high loading on the most important factor and smaller loading on other less important factors. In order to distinguish between factors rotation is applied whereby a factor is classified on an axis. Rotation may be classified as either orthogonal or oblique. Orthogonal rotation is where rotation is completed keeping the factors independent with the axis rotating whilst remaining perpendicular. This is not the case in oblique rotation where factors do not

remain independent or unrelated as the axis rotates independently. Where factors are thought to be related, as in this study, Field (2009) recommends oblique rotation citing that *"in practice there are strong grounds to believe that orthogonal rotations are a complete nonsense for naturalistic data, and certainly for any data involving humans",* (Field, 2009, p644).

Field (2009) suggested that significance of factors is dependent on the sample size. He suggests that only factor loadings of at least 0.4 should be used as this explains 16% of variance. Although Field (2009) suggested that there is debate on the relationship between sample size and number of factors, he suggested that where there are four or more loadings greater than 0.6 the factor is reliable regardless of sample size.

Within Principal Component Analysis, the Kaiser-Meyer-Olkin (KMO) is a measure of sampling adequacy. Small values of the KMO statistic indicate that the correlations between pairs of variables cannot be explained by other variables and that factor analysis may not be appropriate. In the KMO table and Bartlett's test, the KMO statistic should be greater than 0.5. In terms of meanings attributed to different KMO values, Field (2009) suggested KMO values between 0.5-0.7 are mediocre, values between 0.7-0.8 are good, those between 0.8-0.9 are very good and values above 0.9 are superb. These thresholds have been used in applying PCA within the analysis of the second study based on consumer perception of Internet gambling.

4.6 Validity and reliability

Validity is a critical aspect of every research study. Whilst Collis and Hussey (2008) see validity as referring to the accuracy of data and the degree to which it corresponds to or mirrors reality, for Saunders and Lewis (2012, p127) validity is "the extent to which (a) data collection method or methods accurately measure what they were intended to measure and (b) the research findings are really about what they profess to be about". The lack of an agreed definition of validity has resulted in it being divided into a number of different components. For example, Saunders et al., (2007, 2012) classified validity into internal and external validity categories. They define internal validity or 'credibility' as a process that assesses how confident one can be on the findings in a research project. In contrast, they see external validity or 'transferability' as assessing whether the research findings can be applied to other contexts or other groups of people in addition to the people and context in which the research was conducted.

For Collis and Hussey (2008, p.58) "reliability is concerned with the findings of the research; if research findings can be repeated then it is considered as reliable". For Saunders and Lewis (2012, p.128) reliability is "the extent to which data collection methods and analysis procedures will produce consistent findings". Whilst concerns over the reliability of some interviews have been raised, Yin (2003) proposed that elements of interview bias are reduced as the interview becomes more structured. For this reason, semi-structured interviews were used in this research study.

4.6.1   Validity and reliability in qualitative research methods

With specific reference to validity issues in qualitative studies, Kvale (1995) suggested that validity is a subjective phenomenon which has little meaning outside of the domain of those who share a particular paradigm.   As such, he suggested that within qualitative studies there is no absolute way of determining that validity exists as it is the participants who determine the 'truth' of any research process.   Saunders et al., (2007, 2012) also support this view, suggesting that there are no infallible rules for establishing the validity of qualitative research.   They further suggest that as the focus of qualitative research is human beings and human activity, it is unlikely that absolute certainty in knowledge will ever exist. This problem is more acute where abstract concepts, feeling and perceptions are involved as you can never be certain that the researcher has accurately interpreted and presented the views of the interviewee in an accurate manner.

In order to improve the validity and reliability of the qualitative study undertaken in study 1, the following four principles, proposed by Lincoln and Guba (1985) were used to evaluate the study: 'credibility' (how truthful particular findings are); 'transferability' (the extent to which findings are applicable to another setting or group); 'dependability' (the consistency and reproducibility of the findings) and 'confirmability' (neutrality of the findings).   The following table indicates how these principles were applied with the employee study.

Table 11 Application of Lincoln and Guba (1985) principles to improve validity and reliability in qualitative studies

Lincoln and Guba (1985) principles	Application in study 1
credibility	- The interview template, sample recruitment process, and interview process was agreed with the Operations Director, Human Resources Director and Head of Compliance of the participating organisation. - A joint email outlining the purpose of the study was issued by the research team and the participating organisation. - Only individuals who work for the Internet gambling organisation were recruited ensuring that they had knowledge of responsible gambling system employed within the organisation. - Interviews were recorded - The interview template, sample recruitment process, and interview process was subject to ethical approval by the Ethics Committee at the University of Salford and by the participating organisation.
transferability	- Employees from different departments and at different operational and managerial levels were involved in the interview process ensured that different organisational perspectives could be obtained. - Responses were compared with the literature. - Responses by different interviewees were compared.
dependability	- All interview templates were agreed with University of Salford and the participating organisation. - All interviews were recorded - Interpretation of the thematic analysis was verified by the research team. - 2 pilot interviews were undertaken
confirmability	- Interviews were conducted on a one to one basis to minimise the opportunity for interviewees to confer. - Interviewees received an introductory email that was jointly issued by the research team and the organisation outlining the aims and purpose of the study. - Comparisons were made with the literature review and responses from other interviewees. - Interpretation of the thematic analysis was verified by the research team.

Source: Lincoln and Guba (1985, modified)

4.6.2   Validity and reliability in quantitative research methods

A number of models have been proposed to improve validity in quantitative research. Those applied in this research include face validity, criterion related validity, content validity and construct validity as proposed by De Vaus (1996) and Jennings (2001). For

Sarantakos (1998) and Jennings (2001) face validity exists where the questions posed relate to the subject and are viewed as an acceptable way of collecting data for a specific topic. Within this study, the questionnaire had two pilot tests, and was reviewed by the ethics panel of the University of Salford, the Manchester Evening News and the supervising team. The questionnaire was therefore viewed to have face validity as it was seen to be an acceptable format to collect data and the questions were seen to be fit for purpose by those who had experience of academic and operational aspects relating to Internet gambling. Criterion validity is where the questionnaire has the ability to deliver the same results as an established questionnaire. Where relevant, comparisons have been made with previous studies, the results of which suggest that the questionnaire has criterion validity. Content validity relates to the extent to which the content of the questionnaire measures the variables. Due to the lack of studies in this area there were only limited comparisons that could be made with previous studies. The scales used were agreed with the supervisory team which included academics and those who have knowledge of the Internet gambling sector.

Construct validity is seen to consists of the following three components and is concerned with the extent to which theoretical relationships between variables are met; nomological, convergent, and discriminant (De Vaus 1996). Nomological construct validity refers to the laws relating to a given construct which Field (2009) believes is more difficult to establish in social sciences. Cronbach alpha tests have been used to establish nomological validity and its use in this study is outlined in sections 6.6.1 and 6.6.3. For Field (2009) convergent validity is where expected theoretical relationships are reflected in reality whereas discriminant validity is where relationships that you would not expect to see in

reality are not reflected in the theoretical models. Where appropriate, convergent and discriminant validity have been established by using correlation and chi-square tests.

For Ericsson (2002) the validity and reliability of questionnaires can be improved by the use of protocol analysis which he sees as a rigorous methodology for obtaining a verbal review of an individual's thought sequences. The method assumes that it is possible to ask individuals to verbalise their thoughts in a manner that doesn't alter the sequence of thoughts affecting the completion of a task. As such, it is a valid method to collect data on thinking.

The approach is based on thinking aloud, and allows an individual to express their thoughts on a specific task. Although verbal reporting has been subject to criticism, such as an individual's inability to analyse their thoughts and infer the processes controlling the generation of new thoughts, Ericsson and Crutcher (1991) and Ericsson (2002) concluded that such reports have never cast doubt on an individual's ability to recall part of their thought sequences. As such, protocol analysis is seen as a valid methodology for any study involved with human thinking (Ericsson and Crutcher, 1991; and Ericsson, 2002).

Two of the 10 individuals involved in the first pilot study were separately asked to verbalise their thoughts whilst completing the study online. The time taken to complete the study was also noted as this provided an indication of the general time that it would take individuals to complete the 'live' questionnaire. The results from the two protocol analyses, and the first pilot study, resulted in changes being made to the wording of questions that were seen to be confusing and a change in the structure of the questionnaire so that questions requiring similar thought processes were grouped together within one

category. Following amendments, a second pilot test was undertaken where no significant

recommendations of improvements were made.

The validity and reliability of the quantitative data was further improved by specifically

relating where possible the themes of the questionnaire to the literature review as outlined

in the following table.

Table 12 Links between questionnaire themes and literature review

Questionnaire theme	Source
Gambling Activities – Including: betting more than you can afford; needing to gamble with larger amounts to get the same level of excitement; chasing losses; borrowing or selling items to fund gambling; self-identification of problems gambling; health problems results from gambling; other people suggesting you have a problem; feeling guilty about gambling	Carnes (1991) Griffiths (1996) Campbell and Smith (1998)
Reasons for Gambling – Including: relaxation; excitement; relieving boredom; to win money; socialising; to take your mind off other things; to earn income; to complete with others; to vent aggression; the fun element; to be mentally challenged; to something enjoyable	Young (1999) Black and Ramsay (2003) Griffiths (2003, 2005, 2009) Cooper (2004)
Factors that may Affect Level of Harm – Including: Convenience; Privacy and anonymity; higher jackpots; better odds; e-cash; playing more than one game at a time; excitement levels; better self-protection tools; promotions	Young (1999) Griffiths and Parke (2002) Griffiths (2003, 2005, 2009) Cooper (2004) Corney and Davis, (2010)
Perceptions of Fairness of Websites - Including: there is an "on/off" switch; software is fair; random number generators used to determine outcomes of games; terms and conditions for bonuses are fair; terms and conditions for play are open and honest; priority of staff is to keep consumers happy and playing; play for free are the same as real version of games; known characteristics which are addictive should not be incorporated in game design; reducing risk makes the game boring; individuals having information on their gambling is useful and enables better choices; can games be low risk and fun at the same time.	Griffiths and Parke (2002) Griffiths (2003, 2005, 2009) Hing and McMillen (2002) Parke et al., (2007) Hing (2003b) Hing and Breen (2008)
Effectiveness of Codes of Practice – Including: effectiveness of age verification; effectiveness of self-exclusion; desirability of industry wide self-exclusion; need for information on how to spot problem gambling; sites should provide information on where to get help; effectiveness of deposit and play time limits; children and access to gambling; the role of operators and regulators in improving consumer protection.	Hing and McMillen (2002) Hansen (2003) Parke et al., (2007) Hing (2003b) Hing and Breen (2008)

Self-Management – Including: provision of information on responsible gambling; being required to set limits; desirability of receiving information on personal playing habits (time/money/etc.); ease of accessing consumer information; effectiveness of limits (time/money/etc.); confidence in finding and using support mechanisms.	Hansen (2003) Parke et al., (2007)
Provider Help – Including: clear information on how games work is provided; chances of winning are clearly provided; information on net expenditure is easy to locate; customer service staff role in problem gambling; clear and honest terms and conditions; gambling operator's obligations in identifying and treating problem gamblers; research on problem gambling.	Parke et al., (2007)

To further enhance the validity and reliability of the quantitative data, the study was evaluated against the Lincoln and Guba (1985) principles. Although these principles were originally designed to assess qualitative data they have been used in this study as an additional test to improve validity and reliability.

Table 13 Application of Lincoln and Guba (1985) principles to improve validity and reliability in quantitative data

Lincoln and Guba (1985) principles	Application in study 2to improve validity and reliability
Credibility	- The questionnaire was subject to ethical approval by the University of Salford and the Manchester Evening News who promoted the study. (see appendix 1) - The first part of the survey highlighted the aims of the study and the process. - All participants were informed of their right to withdraw at any time up to pressing the 'submit' button. - All responses indicating the individual had not been active on an Internet gambling site in the past three months were excluded. - All responses identifying Antarctica as a main holiday destination were excluded. - All questionnaires completed using the same response throughout were removed - All questionnaires completed in less than 5 minutes were excluded.
Transferability	- Participants demonstrated similar demographics to those in other Internet gambling studies. - Participants used a variety of different websites suggesting an industry wide perspective was given. - Participants who play a variety of Internet games were included in the sample. - Responses were compared with the literature.
Dependability	- Data collection and analysis methods were approved by the University of Salford Ethics Committee. - Principles of questionnaire design proposed by Hussey and Hussey (1997), Sarantakos (1998) were used to structure/design the questionnaire - Questionnaires were subject to two pilot tests - Questionnaires were subject to protocol analysis. - 2 pilot studies were undertaken with 10 people in each group
Confirmability	- Comparisons were made with the literature review. - Statistical analysis was undertaken of the results - Interpretation of the statistical analysis was checked by the supervisory team

Source: Lincoln and Guba (1985)

To maximise both the internal and external validity of this research, triangulation between each of the studies and the literature review was undertaken. Thompson and Perry (2004) suggested that triangulated data improves knowledge of the social world, what influences and causes events and what influences an individual's beliefs and behaviour. As such, triangulation is important because reality may be perceived imperfectly by individuals and consequently, valid knowledge requires a single situation to be reviewed from many

sources. To improve the validity within this research, the two studies were contextualised within the Internet gambling sector and two stakeholder groups were used for data collection purposes. In addition, within the employee study, participants were from various gender, age and occupational groups within the participating organisation and within the consumer questionnaire, participants were from different age, gender, and consumer groups. Consequently, the results obtained reflected the organisational and industrial context rather than issues surrounding the data collection process (Yin 2003).

Validity and reliability were further improved as the supervisory team included individuals who had experience of working and researching within the Internet gambling sector. Their involvement in pilot studies and assessing the assumptions resulting from analysis meant that additional checks were made on the methods used to collect and analyse data. As such, the generalizability of research findings was achieved since there was more than one research setting and one stakeholder group in this thesis (Collis and Hussey, 2008).

4.7 Pilot studies

Yin (2003) suggested that the purpose of a pilot study was to help the researcher to refine data collection plans in terms of the content of the data collection model, procedures for analysing data and methods for presenting findings. Thus, separate pilot studies were conducted for each investigation with the purpose being to develop a proper and clear meaning of the interview/questionnaire questions. Pilot studies were undertaken with members of each of the separate sample groups who were later excluded from the full study. Specifically, 2 individuals who worked for Internet gambling companies were involved in the pilot study for study 1, and 2 groups of 10 individuals were involved with the two pilot studies involved in study 2. The pilot studies assisted in improving

understanding of the interview/questionnaire questions within the context of gambling organisations. Results from the pilot study resulted in changes to some of the questions which were seen to be confusing. In addition, some wording was simplified to enhance understanding.

4.8   Sample design

According to Trochim (2003) sampling is the process of selecting units such as people and organizations from the population of interest. For Yin (2003) the success of a research study is dependent on identifying and engaging with key informants as they provide the insight into the research topic. As such, a key aim of sampling is to enable the researcher to make generalisations about the population from which the sample was chosen.

Sampling methods can generally be divided into scientific and non-scientific methods, (Saunders and Lewis 2012). Within the scientific portfolio, methods include random sampling, systematic sampling, stratified random sampling and cluster sampling. Such methods require the entire population to be identified. None of the two general populations in this research study could be identified for the following reasons:

Study 1   It was impossible to get a listing of all employees who work in the Internet part of the gambling industry. Even within the specific case organisation, staff turnover meant that it was impossible to get a definitive listing of current staff that the organisation was prepared to release.

Study 2   No Internet organisation would release the list of consumers who had used the site in the previously three months. Consequently, it was impossible to identify this broader sample.

A part of the ethical approval requirement from the University of Salford, and the participating organisation, was that each sample should be based on the principle of self-selection. For the reasons outlined above, it was more appropriate to use non-scientific and non-probability sampling methods.

Within the non-scientific portfolio of sampling methods, the probability of selecting or not selecting a specific unit is not known nor is it determinable (Saunders 2007, 2012). Non probability sampling is more often used with qualitative data collection methods involving ideas, insight, experience, motives and attitudes as contained in this study. Saunders and Lewis (2012) highlighted the following non-probability sampling methods: quota; purposive; snowballing; self-selecting and convenience. Most sampling methods are purposive in nature because researchers usually approach the sampling problem with a specific plan in mind. Although non-scientific sampling may not be statistically representative, Castillo (2009) points out that this does not mean the sample is not representative of the larger population; it is just not statistically proven.

According to Castillo (2009) convenience sampling represents a non-probability sampling technique based on a volunteer group that may be chosen by the researcher or self-selected because they are convenient and accessible. She suggested that convenience sampling is the most commonly used sampling technique because it provides a useful method for documenting a particular quality or phenomenon that occurs within a given sample. As such, it is a useful technique for detecting relationships among different phenomena and

factors. Other advantages of convenience sampling are that it is fast, inexpensive, easy to use and the subjects are readily available (Castillo, 2009).

Castillo (2009) highlighted the most obvious criticisms of convenience sampling as being those relating to its perception that it is not representative of the entire population and therefore there is bias in terms of the perception associated with the differences between the responses of the sample and the theoretical results that may have been obtained from the whole population. As a result, there may be questions in terms of the extent to which such results can be generalised.

One of the aims of purposive sampling is for the sample to be representative of the general population to which generalisations will be made. As such, purposive sampling has specific advantages where the emphasis for the sample is based on speed of contact as opposed to the sample being a specific quota of the wider population. Other reasons for selecting the purposive research strategy was the research aim to find a breadth of views from stakeholders on responsible gambling, to determine what and why participants feel about responsible gambling practices and establish their attitudes to the role they play in promoting responsible gambling. As such, the purposive sampling technique allowed the study to capitalise on a wide range of stakeholder characteristics as proposed by Bryman (2004).

Within this research study, the following methods of purposive sampling were undertaken.

4.8.1 Expert sampling

Here the sample has known or demonstrable experience and expertise in some area. In Study 1 the focus was on obtaining the views of employees who worked for an Internet gambling provider and had specific experience of responsible gambling initiatives. Whilst the roles of participants varied between consumer contact personnel, odds setters, web designers, project managers and operations managers all participants were responsible for ensuring that they act in a socially responsible way according to the policies and procedures laid down by their organisation. All participants acknowledged they had received training on responsible gambling and had experience of dealing with responsible gambling initiatives as they relate to key stakeholder groups.

In study 2, the sample consisted of students and staff from the University of Salford and members of the public who had access to the Manchester Evening News webpage. In both cases the participants were required to have accessed an Internet gambling site in the three months prior to the questionnaire being administered.

Whilst neither of the samples could be statistically proven to be representative of the larger population, they could be classed as a purposive and expert sample as the sample was designed with a specific plan in mind. An additional advantage of this sampling method is that conclusions and recommendations are based on the decisions of those who have experience of Internet gambling.

4.8.2 Snowball sampling

Snowballing involves identifying an individual who meets the criteria for inclusion in the study who then may recommend others who they may know who also meet the criteria. Although this method may not be representative, it is useful when you are trying to reach

populations that are inaccessible or hard to find (Collis and Hussey, 2008; and Griffiths, 2009a). Studies within the field of gambling are suitable for such a sampling technique as there is no list of individuals who gamble so individuals knowing of the study may encourage others to participate. Some of the consumer contact personnel in study 1 suggested that they had agreed to participate in the research as a result of their work colleagues taking part.

As sampling design is a necessary and essential part of research, Trochim (2003) advises the following steps: defining the population; specifying the frame; specifying the sample unit; specifying the sampling method; determining the sample size; specifying the sampling plan and selecting the sample. Table 14 highlights how these principles were applied in studies 1 and 2.

Table 14 Application of Trochim (2003) sample selection principles to study 1 and 2

	Study 1	Study 2
Defining the population	Employees who work for an Internet gambling provider who have experience of working with responsible gambling practices and policies	Individuals who had used an Internet gaming site within the last 3 months
Specifying the frame	All employees working for the organisation will be informed of the research and invited to participate in the research	All staff and students in Salford Business School plus those reading the Manchester Evening News will be informed of the aims of the research and those who have used an Internet site in the last 3 months will be invited to participate in the research.
Specifying the sample unit	A sample of individual employees who undertake a variety of roles within the organisation. The sample will be based on self-selection following information being circulated about he aims of the study.	Individuals from the sample frame including staff, student and readers of the Manchester Evening News who have accessed a gambling website in the last three months. The sample is voluntary.
Specifying the sampling method	Purposive sample based on experience and knowledge. In addition, the sample will be voluntary.

Convenience sample based on use of an Internet gambling site in the previous 3 months. In addition, the sample will be voluntary. | Purposive sample based on experience and knowledge. In addition, the sample will be voluntary.

Convenience sample based on use of an Internet gambling site in the previous 3 months. In addition, the sample will be voluntary. |
Determining the sample size	Based on self-selection – a minimum of 12 participants proposed in line with the recommendation by Hussey and Hussey (1997); Dick (1990), Carson et al., (2001), and Riege (2003)	Based on self-selection in line with University of Salford Ethical Approval – a minimum of 100 participants.
Specifying the sampling plan	Those in the target group to be informed of the aims, timeframe, qualifications to participate and process of sample selection.	Those in the target group to be informed of the aims, timeframe, qualifications to participate and process of sample selection.
Selecting the sample	Based on a voluntary sample in line with University of Salford Ethical Approval	Based on a voluntary sample in line with University of Salford Ethical Approval

Source: Trochim (2003, modified)

4.8.3   Sample design – study 1

The group from which interviewees were selected included those who had experience of working with responsible gambling procedures within the Internet sector of the gambling industry. All employees working for the organisation were informed of the aims and purpose of the study and the date of the interviews. A total of 17 employees covering a variety of customer service, back of house roles including odds setters, counsellors and web designers along with those in managerial roles volunteered.

Dick (1990) suggested that interviews such as those used in study 1 require approximately 12 participants in order to create stability amongst the views of the group. However, others have found that stability or saturation can happen earlier than the 12th interview (Carson et al., 2001; Riege, 2003). The interview process brought together the processes of data collection and analysis, since categories were developed and verified as the interviews progressed.

The interview questions were framed in terms of the participant's role within the organisation which enabled the maximum amount of data to be collected whilst avoiding vague or problematic responses.   The production of themes and categories arose from the interviewees themselves. Disagreement between participants did not present any problems in terms of validity of data but enabled the reasons for disagreement to be discussed.

4.8.4   Sample design – study 2

The sample included all staff and students registered at Salford University and those who had access to the Manchester Evening News webpage. The University intranet and Manchester Evening News webpage were used to advertise the study and the recruitment

of individuals who had used an Internet gambling website site within the past 3 months. An opportunity to win an i-Pad2 was offered to encourage individuals to participate in the research.

In total, 617 questionnaires were completed and the data was subject to a "data-cleaning" exercise as highlighted in the following table:

Table 15 Questionnaire completion

Characteristic	Number of participants
Total number of questionnaires completed	617
Total number of questionnaires identifying Antarctica as a holiday destination	3
Number of questionnaire completed with one number throughout	4
Total number of questionnaires completed by those who had not used an Internet site in the last 3 months	112
Total number of questionnaires completed in less than 5 minutes	73
Total number of usable questionnaires	425 (69%)

Whilst there were participants in each of the age classifications, most of them were under 25, 61.17% (n=260). This was in part due to the method of selection which included students from the University of Salford and an advertisement placed on the web paper of the Manchester Evening News.

4.8.5 Ethical considerations

Responsible gambling is an important issue for all stakeholders especially given the addictive nature of gambling, especially Internet based gambling activities, and the requirements placed on providers of gambling products and services by legislation and specifically the Gambling Act 2005. As such, research in the area of responsible gambling can have obvious commercial and moral consequences.

Ethical approval for all studies was sought from the University of Salford using the procedures and requirements for postgraduate research programmes. Study 1 was conducted in August 2009 as an exploratory study. Retrospective ethical approval was sought for this study at the same time as ethical approval was sought for the second study. The ethical approval documents that were submitted and subsequently approved by the ethical panel at the University of Salford are included in Appendix 1.

In addition to the ethical approval process of the University of Salford, study 1 was also subject to approval processes of the participating organisation. The approval involved a presentation and discussion with the Operations Director, Human Resources Director and Head of Compliance. The organisation approved the interview template, and set conditions in terms of participation being voluntary and self-selecting. They also set conditions in terms of access to data and dates when the interviews took place.

In addition to the approval required by the University of Salford Ethical Committee, materials relating to Study 2 were also subject to approval procedures from the Manchester Evening News. This was granted prior to the questionnaire being advertised on the Manchester Evening News website.

Ethical issues relating to both studies were also discussed with the supervision team.

Riege (2003) suggested that interviewing often involves the use of audio taping data that is then transcribed. This may result in the production of documents that may identify those who have provided data. Whilst he suggested that this may increase the construct validity of the research it also has ethical implications. These include the potential for personal,

sensitive and/or commercially important information being recorded. In order to protect data provided by participants, all documentation and audio materials were securely stored within the University of Salford. Electronic materials were stored within the University's file store and written and processed materials were stored in secure filing cabinets.

The guarantee of anonymity was particularly important in this research as individuals were in part critical of some of the practices of their employers and the implications that current responsible practices have on stakeholders.

All participants in each of the studies were informed of agencies that could assist them if they wanted further help or information on responsible gambling. The agencies providing such information also have specialists in providing counselling and support for those who have problems with gambling activities.

4.9   Conclusions

The methodology for both studies in this research was developed from the desire to assess stakeholder's perceptions of the utility of responsible gambling mechanisms used by Internet providers of gambling products and services. Because of the sensitive aspects associated with gambling activities and the problems in accessing data from gambling organisations, the study relied on a mixed approach to create useful knowledge. The preference for the qualitative methodology in study 1, was also determined by the type of knowledge being sought, which was essentially internal and subjective. The decision to use an online questionnaire in study 2 was conditioned by a need to gain triangulated data in order to partially fulfil the requirement for valid and reliable data collection and partially in order to satisfy the desire of the researcher to use a variety of interesting

methods to achieve the objectives set out in the introductory chapter. Whilst no research method or methodology can claim to be perfect, the weaknesses that have been identified in each of the methods used to collection and analysis data and to identify acceptable samples in study 1 and 2 have been balanced against the benefits that accrue from them.

Chapter 5   Study 1 – An Exploratory Investigation of Gambling Employee Perspectives of Responsible Gambling

5.1   Introduction

There seems to be two overarching themes in the literature on developing and managing systems for responsible gambling. Firstly, there is recognition that with the increased provision of gambling products and services comes an increased responsibility for gambling organisations to make attempts to protect vulnerable groups by at least minimising the potential for harm and mitigating existing harm.   Secondly, there is an increased need for gambling organisations not only to act in a responsible way but for them to be perceived as acting responsibly if they are to maintain the implicit trust that underpins all consumer transactions (Giddens 1991,1994; Griffiths 1999, 2003, 2009a; Griffiths and Parke 2002; Hing and McMillan 2002; Hing 2003a,b; Eadington 2004; Messerlian et al., 2005; Parke et al., 2007; Rockloff and Dyer, 2007; Sartor, 2007; Schellinck and Schrans 2007; Gambling Commission 2008, 2012; Hancock et al., 2008; and Hing and Breen 2008). This growing emphasis on responsible gambling is set within an environment of corporate social responsibility and corporate citizenship in which organisations are becoming increasingly accountable for their activities and for minimising negative social impacts that may result from their operation, (Wilson 2000; Hing and McMillan 2002; O'Dwyer, 2003; Matten and Crane 2005; and Cochran 2007).

The role of the consumer – employee relationship in developing and maintaining a system of responsible gambling is critical to the long term sustainability of a gambling organisation (Griffiths 2012).   This is particularly true where responsible gambling initiatives are based on 'self-identification', self-help' and 'self-regulation' by the

consumer, as they not only have to identify and accept that they have a problem, but they also have to identify with an employee with whom they can trust to disclose such information (Hansen, 2003; Blaszczynski and colleagues, 2008, 2011; Hancock et al, 2008). There are also implications for the employee in terms of clarity and specificity regarding their duties in the provision of responsible gambling which includes how they interact with consumers (Kantor and Weisberg, 2002). Where an employee misinterprets what is expected of them from either the consumer or employer this may contribute to one or more of the service quality gaps identified by Zeithaml, Berry and Parasuraman, (1990, 1993) and may affect the way they identify and act with individuals who display behaviours that are associated with problem gambling. Hence, staff working at all levels of gambling operations play a vital role in consumer protection and sustainability in their industry, and currently, there is a paucity of research examining this issue.

The general aims of this study are to:

1. Establish the meaning that employees of Internet gambling operations give to responsible gambling, and;

2. Establish employee's perceptions of the effectiveness and appropriateness of current responsible gambling practices.

As the study aims to explore the meaning and understanding that employees give to their working environment and how this reflects on their contribution to the provision of responsible gambling, an inductive approach has been adopted. Additionally, gambling operation employees are a hard to reach population and hence the number of participants likely to participate in this study was likely to be limited. Consequently, in-depth

interviews were deemed the most appropriate method to collect data which is consistent with existing literature (Amaratunga, 2002; Creswell, 2003; Ghauri and Gronhaug, 2005; and Collis and Hussey, 2008).

5.2   Method

5.2.1   Participants and recruitment

The organisation involved in this study enjoys a national and international reputation as a provider of a variety of Internet gambling services and products. Prior to the recruitment of participants a meeting was held with the Operations Director, Human Resources Director and Head of Compliance where the research approach was agreed in principle. Specifically, conditions were agreed in terms of participation being voluntary; the wording of the introductory email and briefing (Appendix 2a); the consent form to be used (Appendix 2b) the de-briefing documents (Appendix 2c); the interview protocol (Appendix 2d); and the dates when staff would be available for interview.   These documents and processes were also granted ethical approval by the Ethics Committee at the University of Salford, (see Appendix 1). Once agreed, the introductory email and briefing notes were emailed to all staff. The purpose of the introductory email was to capitalise on the advantages of such an introduction letter as outlined by Easterby-Smith et al., (1991) namely: to inform employees of the organisation of the aims of the study; to act as a recruitment tool; to establish credibility; to encourage co-operation; and to provide the opportunity to develop a means of communication.

Following the introductory email to all staff, 17 employees from a range of operational levels within the organisation volunteered to be interviewed and a schedule of interviews was established. The characteristics of the sample are outlined in following table.

Table 16 Demographic and organisational characteristics of sample 1participants

Participant	Period of time working in Internet and/or land-based gambling industry	Gender	Age Group	Role in the organisation
1	2 years	Male	22-25	Customer Service
2	1 $^1/_2$ years	Male	22-25	Customer Service
3	1 year	Male	22-25	Customer Service
4	2 years	Male	31-40	Customer Service
5	1 $^1/_2$ years	Female	18-21	Customer Service
6	3 years	Male	22-25	Customer Service
7	20 years	Male	51-65	Customer Service
8	2 years	Male	26-30	Customer Service Team Leader
9	4 years	Female	26-30	Manager Consumer Experience
10	10 years	Male	31-40	Lead web designer
11	3 years	Female	31-40	Projects Manager
12	15 years	Female	31-40	Head of Consumer experience
13	8 years	Male	51-65	Odds Compiler
14	10 months	Male	26-30	Fraud Analyst
15	20 years	Male	31-40	Test Manager
16	1 year	Male	22-25	Community Executive
17	1 $^1/_2$ years	Male	26-30	Operations Manager

5.2.2 Procedure

The individual interviews were conducted in a private room and were recorded using an electronic recording device. One hour was scheduled for each interview with the average interview lasting approximately 40 minutes.

Participants were informed at the start of each interview of the specific aims of the study, of issues relating to confidentiality and the fact that they could withdraw at any time in the interview process. The briefing notes and interview protocol was explained prior to the consent form being signed.

A semi-structured interview was chosen as the method of data collection. They commenced with structured questions and progressively became more unstructured as the interview progressed. For example, at the start of each interview, staff were asked how long they had worked in the gambling industry, their reasons for joining the industry and to outline the main tasks associated with their current roles. Later staff were asked to discuss more conceptual themes relating to factors that may inhibit or motivate consumers and staff to act in a responsible way.

The interview guide included prompts related to the individual's perceptions of responsible gambling practices; their perceptions of factors affecting responsible gambling initiatives and their impact on employees and end users; their perceptions of factors that may affect responsible gambling initiatives in the future; and the training they received to perform their roles. These factors were outlined in the interview protocol that was issued to the participants prior to the interview, see Appendix 2d. The protocol was, in part, influenced by the following studies:

Table 17 Factors affecting interview protocol

Interview theme	Source
Their perceptions of the meaning of responsible gambling as it relates to themselves and to general consumers.	Black and Ramsay (2003); Griffiths et al., (2007); Griffiths and Wood (2008); Hancock et al., (2008)
Their perceptions of current practices including marketing, provision of advice and information, limit setting, self-exclusion, inductions, play for free, organisational approach to identifying and managing those who may have gambling problems.	Griffiths and Parke (2002); Hing and McMillen (2002); Griffiths (2003, 2005, 2009); Hansen (2003); Parke et al., (2007); Wood et al., (2007); Hing 2003a,b; Hing and Breen (2008).
Training provided to staff and implications of working for an Internet gambling organisation.	Collachi and Taber (1987); Shaffer, Vander Bilt and Hall (1999); Shaffer and Hall (2002); Hing 2003b; Hing and Breen (2008)
Factors affecting consumer willingness to engage with responsible gambling tools.	Blaszczynski and colleagues, (2008, 2011), Griffiths (2009)

The interviews were based on an iterative process of joint exploration between the interviewer and employee. This enabled clarification and the correct interpretations of the employee's comments to be established.   The interviewer's contribution to the interview process was to question, explore and to clarify, rather than to suggest, add or reject any of the categories.

At the end of each interview, interviewees were provided with a debriefing document which provided additional contact details of the research team to whom they could address any queries or get a copy of the finished research. Information for responsible gambling support agencies was also given in case any employees wanted information regarding their own gambling behaviour.

5.3   Analysis

Once the data had been transcribed and checked, it was subject to thematic analysis to enable themes from the transcripts to emerge. Braun and Clarke (2006) proposed a six stage approach to qualitative thematic data analysis which enhances both flexibility and validity. The application of this model to the study is summarised in Table 18. Braun and Clarke (2006) classify thematic analysis as either inductive (constructionist method) or theory driven ('top down'). As this study was conducted in the context of developing theory around responsible gambling and consumer and employee perceptions of responsible gambling practices, the inductive approach was used. Braun and Clarke (2006) suggest that an inductive approach is useful in such cases as it considers data with no preconceptions about what should be found. During the analysis, transcripts were read several times with notes being made to assist in the construction of themes. Themes, sub-themes and extracts were reviewed and re-organised until a coherent set of themes could be finalised which addressed the aims of the study. The procedure followed the six step approach proposed by Braun and Clarke (2006) and is summarised in the following table.

Table 18 Six stages in using thematic analysis

Stage	Activity	Description	Examples of application in study
1	Familiarizing yourself with your data	Transcribing data (if necessary), reading and re-reading the data, noting down initial ideas	Data was transcribed by the researcher and verified.
2	Generating initial codes	Coding interesting features of the data in a systematic fashion across the entire data set, collating data relevant to each code	All data was coded with a brief description of the code being made explicit.
3	Selecting the themes	Collating codes into potential themes, gathering all data relevant to each potential theme	Once the data was coded, the codes were arranged into meaningful themes.
4	Reviewing themes	Checking of the themes work in relation to the coded extracts (phase 1) and the entire data set (phase 2) generating a thematic 'map' of the analysis	The appropriateness of the themes was discussed with the supervisory team.
5	Defining and naming themes	On-going analysis to refine the specifics of each theme and the overall story the analysis tells, generating clear definitions and names of each theme.	The generic theme were labelled to reflect a systems approach to responsible gambling
6	Producing the report	The final opportunity for analysis. Selection of vivid, compelling extract examples, final analysis of selected abstracts, relating back of the analysis to the research question and literature, producing a scholarly report of the analysis.	Specific anonymised quotes were used to support and clarify the themes that had been developed.

Source: Braun and Clarke (2006, p. 87)

In order to improve the reliability of this study, there was a need to achieve detailed responses from individuals involved in work roles at different levels in the organisation to ensure that a wide perspective of views was obtained. The participation of individuals from a variety of roles in the organisation provided a varied perspective of reality, which is characteristic of critical realism research, and it provides the basis for analytical and replication logic (Yin, 1993; and Sobh and Perry, 2006).

5.4   Results and discussion

Figure 5 is a thematic map summarising the main findings from the thematic analysis.

During the analysis several themes were identified including the role of technology in responsible gambling and enhancing responsible gambling. However, following several reviews and reclassification of the data, these factors were not considered to be superordinate themes as: their supporting extracts were inconsistent as one theme; they received little coverage; and they lacked coherence. The result of the thematic analysis was an overarching theme of responsible gambling which consisted of three superordinate themes and their sub-themes. The first theme relates to 'the meaning of responsible gambling' and consists of sub-themes relating to the strengths and weaknesses of current systems of responsible gambling. The second superordinate theme is 'complacency' and highlights operational weaknesses associated with current responsible gambling practices and the third related superordinate theme is lack of 'awareness and effectiveness of responsible' gambling by both employees and consumers.

These superordinate themes and their subthemes are each discussed in turn with appropriate quotes from participating employees being included.

Figure 5 Thematic map demonstrating employee understanding and perceptions of responsible gambling provision
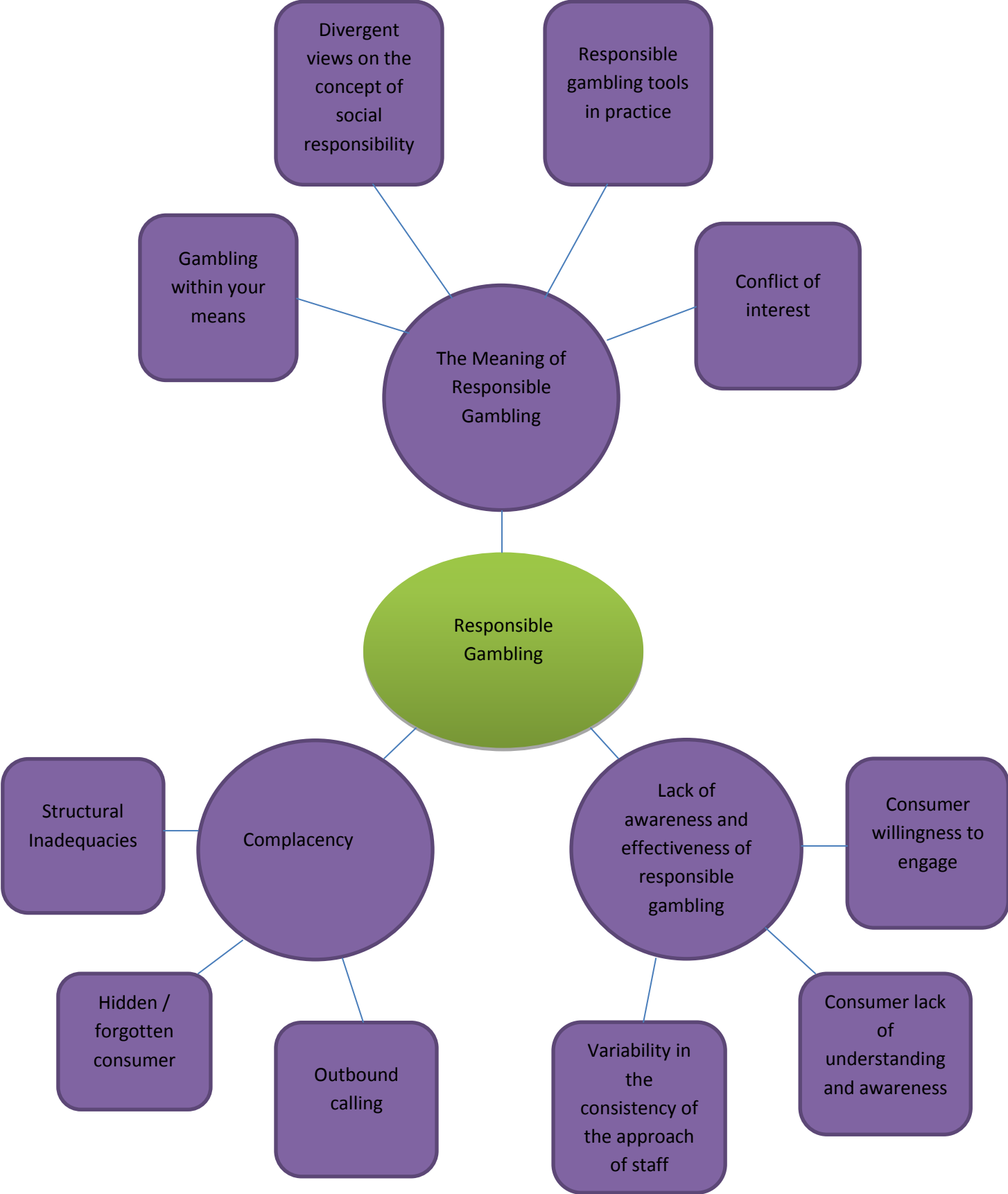
5.5   Superordinate theme one: The meaning of responsible gambling

As reflected in the literature review, participants view responsible gambling as a complex concept for which there is no agreed universal definition. What emerged from the data was that employees perceived responsibility for the provision of responsible gambling as lying on a continuum from those who believed it was solely the responsibility of the consumer at one end, to those who believed the organization should have ultimate responsibility at the other end.   The following four sub-themes were identified from the data relating to the understanding and perception of responsible gambling held by staff: gambling within your means; divergent views on the concept of social responsibility; responsible gambling tools in practice and; conflicts of interest that emerge from the current system of responsible gambling.

5.5.1   Gambling within your means

Whilst each employee offered different nuances regarding the term responsible gambling, a common sub-theme that emerged consistently conceptualized 'responsible gambling' as the consumer gambling within their means.

> *"Erm, I suppose it's just erm, gambling within your means, not gambling too much, knowing how much you can afford to gamble. It's become a problem while you're doing it, when you're gambling what you haven't got. I suppose it's like anything responsible, just, everything within, what's the word, not to excess but within your limits."*
> Participant 4, Male, Customer Service

> *"not spending more than you can afford to lose."*
> Participant 6, Male, Customer Service

> *"It's about managing, erm, how much money you can lose."*
> Participant 9, Female, Manager Consumer Experience

"I see responsible gambling as having the tools to control yourself so it's controlling what you do spend. It's not stopping you spending, it's just, enabling and it's giving people the ability to control everything themselves, so that they're not spending all their money, they're not using a million cards to get loans and everything like that, so basically it's gambling within your means."
<div align="center">Participant 12, Female, Head of Consumer Experience</div>

There was a high level of consistency amongst participants where primary emphasis was placed on relating responsible gambling to the financial capacity of the consumer. Only in a few instances did participants highlight the stress to the individual and their family that had been outlined by previous research (Hing and McMillan 2002; Schellinck and Shrans 2004; Delfabbro et al., 2007; and Griffiths 2009a).

"Me and my best friend have got a kind of strange relationship because with her she finds me talking about gambling really uncomfortable, because her sister's marriage broke up because of it, because of gambling. Apparently, he had, had an issue before but hadn't told his wife, they got married, had a house together, lost thousands that he gambled away and, er, apparently he never really recovered since. They are now divorced, so. She's not comfortable about the location that I work in."
<div align="center">Participant 11, Female, Projects Manager</div>

"Betting within your means. If you can afford to throw certain amounts of money away then it's up to you. But if it hinders your life, disrupts anything then it's not responsible, you're not being responsible for yourself or the others around you."
<div align="center">Participant 17, Male, Operations Manager</div>

The lack of personal and financial information relating to individuals meant that it was difficult for staff to identify a specific spending level as constituting a threshold where a potential problem could be established.

"How much a person can bet differs from one individual to another. Obviously we can't ask them to send us in their outgoings for the month, their income, how much they earn and stuff."
<div align="center">Participant 1, Male, Customer Service</div>

"There are some big losers, but I don't know if they would themselves identify that as a problem….erm, to a point there's not much I can do. It depends how the problems manifested really. I can say 'I think that persons got a problem' but that is just my personal opinion. It might just be because I don't like them very much."
<div align="center">Participant 5, Female, Customer Service</div>

The implications of such views is that staff seemed to place an emphasis on online observable behavioural activities of the player, recorded by the operator, as a way of identifying those who may have a problem with their gambling. Employees felt confident that they were able to identify online tracked behaviours they associate with problem gambling and highlighted the following behaviours as triggers that suggest an individual may have a gambling problem: betting activity and period of betting; having a variety of payment methods/high deposit frequency; changing the deposit limit on a regular basis; self-exclusion/account closure; chasing losses and betting higher amounts; frequently ringing in to try to access a different operator; and the disposition of the consumer (e.g. tone of voice, crying, aggressive). Many of these cues reflect problem gambling behaviours that have previously been highlighted in the problem gambling literature (Carnes 1991, Griffiths and colleagues, 2007, 2009a, 2012; Wardle et al., 2007 and Corney and Davis 2010).

> *"Well people that, say for example, they've got a lot of cards on their account; they're always changing cards or wanting to change cards; they've got to make a lot of deposits but don't withdraw much but they change a lot of cards; they're putting a lot of cards on, they might be getting credit cards or applying for credit cards, putting them on; people that want to change their deposit limit, all the time, and it's going up, and if you look it started off at five pounds a week and now is five hundred pounds a day and it's gone up gradually and gradually; people that are desperate to put money on, try this card, try that card, can we do this can we do that and these are the people we flag as problem gamblers. Obviously, you have to be careful you can't turn round and accuse a person of being a problem gambler."*

Participant 1, Male, Customer Service

> *"There is a certain bunch of consumers who bet on everything. You can tell when they've got nothing else to do because they are on ten minutes on the phone. In terms of the phone you can tell the people who have got problems, but because a lot of them do have the money, you can tell when they've got nothing better on their time."*

Participant 2, Male, Customer Service

Although employees suggested cues that they use to identify problem gambling, they also pointed out that a single cue by itself, or even a combination of cues, may not necessarily mean that a person has a problem with their gambling.

Although participants highlighted the need to protect vulnerable groups as part of the understanding of responsible gambling, they failed to highlight other aspects of responsibility which are required under the Gambling Act 2005, namely: being committed to public health education on the risks of gambling and being committed to identifying and treating problem gamblers.

5.5.2   Divergent views on the concept of social responsibility

Participants suggested a variety of views on who should have responsibility for promoting and managing processes relating to responsible gambling. At one extreme were those who saw responsibility lying with the individual consumer themselves:

> *"Everyone is responsible for themselves really. It's like they can get annoyed that they keep losing and stuff, but at the end of the day they're the ones who keep putting money on."*
> Participant 5, Female, Customer Service

> *"Everyone should be able to spend what they want, it's kind of, it's their life we're not here to hold their hand, you know."*
> Participant 6, Male, Customer Service

> *"As far as I'm concerned they should really control their own gambling. I don't see that it's our responsibility to stop somebody from gambling."*
> Participant 12, Female, Head of Consumer Experience

> *"Who has responsibility? The consumer has, without a shadow of a doubt. They're adults. Most times they've had education. They know what life's all about. They're not stupid."*
> Participant 15, Male, Test Manager

Views within this group were consistent across different roles within the organisation, gender and age groups. At the other extreme were employees who suggested that organisations have a primary duty of care to protect individuals who may be affected by products or services offered by the organisation as reflected in the following statements:

> *"Basically, I just see it from the point of view of the responsibility that the bookmakers have to make sure that they're not exploiting anybody with a gambling problem. Just making sure that they offer enough help to people who seek the help if they feel they have a problem."*
> Participant 3, Male, Customer Service

> *"I mean it's basically about looking after vulnerable people. People who are at risk from gambling addictions or gambling problems."*
> Participant 10, Male, Lead Web Designer

> *"Rightly or wrongly I'm one of those people who see it as a similar thing to alcoholism and I think yes, as an individual you have a certain amount of responsibility. Then if you see it as a disease, then you can't take as much responsibility yourself."*
> Participant 11, Female, Projects Manager

The need to protect vulnerable groups and not to encourage irresponsible behaviour was reflected in the views of a majority of participants. It also reflects one of the main licensing objectives within the Gambling Act 2005. Within such views emphasis was placed on the responsibility of the organisation to provide consumers with the tools that they could use for responsible gambling. In addition, emphasis was also placed on the individual consumer engaging with responsible gambling tools.

> *"For me it's about tools and mechanisms that we offer our consumers that helps them manage their gambling. So I don't see it as something that's prohibitive it's more a support tool."*
> Participant 11, Female, Projects Manager

> *"Ultimately, it's yourself, isn't it? I would say. But I know that as part of that Gambling Act, companies like ourselves, betting companies, have to be aware of that."*
> Participant 13, Male, Odds Compiler

These views reflect the CSR proposals highlighted by Hancock et al., (2008), Griffiths et al., (2009c); Griffiths (2009a, 2012) and Blaszczynski et al., (2011), as they outline the provider's role as one of promoting responsible gambling and safeguarding its consumers through the provision of tools, support and training that enables the consumer to manage and regulate their own activities. Like Griffiths (2009a, 2012), some employees raised concerns over the extent to which individuals engage with help tools and whether they are used by those who are in most need of them.

5.5.3 Responsible gambling tools in practice

Some practices, such as age verification, have been highlighted as systems of good practice which other industries engaging in e-commerce could adopt (CHIS, 2010). Employees highlighted a number of systems of good practice that were in place to assist consumers to self- identify and manage problems arising from their gambling activities including: deposit limits; self-exclusion; age verification; cooling off periods; and access to self-help organisations such as Gamcare. A concern raised by employees is the extent to which responsible gambling tools are used by consumers and whether those who would benefit most from the tools actually use them. Where the self-help tools are used, employees believed that a primary benefit that consumers experience is more effective self-management of their gambling activities as the individual are empowered, trained and engaged. Empowering consumers was primarily seen to result from the provision of self-help buttons and tools placed on the website as they enable the consumer to help themselves in a positive and discrete manner as reflected in the following statements:

> *"I think the strengths are probably all the self-help tools that you can use, self-exclusions, deposit limits, you know."*
> Participant 6, Male, Customer Service

"I suppose that's another good thing we do. Erm, age verification, which I know is law so obviously, we stick to it."
Participant 9, Female, Manager Consumer Experience

"I think it's just the tools that we offer. They are there, they are promoted, accounts are monitored and they're looked at. So rather saying out and out, we think you've got a gambling problem, it's kind of, are you aware that this is there on your account. it's done very subtly and nicely."
Participant 11, Female, Projects Manager

The priority given to self-help web-links by Internet gambling organisations was highlighted as a positive responsible gambling practice. It was suggested that even though such support systems are aimed at a minority of consumers, they are given priority on the actual site.

"When you look at website design it's all about catering to the majority of people and then something like responsible gambling comes along and it's not like that. You know it's about making sure you catch, even the smallest number of people. So in terms of the weight of things within the page and things like that, then you effectively have to put stuff which is only of relevance to a small number of people and give it much higher priority."
Participant 10, Male, Lead Web Designer

"If you look at, if you look at sort of our registration process on our site, there's a whole big area of the site dedicated to Gamcare and all the different symbols that are attached to us. They've quite a substantial sort of chunk of the site that you can see there, it takes up quite a lot of room, so that's quite a way."
Participant 16, Male, Community Executive

Although the space devoted to self-help tools and responsible gambling in general was identified as a positive aspect of current provision, promoting responsible gambling is a requirement for the Gambling Act 2005, and therefore something that affects all consumers and potential consumers and not just those who have problems with their gambling.

Reflecting the conclusions of Wood et al., (2007), Hancock et al., (2008), Hing 2003a,b and Hing and Breen (2008) employees specifically identified self-exclusion and cooling

off periods as important tools used to help consumers to self-manage their gambling activity.

> *"I think self-exclusion is a really good idea, because it means that if people aren't ready to take the full step to actually just say, 'ah, I want to quit complete' they can do it for like six months or they can have a twenty four hour cooling off period. And it's like something which, once they've done that, it's a lot easier for you to just think, well I've done six months, I can do more. I think that's really good because it's like taking it slower. Erm, and I think it's good we have to make people aware of it."*
> Participant 5, Female, Customer Service

> *"If they ring us up and say we don't want it, we don't want the account, we won't re-open it no matter how much they argue we won't re-open it."*
> Participant 6, Male, Customer Service

> *"Well, as far as I can see the major thing they do is that cooling off period where you can self-ban yourself."*
> Participant 13, Male, Odds Compiler

> *"Erm. The main thing from a responsible gambling perspective that I would say we do is self-exclusion. I think probably it is a good one to use because it takes you completely out of the equation as far as betting's concerned and we do have, you know we do have procedures within the industry as well to manage that and to actually identify consumers who we feel may have a gambling problem so to speak."*
> Participant 15, Male, Test Manager

> *"The company as a whole, I know they've got self-exclusion tools, so you can just hit a cooling off period or you can exclude yourself for twenty four hours, a few weeks or months or just completely stop your account, which I think is pretty good, a pretty good feature."*
> Participant 16, Male, Community Executive

The setting of a deposit limit was also specifically highlighted as an effective mechanism which enabled consumers to self-manage their gambling. Deposit limits should be set when the account is set up and requires a time period to elapse before it can be reset. Consumers can also adjust their limits with lower limits taking immediate effect whilst increases in a deposit limit is subject to a time limit before it is active. Once reached, the individual is prevented from using their account. Used properly deposit limits help the consumer to work within a predefined budget.

"Er. I suppose the good thing, obviously is the fact they offer it and they do, you know, put it into practice deposit limits. You know, they won't, if somebody rings up and wants to change the deposit limit and they haven't, you know, had the due cooling offer period, they won't let them just do it, they won't just say oh just let them put it through."

Participant 4, Male, Customer Service

"I think deposit limits is a huge thing to help somebody control their gambling and I think if you've got deposit limits on, you don't necessarily need to self-exclude, because your deposit limit should be betting within your needs, means as such."

Participant 12, Female, Head of Consumer Experience

"Erm, you can also set deposit limits on your account when you first set it up. So I guess you could say something like ten pounds a day and then you would never be like able to break that deposit limit you set yourself."

Participant 16, Male, Community Executive

5.5.4 Conflict of interest

Employees highlighted a number of conflicts of interest that may affect the meaning that stakeholders give to responsible gambling, their perceptions of the effectiveness of current responsible gambling tools and their willingness to use self-help tools. The first conflict relates to the relationship between commercial and social pressures that organisations are under. As already highlighted, the Gambling Act 2005 places certain expectations on those organisations that provide gambling products and services. What the Act fails to do is state specific objectives in terms of such responsibilities and it fails to put into place a system of regulatory compliance. As such, interpretation and management of responsible gambling rests with the provider of gambling products and services which reflects contemporary models of CSR proposed by Kingma (2004) and Power (2004). Employees believe that this requirement creates a further tension on their need to produce profit.

"We do quite a lot to try and help consumers to keep within their limits, but obviously at the same time it's a business, we want as much money as we can get."

Participant 6, Male, Customer Service

"There's a need to make money first. Unfortunately, for a company there is no point being responsible if you're not making money because you're going to shut down and then leave it to other companies that are less responsible."

Participant 10, Male, Lead Web Designer

"I'm looking for the right word, contradiction. Responsible gambling and the need for us to make a profit."

Participant 13, Male, Odds Compiler

A second conflict of interest that was highlighted as affecting the general public's perception of responsible gambling and the effectiveness of responsible gambling systems was the practice where those who provide gambling products and services are also responsible for providing the help and support systems required by those who may develop problems with their gambling. Although employees acknowledged that such a system has weaknesses, and created negative perceptions of the industry's ability to act responsibly, there was general agreement that this was changing and would continue to change as more consumers start to use the responsible gambling tools that are on offer to them.

"I also think that consumers as a whole don't think and don't expect us to be responsible. Whether they think we are or not, they soon find out that we are but they don't think we are."

Participant 1, Male, Customer Service

"For us, our responsible gambling has just been in for the last twelve months, with all the self-help tools that you can use. Er, so I think over time that might change but at the minute, probably not."

Participant 6, Male, Customer Service

5.6   Superordinate theme two: Complacency

The Gambling Act 2005 places a requirement on those providing gambling products and services to prevent gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime; ensuring that gambling is conducted in a fair and open way and protecting children and other vulnerable people from being harmed or exploited by gambling, (Gambling Commission 2008, 2012). Operators within

the industry have introduced a number of measures to meet these licensing objectives but the lack of specific auditable systems means that the provision and management of responsible gambling tools is a responsibility of the individual organisation. Three cues emerged within the complacency superordinate theme: structural inadequacies, outbound calling and the forgotten consumer.

5.6.1 Structural inadequacies

Structure features include those features which are in place to assist consumers to self-manage their gambling activities. Some industry practices, such as age verification, have been identified as exemplary and models of good practice that other e-commerce sectors could use to improve their social responsibilities (CHIS, 2010). In addition, employees identified the improvements in the sector as a whole which had resulted from the introduction of the Gambling Act 2005.

> *"I worked at XXXXX for ten years as well so since I was eighteen I have worked in the betting industry and I have seen it change so much over the twenty years, I have seen so many people come and go. You know when I first started in the industry in 1989, I was eighteen then, and I came as a telephonist and there was nothing as far as responsible gambling was concerned, noting at all."*
> Participant 15, Male, Test Manager

Although acknowledging the improvements in responsible gambling practices, employees were also critical of some of the current provision as outlined in the following sections.

5.6.1.2 Self-exclusion

Whilst there was agreement that self-exclusion was a good tool in self-management it was criticised in that it relates to a specific organisation and there are limited facilities for sharing information. The inability to exclude from specific products means that consumers

may be put off exclusion as they do not want a blanket ban. It was suggested that within the Internet sector, technology was available to make the system more effective and tailored to the individual in that consumers should be able to exclude form a specific product and that the exclusion should then be industry wide. The current system was seen to be weak in that:

> *"Even if you self-exclude with us you could just go to another company or somewhere like that or vice versa if you self-exclude with them you could come to us and we'd all probably be none the wiser that you had self-excluded elsewhere. So I guess maybe you could have some sort of link between all the bookies so if you self-exclude at one site, you know, they pass the information on and it would exclude you elsewhere."*
> Participant 6, Male, Customer Service

> *"You almost could quite easily move around the bookmakers couldn't you and that's one thing that worries me because I think we almost pass on our, not out rubbish, but our problems. We'll stop them and they'll just go to somebody else. Only if you had some sort of data base where if somebody excludes with us, they also get excluded from another company."*
> Participant 12, Female, Head of Consumer Experience

5.6.1.3 Deposit limits

Although viewed as a positive self-help tool, employees also highlighted a number of weaknesses about deposit limits. The ability not to set a limit was seen as the main weakness of deposit limits and it was regarded as the equivalent of not setting a limit. As such, there was an acknowledgement that consumers opt for an unlimited limit on their account.

> *"If you open twenty accounts, you'll probably get one person that sets a limit."*
> Participant 3, Male, Customer Service

> *"We force people to put a deposit limit on. Now you can actually choose no limit as a deposit limit but a lot of people do sort of put on fifty pounds in a week or a month but they just don't understand it. They'll then come back three days later and say, 'ah well, I thought that was last month' and it's like a revolving month. So there's a few things like that they don't understand."*
> Participant 12, Female, Head of Consumer Experience

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Confusion over deposit limits was highlighted as a focus of consumer complaints with consumers not understanding the implications of setting a deposit limit. Employees were adamant that deposit limits are not changed immediately regardless of the level of complaint.

5.6.1.4 Promotion of responsible gambling tools

Although current responsible gambling tools were seen to be fit for purpose and provide consumers with the help they need to manage their gambling activities, it was suggested that the self-help tools are not always positioned where consumers can easily access and use them.

> *"Also on our website, I don't think it's very prominent, the responsible gambling bit. You have to go into, I don't know if you've seen our casino web site or looked at it, but you have to go into help or I can't remember what it was, queries or frequently asked questions or some section like that. I don't think it was very prominent."*
>
> Participant 13, Male, Odds Compiler

In addition, it was suggested that more could be done to promote and educate consumers in terms of what responsible gambling tools are available and how they can be used for maximum effect.

> *"there's tools in place for responsible gambling. I mean don't get me wrong, it's not promoted as much as they could do, you know, the only person you ever really mention it to is when you get a new customer on the phone. They open the account and you've got to tell them about responsible gambling. To tell you the truth, you can see they're not bothered."*
>
> Participant 7, Male, Customer Service

> *"I don't think we explain our responsible gambling procedures and tools as well when a customer first registers with us. I think that definitely could be improved. We offer them the opportunity to set a deposit limit on registration but probably don't explain to them what it is, enough."*
>
> Participant 9, Female, Manager Consumer Experience

5.6.1.5 Behavioural tracking

Behavioural tracking highlights individuals who demonstrate problems with their behaviour (Griffiths et al., 2007, 2009a, 2009b, 2012; Wardle et al, 2007). These can either be electronic or based on staff knowledge of an individual's playing behaviour. Where individuals are identified as having a problem through electronic means, the approach taken by the organisation is to email the individual highlighting the responsible gambling tools that are available. Where an individual is currently engaging with responsible gambling tools, limited intervention appears to be undertaken.

> *"Er, we would sort of send them an email, to sort of say, you know, we are concerned about your betting. You know, we've got, sort of all these self-help tools if, you know, you want to use them or if you want to close your account, you know, let us know and we can do that. That would be an extreme case. We wouldn't just go accusing people, saying, 'oh you've got a gambling problem'."*
> Participant 6, Male, Customer Service

> *"We'd just leave them, because, to be honest, we're happy because they're using the tools so they are controlling their gambling."*
> Participant 12, Female, Head of Consumer Experience

Where the tracking is based on employee knowledge of an individual's gambling behaviour, a less positive approach was believed to occur. Whilst employees felt comfortable in identifying behaviours and activities that may suggest an individual has a problem with their gambling they did not engage with consumers about addressing responsible gambling issues as they did not feel equipped to undertake this role. This reflects concerns raised by Cameron (2007) where venue staff are required to intervene where there is suspicion that an individual has problems with their gambling. It also reflects some of the concerns raised by Griffiths (2012b) who highlighted that not all of the current behaviours used in traditional problem gambling diagnosis methods are reflected in tools that use online observable behavioural activities. The situation is further complicated

as one specific behaviour or even a combination of behaviours does not necessarily mean an individual has a problem with their gambling. For Griffiths (2012b) what is more significant is a change in the individual 'normal' gambling behaviour and activities.

It was suggested that even if an employee did approach a consumer about problem gambling this would not be welcomed by either the consumer:

> *"I know they will be losing in the end, but they are just coming on and I don't know, it doesn't seem to be bothering them, so it's not really my, it's not for me to tell them that they shouldn't be gambling so I do nothing."*
> Participant 2, Male, Customer Service

> *"But if you say to them, you know, I think you might have got a problem I don't think they'd take it very well I don't think. Is it really my responsibility, my level to be doing that?"*
> Participant 4, Male, Customer Service

Or management:

> *"I don't think there is anything that I can do. I don't think, well I'm not sure. They've got to come to us. I'm under the impression that your probably not allowed to approach customers here. They have to say that they've got the problem and we're on tape so you probably wouldn't on the phone."*
> Participant 3, Male, Customer Service

> *"I think there are ways to improve it, but I think it wouldn't be well received. That would lose us business I think, because that makes them feel like we're pushing them away."*
> Participant 5, Female, Customer Service

> *"It was kind of, 'oh this person looks a little bit iffy', and somebody would say. 'yeah, but have you seen how much they're losing to us so we don't want to upset them or close them down because they might stop betting with us."*
> Participant 12, Female, Head of Consumer Experience

> *"You sometimes get people on, like having a hundred quid, they lose, they have two hundred, doubling up. Now should I be taking some action, because that's irresponsible gambling, isn't it? Should I personally be pointing that out? Personally I think it would be, er a bit awkward for me to do that, given that the focus is on making profits and figures and targets and so on."*
> Participant 13, Male, Odds Compiler

Consequently, many employees suggested that whilst they were aware of gambling behaviour that would suggest an individual had problems with gambling, they ignored the behaviour and did little, if anything.

> *"We do get told, if you do spot any, you feel that people have got problems, either mention it to erm, someone, you know with a bit of responsibility at work, or erm, mention it to the consumer himself that, erm, but I don't think that has ever been done."*
>
> Participant 7, Male, Customer Service

Employees were concerned that tracked consumer information was also used for marketing purposes with individuals being targeted who had not used their accounts for a specified period.   This concern is further outlined in section 5.6.2

5.6.1.6 Age verification

Whilst employees acknowledged the successful use of verification with new accounts, it was suggested that this does not apply to existing accounts and consequently, some consumers did have more than one account and some accounts did not have deposit limits.

> *"I think the one thing that we are bad at is, we've put sort of duplicate account checks in but we've never looked back at old accounts. So some people still have ten accounts in our system, so if one shuts down, they'll just try and open another. So it's almost catch up that we've done. Catch up on these are all of the things that we have in place now but what about all the other accounts that don't have deposit limits and things like that."*
>
> Participant 12, Female, Head of Consumer Experience

5.6.2   Outbound calling

The aim of outbound calling is to act as a courtesy service to consumers. Employees were critical of the outbound calling which they undertake to consumers who have not used their account within a specified period of time. Whilst some employees saw outbound calling as being a marketing tool in other industrial sectors, other employees regarded the

practice as being unethical, especially where a consumer has stopped using an account because of the addiction problems they have experienced.

> *"I don't think the way we ring up people who haven't had a bet for a while, and ask them if they want to er, you know we will give them a free five pound bet, I don't think is very good. These people may have left, stopped gambling for a reason. It just seems a bit immoral to me. You know, it's a bit, I think it's a bit like a landlord ringing up a recovering alcoholic and saying 'come in and we'll just give you a couple of free pints if you come back to the pub'. You know, it doesn't seem right to me that we do that and a lot of people don't like doing it. And a lot of people have, a couple of people have sort of quit over the fact that they don't want to do it. It wasn't really in my job description when I started."*
> Participant 4, Male, Customer Service

> *"From a negative point, I would suggest that a certain thing we do, outbound calling, which is where we, we personally have to phone up customers who haven't used their accounts for a significant period offering them a bonus, sort of entice them back in. Well, in my opinion, they say it's a courtesy call, but in my opinion, they try and entice people in and those people who haven't used their account for a while are most likely the ones who are wanting to give up gambling and maybe the reason why they're not using it to offer them a bonus to get them back in using the account."*
> Participant 3, Male, Customer Service

> *"it's set up to er, just like as a courtesy call to see if they've had any problems with their account but basically it's trying to jog their memory that they've actually got an account, so, they use the account."*
> Participant 2, Male, Customer Service

Whilst such calls are common practice in other industries, the concern raised by staff was the extent to which the list of calls they were expected to make was based on data where a consumer had highlighted their reason for not using their account. In general it was perceived that the lists were based purely on the last date the account was used as opposed to the reason for not using the account. As such, employees were concerned that the purpose of the call was to re-engage the consumer regardless of whether they had stopped using the account due to addiction problems.

5.6.3   The forgotten consumer

Reflecting the conclusions of Shaffer et al., (1999), Collachi and Taber (1987), Shaffer and Hall (2002), Hing 2003b and Hing and Breen (2008) employees suggested that whilst working in the gambling industry was not their first choice of employment, they did enjoy working in the industry. A primary advantage of working in the gambling industry is that it enables individuals to combine a career path with their love of sport and betting.

> *"The fact that I'm quite interested in sport, like a bit of a bet myself, so the right sort industry, you get paid to watch the racing and football all of the time. Nice, nice job to have."*
>   Participant 3, Male, Customer Service

> *"I'm obviously interested in sport, so we get to watch all the football and that here, and so that's good, and then I'm into poker as well, so I get to test out poker games and get to play poker while I work as well."*
>   Participant 6, Male, Customer Service

In assessing the impact that working within the gambling sector had on the individual, one group suggested that they had never gambled before and that they still don't.

> *"Because I work for a betting company, it actually makes me not want to gamble. And I don't, really at all. So, I know that side of things, because I see people when they're like getting, when they've lost loads."*
>   Participant 5, Female, Customer Service

> *"I don't gamble personally, that is because of, when I started work in customer care I was probably eighteen, nineteen and it put me off, because I saw customers losing so much money and back then, four years ago, there wasn't as many procedures in place to help these people, in terms of deposit limits and self-exclusions. They weren't as prominent. I don't think self-exclusions existed, back then. So a lot of consumers were coming on, and complaining about how much money they lost and asking, begging for it back, basically, and, you know."*
>   Participant 9, Female, Manager Consumer Experience

For others, working in the gambling industry had reduced their gambling activity or helped them to stop.

> *"I love playing poker, I loved gambling before I came here, so I guess it's fun. I did when I started. I got into the, it's very glossy and er, and it's amazing. I did for a few months but I haven't had a bet for six months or so. I've stopped. There's a reason why we've got this big fancy office and we've got all this, there's a reason why we're doing well, we're hitting targets so I thought I'd stay away from it."*
> Participant 16, Male, Community Executive

Another group suggested that they have and continue to gamble but they believe they gamble responsibly and within defined limits.

> *"A little bit. I play poker more than anything. A little bit of sports betting here and there. I don't bother with a limit, but at the same time I don't bet what I can't lose."*
> Participant 6, Male, Customer Service

> *"Very rarely, I play poker for a while and other than that I may spend twenty quid a year on gambling."*
> Participant 10, Male, Lead Web Designer

A concerning response was from those who suggested that their gambling activity had become worse since starting work for a gambling organisation.

> *"I bet myself, you know what I mean and I do get carried away sometimes."*
> Participant 7, Male, Customer Service

> *"I do. Ever since I came here. I didn't before, now I can't stop. So what does that say?"*
> Participant 14, Male, Fraud Analyst

This final group were described by some management employees as being

"Hidden"   Participant 9, Female, Manager Consumer Experience

and

"Forgotten"   Participant 11, Female, Projects Manager

In terms of why they thought their gambling was out of control, employees suggested it resulted from a combination of factors including: interaction with colleagues and consumers who gambled including some who won large amounts; their work environment

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which endorses gambling and includes colleagues and consumers who gamble high values frequently; the need to be accepted by colleagues; and their social life which included colleagues who also gambled. These reasons reflect those previously identified by Hing (2003b), Hing and Breen (2008) and Griffiths (2009a). When asked if they were seeking help all employees in this category suggested that they did not need help and they did not want to identify the problem within their workplace as it would be perceived as a weakness.

Although classed as a 'hidden' and 'forgotten' group, it was suggested that that many employees do not recognise their problem and that the level of betting amongst staff was evident and part of the culture of the organisation. As such, it was suggested that the number of people in this group was underestimated.

> *"I've never worked in a company where so many people are involved with sort of the gambling aspect of it. Because that's one aspect of responsible gambling that I don't think is looked at enough within, you know, like within the office, almost. In terms of like operators that take bets over the telephone, they always think they've got a tip or they think that they've spoken to somebody who knows something. You know. That sort of thing that sometimes for them the level of bets that they put on is above their means. So I think, you know, even though we look at it from a customer point of view, the other side of it is different."*
> Participant 12, Female, Head of Consumer Experience

5.7 Superordinate theme three: Lack of awareness and effectiveness of responsible gambling

A third superordinate theme related to the general lack of awareness of responsible gambling requirements and tools by both employees and consumers. The following three cues were identified from the data: consumer lack of understanding and awareness; consumer willingness to engage and variability in the consistency of the approach of staff.

5.7.1 Consumer lack of understanding and awareness

Employees were critical of consumers in terms of their knowledge and understanding of the range of responsible gambling tools and services that are available to them. It was suggested that if a responsible gambling system, which is based on self-identification and self-help, is to be effective then consumers need to be aware of all the tools and how to access and use them. In terms of self-exclusions it was suggested that:

> *"More say, "I want to close my account but not self-exclude". That's because I don't think they know what self-exclusion is. So quite a few aren't aware it's there."*
>
> Participant 2, Male, Customer Service

> *"I think, they think that self-exclusion is a way that they can sort of put something on their account and then in a month ring up and get it taken off. Because we get a lot of people doing that. I mean I had one at the weekend, erm, I opened an account with you a while ago and I haven't used it for ages, and I want to open a new one and start betting with you. When I looked the person had self-excluded for five years, and they were only a year and a half into it, yet they were coming back to try and get their account."*
>
> Participant 12, Female, Head of Consumer Experience

A further point associated with consumer understanding of responsible gambling related to their knowledge of the games they gamble on. In some cases consumers believe they have won and it was down to customer care staff to inform them of the rules of the game.

> *"Yeah, I mean it's a great way to learn, to get your fingers burnt. You know what I mean? Second time round you don't make that same mistake again. So, you know you could look on it as a benefit to the consumer. In a certain weird way, you know, hopefully you haven't lost too much money but they've learnt not to do that again, or they've learnt how it actually works so, yeah, getting your fingers burnt."*
>
> Participant 15, Male, Test Manager

In other cases consumers will bet on anything.

> *"there are the kind of customers, you really don't like, and erm, like ones that are betting on anything, like, they'll bet anything, just anything, absolutely anything and then, when their cards like declining again and again because they've got no funds and they're like 'oh I'll go and transfer some money over ' and it's like, you kind of think to yourself well, really you should just not bother, because you're betting all the time and you're losing."*
>
> Participant 5, Female, Customer Service

5.7.2 Consumer willingness to engage

Most organisations base their system of responsible gambling on self-identification and self-help. For employees, such systems fail to recognize that some individuals are unwilling to self-identify and use self-help tools in fear that they become labelled as a problem gambler. This supports the conclusions of Griffiths (2009a, 2012). Reflecting the concerns of Friedman (1970), Hansen (2003), Griffiths (2005) and Cameron (2007), employees suggested that many consumers found self-identification difficult as they wanted to manage their behaviour themselves and, as such, they believed that consumers generally did not want to talk about problem gambling.

> *"I think the large majority if they think they've got a problem don't really want to tell anyone or if they do want to admit it. They want the least amount of people to know. It's not exactly something you want to shout about."*
> Participant 6, Male, Customer Service

An additional factor that was highlighted as affecting individual consumer perceptions of the gambling industry and their willingness to engage with responsible gambling tools was the general public's perception of the industry. It was suggested that the general public perceive the industry's approach to responsible gambling as being negative and this results from practices within both the land based and Internet sectors as well as the negative portrayal of the industry by the media.

> *"I think the industry is still tarnished with the bearded men in the bookies, having a cigarette and betting their life away on the gee-gees."*
> Participant 1, Male, Customer Service

> *"I would say with the way the traditional betting shop is now, they are full of roulette machines and stuff that hook the youngsters and I think they are less willing to take a traditional bet and they are more filling the shops and Internet sites with things that have the edge with the bookmakers."*
> Participant 3, Male, Customer Service

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"I read a lot of forums and stuff like that and the way the gambling industry is perceived, is that the man in the street now thinks betting offices are like fruit machine arcades."

<div align="center">Participant 7, Male, Customer Service</div>

"I've noticed that there has been a change in terms of the types of products, particularly on the casino side of things which we are putting out there which personally I find a bit more questionable. Erm, such as cartoon based casino games, that's something I have a problem with. I think we shouldn't be offering, er, things like comic casino games. Personally I think they're very wrong and directed at children, because of the films."

<div align="center">Participant 11, Female, Projects Manager</div>

5.7.3   Variability in the consistency of the approach of staff

As in all service delivery systems, employees play a central role in facilitating the relationship between the organisation and its consumers (Zeithaml, et al, 1990, 1993 and Johnson and Clark 2005). The significance of consumers being able to identify with staff is central where consumers are expected to self-identify as having problems with their gambling (Kantor and Weisberg 2002; Hansen 2003; Griffiths 2005, 2009a, 2009b; Cameron 2007; and Blaszczynski et al., 2011). As such, it is essential that staff are not only aware of all responsible gambling tools but also how they should be used. It was suggested that this is not always the case:

"I don't think it's not responsible but I think that people aren't aware of their options. I don't know much about erm, the actual like counseling side of things."

<div align="center">Participant 5, Female, Customer Service</div>

Staff understanding of responsible gambling systems places increased emphasis on the quality of training and their understanding of how responsible gambling tools are used. Whilst employees acknowledged that they had received training, it was generally perceived as negative and as something that occurred as part of induction. Its purpose was seen as something that had to be completed in order to maintain Gamcare accreditation as opposed to something that would improve responsible gambling.

"At the very start there was a, I can't remember what it was. There was something to do with Gamcare where you fill it on, fill it out online. Sort of you're given the information, you answer questions on it and you get some sort of qualification. I'm not sure. But that's all I've had. That was in the initial training."
Participant 3, Male, Customer Service

"Just basically when I first started when we did the induction course we were just told what it was and that we had to inform them what responsible gambling was. That's pretty much it."
Participant 4, Male, Customer Service

"My original training, you do a section on it. Erm. We've been told all about the websites and stuff, and I think there have been a couple of like, meetings, like slide shows and stuff, but not like intensive training on it. Erm. There could be more so we'd know more about, like, I don't know a lot about the Gamcare websites and stuff, and like what they all actually do. I mean we have like, we had, erm, a while back a meeting, I think, where they were like saying about all the Gamcare counselling and stuff. Erm, but there could be more. I think it could be that I'm not listening though."
Participant 5, Female, Customer Service

"It varies by area. The whole company, erm, we've got this online training system and basically, we've got two responsible gambling erm, sort of training courses that you do on line so you have to go on, read all this information and answer the questions on it. And to be honest, even though it's there and it's something we do, I'm not sure it works that much."
Participant 12, Female, Head of Consumer Experience

Although staff identified some negative aspects of the quantity and quality of training received, it is concerning that the Head of Consumer Experience equally is unsure of the effectiveness of the training provided to staff who have direct contact with consumers.

Staff acknowledged that there is not a consistent approach in how they promote responsible gambling tools to consumers. In part this is due to employees believing that consumers place the same level of emphasis on responsible gambling as they do.

"It all depends on them, I guess on which, whoever opens your account, because some people will just say, 'you've got, these are available to you, if you so wish, if you're worried that your gambling too much you can set the deposit limit' and they'll just explain it. Otherwise, some people actually say 'so do, would you want to set up a deposit limit or not?' It depends. I suppose it does depend on who actually takes the call. But usually, if you ask them that, they'll say no."
Participant 4, Male, Customer Service

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"Erm. I don't think a lot of people know that things are in operation. Like self-exclusions and deposit limits. I know for a fact I don't take any notice of them when I'm setting up my accounts. So I presume there will be a lot of people that feel the same, just like click through them when they are on the Internet, or just say, "oh whatever".

Participant 2, Male, Customer Service

5.8   Discussions

Employee responses resulted in three superordinate themes emerging in relation to responsible gambling: the meaning of responsible gambling; complacency; and the lack of awareness of responsible gambling. Employees generally perceive that responsibility for the provision of responsible gambling lies on a continuum from those who believe it is solely the responsibility of the consumer at one end, to those who believe the organization should have ultimate responsibility at the other end. Whilst each employee offered different nuances regarding the term responsible gambling a common sub-theme that emerged consistently conceptualized 'responsible gambling' as the consumer gambling 'within their means'. Only in a few instances did participants extend the emphasis to include the stress that problem gambling has for the individual, their colleagues, their family and their friends. For employees, an important aspect of responsible gambling from an organisations perspective is that the organisation must not only be responsible in its practices, but that it must be perceived as being responsible by the public if it is to be sustainable. This reflects previous studies undertaken by Harridge-March, 2006; Griffiths, 2005, 2009b, 2012; Gainsbury et al., 2012.

In identifying those with problem gambling, employees placed an emphasis on the online observable behavioural activities of the player, (i.e., the consumer database tracking various transactions and behaviours). Reflecting the concern of Griffiths (2012b)

employees suggested that whilst they could identify specific behavioural cues that may indicate problem gambling, they also pointed out that a single cue by itself, or even in combination with other cues may not necessarily mean that a person has a problem with their gambling. As such, employees suggested that they felt uncomfortable approaching consumers who they believed may have a gambling problem because of the potential negative reaction of the consumer and their managers. These responses reflect the concerns that Cameron (2007) and Delfabbro et al., (2007) previously identified and they also reflect the conclusions highlighted in the Panorama programme on UK Gambling presented on 6th November 2012, where gambling industry staff stated that the training they received to identify, approach and help those who demonstrate problems with their gambling was inappropriate. There are some potentially important implications to this finding. Firstly, it seems to be the case that further research should be prioritized to explore similarities and differences between online observable behaviours and current models for diagnosing problem gambling as this will identify any gaps between the diagnostic tools. This also reflects the concern highlighted by Griffiths (2012b) who acknowledges that whilst it is possible to identify problem gambling using online behavioural tracking data, not all of the current behaviours used to diagnose problem gambling can be identified in such tracking mechanisms. This indicates that there may be a need to develop and verify industry wide standards based on actual gambling behaviour which gives employees the confidence to identify and engage with suspected cases of problem gambling more readily. A second implication of using online observable behaviour to identify problem gambling is that further research is required to determine if problem gambling can accurately be identified and even predicted using tracked behavioral and transactional consumer data. For example, if operators record how much is being spent, how long consumers are playing and other more subtle aspects of their actual game play – can this actually give a

reliable and valid indication of whether they might be experiencing problems as a result of their gambling? A third implication of using observable tracked behaviour to identify problem gambling is the need for a review of training provided to employees so that they see it as empowering them to fulfill their obligations rather than as something that is required in order to maintain Gamcare accreditation.

Employees preferred to direct consumers to the self-help tools as the primary method of managing problem gambling. Such tools were seen to be dependent on consumer empowerment, consumer training and consumer engagement. Employees raised a concern over the extent to which employees and consumers were aware of the range of responsible gambling tools that were available to them; how to access them; and how to use them. These concerns reflect those previous highlighted by Griffiths (2012b) and Gainsbury et al., (2012) who suggested that there is limited evidence as to how effective such self-help tools actually are and whether they miss consumers who need help the most. Importantly, Blaszczynski and colleagues, (1997; 2006) suggest that problem gamblers may not be accurate in estimating or recalling their gambling activity which may invalidate the potential usefulness of consumers using a 'problem gambling checklist' to check if they may have a gambling problem. A further problem with most self-help tools is that they require the consumer to be proactive and seek out these tools and also be willing to engage responsibly with setting limits on their time or expenditure. However, it may well be the case that those gamblers who need help the most, may be less likely to engage independently with such tools. One of the benefits of establishing an industry standard in using consumer data to identify problem gambling is that this gives power and initiative back to the employee to monitor consumers and approach consumers who they deem may be at risk. For this reason, consumer analytics in relation to problem gambling certainly

merits further investigation, and based on the findings in this study, it should be prioritized in the National Responsible Gambling Strategy for the United Kingdom. As previously stated this also requires a review of the current employee training requirements relating to responsible gambling.

There was consistent evidence from the data extracts that there seemed to be some complacency among some of the employees in relation to consumer protection and the provision of responsible gambling and for this reason a superordinate theme of 'Complacency' was constructed. Three cues emerged within the complacency superordinate theme: structural inadequacies, outbound calling and the forgotten consumer. Structural features include those features which are in place to assist consumers to self-manage their gambling activities. For example, self-exclusion and options to set financial and time limits. Although acknowledging the improvements in responsible gambling practices, employees were also critical of some of the current provision. For example, the situation where the organisation provides both the games that may cause addiction and the help and support network to help manage addiction was seen as a potential conflict of interest which was further reinforced as the organisation is required to make a profit. The perceived ineffectiveness of the current self-exclusion provision and the ability to have an unlimited limit was seen to create negative perceptions of the effectiveness of current systems that are in place to protect consumers. Such perceptions may in turn affect both employee and consumer willingness to engage with responsible gambling tools and further reinforce the negative perceptions they may have of the gambling industry. In general, it was suggested that more could be done to promote and educate consumers and employees in terms of what responsible gambling tools are available and how they can be used for maximum effect. Hence, consistent with previous

suggestions, further research should explore if industry wide codes of conduct should also include a minimum set of standards relating to the role that gambling operators play to informing and educating consumers. For example, this could include an initial introduction and orientation during consumer registration and then perhaps some interaction on a 6-monthly basis. The discussion could cover, for example, how to gamble responsibly and an outline of the available responsible gambling tools and how to use these effectively.

Another significant cause for concern that was expressed among some employees was that information held about consumers was being used inappropriately for marketing purposes to promote products and services to those who had not used their accounts for a specified period. This practice, which is reflected in outbound calling, may be regarded as running contrary to the spirit of using behavioural analytics in developing a responsible gambling solution which was discussed previously. For example, an account with little or no activity may prompt a marketing response whereby the consumer is contacted and enticed to reinitiate gambling with the operator. Of course, such marketing practices are not unethical in a general sense, however, some consideration is required as to how this relates to indicators that a consumer may have a gambling problem. For example, if a consumer had a play history which does not suggest any evidence of problematic play (controlled spending, no payment rejections, limited reloading of funds within session) then this may be perfectly acceptable. On the other hand, if a consumer looks like they spend large amounts of time and money in an uncontrolled way, then enticing this consumer back would then be considered to be very unethical. The current concern is whether these issues are being actively considered by gambling operators in executing marketing strategies within their organization. This concern gives further weight to the potential importance of behavioral analytics in identifying problem gambling. Finally, it also

suggests that such a solution will not be straightforward in its implementation since it will also need to permit marketing functionality to the marketing team. In other words, it will be helpful if data analytics could help identify whether a consumer has moved to a competitor (where it would be ethically acceptable to try to entice them back) or whether they are trying stop gambling because of gambling-related problems (where it would not be ethically acceptable to try to entice back).

Working in the gambling industry was seen to have positive and negative implications in terms of a gambling employees' own gambling behaviour. Employees who have a problem with their gambling were referred to as 'hidden' or 'forgotten' and included those who had developed problems whilst working in the sector but who remained silent. It was suggested that that many employees do not recognise their problem and that the level of betting amongst staff was evident and part of the culture of the organisation. As such, the number of people in this group was seen to be underestimated and no effective provision in terms of help and support was seen to be offered to staff.

Both the marketing concern and concerns about gambling amongst gaming staff, would suggest that employees working at all levels within the Internet gambling industry may benefit from training which covers potential risk factors for gambling industry staff and issues which explore the relationship between marketing and responsible gambling. Again it may be worth giving consideration to making such training mandatory as part of an overall code of conduct endorsed by industry bodies and regulators. This would enable a consistent approach amongst staff and would enable them to be aware of behaviours associated with Internet problem gambling. It would also enable staff to feel confident in fulfilling their obligations for identifying, approaching and helping those who have

problems with their gambling. A final benefit of such training is that it would improve the perceived effectiveness and purpose of training to something more than a Gamcare accredited exercise which current training programmes are perceived to be. Further research should also explore in more depth the potential problem gambling risk factors that apply specifically to industry staff and these may include increased exposure to gambling material, perceptions of potential 'inside knowledge/advantage' and the social influence of colleagues who bet on a regular basis. These issues warrant further investigation.

A third superordinate theme related to the general lack of awareness of responsible gambling requirements and tools by both employees and consumers and included the following three sub-themes: consumer lack of understanding and awareness; consumer willingness to engage and variability in the consistency of the approach of staff. Employees were critical of consumers in terms of their knowledge and understanding of the range of responsible gambling tools and services that are available to them. Most organisations base their system of responsible gambling on self-identification and self-help which requires consumers to be aware of all the tools and how to access and use them. It also requires them to identify with staff when they are experiencing problems. This lends further weight to recommendations made previously in this study that consumers should be better informed about responsible gambling by staff at the point of registration and on an ongoing basis. It also supports the previous suggestion that staff training on responsible gambling should be further developed to ensure that staff engagement with consumers on these issues are both sufficient and consistent.

Current responsible gambling systems reflect more generally contemporary models of CSR where statute highlights the principles to be achieved with the individual organisation

and audit bodies developing the systems by which compliance can be demonstrated and assured. Two main conflicts of interests that were highlighted as inhibiting the industry as being perceived as responsible was the need for the organisation to be socially responsible whilst at the same time being a commercial success and balancing the need to provide commercially viable products that may be addictive with the obligation to provide help and support services to those who may develop addiction. These factors reflect primary challenges to the gambling industry, its regulators and government if current responsible gambling systems are seen to be effective.

5.9   Summary

The employee study aimed to establish the meaning that they give to responsible gambling and to establish their perceptions of the effectiveness and appropriateness of current responsible gambling practices used within the Internet sector of the gambling industry. Whilst employees offered different subtle differences regarding the term 'responsible gambling', a common sub-theme that emerged related to the individual consumer having ultimate responsibility for their gambling choices and behaviour whilst being encouraged to gamble 'within their means'. In order to achieve this aim there is recognition that gambling organisations must provide training and empowerment to employees and consumers.

Whilst employees identified self-help tools as the preferred primary method for managing problem gambling, there is limited evidence as to how effective such self-help tools actually are. What is more concerning is that self-help is voluntary yet its success is dependent on consumer empowerment, consumer training and consumer engagement

which may not reflect the personal interests of those who are in most need of help and support. In addition, they may not reflect the content of responsible gambling strategies developed by the gambling provider. Employees identified the following ways of improving the effectiveness of current responsible gambling initiatives for both consumers and employees: develop responsible gambling systems around observable behavioural activities as this will identify problem gambling behaviour in both consumers and employees; give gambling providers and employees the power to monitor and approach those consumers and employees who they believe may be at risk; ensure a more consistent approach amongst staff within the industry; improve both employee and consumer knowledge of what responsible gambling tools are available and how they can be accessed and used; and develop ethical marketing activities which distinguish between consumers who have problems with their gambling and those who do not. Such proactive approaches by industry would reflect the current system of corporate social responsibility which requires organisations and industries to develop responsible practices that may be audited against general responsibility principles which are outlined in statute.

Chapter 6   An Exploratory Investigation into Consumer Perspectives on Problem Gambling and Social Responsibility in Internet Gambling

6.1   Introduction

In general there is agreement that there has been significant growth in Internet gambling, that its popularity has increased and that the industry is likely to experience further continued growth as technological and Internet developments occur (Global Betting and Gaming Consultants (GBGC), 2007, 2009, 2010). Whilst this growth has presented many benefits, such as increased government revenue and leisure opportunities, it has also presented challenges for many regulatory and legislative authorities who have found it difficult to effectively regulate the social, commercial, and clinical aspects of the Internet gambling industry, (Rose and Owens, 2005 and Balestra and Cabot, 2006). This is in part due to the speed at which the industry is changing and the global nature of Internet gambling. The changing nature of the industry has also highlighted the variety of approaches that different countries have adopted to the management of Internet gambling which varies from outright prohibition to a permissible and relaxed regulatory environment (Parke et al., 2007 and Blaszczynski et al., 2008).

Power (2004) suggests that within each jurisdiction, regulatory agencies have been established in order to manage the risk that Internet gambling poses to the jurisdiction in terms of its credibility and its ability to manage gambling activities. In managing this risk, regulation tends to be based on self-regulation at the organisational level which Kingma (2004) suggests is as significant and important as state regulation. This emphasis on risk

management and self-regulation at the organisation level is seen by Power (2004) as reflecting a change in corporate governance whereby compliance to organisational policies and procedures forms the basis of external agency review. As such, the gambling organisation and regulatory agency become responsible for creating risk management and regulatory systems whilst the government within the jurisdiction broadly outlines standards which they expect organisations to meet. This approach of the organisation taking responsibility for risks to the individual consumer and wider society is reflected in models of corporate social responsibility which stress than an organisation's social responsibilities should be integrated within its strategies as opposed to being imposed upon them (O'Dwyer 2003; Carmeli and Gefen 2005; Cochran 2007; Griffiths 2009a, 2009b; and Griffiths 2009a, 2009b, 2012). One driver for this approach was the global and diversified nature of contemporary business organisations which makes it impossible to legislate for individual eventualities. One practical problem of this system is that relying on the organisations to regulate themselves places greater emphasis on the monitoring of such self-regulation if the system is to be perceived as credible and effective (Hutter, 2001).

In meeting their organisational responsibility, Power (2004) suggests that risk-based regulation can be used by an organisation and regulatory agency to manage their own reputations. Consequently, regulatory agencies and Internet gambling organisations have developed risk management and responsible gambling systems which are based on self-identification and self-regulation by the individual player. For eCOGRA (2007) and Blaszczynski et al., (2011) whilst such systems require the gambling operator to ensure that they operate in a responsible, transparent and non-exploitative way, the ultimate responsibility to whether to gamble and how to gamble rests with the individual. This

implies that the individual consumer should be provided with sufficient information so that they understand the nature and risks associated with the games, products and services that they use.

Within current systems of corporate social responsibility, there is increasing recognition that organisations not only need to act in a responsible way but also that they should be perceived as acting in a responsible way (Giddens 1991, 1994; Griffiths 1999, 2003, 2009b, 2012; Griffiths and colleagues 2002, 2009c; Hing and McMillan 2002; Hing 2003; Eadington 2004; Messerlian et al., 2005; Parke et al., 2007; Rockloff and Dyer, 2007; Sartor, 2007; Schellinck and Schrans 2007; Gambling Commission 2008, 2012; Hancock et al., 2008; Hing 2003b and Hing and Breen 2008). At a minimum this requires consumers to be aware of, and understand the products and services that they use and for there to be trust between the consumer and provider. For organisations this requires them to understand why an individual gambles and acknowledge the factors that may cause harm to those using their products and services. Such understanding will enable organisations to develop strategies that promote responsible gambling and protect those who may develop problems with their gambling.

To date, there is limited understanding of stakeholder perceptions of the effectiveness of operator self-regulation as a consumer protection tool in responsible Internet gambling. Results from the Internet gambling employee study, (see Chapter 5), suggest that individual consumers lack awareness of their behaviour and attitudes to tools available to them that may assist in helping them regulate their behaviour. This reflects the conclusions of Griffiths 2009b, 2012 and Gainsbury et al (2012) who suggest that whilst consumers expect responsible gambling tools to be available, in general there are relatively

low levels of engagement with such tools. They suggest that where engagement with responsible gambling tools is voluntary, then engagement level is lower. Employee participants also suggested that although there are many strengths of current responsible gambling tools, they all have their own specific weaknesses. For example, a consumer may exclude form one site only to move onto to another provider reducing the effectiveness of self-exclusion as a self-help tool. At present there are in excess of 2500 Internet gambling sites with no integrated system of self-exclusion (Williams, Wood and Parke 2012).

Given the focus of responsible gambling requires the individual consumer to make informed choices, Blaszczynski et al., (2008, 2011) suggest that it is essential that any review of current responsible gambling provision requires input directly from the consumer. As such, this study aims to explore consumer perceptions of responsible gambling with specific focus on the strengths and weaknesses of current responsible gambling provisions and the level of help offered by gambling operators to assist consumers to regulate their gambling behaviour.

6.2   Methods

6.2.1   Survey

A web-based survey was approved by the University of Salford Ethics Committee and The Manchester Evening News who both provided links from their websites to the survey which was hosted by SurveyMonkey. Web-based surveys have been used in previous studies and are acknowledged as a suitable method for investigating Internet gambling behaviour (Wood et al., 2007 and Griffiths et al., 2009a, 2009b). All participants were provided with an outline of the aims of the survey and how to complete it. They were

informed that their participation was confidential and that they could withdraw from the survey at any point up to pressing the 'submit' button, upon which their responses would be electronically recorded. Informed consent was provided electronically as part of the web survey.

The survey contained 113 questions consisting of both open and closed questions. Divided into three parts, the first part of the survey was designed to obtain consent from participants and collect information on their behaviour and attitudes including the types of games played and frequency of play. The second part of the survey focused on consumer attitudes towards responsible gambling including: self-exclusion options; training and support for staff; problem gambling information; advice and referral in relation to problem gambling, limit setting, play for free facilities and practices, game design protocol and consumer analytics; and stakeholder involvement in research. Responses were collected primarily through the use of Likert scale questions with participants highlighting their level of agreement with specific statements. The final part of the survey related to socio-demographic information including age and gender.

6.2.2   Participants

A self-selected sample of 425 Internet consumers was recruited through hyperlinks placed on the University of Salford and Manchester Evening News web sites. Participants were required to have engaged in Internet gambling in the past three months consistent with the requirements in other studies (eCOGRA, 2007, Parke 2007). The opportunity to win a i-Pad2 was used as an incentive to improve participation in the study. The use of such an incentive is considered acceptable and a low risk method to improve participation rates in

gambling research as its structural characteristics, (no stake, little consumer involvement, no chasing potential, delayed outcome determination, weak schedule of determination and weak schedule of reinforcement) are unlikely to stimulate additional gambling activity, (Parke and Griffiths 2007; and Griffiths 2009a).

In total, 617 questionnaires were submitted. The completed surveys were subject to the following qualifications in order to minimize response bias:

a.   Removing responses where individuals selected 'Antarctica' as their most frequent holiday destination. The use of this response suggested that the individuals had not read the question with sufficient care so the validity of their other responses was called into question. As such, 3 surveys were removed.

b.   Removing responses where individuals had selected the same responses for each Likert scale question. Four such cases were removed.

c.   Removing responses where individuals had not played with an Internet gambling provider in the past 3 months. Reflecting other studies, participants were required to have engaged in Internet gambling within the past 3 months (eCOGRA, 2007, Parke 2007). This requirement was explicit in the promotional material and on the survey suggesting that individuals had not read the information with sufficient care. One hundred and twelve cases were removed.

d.   Removing those responses which had been completed in less than 5 minutes. 73 responses were submitted within 5 minutes. The pilot studies suggested that on average the survey took approximately 11 minutes to complete. It was therefore decided that those completed in less than five minutes were either not completed with sufficient due diligence and/or did not contain sufficient responses.

It was felt that the above safeguards were particularly important given the incentive of the chance to win an i-Pad2 and a corresponding increase in the likelihood for unreliable responses.

In total 425 cases, (68.88%), were retained for further analysis.

6.3 Analysis of the study data

Statistical analysis of the relevant data included the use of the chi-square test, linear regression analysis, stepwise multinomial regression, ANOVA, t-test and principal component analysis. Explanations of linear regression analysis, stepwise multinomial regression and principal component analysis are outlined in sections 4.5.6, 4.5.7 and 4.5.8 respectively.

In order to determine whether problem gambling is related to behavioural and categorical characteristics of the participants, the Problem Gambling Severity Index (PGSI) was used. This is a self-reporting screening method used to measure problem gambling in the general population as opposed to a clinical situation and it categorises individuals on a scale from non-problem to problem gambler based on responses which are characterised on a four point scale (0 = never; 1 = sometimes, 2= most of the time, 3 = almost always, (Ferris & Wynne, 2001). Based on the score achieved, the PGSI identifies different subgroups of problem gamblers based on their risk status (non- problem, low, moderate, and high). As PGSI is used to classify problem gambling within the general population it is used in this study as a basis for both the linear regression analysis and stepwise multinomial regression

analysis to identify factors that may predict problem gambling and therefore have implications for developing and improving responsible gambling strategies. With linear regression analysis PGSI individual scores are used as the basis for comparison, whereas PGSI classifications are used with stepwise multinomial regression.

6.4   Results

6.4.1   General Internet gambling behaviour

6.4.1.1   Key consumer demographics and Internet gambling behaviour

Table 19 summarises the key demographic and gambling behaviour of participants. In general the age, gender and PGSI profile of those responding to the questionnaire was similar to previous studies involving Internet gambling (Griffiths and Barnes 2008 and Griffiths et al., 2009a). Further analysis of the data, using a Chi-square test, suggests that there are differences in responses which are significant at the 99% confidence level when PGSI categories are analysed in terms of 'frequency of play', (P-value = 0.000, χ^2 40.066, df 6); gender (P-value = 0.006, χ^2 10.119, df 2) and age (P-value =0.005, χ^2 40.066, df 6). In general those who gambled most frequently were in the moderate and problem gambling categories; males were more likely to be in the problem gambling category than females; and those in the problem gambler group were more likely to be in the 27-31 age category with those 32-45 being less likely to be in this group. These results reflect those obtained by eCOGRA (2007), Parke et al., (2007) and Jonsson (2012) and they will form part of the focus of the statistical analysis in section 6.6.

Table 19 Key consumer demographics and Internet gambling behaviours

Gender (n=425)	Male	Female					
%	69.2	30.8					
Age (n=425)	Under 21	21-26	27-31	32-45	46+		
%	25.2	41.8	15.5	12.7	4.8		
Frequency of Play (n=425)	2-3 times a day	Daily	2-3 times a week	Weekly	2-3 times a month	Monthly	2-3 times a year
%	5.0	5.4	22.1	19.3	19.3	13.8	15.1
PGSI Classification	No Problem	Low Problem	Moderate Problem	Problem			
%	21	26	31	22			

6.4.1.2   Gambling preferences and gender

Chi-square tests presented in Table 20, suggest that there are statistically significant differences between gender preferences for playing specific games with females preferring land-based and online bingo and online lottery. Males prefer online sports betting and horse-racing; land-based and online based poker; land based and online roulette; online blackjack online video poker and online informal betting. These results reflect those of eCOGRA (2007), Parke et al., (2007) and Wood and Williams (2009) which suggest that males tend to engage in games of skill whilst females prefer games of chance.

Table 20 Gambling activity by gender (Male n= 251, Female n=114)

Gambling Activity	Male (%)	Female (%)	*P*-value (χ^2)
Slot/Gaming Machines – Online	14.6	13.0	0.652
Slot/Gaming Machines - Land-based	9.9	10.7	0.795
Video Poker – Online	10.5	5.3	0.083
Video Poker - Land-based	1.7	1.5	0.896
Sports Betting and Horse-Racing – Online	42.9	22.9	0.000**
Sports Betting and Horse-Racing - Land-based	19.7	13.0	0.920
Poker - Online	39.5	25.2	0.004**
Poker - Land-based	23.5	9.9	0.001**
Blackjack – Online	14.3	5.3	0.008**
Blackjack - Land-based	9.9	3.1	0.015*
Roulette – Online	19.4	9.2	0.008**
Roulette - Land-based	12.9	3.1	0.002**
Lottery – Online	43.5	53.4	0.059
Lottery - Land-based	30.6	36.6	0.220
Bingo – Online	7.8	35.1	0.000**
Bingo - Land-based	2.0	9.9	0.000**
Informal betting - Online, e.g. with friends and colleagues	10.2	5.3	0.101
Informal Betting - Land-based, e.g. with friends and colleagues	17.0	15.3	0.655
Betting on video games – Online	3.4	0.8	0.114
Betting on video games -Land-based	4.1	1.5	0.173

Other gambling activities highlighted included off line scratch cards (4 responses), online scratch card (3 responses), online craps (1 response), and mobile phone gambling (1 response).

* significant at p=0.05, ** significant at p=0.01

Other interesting differences based on gender are those between online and land-based sports betting and horse-racing where males prefer to engage in online activities whilst there are no gender differences in land based sport betting. In terms of Bingo, females prefer this activity whether using land based or online media.

6.4.1.3   Gambling preferences and age

Gambling preferences based on age suggested that there was only one significant difference at the 95% confidence level with those under 21 preferring online sports betting and horse-racing (*P*-value = 0.01).

6.4.1.4 Gambling and harm

Participants were asked to state their level of agreement with statements that suggested that specific factors were associated with Internet gambling-related harm. The results, are summarised in Table 21 and suggests that consumer perceptions regarding the factors that may increase harm caused by Internet gambling are: convenience; the fact that you are not playing with actual cash but e-cash; and you can play more than one game at a time. The factors that are perceived to have most impact on reducing harm are: it's not as exciting as land based gambling; there are better tools to help you gamble safer; and the availability of better odds. But even here the level of endorsement is not particularly high with no more than 30% suggesting that such factors can reduce harm. Statistical analysis suggests that there are no differences in the ranking of harm factors when based on PGSI groups and gender groups.

Table 21 Participants perceptions of factors that may cause gambling related harm

Factor	CIH	SIH	NIOH	SRH	CRH
Convenience (n=404)	48%	30%	17%	3%	2%
The fact that you are not playing with actual cash but e-cash (n=400)	50%	25%	15%	6%	4%
You can play more than one game at a time (n=403)	38%	38%	19%	4%	1%
Faster games (n=402)	37%	37%	17%	7%	2%
Availability of higher jackpots (n=400)	27%	42%	23%	6%	2%
Privacy and anonymity (n=403)	30%	33%	25%	9%	3%
Promotions (n=398)	24%	41%	24%	9%	2%
Availability of better odds (n=403)	24%	39%	24%	11%	2%
There are better tools to help you gamble safer (n=402)	11%	17%	44%	25%	3%
It's not as exciting as land based gambling (n=401)	8%	17%	48%	22%	5%

Notation: CIH (considerably increases harm); SIH (slightly increases harm); NIOH (no impact on harm); SRH (slightly reduces harm); CRH (considerable reduces harm)

A correlation matrix of the factors that are perceived to cause gambling related harm is included in appendix 5j. Given none of the correlation values are above 0.5, this suggests that there are acceptable levels of multicollinearity thus justifying that each factor is

treated separately. This view is supported by Alm (1998) and Abdou (2009) who suggests that correlation values up to 0.70 are not considered a serious problem and Lewis-Beck (1980) and Gujarati (2003) who propose that there is only a problem with multicollinearity where the correlation value is above 0.8.

Further analysis of the data, using PGSI categories as an independent variable on a one way ANOVA, suggest that those in the 'problem gambling' category saw 'it is not as exciting as land-based gambling' as having least impact on reducing or causing harm when compared with other PGSI groups. This difference in perception was significant at the 95% confidence level, (F-value = 3.495, df 4, P-value = 0.016). With reference to 'there are better tools to help you gamble safer', those in the 'no problem' category believe this would considerably reduce harm when compared with other groups. This difference in perception was significant at the 99% confidence level, (F-value = 3.912, df 3, P-value = 0.009).

In terms of differences in perception of factors that may increase harm for those who gamble on the Internet, based on age, there were only significant differences in views relating to 'there are better tools to help you gamble safer' which is significant the 95% confidence level using a one way ANOVA, (F-value = 3.114, df 4, P-value = 0.015) and 'the fact that you are not playing with actual cash but e-cash' which is significant at the 90% confidence level, (F-value = 2.166, df 4, P-value = 0.072). In both cases those in the 21-26 age group agreed more strongly with the statement that the factors would increase harm when compared with all other age groups.

When perception of factors that cause harm are analysed in terms of gender, only 'availability of better odds' and 'you can play more than one game at a time' were

significant at the 90% confidence level using a one way ANOVA, (F-value = 0.873, df 398, P-value = 0.056 and F-value =0.028, df 398, P-value = 0.066, respectively). In both cases males believed that these factors would increase harm when compared to female views.

Where factors that cause harm are compared on a consumers frequency of play, only 'privacy and anonymity' is significant using a one way ANOVA, (F-value = 2.712, df 2, P-value = 0.068). Here those who gamble at least monthly are more likely than all other groups to see this as a factor that considerably increases harm.

6.5   Perception of responsible gambling practices

Participants were asked to rate their level of agreement with a number of factors relating to current responsible gambling practices and tools on a seven point Likert scale (whereby 1 = strongly disagree and 7 = strongly agree). Table 22 provides a summary of the descriptive statistics which are outlined below. For discussion purposes consumer responses will be considered using the following headings which are based on the PCA of gambling behaviour: proactive responsible gambling; transparent terms and conditions; customer service (reactive); self-exclusion and self-help; game design   ; and consumer information, behaviour and transaction.

Table 22 Rating of responsible gambling factors by consumers

	SD (%)	D (%)	SlD (%)	NA/ND	SlA (%)	A (%)	SA (%)
When I have spoken to customer service staff they seem to know about issues related to problem gambling (n=354)	3	8	11	59	10	6	3
When I have spoken to customer service staff they put my welfare first (n=354)	5	9	14	53	12	5	2
The main priority for customer service staff is to keep consumers happy so they keep spending money (n=374)	8	13	17	30	18	11	3
I would welcome being approached if a gambling operator thought I had a problem with my gambling (n=362)	3	4	11	23	22	25	12
Customer service staff should take action if they see signs of problem gambling (n=353)	2	3	6	22	25	28	14
Customer service staff should be trained to recognise signs of problem gambling (n=356)	1	3	5	21	24	31	15
A gambling game CANNOT be low risk and fun at the same time (n=374)	10	13	16	27	17	12	5
Gambling operators should not design games using characteristics they know to be addictive (n=375)	3	7	10	27	18	20	15
Reducing the risk in a game will make a game boring (n=373)	3	7	12	25	30	16	7
Play-for-free versions of a game should be exactly the same as the real version (n=375)	2	5	5	18	14	28	28
It is easy to get around the self-exclusion system for any one site (self-exclusion being where a player requests to be denied access to a site for a specified period of time) (n=362)	3	6	7	42	19	17	6
Self-exclusion is ineffective since players can simply choose to play at another site (n=359)	2	3	4	23	21	33	14
For self-exclusion to work all sites need to co-operate to have an industry-wide 'self-exclusion' system (n=360)	2	2	4	20	18	32	22
Internet gambling websites should provide options for players to limit how much time they can spend (n=361)	2	3	7	17	13	30	28
Internet gambling websites should provide options for players to limit how much money they can spend (n=360)	1	2	5	16	17	29	30
I have been encouraged to set a responsible gambling limit on each site I use (n=362)	9	19	13	25	19	12	3
I feel confident about where to find information on responsible gambling (n=357)	3	10	12	30	22	18	5

	SD	D	SlD	NA/ND	SlA	A	SA
I should get information about how I play regardless of whether or not I request it (n=359)	4	9	9	23	21	25	9
Information providing support for those worried about their gambling should be placed in a prominent position on the website (n=362)	1	2	4	23	15	33	22
Having detailed information on how much money I have spent would be useful (n=360)	1	2	5	18	19	33	22
Internet gambling websites should provide information regarding how to spot problem gambling (n=360)	1	1	4	19	19	33	23
Internet gambling software is fair (n=377)	8	15	23	28	14	9	3
Internet gambling sites tell their players their chances of winning on each game (n=354)	8	17	19	26	17	11	2
Terms and conditions for bonuses are fair (n=374)	7	12	17	32	19	12	1
Information on responsible gambling is covered sufficiently during the registration process (n=362)	4	13	17	29	20	13	4
I have been informed of the importance of responsible gambling by each site I use (n=362)	6	14	14	22	24	16	4
Internet gambling sites are misleading about my chances of success (n=354)	2	7	10	29	27	19	6
Terms and conditions are necessary to ensure some players do not abuse the bonus system (n=373)	4	8	8	26	29	19	6
Internet gambling sites are open and honest regarding the terms of conditions of gambling on their site (n=375)	8	13	17	30	18	11	3
Terms and conditions for bonuses are clearly communicated (n=373)	10	13	20	24	21	11	1

SD   Strongly disagree
D   Disagree
SlD   Slightly disagree
NA/ND   Neither agree nor disagree
SlA   Slightly agree
A   Agree
SA   Strongly agree

6.5.1   Proactive responsible gambling and customer service (reactive)

Findings from this study suggest that 70% (n=249) of participants agreed that staff should be trained in terms of how to recognise those who may have problems with their gambling and 67% (n=237) agreed that where staff see signs of problem gambling they should take action.

Overall, 59% (n=214) of participants agreed that they would welcome being approached if an online operator thought they had problems with their gambling and in general participants suggested that they would welcome Internet gambling operators using consumer tracking data in a more proactive way.   Further analysis of the data, using a Chi-square test, suggests that there are differences in responses which are significant at the 99% confidence level where those in the problem category were more likely to disagree with the statement that they would welcome being approached if an online operator thought they had problems and those in the moderate and low problem gambling categories agreed most strongly with the statement, (P-value = 0.010, χ^2 34.745, df 18). Where staff identify individuals as having a potential problem, 94% (n=399) of respondents suggested that taking no action was the least acceptable choice of action that should be taken. This view was consistent across all PGSI groups.

As outlined in Chapter 5, employees highlighted the potential conflict of interest with an Internet gambling operator also being responsible for providing responsible gambling support to those who may be experiencing problems with their gambling. Consumers also highlighted this concern, with 32% (n=120) of participants agreeing that the primary aim of customer care staff was to encourage people to play. Whilst the majority of respondents in each group agreed with the statement, further analysis of the data using a Chi-square

test, suggests that there are differences in responses which are significant at the 99% confidence level where those in the moderate and problem categories respectively having stronger levels of agreement and disagreement with this statement when their responses are compared with other PGSI groups (*P*-value = 0.006, χ^2 36.607, df 18). The cynical view of staff involvement in responsible gambling strategies is also reflected in consumer views where only one in five participants suggested that 'when I have spoken to customer care staff they seem to know about issues related to problem gambling' and 'when I have spoken to customer care staff they put my welfare first'. In both cases there were significant differences in the responses of different PGSI groups which were significant using a Chi-square test at the 99% confidence level. In both cases those in the problem and moderate problem groups respectively had stronger views in terms of agreeing and disagreeing with the statements with those in no problem groups being more likely to neither agree nor disagree with the statements, (*P*-value = 0.000, χ^2 51.070, df 18; and putting consumer welfare first: *P*-value = 0.000, χ^2 51.799, df 18).

6.5.2   Game design

Griffiths and colleagues (2007, 2008, 2009a, 2009b, 2012) highlighted game design as a central aspect of responsible gambling. Those who design games are challenged with creating exciting games which are not addictive. This challenge was reflected in the concerns of the participants as 53% (n=199) agreed that games should not be designed which are known to contain characteristics that are addictive whilst 34% (n=127) agreed that a game cannot be low risk and exciting at the same time and 53% (n=198) suggested that reducing risk would make a game boring.

Where games are offered on a 'play for free' and 'pay to play', 70% (n=263) of participants agreed that both versions should be the same.

6.5.3   Self-exclusion and self help

Self-exclusion and deposit limits are required under regulation relating to responsible gambling. 68% (n=244) of participants regarded the current system of self-exclusion within the Internet sector as ineffective with 42% (n=152) of participants agreeing that it is easy to get around the self-exclusion systems and 72% (n=259) agreeing that self-exclusion will only work where there is an industry wide system. In both cases, there were significant differences using a Chi-square test at the 99% confidence level with those in the low and moderate problem gambling groups agreeing more strongly with each of the statements whilst those in the problem category were most like to disagree, (P-value = 0.006, χ^2 36.607, df 18, P-value = 0.003, χ^2 38.369, df 18, and P-value = 0.006, χ^2 36.508, df 18 respectively).

Overall, 71% (n=256) of participants suggested that 'Internet gambling websites should provide options for consumers to limit how much time they can spend' and 76% (n=274) agreed that 'websites should provide options for consumers to limit how much money they can spend'. When asked if they had been encouraged to set a limit, 34% (n=123) agreed.

6.5.4   Customer information, behaviour and transaction

In evaluating information that consumers receive on responsible gambling, 44% (n=159) of participants agreed that they had been informed of the importance of responsible

gambling; 38% (n=136) of participants agreed that responsible gambling was covered sufficiently during the registration process and 75% (n=270) of participants agreed that websites should provide information on how to spot problem gambling.

In terms of access to information 55% (n=197) agreed that they should receive information on how they play even if they do not request it, and more specifically 74% (n=266) agreed that having information on how much money they spend would be useful. In total, 45% (n=163) felt comfortable where to find information on responsible gambling and 70% (n=253) agreed that information on responsible gambling should be placed in a prominent position.

6.5.5   Transparency and Fairness

Less than a third, (32%, n=120), of participants perceived Internet gambling websites terms and conditions to be open and honest with 52% (n=184) agreeing that they are misleading in terms of the chances of success; 30% (n=106) agreed that Internet sites tell their consumers the chances of winning and 26% (n=98) agreed that the software was fair.

Whilst 54% (n=210) of participants agreed that terms and conditions are necessary to ensure some consumers do not abuse the systems. participants were generally critical of current bonus system offered by Internet gambling providers in that only a third agreed that terms and conditions relating to bonuses are clearly communicated and that terms and conditions for bonuses are fair.

6.6 Responsible gambling and consumer behavioural components - Principal Component Analysis (PCA)

The second part of the questionnaire was based on Likert questions which sought to elicit participant views on responsible gambling practices currently used within the Internet gambling sector.

A Principal Component Analysis was conducted of 52 of the survey items with Direct Oblimin rotation. The Kaiser-Meyer-Olkin measure verified the sampling adequacy for the analysis, (KMO = 0.852) which is considered 'very good' (Field, 2009) and KMO values for all individual items were >0.77, which is well above the acceptable limit of 0.5 (Field 2009). Bartlett's test of sphericity χ^2=19334.49, df 66, p<0.001, indicated that correlations between items were sufficiently large for PCA (Field 2009). Whilst scree plots were used to determine the number of factors within Principal Component Analysis, there was an acknowledgement that their use alone may be regarded as subjective (Kiln, 1997 and Cramer, 1998). Consequently, factors were also extracted using components which had eigenvalues over the Kaiser's criterion of 1 as recommended by Guttman (1982) and Field (2009). 12 components, based on 43 variables, had eigenvalues of at least 1 and collectively explain 67.64% of the variance.

Further analysis of the Component Matrix, suggested that only the first six factors were coherent and represented 53.86% of the total variance amongst variables. Within the first six components each of the loadings were pure, i.e. they loaded on just one factor. For these reasons, only the first six factors, representing 29 variables, were used in more

detailed statistical analysis. A summary of the six factors and their components is highlighted in Table 23.

Table 23 Six principal responsible gambling and behaviour components

Factor	Factor Title	Summary of components
1	Proactive responsible gambling	Co-operate with stakeholders, for example researchers, government, charities in order to advance our understanding of consumer behaviour; analyse consumer behaviour patterns to identify problem gambling; customer service staff being trained so that they can and do take action where they see problem gambling
2	Transparent terms and conditions	Terms and conditions for bonuses are clearly communicated and are fair; online gaming software if fair; websites are open and honest in relation to terms and condition and terms and conditions are necessary to ensure the bonus system is not abused.
3	Customer service (reactive)	Customer services staff knowledge of responsible and problem gambling; customer care attributes and obligation of gambling organisations to undertake research beyond their own commercial objectives.
4	Self-exclusion and self-help	Effectiveness of Self-exclusion and self-help; industry-wide self-exclusion; provision of help to enable individuals to spot problem gambling and where to get help.
5	Game design	Design of play-for-free versions of a game; use of characteristics which are known to be addictive in game design; customer service priority to keep consumers spending money; providing consumers with information on which they can self-regulate and obligation of operators to extend CSR beyond regulatory recommendations.
6	Consumer information, behaviour and transactions	Mandatory provision of information to consumers on their consumer behaviour and characteristics.

Table 24, represents the rotated component matrix of responsible gambling practices and behaviours. The loadings represent the correlation coefficients between the variables and the factors with higher loaded values having a higher contribution to the variable.

Table 24 Rotated component matrix of responsible gambling practices and behaviours

Component/Factors	1	2	3	4	5	6
Gambling operators should co-operate with stakeholders (e.g. researchers, government, charities) in order to advance our understanding of player behaviour (n=357)	0.808	-	-	-	-	-
Gambling operators should analyse player behaviour patterns to identify problem gambling (n=356)	0.795	-	-	-	-	-
Gambling operators should allow researchers to have access to the player information so that they can better understand problem gambling (n=357)	0.765	-	-	-	-	-
Customer service staff should take action if they see signs of problem gambling (n=353)	0.759	-	-	-	-	-
Customer service staff should be trained to recognise signs of problem gambling (n=356)	0.725	-	-	-	-	-
Terms and conditions for bonuses are clearly communicated (n=373)	-	0.778	-	-	-	-
Terms and conditions for bonuses are fair (n=374)	-	0.769	-	-	-	-
Internet gambling sites are open and honest regarding the terms of conditions of gambling on their site (n=375)	-	0.720	-	-	-	-
Terms and conditions are necessary to ensure some players do not abuse the bonus system (n=373)	-	0.715	-	-	-	-
Online random number generators are used to determine the outcome of games (n=372)	-	0.493	-	-	-	-
Terms and conditions for bonuses are deceptive (n=356)	-	-0.451	-	-	-	-
Internet gambling software is fair (n=377)	-	0.414	-	-	-	-
When I have spoken to customer service staff they seem to know about issues related to problem gambling (n=354)	-	-	0.859	-	-	-
When I have spoken to customer service staff they put my welfare first (n=354)	-	-	0.850	-	-	-
Gambling operators should not be under any obligation to do research other than to advance their own commercial objectives (n=357)	-	-	0.527	-	-	-
Self-exclusion is ineffective since players can simply choose to play at another site (n=359)	-	-	-	0.787	-	-

Item	Factor 1	Factor 2	Factor 3	Factor 4	Factor 5	Factor 6
It is easy to get around the self-exclusion system for any one site (self-exclusion being where a player requests to be denied access to a site for a specified period of time) (n=362)	-	-	-	0.734	-	-
For self-exclusion to work all sites need to co-operate to have an industry-wide 'self-exclusion' system (n=360)	-	-	-	0.684	-	-
Internet gambling websites should provide information regarding how to spot problem gambling (n=360)	-	-	-	0.497	-	-
Internet gambling websites should provide information regarding where to get help (n=360)	-	-	-	0.473	-	-
Play-for-free versions of a game should be exactly the same as the real version (n=375)	-	-	-	-	0.670	-
Gambling operators should not design games using characteristics they know to be addictive (n=375)	-	-	-	-	0.634	-
The main priority for customer service staff is to keep consumers happy so they keep spending money (n=374)	-	-	-	-	0.612	-
Having detailed information on my gaming and betting choices is useful (n=372)	-	-	-	-	0.448	-
In relation to player protection and social responsibility, gambling operators should NOT be held accountable to regulators provided they are operating within the limits of the law (n=358)	-	-	-	-	-0.410	-
As a player I would like to receive information about how I play (n=361)	-	-	-	-	-	0.883
I should get information about how I play regardless of whether or not I request it (n=359)	-	-	-	-	-	0.799
Having detailed information on how much money I have spent would be useful (n=360)	-	-	-	-	-	0.599
Having detailed information on how much time I have spent would be useful (n=360)	-	-	-	-	-	0.58

NB Extraction method: principal component analysis of 6 factors. Rotated method: Direct Oblimin.
Converged in 23 iterations
Note:
Factor 1 Proactive responsible gambling
Factor 2 Transparent terms and conditions
Factor 3 Customer Service (Reactive)
Factor 4 Self-exclusion and self-help
Factor 5 Game design
Factor 6 Consumer Information, Behaviour and Transaction

Appendix 4 contains a summary of the questionnaire responses that make up each of the six factors considered in the analysis and appendix 5h contains a correlation matrix relating to these factors. Correlation values in appendix 5h indicate that no value is above 0.5 which suggests that there are low levels of multicollinearity between these behavioural factors. This justifies treating each factor individually, (Lewis-Beck 1980, Alm 1998, Gujarati 2003 and Abdou 2009).

Given the low levels of multicollinearity, each of the six extracted factors relating to 'gambling practices and behaviours' were subject to a Cronbach Alpha Test. Cronbach's alpha is a coefficient of reliability as it measures internal consistency between sets of items on a scale from 0 to 1. A "high" alpha value is often used as evidence that the items measure an underlying construct and Nunnaly (1978) concluded that a value of at least 0.7 suggests the consistency between items is 'acceptable'.

The Cronbach Alpha value for each group is highlighted in the following table:

Table 25 Cronbach alpha for six PCA factors

Factor	Number of Items	Cronbach Alpha
Proactive responsible gambling	5	0.873
Transparent terms and conditions	7	0.751
Customer Service (Reactive)	3	0.775
Self-exclusion and self-help	5	0.834
Game design	5	0.542
Consumer Information, Behaviour and Transaction	4	0.820
Overall	29	0.853

The results suggest that there is an acceptable level of consistency between questions in each of the six groups. The relatively low alpha value for 'game design' is acceptable

given the consistency between this variable and other values as reflected by the overall Cronbach alpha value of 0.853.

Given the focus of the study was to identify factors relating to problem gambling and how to improve responsible gambling, PGSI was used as a measure of problem gambling in the sample. PGSI individual scores were used in the Linear Regression as this requires continuous scaled data with the PGSI group classifications being used in the stepwise multinomial regression as here the focus is on determining differences within responding groups using a single classification variable. Reducing PGSI scores is one measure of managing and reducing problem gambling. For that reason PGSI was the focus of the stepwise multinomial and linear regression analysis.

6.6.1 Linear regression

Linear regression was undertaken between PGSI scores and the following factors in order to determine if regulation and responsible gambling practices could be improved: the six extracted factors relating to gambling practices and behaviours: age, gender and frequency of play; factors that are perceived to increase potential harm for online consumers; and factors that are perceived motivate individuals to gamble. The specific regression models used are highlighted in point's a-d below.

a.   Regression Model$_1$ (R_1):   (PGSI individual score as a dependent on the six extracted factors identified in the PCA)

$$PGSI = \alpha + \delta_1 \text{ x PRG} + \delta_2 \text{ x TTC} + \delta_3 \text{ x CS} + \delta_4 \text{ x SESH} + \delta_5 \text{ x GD} + \delta_6 \text{ x CIBT}$$

where,

$\propto$ = Intercept, a measure of the mean for the responses when all predictor variables are at value 0 (zero), δ = delta function or slope measuring the rate of change in PGSI individual scores given the change in each of the predictor variables. PGSI refers to Problem Gambling Severity Index; PRG refers to proactive responsible gambling; TTC refers to transparent terms and conditions; CS refers to customer service (reactive); SESH refers to Self-exclusion and self-help; GD refers to game design and CIBT refers to Consumer Information, Behaviour and Transaction.

b.   Regression Model$_2$ (R_2): (PGSI individual score as a dependent on gender, age and FOP – frequency of play)

$$PGSI = \alpha + \delta_1 \text{ x GENDER} + \delta_2 \text{ x AGE} + \delta_3 \text{ x FOP}$$

where,

$\propto$ = Intercept, a measure of the mean for the responses when all predictor variables are at value 0 (zero), δ = delta function or slope measuring the rate of change in PGSI individual scores given the change in each of the predictor variables. PGSI refers to Problem Gambling Severity Index; GENDER refers to males or females; AGE refers to participants' age and FOP refers to Frequency of Play.

c.   Regression Model$_3$ (R_3): (PGSI individual score as a dependent on factors perceived to increase harm for online consumers)

$$PGSI = \alpha + \delta_1 \text{ x C} + \delta_2 \text{ x PA} + \delta_3 \text{ x AHJ} + \delta_4 \text{ x ABO} + \delta_5 \text{ x FG} + \delta_6 \text{ x EC} + \delta_7 \text{ x PMG} + \delta_8 \text{ x NE} + \delta_9 \text{ x BT} + \delta_{10} \text{ x P}$$

where,

$\propto$ = Intercept, a measure of the mean for the responses when all predictor variables are at value 0 (zero), δ = delta function or slope measuring the rate of change in PGSI individual scores given the change in each of the predictor variables. PGSI refers to Problem Gambling Severity Index; C refers to convenience; PA refers to privacy and anonymity; AHJ refers to availability of higher jackpots; ABO refers to availability of better odds; FG refers to faster games; EC refers to the fact that you are not playing with actual cash but e-cash; PMG refers to the fact you can play more than one game at a time; NE refers to the fact it's not as exciting as land based gambling; BT refer to the availability of better tools to help you gamble safer and P refers to promotions

d.   Regression Model$_4$ (R_4): (PGSI individual score as a dependent variable on the 5 motivational factors identified in the PCA)

PGSI = α + δ$_1$ x E + δ$_2$ x RE + δ$_3$ x FM + δ$_4$ x AM + δ$_5$ x SC

where,

∝ = Intercept, a measure of the mean for the responses when all predictor variables are at value 0 (zero), δ = delta function or slope measuring the rate of change in PGSI individual scores given the change in each of the predictor variables. PGSI refers to Problem Gambling Severity Index; E refers to excitement; RE refers to relaxation and escape; FM refers to financial motivation; AM refers to Autonomy and Mastery and SC refers to social and competition.

The results were not significant in terms of PGSI and the six extracted factors relating to gambling practices and behaviours (see appendix 5a, Regressions Model R_1, and appendix 5b, Stepwise Multinomial Regressions MR$_1$, for further details) or for PGSI scores and the factors that are perceived to increase potential harm for online consumers (see appendix 5d, Regressions Model R$_3$, PGSI score and factors that may cause harm; appendix 5e, stepwise multinomial regression of factors that may cause harm and age; appendix 5f, Multinomial regression of factors that may cause harm and frequency of play and appendix 5g, stepwise multinomial regression of factors that may cause harm and gender for further details)

Regression models were significant for PGSI individual scores as a dependent factor relating to age, gender and frequency of play. This result is summarised in Table 26 which indicates that the overall model is significant at the 99% confidence level (*P*-value = 0.000) with an R^2 value of 0.087 (R^2 adjusted value of 0.080) suggesting that 8.7% of changes in an individual's PGSI individual score are accountable by factors such as age, gender and frequency of play. Also, the VIF figures suggest there is no collinearity in the model. Of the independent variables, 'frequency of play' is the only significant predictor variable at the 99% confidence level (*P*-value = 0.000) suggesting that frequency of play

has more influence on PGSI scores than either age or gender. Here the relationship is

positive suggesting that as frequency of play increases so too does the individual's PGSI

score.

**Table 26 Regression Model (*RM₂*) - Regression using PGSI individual scores as a
dependent variable and the age, gender and frequency of play of
participants**

Factors	β	Std Error	t stat	Sig	VIF	Model
Constant	11.344	1.436	7.902	0.000		-
Gender	0.560	0.540	1.035	0.301	1.026	-
Age	0.022	0.029	0.768	0.443	1.031	-
FOP	2.235	0.381	5.870	0.000	1.050	-
Model						
F-value						12.721
Df						3
R^2						0.087
R^2 Adj.						0.080
P-value						0.000

Notation: Independent variable is PGSI individual score; FOP refers to frequency of play and VIF refers to variance inflation factor.

6.6.2   Stepwise multinomial regression analysis

This modelling technique was used to analyse Likert-scale questions against variables

where there were at least 2 categories, for example PGSI classification groups and age

groups.   Reflecting the general focus of improving gambling regulation and practices, the

following stepwise multinomial regression analyses were undertaken.

a.   Stepwise Multinomial Regression Model₁ (*MR₁*): (PGSI category as a dependent
on the six extracted factors identified in the PCA)

$$1(\alpha, \beta) = \prod_{i=1}^{n}[\pi_1 (X_i) \ ^{PGR} \pi_2 (X_i) \ ^{TTC} \pi_3 (X_i) \ ^{CS} \pi_4 (X_i) \ ^{SESH} \pi_5 (X_i) \ ^{GD} \pi_6 (X_i) \ ^{PIBT}]$$

where,

1 is the usual indicator function using PGSI group classification; α and β are the
model parameters; π_1, π_2 … π_n are the probabilities of various independent
variables namely PRG: proactive responsible gambling; TTC: transparent terms
and conditions; CS: customer service (reactive); SESH: self-exclusion and self-
help; GD: game design; and CIBT: consumer information, behaviour and

transaction. X_i is the covariates of each of the indicator variables which is 1 if the indicator variable is of type 1, or 0 otherwise, etc..

b. Stepwise Multinomial Regression Model$_2$ (MR_2): (PGSI category as a dependent on gender, age and FOP – frequency of play)

$$1(\alpha, \beta) = \prod_{i=1}^{n} [\pi_1(X_i) \; {}^{GENDER} \pi_2(X_i) \; {}^{AGE} \pi_3(X_i) \; {}^{FOP}]$$

where,

1 is the usual indicator function using PGSI group classification; α and β are the model parameters; π_1, π_2 … π_n are the probabilities of various independent variables namely GENDER: males or females; AGE: participants' age and FOP: Frequency of Play. X_i is the covariates of each of the indicator variables which is 1 if the indicator variable is of type 1, or 0 otherwise, etc.

c. Stepwise Multinomial Regression Model$_3$ (MR_3): (PGSI category as a dependent on factors perceived to increase harm for online consumers)

$$1(\alpha, \beta)$$
$$= \prod_{i=1}^{n} [\pi_1(X_i) \; {}^{C} \pi_2(X_i) \; {}^{PA} \pi_3(X_i) \; {}^{AJH} \pi_4(X_i) \; {}^{ABO} \pi_5(X_i) \; {}^{FG} \pi_6(X_i) \; {}^{EC} \pi_7(X_i) \; {}^{PMG} \pi_8(X_i) \; {}^{NE} \pi_9(X_i) \; {}^{BT} \pi_{10}(X_i) \; {}^{P}]$$

where,

1 is the usual indicator function using PGSI group classification; α and β are the model parameters; π_1, π_2 … π_n are the probabilities of various independent variables namely: C refers to convenience; PA refers to privacy and anonymity; AHJ refers to availability of higher jackpots; ABO refers to availability of better odds; FG refers to faster games; EC refers to the fact that you are not playing with actual cash but e-cash; PMG refers to the fact you can play more than one game at a time; NE refers to the fact it's not as exciting as land based gambling; BT refer to the availability of better tools to help you gamble safer and P refers to promotions. X_i is the covariates of each of the indicator variables which is 1 if the indicator variable is of type 1, or 0 otherwise, etc.

d. Stepwise Multinomial Regression Model$_4$ (MR_4): (PGSI category as a dependent on the 5 motivational factors identified in the PCA)

$$1(\alpha, \beta) = \prod_{i=1}^{n} [\pi_1(X_i) \; {}^{E} \pi_2(X_i) \; {}^{RE} \pi_3(X_i) \; {}^{FM} \pi_4(X_i) \; {}^{AM} \pi_5(X_i) \; {}^{SC}]$$

where,

1 is the usual indicator function using PGSI group classification; α and β are the model parameters; π_1, π_2 … π_n are the probabilities of various independent variables namely: E refers to excitement; RE refers to relaxation and escape; FM refers to financial motivation; AM refers to Autonomy and Mastery and SC refers to social and competition. X_i is the covariates of each of the indicator variables which is 1 if the indicator variable is of type 1, or 0 otherwise, etc.

The results indicate that the multinomial regression model relating PGSI classifications to the six factors of gambling behaviour was not significant at the 95% confidence level.

In terms of PGSI categories and age, gender and frequency of play the model was significant at the 99% confidence level as outlined in Tables 27 & 28.

Table 27 Comparison of PGSI Groups in terms of age, gender and frequency of play (ref: problem gambling, MR_2)

PGSI Group*	Factors	β	Std Error	Df	P-value
No Problem	Intercept	-4.884	1.029	1	0.000
	AGE	0.048	0.018	1	0.008
	FOP	1.287	0.272	1	0.000
Low	Intercept	-2.795	0.905	1	0,002
	FOP	0.886	0.235	1	0.000
Model		**Fitting Criteria (-2 Log Likelihood)**	**Chi-Square**	**Df**	**P-value**
Intercept only		607.454			
Final		557.686	49.768	9	0.000
Pseudo R^2		0.123			
Overall classification accuracy		37.6%			

*Problem gambling used as a reference group

Table 28 Comparison of PGSI Groups in terms of age, gender and frequency of play (ref: no problem, MR_2)

PGSI Group*	Factors	β	Std Error	Df	P-value
Low	Intercept	2.088	1.008	1	0.038
	Age	-0.029	0.016	1	0.069
Moderate	Intercept	5.399	0.986	1	0.000
	Gender	-0.606	0.319	1	0.058
	Age	-0.056	0.017	1	0.001
	FOP	-1.089	0.259	1	0.000
Problem	Intercept	4.884	1,029	1	0.000
	Age	-0.048	0.018	1	0.008
	FOP	-1.287	0.272	1	0.000
Model		**Fitting Criteria (-2 Log Likelihood)**	**Chi-Square**	**Df**	**P-value**
Intercept only		607.454			
Final		557.686	49.768	9	0.000
Pseudo R^2		0.123			
Overall classification accuracy		37.6%			

*No problem gambling used as a reference group

The model has a Pseudo R^2 value of 0.123 with an overall classification accuracy of 37.6%. This implies that 12.3% of PGSI classification results from age, gender and frequency of play. Analysis of the data in Tables 27 and 28, suggests where the 'problem gambling group' is used as a reference point people in this group tend to be older than

those in the 'no problem' group and they tend to play more frequently than those in the 'no' and 'low problem' groups. When using the 'no problem' group as the comparator, they tend to be younger, than those in all other PGSI classification groups, and they tend to play less than those in the moderate and problem groups. Further analysis of the data, suggest that, in general, those aged between 27-31 years are more likely to be in the problem gambling category.

In terms of 'frequency of play', a one way ANOVA suggests that those in the 'problem' group tend to play more frequently than other PGSI groups, (F-value = 11.625, df 3, P-value = 0.000). Where PGSI classification groups are analysed in terms of gender, a *t-test* suggests that there are differences which are significant at the 90% confidence level (P-value = 0.058), with females tending to be in the 'no problem group' when compared to males.

These results support the trends identified in the descriptive statistics in section 6.4.1.1 which suggest that in general those in the 'no problem' group are more likely to be female, over 32 or under 27 who play infrequently. By comparison those in the problem category are more likely to be male, in the 27-31 age category who play at least daily. The results suggest that whilst age, gender and frequency of play are predictors of PGSI individual scores and categorical groupings, frequency of play is the most significant factor in predicting problem gambling.

6.6.3 Factor analysis of motivational factors

Respondents were requested to state their level of agreement with a number of motivational factors including: to relax; it's exciting; to relieve boredom; to win money; to socialise, to take my mind off other things; to earn income; to compete with others; to vent aggression; it's fun; to be mentally challenged; and to do something I enjoy for a change. A principal component analysis was conducted of the 12 survey items with Direct Oblimin rotation. The Kaiser-Meyer-Olkin measure verified the sampling adequacy for the analysis, (KMO = 0.83) which is 'very good' (Field, 2009), and KMO values for all individual items were >0.55, which is above the acceptable limit of 0.5 (Field 2009). Bartlett's test of sphericity (χ^2=1390.81, df 66, p<0.001) indicated that correlations between items were sufficiently large for PCA (Field 2009). The initial analysis suggested that all twelve items had eigenvalues over Kaiser's criterion of 1 and in combination they explained 58.63% of the variance. Given the sample size and the number of variables, factors with eigenvalues of at least 0.7 were accepted resulting in 5 factors accounting for 71.61% of the variance being used. All twelve variables loaded onto the factors as pure variables (loaded onto one factor).

Table 29, represents the rotated component matrix of motives for gambling. The loadings represent the correlation coefficients between the variables and the factors with the higher the loading value having a higher contribution to the variable.

Table 29 Rotated component matrix of motivations to gamble

Variables\Factors	1	2	3	4	5
To relieve boredom	0.711	-	-	-	-
It's exciting	0.704	-	-	-	-
To relax	-	0.858	-	-	-
To vent aggression in a socially acceptable way	-	0.832	-	-	-
To take my mind off other things	-	0.605	-	-	-
To win money	-	-	0.793	-	-
To earn income	-	-	0.778	-	-
To be mentally challenged	-	-	-	0.854	-
To do something I enjoy for a change	-	-	-	0.810	-
It's fun	-	-	-	0.634	-
To socialise	-	-	-	-	0.984
To compete with others	-	-	-	-	0.466

Factor 1   Excitement – factors that allow the individual to be delighted and invigorated.

Factor 2   Escape and Relaxation – factors that provide an outlet enabling the individual to forget about current problems and challenges

Factor 3   Financial Motivation – to earn income and win money

Factor 4   Autonomy and Mastery – factors associated with independence and expertise

Factor 5   Social and Competition – to meet others and compete

Each of the six extracted factors relating to 'gambling motivation' were subject to a Cronbach Alpha Test as outlined in Table 30.

Table 30 Cronbach alpha values for motivational factors

Factor		Number of Items	Cronbach Alpha
Factor 1	Excitement	2	0.623
Factor 2	Escape and Relaxation	3	0.641
Factor 3	Financial Motivation	2	0.611
Factor 4	Autonomy and Mastery	3	0.775
Factor 5	Social and Competition	2	0.648
Overall		12	0.814

The results suggest that there is an acceptable level of consistency between questions in each of the five groups. A correlation matrix of motivational factors is included in appendix 5i, and given no value is above 0.5, this suggests acceptable levels of

multicollinearity and thus justifies treating the factors as individually, (Lewis-Beck 1980, Alm 1998, Gujarati 2003 and Abdou 2009).

To determine if there were influencing factors between PGSI scores and a consumer 's motivation to gamble, a regression analysis was undertaken.

6.6.4 Consumer motivation and PGSI scores – Regressions Model$_4$

Table 31 Regression Model$_4$ - Regression of motivation factors and PGSI scores

Factors	β	Std Error	t stat	*P*-value	VIF	Model
Constant	4.362	0.239	18.220	0.000	-	-
Excitement	0.452	0.261	1.728	0.085	1.158	-
Escape and Relaxation	-0.717	0.265	-0.344	0.000	1.218	-
Financial	0.972	0.245	3.975	0.000	1.038	-
Social and competition	-0.619	0.272	-2.278	0.023	1.273	-
Model parameters						
F Value						14.558
Df						5
R^2						0.169
R^2 Adjusted						0.157
Sig						0.000

Notation: Independent variable is PGSI individual score; VIF refers to variance inflation factor.

The model is significant at the 99% confidence level (*P*-value=0.000) with an R^2 value of 0.157 (R^2 adjusted value, 0.157) suggesting that 15.7% of changes in an individual's PGSI individual score is accountable by motivational factors. Of the independent variables, there are significant differences between groups at the 99% confidence level for financial motivations (*P*-value = 0.000) and escape and relaxation (*P*-value = 0.000); at the 95% confidence level for social and competitive reasons (*P*-value = 0.023) and at the 90% confidence level for excitement (*P*-value = 0.085).

In terms of excitement and financial motives, these are positively related to PGSI scores suggesting that the higher the score, the more significant financial and excitement motives are. For escape and relaxation and social and competition, there is a negative relationship

with PGSI score suggesting that the higher the PGSI score the less significant these factors are.

6.6.5 Stepwise Multinomial Regression – Consumer motivation and characteristics

In order to determine if there were differences in motivational factors and age, gender and frequency of play, stepwise multinomial regression was undertaken.

The results suggest no differences between the 5 motivational factors and responses within the different age groups where the 'under 21' and 'over 46 years' age groups are used as the reference groups on which comparisons are made. (See appendix 5c, Regression Model R2, for further details).

6.6.6 Stepwise Multinomial Regression MR_4 – Consumer motivation and PGSI classification group

Tables 32 and 33 provides a summary of stepwise multinomial regression between PGSI classification and motivational factors using PGSI problem and no problem groups respectively as references.

Table 32   Consumer motivation and PGSI characteristics (a)

PGSI group*	Factors	β	Std Error	Df	P-value
No Problem	Intercept	-0.164	0.210	1	0.436
	Excitement	0.501	0.212	1	0.018
	Escape and Relaxation	-1.175	0.224	1	0.000
	Financial	0.695	0.202	1	0.001
	Social and Competition	-0.406	0.223	1	0.069
Low Problem	Intercept	0.448	0.177	1	0.012
	Escape and Relaxation	-0.827	0.189	1	0.000
	Financial	0.459	0.184	1	0.013
Moderate Problem	Intercept	0.492	0.180	1	0.006
	Excitement	0.433	0.196	1	0.027
	Escape and Relaxation	-0.631	0.178	1	0.000

Model		Fitting Criteria (-2 Log Likelihood)	Chi-Square	Df	P-value
Intercept Only		992.587			
Final		861.054	131.533	15	0.000
Pseudo R^2		0.303			
Accuracy		43.1%			

*Problem group used as a reference group

Table 33 Consumer motivation and PGSI characteristics (b)

PGSI group*	Factors	β	Std Error	Df	P-value
Low Problem	Intercept	0.612	0.190	1	0.001
	Excitement	-0.645	0.188	1	0.001
	Escape and Relaxation	0.348	0.199	1	0.081
	Social and Competition	0.442	0.194	1	0.023
Moderate Problem	Intercept	0.656	0.192	1	0.001
	Excitement	-0.934	0.203	1	0.000
	Escape and Relaxation	0.544	0.202	1	0.007
	Financial	-0.557	0.185	1	0.003
	Social and Competition	0.343	0.194	1	0.077
Problem	Intercept	0.164	0.210	1	0.436
	Excitement	-0.501	0.212	1	0.018
	Escape and Relaxation	1.175	0.224	1	0.000
	Financial	-0.695	0.202	1	0.001
	Social and Competition	0.406	0.223	1	0.069

Model		Fitting Criteria (-2 Log Likelihood)	Chi-Square	Df	
Intercept Only		992.587			
Final		861.054	131.533	25	0.000
Pseudo R^2		0.303			
Accuracy		43.1%			

*No problem group used as a reference group

The model is significant at the 99% confidence level, Pseudo R^2 0.303 and an overall classification accuracy of 68.5%. The model suggests that 30.3% of PGSI classification results from motives to gamble.

Those who are classified the 'problem gambling' category are motivated more by excitement than those in the 'no problem' and 'moderate problem' groups and more by financial motives when compared to those in the 'no problem' and 'low problem' groups. They are less inclined to be motivated by escape and relaxation when compared with other PGSI groups. Those in the 'no problem' group are more strongly motivated by escape and relaxation and social and competition motives than all other PGSI groups. In addition they are motivated less by excitement motives than all other PGSI group and less by financial motives than those in the problem and moderate PGSI categories.

6.6.7 Step-wise Multinomial Regression Model MR_5 - Consumer motivation and gender

In terms of differences in motivation factors based on gender, the model as summarised in Table 34, is valid at the 99% confidence level, Pseudo R^2 0.067 and an overall classification accuracy of 68.5%. The model suggests that 6.7% of changes in motivations to gamble are determined by gender.

Table 34 Stepwise multinomial regression motivation factors and gender – MR_5

Gender*	Factors	β	Std Error	Df	P-value
Male	Intercept				
	Excitement	-0.217	0.123	1	0.000
Model		**Fitting Criteria (-2 Log Likelihood)**	**Chi-Square**	**Df**	**P-value**
Intercept Only		451.168			
Final		433.118	18.050	5	0.003
Pseudo R^2		0.067			
Overall Classification Accuracy		68.5%			

*Female used as a reference group

In terms of gender, there are significant differences in terms of 'excitement' which is significant at the 99% confidence level, (*P*-value = 0.000, df1).   In general, males are more likely to highlight 'excitement' as a motive to gamble.

6.6.8   Step-wise Multinomial Regression Model MR_6 - Consumer motivation and frequency of play (ref: once a month)

Tables 35 & 36 summarise the relationship between 'motivation to gamble' and 'frequency of play'. In order to assist the analysis, participants were classified into the following three groups: daily (those who play at least once a day); weekly (those who play at least once a week but less than once a day); and monthly (those who play less frequently than weekly). The model is significant at the 99% confidence level, Pseudo R^2 value 0.109 and overall classification accuracy of 58.7%. This suggests that 10.9% of motives to play are accountable through frequency of play.

Table 35 Stepwise multinomial regression motivation factors and frequency of play

Frequency of Play*	Factors	β	Std Error	Df	*P*-value
At least once a week	Intercept				
	Excitement	-0.363	0.134	1	0.007
	Financial	-0.421	0.130	1	0.001
Model		**Fitting Criteria (-2 Log Likelihood)**	**Chi-Square**	**Df**	***P*-value**
Intercept Only		684.635			
Final		648.656	35.979	10	0.000
Pseudo R^2		0.109			
Overall Classification Accuracy		58.7%			

*At least once a month used as a reference group

Table 36 Stepwise multinomial regression motivation factors and frequency of play

Frequency of Play*	Factors	β	Std Error	Df	*P*-value
At least once a week	Intercept				
	Financial	0.394	0.216	1	0.067
Model		**Fitting Criteria (-2 Log Likelihood)**	**Chi-Square**	**Df**	**P-value**
Intercept Only		684.635			
Final		648.656	35.979	10	0.000
Pseudo R^2		0.109			
Overall Classification Accuracy		58.7%			

*At least once a daily

Table 35 suggests that when using those who gamble online monthly as a comparator group, they are less motivated by excitement and financial motive than those who gamble weekly. In comparison those who gamble daily are more motivated by financial considerations than those who gamble once a week as summarised in Table 36.

6.7   Discussion

Although there are a variety of regulatory approaches to Internet gambling, most approaches are based on the principle of having an informed consumer take responsibility for their own gambling behaviour, (Kingma 2004; Power 2004; Parke et al., 2007; and Blaszczynski et al., 2011). For Kingma (2004) and Power (2004) this emphasis on self-regulation at the organisation level reflects broader developments in corporate social responsibility (CSR) and corporate governance where government establish standards whilst gambling organisations and regulatory agencies are responsible for creating risk management and regulatory systems.   Implied in contemporary models of CSR is the increasing recognition that organisations not only need to act in a responsible way but also that they should be perceived as acting in a responsible way (Griffiths and colleagues, 2002, 2009c; Griffiths 2009a, 2009b, 2012; Hing and McMillan 2002; Hing 2003a,b; Eadington 2004; Messerlian et al., 2005; Parke et al., 2007; Rockloff and Dyer, 2007; Sartor, 2007; Schellinck and Schrans 2007; Gambling Commission 2008, 2012; Hancock et al., 2008; and Hing and Breen 2008). As such, organisations have a duty of care to stakeholders to develop responsible products and services and to educate employees and consumers about facilities that will enable them to use such products and services in a responsible way.

Griffiths et al., (2009a, 2009b) suggest that developing responsible gambling products and services is a central aspect of responsible gambling. Game design presents a number of challenges for operators in that they have to balance the need to develop games which are exciting and challenging with the need to develop games which are not addictive or harmful. This challenge was reflected in the concerns of the participants as 53% (n=199) agreed that games should not be designed which are known to contain characteristics that are addictive; 34% (n=127) agreed that a game cannot be low risk and exciting at the same time; and 53% (n=198) suggested that reducing risk would make a game boring. This presents an obvious dilemma for operators and regulators for which further consideration must be prioritised. Operators and regulators must consider if, and how, game parameters will be restricted or modified and what the likely implications will be for commercial performance. Currently, responsible gambling programmes such as a GAM-GaRD (Griffiths et al., 2008) are assessing and determining game design as a harm minimisation technique with limited empirical evidence for how various game parameters impact on consumer behaviour or how subsequent modifications reduce harm. Thus there is a need for empirical research in area of game design in order to better inform regulatory and commercial policy on harm reduction.

Consistent with previous studies (eCOGRA, 2007; Parke et al., 2007; and Wood and Williams, 2009) males were more likely to engage in games of skill, such as poker and sports betting whilst females tended to engage in games of chance including lottery and bingo. Also consistent with previous studies were consumer perceptions regarding which factors are most likely to cause harm for those gambling online and these included in order of level of endorsement: convenience; the fact that you are not playing with actual cash but

e-cash and the opportunity to play more than one game at a time (Young, 1999; Griffiths and Parke, 2002; Griffiths and colleagues 2003, 2005, 2009a; and Cooper, 2004). There was also support for the claim that in the modal class of responses for those consumers demonstrating signs of problem gambling, were males, being aged 27-31 who reported gambling at least on a daily basis. Further analysis of the data suggests that only frequency of play was identified as a statistically significant positive factor predicting gambling behaviour which is also consistent with previous research (eCOGRA, 2007; Parke et al., 2007 and Jonsson, 2012).

Consumer attitudes related to current responsible gambling practices and tools were also explored. Whilst Internet operators have an obligation to be responsible to those who access their websites the duty of care increases once an individual enters into a more formal agreement with the operator. This duty of care is based on the principle of self-regulation by an informed consumer which implies that the consumer is provided with sufficient information at an appropriate time in order to make an informed choice (Griffiths 2009a, 2009b, 2012 and Blaszczynski, 2011). This view is supported by the results from this study where 65% (n=234) of participants suggested having information would be useful in helping them to make decisions and 55% (n=197) agreed that they should receive information on how they play even if they do not request it. More specifically, 74% (n=266) and 68% (n=244) of participants respectively agreed that information on how much money and time they spend gambling online would be useful. Critically, although this information is currently provided by Internet gambling operators the challenge is to successfully inform consumers about the availability, accessibility and functionality of such information and self-help tools. These challenges are further supported by the results in this study which suggest that only 45% (n=160) of participants

felt comfortable where to find information on responsible gambling and 70% (n=253) agreed that information on responsible gambling should be placed in a prominent position.

The registration process is significant in shaping consumer perceptions of the gambling provider which could be critical in terms of levels of both engagement and trust. Findings from the current study highlight a number of challenges for operators in that they may be seen to be fulfilling their regulatory obligations, but codes of practices and methods of audit are perceived by consumers and employees as being weak. For example, within the registration process consumers are required to engage with customer service staff about issues relating to responsible gambling. However, only 44% (n=159) of participants agreed that they had been informed of the importance of responsible gambling during registration process and even fewer, (38%, n=137), agreed that responsible gambling was covered sufficiently during the registration process. There therefore seems to be an immediate need for operators to provide a more effective and comprehensive induction to responsible gambling information and tools and, just as important, to better highlight their importance in avoiding harmful or problematic play. This should be reinforced during and after the registration process is complete. As such, responsible gambling is not only an issue for registration but something that should be interwoven into the on-going relationship between the consumer and organisation.

In addition to the provision of information, it has also been recommended that responsible gambling systems should also include support systems and tools that are easy to locate and use (Griffiths, 2009b, 2012; and Blaszczynski, 2011). For example, self-exclusion is viewed as an essential support tool and an integral part of responsible gambling strategy (eCOGRA, 2007; Parke et al, 2007; Griffiths, 2009b, 2012 and Blaszczynski, 2011). In

addition, Broda, LaPlante, Schumann, LaBrie, Nelson and Schaffer, (2008) suggests that self-exclusion is easier to implement within Internet gambling when compared to land-based gambling, because of the technological applications available in the Internet sector. Participants were critical of the effectiveness of the current self-exclusion system with 68% (n=244) reporting that they consider the current system to be ineffective and 42% (n=152) agreeing that the current system is easy to get around. In terms of improving the effectiveness of the system 72% (n=259) of participants agreed that self-exclusion will only work where there is an industry wide system where the consumer can exclude from all participating Internet gambling providers. Such concerns make intuitive sense since in the current environment a consumer may exclude from one gambling operation only to move on to gamble with one of around 2,500 other Internet gambling providers. Consequently, there may be operational advantages to be derived from further research into the feasibility of a multi-operator self-exclusion system.

Making provisions for consumers to set a deposit limit is a regulatory requirement although it is unclear to what extent this is established during the registration process. Although consumers may set an unlimited limit, 71% (n=256) and 76% (n=273) of participants suggested that Internet gambling websites should provide options for consumers to limit how much time and money they can spend respectively. Only 34% (n=123) of participants recalled being asked to set a deposit limit during the registration process.

In terms of customer support, consumers highlighted the significant role they believe employees should play in promoting and managing responsible gambling. In general, consumers expect that staff should be trained in terms of how to recognise those who may

have problems with their gambling and where they see signs of problem gambling they should take action. A total of 94% (n=399) of consumers suggested that where staff identify a person may have a problem with gambling, taking no action was the least acceptable choice of action that should be taken. Previous studies have been divided in terms of the role customer contact employees should play in responsible gambling with Cameron (2007) suggesting it is difficult to establish an exact duty of care that is owed to consumers as it is not easy to identify problem gamblers. As such, he suggests that customer contact employees should not have an interventionist role. An alternative view proposed by Lewis (2008) is that managers and staff must be trained in terms of what and how to identify problem gambling. For Delfabbro et al., (2007) current training for staff to identify problems is not sufficient and they recommend that training should enable employees to feel confident to intervene and help individuals that they believe have problem with their gambling. They highlighted the lack of such training as being significant in preventing venue staff from approaching individuals who demonstrate problems with their gambling. As such, there is a need to review not only the content but also the aims of staff training programmes as they relate to responsible gambling. Again it is suggested, that alongside automated consumer tracking using consumer data as suggested by Griffiths (2012b) there is also a "human" element to the detection of gambling problems in both the offline or online environments. Hence, a fruitful area for future research will be to scope requirements for adequate training for frontline staff who may play an instrumental role in identifying and intervening with consumers who exhibit signs of problem gambling.

Delfabbro et al., (2007) suggest that an additional problem of employee intervention may be that it is unwelcome by consumers for reasons relating to intrusions on privacy and

accusations of problem gambling. Consumers may even feel aggrieved that they were restricted from further play so as they could not win their money back. Participants in this study offered a mixed response to this concern as 59% (n=214) of consumers agreed that they would welcome being approached if an online operator thought they had problems with their gambling. With the exception of those in the no problem group, a majority of respondents in all other PGSI groups agreed with the statement with those in the moderate and low problem gambling categories agreeing most strongly with the statement. In general, participants agreed that Internet gambling operators should use consumer tracking data in a more proactive way. The results from the employee study, (see chapter 5), suggests that employees identified similar cues of problem gambling to those identified in previous studies, Griffiths and colleagues (2007, 2009c), Wardle et al., (2007) and Corney and Davis (2010) suggesting that individuals who are having problems with gambling demonstrate similar behaviour. This has implications for those developing responsible gambling strategies as it may result in a change in focus which currently stresses the informed consumer being ultimately responsible for their gambling choices to one where responsibility also lies with operators being required to use actual live data in a more proactive and targeted way to identify and help individuals who may have a problem with their gambling.

In order to reduce the potential for consumer exploitation, and improve trust between the organisation and consumer, Hansen (2003) and Gainsbury et al., (2012) both suggest that Internet gambling organisations must be aware of the factors that determine consumer behaviour and specifically ensure that trust is established.   In this study participants were asked to rate motives for Internet gambling from which a series of latent variables were identified using principal component analysis. These included: excitement; escape and

relaxation; autonomy and mastery; financial and social and competition. For Autonomy and mastery, there were no differences in consumer responses based on categorical data. Excitement and financial motivations were positively related to PGSI scores whilst escape and relaxation and social and competition were negatively associated with PGSI score and classification groups. This is different from previous research on this area which identified escape as a core function of gambling among problem gamblers (Wood and Griffiths 2010). Further analysis suggests that there were significant differences in motivations to gamble when responses were examined according to gender, problem gambling classification and frequency of play. Whilst, there were no significant differences in gambling motivation according to age, males were significantly more likely to gamble in order to move from a state of hypo-arousal to hyper-arousal which is consistent with previous findings (Brown 1986). In terms of PGSI category, those who were classified in the 'problem gambling' category were motivated more by excitement and financial motives whilst those in the 'no problem' PGSI group were more strongly motivated by escape and relaxation and social and competition motives than all other PGSI groups. In term of frequency of play, those who gamble daily or weekly were more likely to be motivated by financial factors. These results have implications for game design as they further reinforce the need to develop games which are exciting and challenging whilst at the same time reducing the addictive or harmful aspects of games.

Hansen (2003) also highlighted the need to understand how trust between consumer and employee is developed if the organisation is to survive in the long term. He suggests that the consumer/employee relationship is influenced in terms of the level of employee benevolence experienced by the consumer and the consumer's perception of the employee. Because of the remote nature of contact between the consumer and Internet gambling staff, this places increased importance on the quality of personnel, the training they receive and

the level of empowerment within the organisation (Bowen and Lawler 1992; Mohr and Bitner 1995; Lee et at., 2006; and Blaszcznski et al., 2008, 2011). Participants also expressed concern over the potential conflict of interest given that an Internet gambling operator is also responsible for preventing or reducing gambling related harm in addition to the traditional marketing functions within commercial organisations. This concern seems to have implications for trust among consumers. In the current study, less than a third of participants perceived Internet gambling websites to be open and honest; believed that Internet sites tell their consumers the chances of winning or reported that the software used to determine gambling outcomes is fair. In addition, half of participants agreed that Internet gambling websites were misleading in terms of the chances of success. There was a similar level of cynicism regarding the interaction they had with employees with more than half of participants agreeing that the primary aim of customer care staff was to encourage people to play and less than 20% (n=67) agreed that customer service staff were knowledgeable about responsible gambling or put consumer interests first. This has potential implications for the credibility of responsible gambling systems which emphasise consumers approaching customer care staff to assist them to resolve problems as the level of cynicism that they attribute to staff may discourage them from engaging with them and tools offered to assist in reducing problem gambling.

6.8   Conclusion

This study aimed to explore consumer perceptions of responsible gambling with specific focus on the strengths and weaknesses of current responsible gambling provisions and the level of help offered by gambling operators to assist consumers to regulate their gambling behaviour. It has identified that although currently used systems of responsible gambling

places emphasis on the informed individual to take ultimate responsibility for their behaviour, the individual consumer does not generally feel that they have been provided with the necessary information on which to base such decisions.

Trust between consumer and provider is important but may be undermined by the conflict of interest that the gambling provider faces; namely to make a profit by providing successful, engaging and exciting games which, at the same time, are not addictive or harmful. The consumer also has negative perceptions of employees in whom they have to trust in order to engage with responsible gambling tools or engage with responsible gambling information provided. A majority of consumers feel that employees do not have the necessary knowledge or skills to fulfil their role and that employees are primarily concerned with keeping the consumer playing.

Chapter 7   Discussions

7.1   Introduction

The aim of this study was to explore Internet gaming employee and consumer perceptions of responsible gambling practices within the Internet sector of the gambling industry in the UK. The purpose of this chapter is to provide a synthesis of the main findings from the two studies and to discuss the academic and applied contributions of the study. The chapter will also include a review of the limitations of the study and highlight related areas which merit further investigation.

7.2   Synthesis of main findings

To achieve the aims of the research, six objectives and four hypotheses were examined. The objectives will be used to structure this discussion with the relevant hypotheses being reviewed and either accepted or rejected at the end of each of the relevant sections.

7.2.1 Objective 1 - Evaluate critically the strengths and weaknesses that employees and consumers perceive characterise the current systems of responsible gambling.

In general, employee perceptions of responsible gambling varied across a continuum reflecting the lack of a standard approach within and across jurisdictions. At one end, reflecting the conclusions of Friedman (1970) and Cameron (2007) some employees suggested that individual consumers must be responsible for their own gambling. This perception was based on the principle that it is difficult to identify those who have gambling problems and even where such identification is made, consumers prefer not to be

approached. At the other end, employees suggest that organisations must be responsible for the goods and services they offer and they must take a proactive approach to responsible gambling whereby the individual consumer makes decisions based on informed choice. This view was previously reflected in the work of Griffiths (1999, 2003, 2009b, 2012), Griffiths and colleagues (2002, 2009b, 2009c), Hing and McMillan (2002), Hing (2003), Eadington (2004), Messerlian et al., (2005), Parke et al., (2007), Rockloff and Dyer (2007), Sartor et al., (2007), and Schellinck and Schrans (2007), Blaszcznski and colleagues (2008, 2011), Hancock et al., (2008) and Gainsbury et al., (2012). Common subthemes within employee perceptions are that responsible gambling is about 'gambling within your means' and it should be based on the principle of an 'informed consumer'. The principle of the informed consumer was previously identified by eCOGRA (2007) and Blaszczynski et al., (2011) and reflects current views of corporate social responsibility where a government within a jurisdiction is responsible for outlining standards which are to be met whilst the gambling organisation and regulatory agencies become responsible for creating risk management and regulatory systems to demonstrate compliance. The implication of such views is that increased emphasis is placed on the monitoring of self-regulation if the system is to be perceived as credible and effective (Hutter, 2001; Gainsbury et al., 2012). This in turn necessitates a review of the feasibility of developing industry wide mandatory standards against which organisations are to be audited.

Employees highlighted a number of strengths relating to age verification and self-exclusion, some aspects of which are highlighted as systems of good practice, (CHIS, 2010). Although complimentary about such activities both employee and consumer participants highlighted concerns relating to the following four areas. Firstly, concern was expressed about a responsible gambling strategy that emphasised self-identification, self-

help and self-regulation on one side and profit maximisation on the other. The tensions between these two factors were seen to present problems for gambling providers and the perceived level of trust they receive from their consumers. Consumers reflected this lack of trust in the following responses: 32% (n=120) agreed that they did perceive Internet gambling websites to be open and honest; 19% (n=67) agreed that employees were knowledgeable about issues related to responsible gambling; 19% (n=67) agreed that employees did put consumer interest first and 32% (n=120) agreed that the primary aim of customer care staff was to encourage people to continue to play. Consumers in this study would prefer to see gambling organisations adopting a more proactive role whereby they use consumer information to identify those who may have a problem with their gambling. Although highlighting concerns in terms of the validity and reliability of online observable behavioural activities, Griffiths (2012) suggests that they offer the gambling industry the potential to develop screening instruments which will concentrate specifically on gambling behaviour itself, rather than the associated negative consequences associated with problem gambling. Further research into observable behavioural activities is necessary in terms of the desirability and effectiveness of such a diagnostic tool as it will enable employees and gambling providers to be empowered to identify those who they believe are experiencing problems with their gambling. This will also require the development of appropriate training programmes to enable employees to approach and support those who are experiencing problems with their gambling. Employees were critical of current provision in this area as they suggested that they were not qualified to undertake this role which is a requirement for licensees within the Gambling Act 2005.

Secondly, concerns were expressed relating to the levels of stakeholder engagement with responsible gambling tools. Employees raised concerns that consumers were not always

aware of how to use self-help tools such as deposit limits and self-exclusions and more specifically consumers were not fully aware of the technical aspects of the products they were gambling on. Consumers were critical of the level of information provided on responsible gambling, on information on how to access and use responsible gambling tools and on employees approach and understanding of responsible gambling. These concerns reflect those which were previously highlighted by Griffiths (2009b, 2012) and Gainsbury et al., (2012) who suggest that those in most need of help may not engage with such self-help tools and more generally where participation with self-help tools is voluntary that engagement is low. More concerning was the low level of understanding that consumers perceive employees have of issues relating to responsible gambling and the perception that consumer interests are not the main priority for employees or gambling organisations. These concerns have implications for the effectiveness of a responsible gambling system which is based on self-regulation at the operational level and more specifically on the relationship between consumers and employees who are central in responsible gambling systems which are based on self-identification. In addition, they reflect concerns that Gainsbury et al., (2012) highlight relating to the low level of trust that consumers generally have in the gambling industry which may further reinforce and justify their non-engagement with responsible gambling tools.

The third concern that employees and consumers expressed relates to the effectiveness of current responsible gambling systems. Specifically, both employees and consumers were critical of self-exclusion and deposit limits, the provisions of which are regulatory requirements in the UK. In relation to self-exclusion, there is a belief that technology is available to implement an industry wide and product based system for exclusion which both employees and consumers suggest is essential if the system is to be credible and

effective. For deposit limits, the ability to set an unlimited deposit was seen as a weakness in the system and consumers suggested that they should have to limit their gambling in both time and money terms. Consumers requested that that more information should be made available on responsible gambling, its importance and how it will enable them to make more informed choices about their gambling behaviour. Training for both employees and consumers in terms of how to access and use responsible gambling tools was seen to be essential if a culture of responsible gambling was seen to be encouraged and effective.

The fourth concern relates to current marketing activities which employees and consumers generally saw as irresponsible. For employees, the use of vouchers, freebies, outbound calling and the development of games based on popular comic characters were highlighted as having negative effects on the level of trust that consumers place on online gambling providers. Whilst such practices are common within many industrial sectors, the potential addictive nature of gambling products and services led many employees to suggest that where these activities are targeted at those who have or may have a gambling problem then they are unethical and irresponsible. The effectiveness of marketing activities could be improved by linking such activities with observable behaviours which are recorded by Internet gambling providers as this would enable consumers to be segmented on the basis of problem gambling behaviours.

Consumers specifically raised concerns on the transparency of current marketing activities and more specifically on information on the chances of winning a game; the fairness of software used; the clarity of terms and conditions in general and more specifically in terms of promotions and bonuses. Such negative perceptions may impact on the trust that consumers have of their websites that they use.

Given the four areas of concern that employees and consumers raised relating to the current systems of responsible gambling, Hypothesis 1, that "employees and consumers both perceive the current system of responsible gambling to be fair and transparent", is not accepted. Both employees and consumers raise concerns that affect the legitimacy and effectiveness of the current systems used to promote and maximise responsible gambling. As such, there is a need to review how each of the four concerns may be reduced or eliminated.

7.2.2 Objective 2 – Identify whether employees require an additional duty of care relating to responsible gambling.

Previous studies which have evaluated the effect of addictive aspects of certain products and services on the behaviour of employees have presented a variety of conclusions. For example, whilst McAuliffe, (1991) suggested that employees who have most exposure to addictive products as part of their work activities are no more likely to be affected by them than any other employee groups, Griffiths (2009a) concludes that gambling organisations have facilities that may be used/abused by employees and this creates a problem for both the organisation, employees and an employee's colleagues. This situation may be further compounded as this study, and previous studies, suggest that the gambling industry is an attractive place of employment for those who have gambling problems, (Shaffer, 1999, 2002; Hing and Breen, 2008; and Griffiths 2009).

Within this study, some employees described a group of colleagues who engaged in gambling activities within the workplace as 'hidden/forgotten' in terms of the organisations approach to CSR and responsible gambling. With reference to the

employee-employer relationship there appeared to be a consensus that working for an online gambling operator does affect, both positively and negatively an employee's attitude and behaviour towards gambling. Employees generally enjoyed working in the industry and for many it allowed them to combine their love of sport and betting. A majority of employees suggested that whilst they did gamble, their gambling was controlled. For some working for a gambling organisation had resulted in them reducing their gambling activity with some participants having now stopped gambling. For a minority, working in the online gambling industry has had a negative effect on their gambling behaviour. Although this group are acknowledged by employees as existing within the organisation, they are seen to be 'hidden' and/or 'forgotten' and it was suggested by employee respondents that the number of colleagues in this group is publically underestimated. Reflecting the conclusions of Hing and Breen (2008), individuals who suggested that they did have a problem with gambling highlighted the following as key factors that affected their gambling: interaction with colleagues and consumers who gambled some of whom may be successful; their work environment which endorses gambling and includes colleagues and consumers who gamble high values frequently; and their social life which included colleagues who also gambled. These employees suggested that seeking help for gambling related problems would be viewed as a weakness and potentially career limiting which reflects the conclusions made by Hing and Breen (2008). The need to manage their own gambling was a common theme amongst staff who suggested they had a problem and reflects their belief that other consumers also would prefer not to publically declare their problem.

Hypothesis 2, that "employees require additional duty of care in terms of training and monitoring given their close proximity to gambling products and services" is accepted. It

would appear that employees require additional support from their employers in terms of the potential problems that result from working within the online sector of the gambling industry. These results suggest that further research into employee behaviour is required.

7.2.3 Objective 3 - Evaluate critically the role that employees should undertake in promoting and implementing responsible gambling.

Employees accept that they have a pivotal role to play in improving responsible gambling which is influenced by two main factors: their relationship with their consumers and their relationship with their employer. Both relationships are interrelated and place responsibilities on employees to ensure that products and services are delivered in a socially responsible way.

The employee-consumer relationship is important in all service delivery systems but it is critical in the online gambling sector due to the potentially addictive nature of online gambling products (Griffiths and Parke, 2002; Shaffer and Hall, 2002; Griffiths, 2003, 2008, 2009a, 2009b; Parke et al, 2007; Williams et al, 2007; and Hing and Breen 2008). This increased significance of the employee-consumer relationship is reflected in responsible gambling strategies which are based on 'self-identification', 'self-help' and 'self-regulation', where employees are generally the first contact point for those who may be experiencing problems with their gambling (Hansen, 2003; Blaszczynski et al., 2008; Hancock 2008). Some employees suggested that because they were not interested in responsible gambling, they presumed that consumers were equally disinterested and as such, they 'passed over' it. In addition, it was suggested that the quality of information that a consumer receives on responsible gambling is dependent on the customer service employee with whom they interact. These factors may account for the poor level of knowledge that employees perceive that consumers have of responsible gambling tools as

employees incorrectly presume that consumers have a similar knowledge level to themselves and similar perceptions on responsible gambling. They also have implications for responsible gambling strategies and specifically the confidence that consumers have in a responsible gambling system that places emphasis on the consumer to identify with an employee that they require help. These concerns were previously highlighted by Hansen, (2003); Blaszczynski et al., (2008); and Hancock (2008).

Supporting the conclusions of previous studies, (Kantor and Weisberg 2002; Hansen 2003; Blaszcznski and colleagues 2008, 2011; Hancock (2008); and Griffiths 2009a, 2009b), employees in this study acknowledge that they were aware of their role in developing trust with consumers and identifying those who may be experiencing problems. However, even though they suggested that they could identify behaviours that may suggests a person is experiencing problems with their gambling a sizable minority did not feel either comfortable or qualified to approach these individuals. In addition, a sizable minority of employees suggested that there may be potentially negative reactions from both the consumer and managers if they intervened directly with a person they believed may have gambling problems. The fear of management and consumer reaction were the primary reasons employees gave for why they did not intervene where they believed a consumer was experiencing problems with their gambling and they reflect the conclusions proposed by Cameron (2007) and Delfabbro et al., (2007). These perceptions by employees are contrary to those expressed by consumers in this study, as 70% (n=249) agreed that staff should be trained to identify signs of problem gambling and 67% (n=237) agreed that customer service staff should take actions where they see such signs. Overall, 94% (n=399) of consumers in this study suggested that taking no action where an individual was suspected as having gambling problems was the least acceptable strategy. In addition,

59% (n=214) of consumers suggested that they would welcome being approached if staff thought they had a problem with their gambling. This has obvious implication for staff training and the role of staff and organisations in managing responsible gambling strategies. The implications are further complicated as consumers perceived that the main role of customer care staff was to keep consumers playing. This may have implications for the way in which consumers perceive responsible gambling tools, the trust they have in responsible gambling support mechanisms in general and their willingness to engage with responsible gambling tools and/or staff about problems they experience. As such, these factors require further research as responsible gambling systems are based on self-identification, self-help and self-regulation by the consumer.

Whilst employees acknowledged that they received training on responsible gambling they were critical of the fact it only occurred during induction. Its fitness for purpose was questioned by employees operating at various managerial and operational levels in the organisation, with a minority suggesting that its primary objective was to ensure Gamcare accreditation. There is a need to review current training provision and the desirability and feasibility of developing externally accredited training programmes for those working in the gambling industry. The gambling industry may benefit from training schemes similar to those delivered in the alcohol industry where employees are required to hold a personal licence for dispensing alcohol. One aim of this training is to increase consumer contact personnel understanding of alcohol abuse and promote responsible drinking.

Although central to any responsible gambling strategy, employees agreed that their contribution must be viewed as additional and not as a replacement or substitute to those obligations owed by the organisation or the individual consumer. These results are

significant as they further highlight the need for more specific and explicit responsibilities for stakeholder groups to be identified. This employee concern reflects previous studies which highlight the need for ultimate responsibility resting with the consumer but the organisation having responsibility to provide sufficient, timely and necessary information to consumers so that they can make an informed choice, (Blaszcznski et al., 2004, 2008, 2011; Kingma 2004; Power 2004; Parke et al., 2007; and Volberg 2002).

Hypothesis 3, "employees feel that they are equipped with the knowledge and skills to fulfil their responsible gambling obligations to their requirements" is partially accepted as employees acknowledge that they feel confident in identifying signs of problem gambling but they do not feel equipped to approach individuals who demonstrate such problems. In addition, they feel that such an approach would be unwelcome by both consumers and managers. This perception is contrary to that of consumers who expect employees to be trained in how to identify and approach those demonstrating problems with their gambling.

7.2.4 Objective 4 - Identify factors that employees and consumers of online gambling operations perceive inhibit and motivate them to act in a socially responsible way?

The Internet has not only increased accessibility to gambling but also provides those using such products and services with a number of options not offered within land-based gambling venues. Examples of such options identified by both employees and consumers in this research include: anonymity; accessibility; affordability; escape; convenience; dis-inhibition; social support and the ability to experiment and learn. These responses reflect those highlighted in previous studies undertaken by Young (1999), Griffiths and Parke (2002), Griffiths (2003, 2005, 2009a, 2009b), Cooper (2004), Williams et al., (2007), and Corney and Davis, (2010). Whilst such factors may characterise the online gambling

environment as perceived by employees and consumers and influence the way that they interact with each other, the studies outlined above have also suggested that such factors are linked to the development and maintenance of problem gambling.

In assessing how employees support the individual gambler to be aware of responsible gambling tools and to act in a socially responsible way, employees suggested that this was influenced by their own approach to gambling. When comparing their approach to promoting and managing responsible gambling with the approach adopted by other customer service personnel and consumers, a sizable minority of employees identified the following weaknesses of current provision which inhibit consumers and employees from acting in a responsible way: employees lack of knowledge and engagement with responsible gambling systems; employees inability and unwillingness to promote responsible gambling; ineffective and inappropriate staff training; consumers lack of knowledge of the games they play; consumers lack of knowledge and engagement with responsible gambling tools available to them; consumers lack of knowledge of how to access and use support tools; inconsistencies in responsible gambling information and the way it is presented on gambling websites; consumer and employee fears of using support tools; the need for effective time and financial deposit limits and the lack of effective industry-wide self-exclusion. Such perceptions reflect other more general studies on CSR where employees perceive that their own ethical attitudes/beliefs are higher than their peers ethical behaviour and that whilst managers may have similar ethics to themselves; employees believe that managers beliefs are higher than their actual behaviour, (Kantor and Weisberg, 2002 and Hing and Breen 2008). These responses suggest that whilst employees are aware of their organisations responsibilities, their own beliefs take precedence when dealing with consumers and their responsible gambling needs.

The principal component analysis in this study identified the following motivational factors to gamble: excitement; escape and relaxation; financial motivation; autonomy and mastery and social and competition. Whilst previous studies have identified financial factors as one motive, within this study financial motives were categorised in terms of 'to win money' and to 'earn income'. Each of these sub-motives is significant to different consumer groups based on PGSI category. For example, to 'earn income' was a stronger motive for those in the problem gambling category whilst to 'win money' was a motive highlighted by all PGSI groups. This response has policy implications as there may be a need for better signage and social marketing highlighting that gambling is entertainment and not a way to make money.

An additional contribution to motivational knowledge is the inclusion of human factors as being significant in influencing an individual's decision to gamble. Within this study, consumers identified 'autonomy and mastery' including the sub-motives of 'to be mentally challenged', 'to do something I enjoy for a change' and 'it's fun' as being significant factors that motives them to gamble. Internet gambling may enable individuals to satisfy their human need of 'autonomy and mastery' especially where it cannot be achieved in other aspects of their life such as work, leisure or family. This has significant implications for the treatment of problem gambling as it may allow for alternative ways that individuals can satisfy their need for 'autonomy and mastery' to be identified.

In general, consumers within this study suggested that the three strongest motives for using the Internet for gambling purposes were to 'win money'; 'it's fun' and 'it's exciting'. By comparison, they suggest that the least influential motives include: 'to vent aggression'; 'to

relax'; and 'to socialise'. With many websites using chat rooms as a tool to assist individuals in self-identification of problems, the low level of priority given to the need 'to socialise' may require this strategy to be re-evaluated.

One additional factor that both employees and consumers believe may inhibit them from reacting responsibly is the level of trust they have in the responsible gambling system. This is largely influenced by perceived conflicts of interest that may result in employees and/or consumers mistrusting the system and seeing it as ineffective. This necessitates a review the link between commercial organisations and those organisations that are responsible for providing support and assistance to those at risk.

The emphasis on personal characteristics governing both employees and consumers in their approach to responsible gambling means that Hypothesis 4, "personal characteristics of the employee and consumer are influential in governing their approach to responsible gambling", is accepted.

7.2.5   Objective 5 - Identify factors which predict Problem Gambling Severity Index (PGSI) as a measure of problem gambling.

Factors that motivate and inhibit consumers from engaging with responsible gambling practices were found to be dependent on PGSI classification, age and frequency of play. Consumers classed in the PGSI 'problem category' were more likely to suggest that their gambling behaviour is characterised by the following practices: betting more than they could afford; needing to gamble with larger amounts to get the same level of excitement; chasing losses; borrowing or selling items to fund gambling; experiencing health problems resulting from gambling; other people suggesting you have a problem and feeling guilty about gambling. These behaviours reflect conclusions on problem gambling behaviour

proposed by Carnes (1991), Griffiths (2003) and Delfabbro et al., (2007). In addition, they support work undertaken on, behavioural observational tracking by Griffiths and colleagues (2007, 2009a, 2009b, 2009c), La Brie and Colleagues (2007, 2008) and Wardle et al., (2007). In general, those in the 'problem gambling group' were motivated by factors that enabled them 'to earn income'; 'to take my mind off other things' and 'to vent aggression in a socially responsible way'. Other motives that were significant when based on PGSI classifications were that those in the 'low problem group' were motivated by factors associated with 'escape and relaxation', whilst those in the 'moderate group' were motivated by 'excitement', 'to relieve boredom'; 'to compete with others'; to win money' and factors associated with 'fun'.

Consumer gambling motives based on age suggest that those in the 21-26 years age group were motivated 'to earn income' and those in the 46+ age group gambled primarily as a form of 'escape and relaxation'. Reflecting the conclusions of eCOGRA, (2007), Parke et al., (2007) and Jonsson, (2012), frequency of play was highlighted as the strongest predictor of problem gambling with the relationship between the two factors being positive. In general, those who gambled daily, were motivated by 'competing with others'; 'it's exciting'; and 'to relieve boredom'. By comparison, those who gambled weekly were motivated by 'to earn income'; 'it's fun' and 'to win money'. Combined with observable behavioural factors, an individual's motives to gamble has the potential to assist in developing models that can identify those who have problems with their gambling or those who are likely to develop problems with their gambling. Technology within the Internet sector enables the necessary data to be collected and analysed to further develop this area of research.

7.2.6 Objective 6 - Propose how responsible gambling may be managed more effectively.

The Gambling Act 2005 is perceived by employees as providing a platform for changing the public's perception of how responsible the gambling industry is. For employees, two of the main agents for change within the Gambling Act 2005 are media advertising and programme sponsorship which has increased the public's awareness of gambling organisations and products. In addition, Bingo and the National Lottery were also highlighted by employees and consumers as being responsible for a change in the public's perception of the gambling industry as they are often not regarded as gambling but as a treat or learning strategy in schools and as a form of entertainment in care homes and social clubs. These activities, combined with improvements in account verification, deposit limits and self-exclusions were believed by employees and consumers to be a platform on which further improvements in the public's perception of the levels of responsibility exercised by the industry could be based.

Both employees and consumers suggested the following recommendations to improve responsible gambling within the Internet sector. The recommendations have been presented under the following headings to reflect the six extracted factors relating to gambling practices and behaviours that were developed in this research as part of a principal component analysis: (proactive responsible gambling; transparent terms and conditions; customer service (reactive); self-exclusion and self-help; game design; and consumer information, behaviour and transaction.)

7.2.6.1 Proactive Responsible Gambling

Proactive responsible gambling may be further enhanced by:

Recommendation	Supporting evidence from primary data sections
Improving cooperation between stakeholders, for example researchers, government and charities in order to advance understanding of consumer behaviour and specific cues that can be used to further develop the identification of problem gamblers through tracking consumer behaviour and activity. This should then inform staff training and consumer inductions.	62% (n=265) of consumers agreed that gambling operators should analyse consumer behaviour patterns to identify problem gambling; 59% (n=253) of consumers agreed that gambling operators should co-operate with stakeholders (e.g. researchers, government, charities) in order to advance our understanding of consumer behaviour; 56% (n=240) of consumers agreed that gambling operators should allow researchers to have access to the consumer information so that they can better understand problem gambling; 23% (n=99) of consumers agreed that Gambling operators should not be under any obligation to do research other than to advance their own commercial objectives
Customer service staff should be trained so that they feel empowered to take action where they see problem gambling.	94% (n=399) of consumers agreed that where staff identify a person may have a problem with gambling, taking no action was the least acceptable choice of action that should be taken; 70% (n=249) of consumers agreed that staff should be trained in terms of how to recognise those who may have problems with their gambling; 67% (n=237) of consumers agreed that where staff see signs of problem gambling they should take action.
Researching the feasibility of establishing an industry framework of how problem gambling is identified, how the information is investigated, what action should be taken and how the data is audited needs to be established.	72% (n=259) agreed that self-exclusion will only work where there is an industry wide system; 42% (n=152) of consumers agreed that it is easy to get around the self-exclusion systems; Recommendation from employee interviews.
Developing an effective audit tools for responsible gambling which are externally verified.	Recommendation from employee interviews
Identifying alternative ways of funding, auditing and managing research into responsible gambling and gambling addiction to replace the current voluntary codes of practice.	Recommendation from employee interviews

7.2.6.2 Transparent Terms and Conditions and Consumer Information, Behaviour and Transactions

There is a need for terms and condition to be clearly articulated to those who wish to play and/or those who actually play online games with Internet providers. Provision may be further improved by:

Recommendation	Supporting evidence from primary data sections
Establishing consumer forums who would agree terms and conditions.	Recommendation from employee interviews
Having standard terms and condition using standard images for responsible gambling tools on all websites in a similar way that warnings on cigarettes are standardised. and Placing buttons for terms and conditions and responsible gambling tools in a similar position on all websites thus enabling consumers to identify with such tools regardless of the site they use.	55% (n=197) of consumers agreed that they should receive information about how they play regardless of whether or not it has been requested; 52% (n=184) of consumers agreed that terms and conditions are misleading in terms of the chances of success; 45% (n=161) of consumers agreed that they felt confident about where to find information on responsible gambling; 32%, (n=120), of consumers agreed that Internet gambling websites terms and conditions are open and honest; 30% (n=106) of consumers agreed that Internet sites tell their players the chances of winning; 26% (n=98) of consumers agreed that Internet gambling software was fair.

7.2.6.3 Customer Service (Reactive)

Customer service provision could be further improved by:

Recommendation	Supporting evidence from primary data sections
Mandatory accredited training. A review of training needs which could be externally accredited should be undertaken to enable staff to fulfil their regulatory obligations more effectively.	Recommendation from employee interviews; 70% (n=249) of consumers agreed that staff should be trained in terms of how to recognise those who may have problems with their gambling.
Improving customer service staff knowledge of responsible and problem gambling.	70% (n=249) of consumers agreed that staff should be trained in terms of how to recognise those who may have problems with their gambling; 67% (n=237) of consumers agreed that where staff see signs of problem gambling they should take action; 19% (n=67) of consumers agreed that employees were knowledgeable about issues related to responsible gambling.
Licensing customer service staff in a similar way that those who sell alcohol are licensed.	Recommendation from employee interviews

7.2.6.4 Self-exclusion and Self-help

As core aspects of responsible gambling policy, self-exclusion and self-help could be further enhanced by:

Recommendation	Supporting evidence from primary and secondary data sections
Enforcing money and time limit setting by consumers with the removal of an unlimited limit. and Annual responsible gambling discussions with customer care staff.	76% (n=274) of consumers agreed that websites should provide options for players to limit how much money they can spend; 72% (n=259) agreed that self-exclusion will only work where there is an industry wide system; 71% (n=256) of consumers suggested that Internet gambling websites should provide options for players to limit how much time they can spend; 42% (n=152) of consumers agreed that it is easy to get around the self-exclusion systems; 34% (n=123) of consumers recalled being asked to set a deposit limit during the registration process.

7.2.6.5 Game Design

Game design can be further improved by:

Recommendation	Supporting evidence from primary and secondary data sections
Ensuring play-for-free versions of a game are identical to play-to-pay game versions.	70% (n=263) of consumers agreed that play-for-free versions of a game should be identical to the play-to-play versions.
Not designing games using factors which are known to be addictive.	53% (n=199) of consumers agreed that games should not be designed which factors that are known to be addictive; Recommendation from employee interviews.
Not designing games which are linked to cartoon characters.	Recommendation from employee interviews

7.3   Limitations of the study

One of the limitations of the study was the lack of research within the area of consumer and employee perceptions of responsible gambling against which direct comparisons could be made. Previous studies have tended to concentrate on specific aspects of responsible gambling whereas this study has highlighted consumer and employee perceptions of actual responsible gambling practices. This study therefore addresses some of gaps in current literature.

Although a variety of organisations that provide online gambling products and services were approached, only one organisation gave permission for data to be collected form their employees. Similarly, regulatory bodies were invited to participate in the study but declined. The difficulty in engaging with the gambling industry has previously been highlighted by other researchers including Collis and Hussey, (2008) and Griffiths (2009a). Gaining the perspectives of other organisations and regulatory bodies would enhance the study and understanding of approaches to responsible gambling. In addition, it may improve responsible gambling provision by addressing some of the weaknesses identified in this study.

The data in this study was obtained from employees from one organisation, in one jurisdiction, in only one sector of the industry. It could also be argued that their willingness to engage in academic research in responsible and problem gambling might signify that they are, on average, a more responsible organisation. In addition, employees may have felt obliged to minimise criticism and/or be loyal to their organisation. Hence, findings in this study may not be generalizable to all gambling industry employees. Despite such

limitations, a strong feature of this research is that this represents the first attempt to explore and assess employee perspectives of responsible gambling. Importantly, findings should be treated with caution given such limitations.

The consumer sample was self-selecting and may therefore not be representative of the general population of consumers who play games offered by this sector. However, the samples are similar to those used in other studies such as Young (1999); Wood et al., (2007); Griffiths and colleagues (2008, 2009) and Hing and Breen (2008). The primary use of a student population and those who access a regional newspaper through the Internet enabled some of the problems of reaching this difficult to access consumer group to be over-come and is further justified given the similarities in these groups and those who generally use the Internet, (eCOGRA 2007; Wood, et al., 2007; Griffiths and Barnes 2008; and Griffiths et al., 2009)

7.4   Contribution

This study has filled a gap in current literature in that it provides a review of existing responsible gambling practices from both an employee and consumer perspective. The main contributions can be divided into academic and applied contributions as follows:

7.4.1   Academic Contributions

Models of responsible gambling and corporate social responsibility that focus on self-identification, self-help and self-regulation need to identify information sources, training and audit systems that support their fitness for purpose. The results from this study

suggest that whilst employees highlighted significant benefits of current responsible gambling systems a majority of employees and consumers highlighted negative perceptions of these systems which may undermine the level of trust that employees and consumers have in them. This may have detrimental effects on consumer and employee perceptions of the utility of responsible gambling tools and the level of responsibility they associate with Internet gambling providers.

Results from the employee interviews suggest that an employee's personal characteristic, such as their own gambling behaviours, influences how they interact with consumers on matters relating to problem/responsible gambling. Where employees suggested they did not follow current protocols in terms of promoting responsible gambling practices such as setting deposit limits, this was because they presumed that consumers were disinterested in such factors in the same way that they are. Further research needs to be undertaken to identify how a standard approach may be incorporated in all responsible gambling systems.

Consumers suggests that there are differences between financial motives which are associated with the need 'to win money' and those associated with need 'to earn income'. Whilst winning money is highlighted by all PGSI groups as being a primary motive to gamble, earning income from gambling is more characteristic of those in the PGSI problem group, those who gamble weekly and those less than 26 years. Consumer responses also suggest that that human factors, such as the need for autonomy and mastery, are as significant as social, financial, escape and arousal factors in influencing gambling choices. This may have implications for the way in which individuals with gambling

problems are treated as the need for autonomy and mastery can be achieved by alternative means.

A final academic contribution is that the following four concerns affect how employees and consumers perceive responsible gambling: perceptions of potential conflicts of interest with a system; willingness to engage with responsible gambling tools; the perceived effectiveness of responsible gambling systems and the level of responsibility associated with marketing activities. These concerns should be addressed when introducing new responsible gambling initiatives as they may affect the relationship between employees, consumers and the gambling organisation. This is particularly important given that many responsible gambling initiatives focus on the employee-consumer relationship.

7.4.2   Applied Contributions

Current regulations have a number of inherent conflicts which have implications for the level of integrity stakeholders perceive they have. For example, the lack of minimum standards for operators and the absence of audit systems led employees and consumers to criticise current responsible gambling provisions. Consequently, this research identifies the need to establish externally accredited responsible gambling training for all employees.

Within other industries such as the liquor trade, customer service staff are licensed to ensure a minimum standard in relation to dispensing alcohol and identifying problem drinking. This research proposes that the gambling industry would benefit from licensing customer service staff to promote similar benefits in relation to responsible gambling. In addition, this research has highlighted the following operational processes that would

improve responsible gambling: standard terms and condition using standard images for responsible gambling tools on all websites in a similar way that warnings on cigarettes are standardised; placing buttons for terms and conditions and responsible gambling tools in a similar position on all Internet websites so that access by consumers is facilitated; ensuring buttons for 'self-help' and 'self-exclusion' occupy similar position on all websites thus enabling consumers to identify with such tools regardless of the site they use; the mandatory provision of information to consumers on their playing behaviour and characteristics; and a requirement for organisations and their employees to be more proactive in identifying and supporting those who have gambling problems.

Reclassifying problem gambling as a public health issue in a similar way that drug addiction and alcohol addiction are classified may result in more effective methods of funding research into this area. For example there is a need for research on the feasibility of an industry wide, or jurisdiction wide, self-exclusion system based on a per-product basis, there is a need to enforce money and time limit setting by consumers with the removal of an unlimited limit and there is a need to review marketing activities including promotions and outbound calling.

Internet gambling shares similarities with other aspects of e-commerce which may provide the opportunity for the development of addictive behaviours. Using Griffiths (2003, 2009a, 2009b) framework of structural and situation factors it may be suggested that addiction to activities such as Internet shopping, Internet gaming and Internet pornography are more likely to occur where there are factors that may influence an individual in developing problem/addictive behaviour such as ease of access to websites; variety of modes of access to websites; and the number of websites etc. (situational factors) and

where there are factors to reinforce, satisfy and facilitate the behaviour/activity such as: frequency of access; amount spent; aesthetics of the website; and promotions and advertising etc (structural factors). As such, the conclusions form this study may be applied within other industries. For example there may be benefits in terms of proactive responsible behaviour on the part of the websites; improving transparency in relation to terms and conditions; improving customer service with an emphasis on proactive practices; industry wide self-exclusion and self-help; and improved consumer information on their behaviour and transactions. The factors may also form the basis of future research as outlined in section 7.5.

7.5   Implications for future research

This study has highlighted the need for further research into how tracked data can be used to explore within-session characteristics (sessional play) and explore the usage of responsible gambling tools. Such research should focus on the feasibility of using tracked data to establish early detection systems that can help prevent problems before they begin. This would also include an evaluation of current evidence that is presented by consumers to customer contact personnel.

The employee-consumer relationship is critical in all service delivery systems and is more critical in responsible gambling systems that are based on self-identification, self-help and self-regulation as they increase further the level of trust that is required between consumers and customer service personnel. As such, further research could be undertaken into aspects of employee and consumer empowerment. This could influence the design of

employee training programmes and consumer induction programmes in terms of the content and delivery of responsible gambling practices.

Employees identified a number of concerns that potentially may affect the perception that consumers have in terms of how ethical and responsible they believe the Internet gambling sector to be. For example the lack of an industry-wide self-exclusion system and the ability to set an unlimited deposit limit were criticised by employees and consumers. Further work could be undertaken to determine whether there are opportunities to further enhance these responsible gambling tools and the challenges that need to be overcome. For example, what are the primary barriers to introducing a jurisdiction and/or industry wide self-exclusions systems and system for setting deposit limits. In addition, research could be undertaken on the feasibility of having responsible gambling buttons and tools that are presented in a standard format using standard colours located in similar positions on each Internet website.

The hidden or forgotten aspect of corporate social responsibility and responsible gambling obligation is the duty owed by the employer to the employee. The 'weakness' associated with employees who have gambling problems seeking help reflects a concern that the incidence of problem gambling amongst employees is higher than acknowledged. A national survey of gaming industry staff could be undertaken to further validate initial findings from this study which could be undertaken in collaboration with the Gambling Commission or Responsible Gambling Strategy Board. In addition, research into promoting responsible gambling to employees and encouraging them to engage with such tools could be undertaken. Employees need to be assured that using responsible gambling tools will not have adverse effects on their career opportunities. In addition, research

could be undertaken with treatment providers in order to explore further issues of gambling among industry staff who appear to be an at-risk population for whom there is little information.

The similarities between internet gambling and other similar e-commerce sectors provide the opportunity to determine if some of the conclusions and recommendations highlighted in this research are also applicable to them. As all organisations are required to engage with corporate social responsibility, there is increasing need for Internet based organisations to prove that they act in a responsible way. In terms of some activities, such as age and account verification, the standard expected is similar across all sectors. However, where there is a potential for addictive or negative behaviours to develop, the organisation must ensure that it has undertaken all due diligence in terms of their policies and procedures, and that such policies and procedures are audited. As such, further research could be undertaken in general and specific codes of practices that could be adopted within e-commerce and specifically in e-commercial activities associated with the leisure industries sectors of the economy.

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Appendices

Appendix 1 -   Research Ethics Panel

Ethical Approval Form for Post-graduates

Ethical approval must be obtained by all postgraduate research students (PGR) <u>prior</u> to starting research with human subjects, animals or human tissue.

A PGR is defined as anyone undertaking a Research rather than a Taught masters degree, and includes for example MSc by Research, MRes by Research, MPhil and PhD. The student must discuss the content of the form with their dissertation supervisor who will advise them about revisions. A final copy of the summary will then be agreed and the student and supervisor will 'sign it off'.

The **signed** Ethical Approval Form and application checklist must be **forwarded to the Contracts Office, G10 Faraday House AND** an electronic copy **MUST** be **e-mailed to the Research Ethics Panel** via Tim Clements (t.w.clements@salford.ac.uk). The forms are processed online therefore without the electronic version, the application cannot progress. Please note that the form must be signed by **both** the student and supervisor.

Please ensure that the electronic version of this form only contains your name and your supervisor's name on <u>this</u> page, where it has been requested.

All other references to you or anyone else involved in the project must be removed from the electronic version as the form has to be anonymised before the panel considers it.

Where you have removed your name, you can replace with a suitable marker such as […..] Or [Xyz], [Yyz] and so on for other names you have removed too.

You should retain names and contact details on the hardcopies as these will be kept in a separate file for potential audit purposes.

Please refer to the ['Notes for Guidance'](#) if there is doubt whether ethical approval is required

The form can be completed electronically; the sections can be expanded to the size required.

Name of student:	Mr James Mulkeen
Name of Supervisor:	Dr. Jonathan Parke
School:	Salford Business School
Course of Study:	PhD

Name of Research Council or other funding organisation (if applicable): NA

1a. Title of proposed research project

Corporate Social Responsibility: An evaluation of stakeholder perceptions of responsible gambling initiatives within Internet gambling organisations

1b.   Is this Project Purely literature based?

No (delete as appropriate)

2. Project focus

The purpose of the study is to evaluate stakeholder perceptions of responsible gambling. Although highly regulated, the Gambling Act 2005 enabled gambling organisations to advertise more widely their products and services for the first time. Alongside the relaxation of advertising and marketing requirements was a need for providers to prove that they act in a responsible manner with those who engage with their products and services. What was not made clear by the Gambling Act 2005 was the form and extent of responsibility. Consequently, this study seeks to establish key stakeholders perceptions of responsible gambling measures undertaken by the remote providers of gambling products and services, the barriers and motivators for implementing responsible gambling measure and future actions that could be taken.

3. Project objectives

The project is divided into three studies the objectives of which are to:

1. Determine and evaluate the perceptions that employees of providers of remote gambling products and services have of their responsible gambling obligations.
2. Determine and evaluate consumer's perceptions of responsible gambling and the extent to which remote providers meet such expectations.
3. Recommend practices that will improve player protection for those using gambling products and services.

4. Research strategy

(For example, outline of research methodology, what information/data collection strategies will you use, where will you recruit participants and what approach you intend to take to the analysis of information / data generated)

The project is divided into two studies.

<u>Study 1</u>

This was an exploratory study which sought to establish employee's perceptions of responsible gambling and evaluate how such perceptions impact on operational practices. In addition, the study sought to establish employee's views on how responsible gambling practices of remote providers could be improved.

Prior to agreeing to the study a presentation was made to the Operations Director, Head of HRM and Head of Conformance. They agreed to be part of the study and to promote the study amongst their employees on the understanding that their involvement was voluntary and confidential.

They agreed the briefing statement, consent form, debriefing document and interview protocol included in appendix 1. In addition, the following process was agreed and applied;

a. **<u>Recruitment</u>** - The HRM department emailed all employees and

informed them of the aims of the study and the fact that all responses would be anonymous. Candidates included those who on duty on 17th August 2009 when the study was undertaken. Participation was voluntary and confidential. (See appendix 1 for briefing statement, consent form, debriefing document and interview protocol)

b. **<u>Consent</u>** - All participants were informed of that participation was voluntary and they had the option not to participate, to withdraw when the aims of the research were highlighted to them before the interview commenced and when the interviews were completed. They were also informed that they only had to answer questions that they felt comfortable with. (See appendix 1 for briefing statement, consent form, debriefing document and interview protocol)

c. **<u>Anonymity</u>** - Whilst a list of participants was provided by the organisation, they were given a number from 1-17 which did not reflect their position in the interview process. All interviews were recorded with no names being identified. Taped information and any written information including consent forms will be kept in a secure filing cabinet within Salford University. Similarly, transcribed and other electronic information will be kept on the University of Salford data system which is password protected. All information will be destroyed within a five year period of the project being submitted.

Respondents are informed in the briefing sheet that the results of the research are part of a PhD and likely to be published in a variety of journals

and research conferences. They are also informed that their anonymity will be protected at all times and they can obtain a copy of the published results by contacting the researcher.

Taped information and all written information including consent forms for this study are kept in a secure filing cabinet within Salford University. Similarly, transcribed and other electronic information is kept on the University of Salford data system which is password protected. All information will be destroyed within a five year period of the project being submitted.

d. **Participation** -   Prior to the start of each interview respondents were reminded of the aims of the study and were given the opportunity to withdraw. At the end of each interview participants were again given the opportunity to state if they were happy for the information that they had provided to be included in the study.

The study was completed in August 2009. Ethical approval was not sought for this exploratory study before it was undertaken as one of its aims was to determine if there was sufficient information and need for future studies. Retrospective ethical approval is now being sought for this study.

The responses from this study were analysed thematically. Themes identified were verified by an employee form Gamcare which is a charitable organisation that offers advice to gambling providers and those who believe that they may have problems with gambling. The accuracy of the transcribed data was verified by a certified accountant experienced in audit.

Study 2

The second study for which ethical approval is being sought is an online questionnaire to determine consumers perceptions of responsible practices undertaken by remote providers of gambling products and services. Those participating must have used an Internet gambling site in the last 3 months. The questionnaire will be divided into the following sections and is located in appendix 2 of this document:

- Agreement and demographic information. - All participants will be informed that they will have the opportunity to exit the survey at any time and they will be provided with the option at the end of the survey to submit the information.
- General Behaviours and Attitudes – Gambling including the types of games that individuals play, frequency, motivations for playing and responses to losing money.
- Attitudes – General Integrity, Fairness and Player Protection including problems they may experience whilst online, dispute handling by remote providers, their understanding of the role of protection agencies such as eCOGRA and the UK Gambling Commission, their perceptions of regulation of Internet providers.
- Social Responsibility in Internet Gambling including age verification, transparency, transaction histories, self-exclusion options, training and support for staff, problem gambling information, advice and referral, limit

setting, play for free facilities, player analytics and stakeholder engagement.
- Problem Gambling Measurement and whether they would like more information on problem gambling, (website will be provided to support those who do want further information).

The following principles will be followed:

a. **Recruitment** - Respondents will be chosen from the student population of the University of Salford and readers of the Manchester Evening News. Using the University of Salford intranet and Manchester Evening News Webpage potential respondents will be informed of the aims of the study and its purpose. There will be an opportunity for one participant to win an i-Pad2 (See appendix 2a for the recruitment advert and appendix 2b for the questionnaire).

b. **Consent** - All participants will be informed that participation is voluntary and they will have the option not to participate and withdraw at any stage up to pressing the "submit" button at the end of the questionnaire. In addition, respondents may select to answer only specific questions.

c. **Anonymity** - All responses will be anonymous. Any information provided for the purpose of wining one of the two available i-Pad2s will be securely stored on the University computer system which will be password protected.

d. **Participation** - Prior to the start of each questionnaire respondents will be reminded of the aims of the study and will be given the opportunity to withdraw. Participants can withdraw at any point up to pressing the "submit" button. Respondents will have to press a "start" button for the questionnaire to start but they may withdraw at any time up to pressing the submit button.

The questionnaire will be completed online with the results being subjected to statistical analysis.

All participants will be offered the opportunity to access additional help if they believe that they may have a problem with gambling.

5. What is the rationale which led to this project?

(For example, previous work – give references where appropriate. Any seminal works must be cited)

With increased access to and acceptability of at least some forms of gambling comes increased responsibility for gambling organisations to be perceived as responsible and to protect vulnerable groups (Griffiths 1999, 2003, 2009; Griffiths and Parke 2002; Hing and McMillan 2002; Hing 2003; Eadington 2004; Messerlian et al 2005; Parke et al 2007; Rockloff and Dyer (2007); Sartor, 2007; Schellinck and

Schrans 2007; Gambling Commission 2008; Hancock et al 2008; Hing 2003 a,b; Hing and Breen 2008). This growing emphasis on responsible gambling is set within an environment of corporate social responsibility and corporate citizenship in which organisations are becoming increasingly accountable for their activities and for minimising their impact on society both in relation to current and future products, markets and stakeholders (Wilson 2000; Hing and McMillan 2002; O'Dwyer (2003); Matten and Crane 2005; Cochran 2007). Whilst there have been previous studies on responsible gambling these have tended to concentrate on land based venues the social responsibilities of gambling organisations (Griffiths 1999, 2003, 2009; Griffiths and Parke 2002; Hing and McMillan 2002; Hing 2003a, b; Hing and Breen 2008; Hancock et al, 2008).

The significance of employees in helping their employing organisation meet their social responsibilities is reflected in the wealth of studies which concentrate on organisational behaviour and the relationship between the employer and employee. For Lee et al (2006) the employee-organisation relationship, as reflected in organisational citizenship behaviour, involves dividing the individual's work-role into its role-prescribed behaviour and its extra roles. Role prescribed behaviour is the formal role requirements that are explicit in documents such as job descriptions and implied in the 'working relationships' an individual develops with colleagues in the organisation. Extra roles are all other roles an employee performs and are discretionary and subject to individual choice. It is such extra roles that Lee et al (2006) highlighted as resulting in both benefits and costs to the organisation and consumer in terms of perceived value and the actual cost of providing a service. This is significant in services organisations, such as gambling, where the employee has direct contact with the consumer and therefore may affect the consumer's perception of the organisation, their perceived satisfaction and their behaviour, (Castro, 2004; Rotenberry and Mobery, 2007).

As many responsible gambling initiatives are based on 'self-identification' and 'self-reporting' by the individual gambler the relationship and level of trust between the consumer and consumer contact employee becomes critical (Blaszcznski et al 2008, Hancock et al 2008). Whilst this has obvious implications for the consumer in term of them being able to identify with an employee that they can trust to disclose such information to (Hansen, 2003), it also has implications for the employee in terms of them being clear about what is expected of them from both a consumer and employer perspective, (Kantor and Weisberg, 2002). Where an employee misinterprets what is expected of them from either the consumer or employer this may contribute one or more of the service quality gaps identified by Zeithaml et al (1990) and may affect the way they identify and act with individuals who display behaviours that are associated with problem gambling.

Given the significant role of the employee within any credible responsible gambling initiative this study aims to explore remote gambling venue employee's perceptions of corporate social responsibility as reflected in responsible gambling initiatives that were adopted by their organisation. The study will also evaluate factors which motivate and/or inhibit employees of remote gambling organisations to assist their employer in effectively meeting their social responsibilities in terms of responsible

gambling.

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6. **If you are going to work within a particular organisation do they have their own procedures for gaining ethical approval**

   (For example, within a hospital or health centre?)

   Yes

   If YES – what are these and how will you ensure you meet their requirements?

7. **Are you going to approach individuals to be involved in your research?**
   YES

   If YES – please think about key issues – for example, how you will recruit people? How you will deal with issues of confidentiality / anonymity? Then make notes that cover the key issues linked to your study

Study 1

An individual organisation was approached who agreed to participate in the study.

The Operations Director, Head of HR and Head of Conformance were involved in a presentation and insisted on the information being anonymous. They informed all of their employees of the day when information would be collected. A total of 17 individuals volunteered to take part in the research. Each individual was assigned a slot to ensure that the work activities of the employer were not affected adversely. Participants were informed of the aims of the study and asked if they wished to continue. At the end of the interview participants were again asked if they wanted their responses to be included. All agreed. The respondents selected a participation number between 1-17 that was different from their interview number. This was to further improve confidentiality.

Study 2

Students from the University of Salford will be recruited from the University intranet. Participants will also be recruited through an advertisement in the Manchester Evening News. Those participating will provide information online and it will be anonymous. Participants will be able to withdraw from the questionnaire up to clicking the "submit" button.

8. More specifically, how will you ensure you gain informed consent from anyone involved in the study?

In study 1, all participants were informed of the aims of the questionnaire and asked if they wished to proceed. All respondents indicated that they were willing to proceed and for the data to be recorded. Appendix 1 includes the briefing statement, consent form, debriefing document and interview protocol. These were agreed with the Operations Director, Head of HR and Head of Conformance at the participating organisation.

In study 2, respondents will be informed of the aims of the study and will have the opportunity to withdraw at any time. Each respondent must press a start button to indicate that they consent to participating in the study and they have to press a "submit" button for their responses to be recorded. Respondents may withdraw from the study at any point up to the submit button being pressed. Respondents only need to answer those questions which they fell comfortable with.

Prior to starting the questionnaire, the participants will be provided with a briefing document explaining the purpose of the study. A debriefing document will also be provided.

9. How are you going to address any Data Protection issues?

See notes for guidance which outline minimum standards for meeting Data Protection issues

No individual will be identified in the research. For example in study 1, a list of employees who agreed to participate in the research was supplied by the remote gambling organisations. In total 17 individuals were interviewed and they selected a number from 1-17 which did not coincide with their allocated interview slot.

Any taped or written information, including consent forms, will be kept in a secure filing cabinet within Salford University. Similarly, transcribed and other electronic information will be kept on the University of Salford computer system which is password protected. Only the researcher will have the password. All information will be destroyed within a five year period of the project being submitted.

The contact details of the participating organisations are currently held only on the University of Salford's file store. This is password protected. There are no plans to use any other computer system for primary data handling except for the University of Salford. Contact details will be deleted once the study has been successfully completed.

All participants have been informed that the identities will be anonymisied to prevent them or their organisation being identified.

10. **Are there any other ethical issues that need to be considered? For example - research on animals or research involving people under the age of 18.**

One i-Pad2 will be offered in order to encourage individuals to participate in the research. The opportunity to win an i-Pad2 is used in the advertising material.

11. **(a) Does the project involve the use of ionising or other type of "radiation"**

No

(b) Is the use of radiation in this project over and above what would <u>normally</u> be expected (for example) in diagnostic imaging?

Not Applicable

(c) Does the project require the use of hazardous substances?

No

(d) Does the project carry any risk of injury to the participants?

No

(e) Does the project require participants to answer questions that may cause disquiet / or upset to them?

The risk is minimal and all respondents will be provided with the opportunity to access support and help-lines including Gamcare and gambling therapy. The links to such help is provided at the end of the questionniare.

If the answer to any of the questions 11(a)-(e) is YES, a risk assessment of the project is required and must be submitted with your application.

12.   How many subjects will be recruited/involved in the study/research? What is the rationale behind this number?

Study 1

17 interviews were undertaken. This was dictated by the number who volunteered to participate in the study when informed by their employers. This was an exploratory study and provided the basis for the second study in terms of themes that formed the basis of the questionnaire for those who use remote gambling products and services.

Study 2

The number of respondents will be at least 200. This will provide enough statistical power to draw meaningful conclusions.

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13.   Please state which code of ethics has guided your approach (e.g. from Research Council, Professional Body etc).

Please note that in submitting this form you are confirming that you will comply with the requirements of this code.

ESRC

Remember that informed consent from research participants is crucial, therefore all documentation must use language that is readily understood by the target audience.

Projects that involve NHS patients, patients' records or NHS staff, will require ethical approval by the appropriate NHS Research Ethics Committee. The University Research Ethics Panel will require written confirmation that such approval has been granted. Where a project forms part of a larger, already approved, project, the approving REC should be informed about, and approve, the use of an additional co-researcher.

I certify that the above information is, to the best of my knowledge, accurate and correct. I understand the need to ensure I undertake my research in a manner that reflects good principles of ethical research practice.

Signed   by   Student

_____

Print Name

_____

Date

_____

In signing this form I confirm that I have read and agreed the contents with the student.

Signed   by   Supervisor

_____

Print Name

_____

Date

_____

Research Ethics Panel:

Application Checklist

<table>
<tr><td>**Ref No:** Office Use Only</td></tr>
</table>

<u>Name of Applicant:</u>	James Mulkeen
<u>Title of Project:</u>	Corporate Social Responsibility: An evaluation of stakeholder perceptions of responsible gambling initiatives within Internet gambling organisations

The checklist below helps you to ensure that you have all the supporting documentation submitted with your ethics application form. This information is necessary for the Panel to be able to review and approve your application. Please complete the relevant boxes to indicate whether a document is enclosed and where appropriate identifying the date and version number allocated to the specific document (*in the header / footer*), Extra boxes can be added to the list if necessary.

Document	Enclosed? (indicate appropriate response)			Date	Version No	Office Use
Application Form		<u>Mandatory</u>		December 2010	1	
Risk Assessment Form	Yes	**<u>No</u>**	**<u>Not required for this project</u>**			
Participant Invitation Letter	**<u>Yes</u>**	No	Appendices , 1and 3 include the briefing statement, consent form and debriefing documents for studies 1, and 3 respectively. Appendices 2a and 2b contains the questionnaire and consent information for study 2	December 2010	1	
Participant Information	**<u>Yes</u>**	No	See appendices	December	1	

Sheet			1, 2a, 2b and 3 for studies 1, 2 and 3 respectively	2010		
Participant Consent Form	**<u>Yes</u>**	No	See appendices 1, 2a, 2b and 3 for studies 1, 2 and 3 respectively	December 2010	1	
Participant Recruitment Material – e.g. copies of posters, newspaper adverts, website, emails	**<u>Yes</u>**	No	See appendices 1, 2a, 2b and 3 for studies 1, 2 and 3 respectively	December 2010	1	
Organisation Management Consent / Agreement Letter	**Yes**	No	See appendices 1, 2a, 2b and 3 for studies 1, 2 and 3 respectively	December 2010	1	
Research Instrument – e.g. questionnaire	**<u>Yes</u>**	No	See appendix 2b	December 2010	1	
Draft Interview Guide	**<u>Yes</u>**	No	See appendices 1 and 3 for studies 1, 2 and 3 respectively	December 2010	1	
National Research Ethics Committee consent	Yes	**<u>No</u>**	Not required for this project	December 2010	1	
Note: If the appropriate documents are not submitted with the application form then the application will be returned directly to the applicant and will need to be resubmitted at a later date thus delaying the approval process						

Appendix 2

Study 1

Appendix 2a - Study 1, Introductory email and briefing
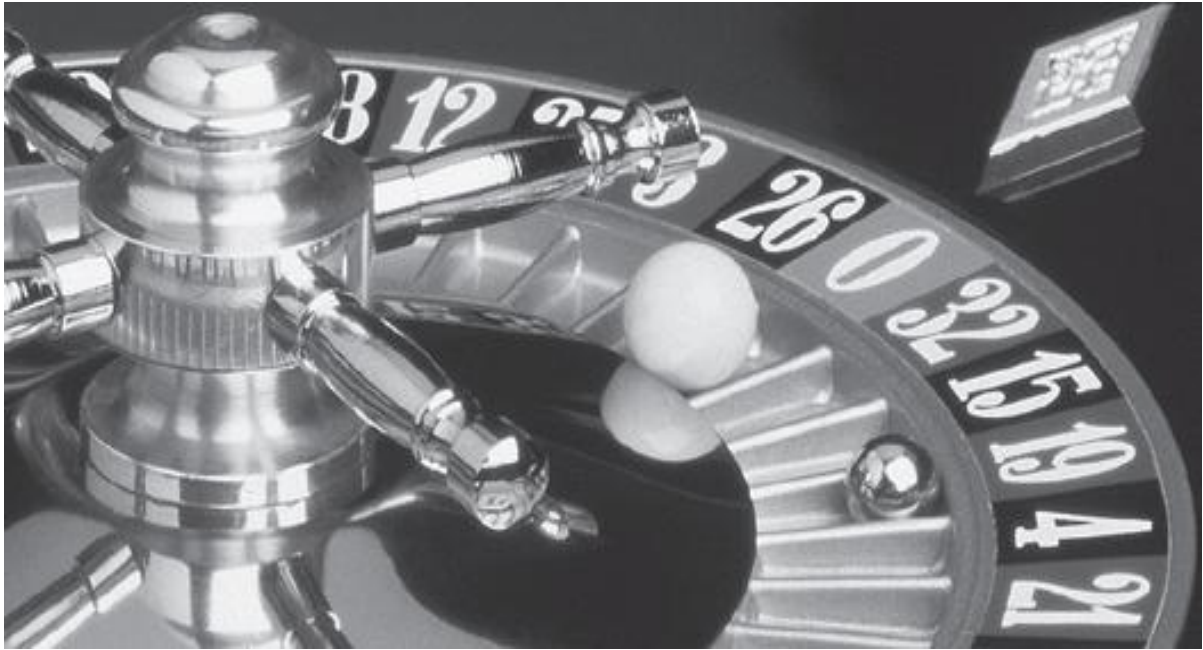
Opportunity To Take Part In Research

(Participating organisation) are currently undertaking some research into responsible gambling with the University of Salford.

We are interested in your views on the responsible gambling and all interviews will be anonymous.

Please read the briefing sheet below and if you are interested in taking part please respond to this email.

If you are interested in learning more about responsible gambling please click on the following link

http://www.gamcare.org.uk

Study 1   Briefing Sheet

Participant Information Sheet

Project Title: An evaluation of stakeholder perceptions of responsible gambling
                         initiatives within Internet gambling organisations

Study Title: An exploration of the employee's role in the development, provision
                         and management of responsible gaming

Before you decide to take part in this research study it is important that you understand
why this research is being undertaken and what will be required of you.
The following information will provide you with the main facts associated with this
research. Please read it carefully and ask any questions that you may have so that you can
make a decision on whether or not you would like to take part.

What is the purpose of the study?

The Gambling Act 2005 places obligations on gambling organisations in terms of
responsible gambling practices that they should adopt. As employees have direct contact
with consumers they are responsible for ensuring that their practices conform with
responsible gambling requirements as laid out in licensing conditions and codes of
practise.

The study seeks to obtain your views on various aspects of responsible gambling which
will be kept strictly anonymous.

Do I have to take part?

The decision to take part is yours alone. If you do decide to take part you will be given
this information sheet to keep and be asked to sign a consent form. If you decide to take
part you are still able to withdraw at any time without giving a reason.

What will happen if I take part?

If you agree to take part in this study you will be interviewed by the researcher. The
interview will last approximately 45 minutes, though it may be slightly longer. This will
depend on how much you want to say during the time. You are free to stop at any time and
you do not have to answer any questions that you find uncomfortable. The interviews are
to be recorded so that they can be transcribed and analysed at a later date.

Will my taking part in this study be anonymous?

Yes. If you consent to take part in the research the interviews will be recorded. All personally identifying information which is collected about you during the course of the research will be kept strictly confidential. Any information about you will have your name removed so that you cannot be recognised from it. However your words may be directly used in the report from the study. The recordings will be transcribed and then studied. Taped information and any written information including consent forms will be kept in a secure filing cabinet within Salford University. Similarly, transcribed and other electronic information will be kept on the University of Salford data system which is password protected. All information will be destroyed within a five year period of the project being submitted.

What will happen to the results of the research study?

The results of the research are likely to be published in a variety of journals and research conferences. Your anonymity will be protected at all times. You can obtain a copy of the published results by contacting the researcher. The findings will also form part of my PhD thesis.

Contact for further information

Further information can be obtained from the research team:

James Mulkeen
Salford Business School
Maxwell Building
The Crescent
Salford M5 4WT
Tel 0161 295 2066 Email: j.mulkeen@salford.ac.uk

Dr Jonathan Parke
Centre for the Study of Gambling
University of Salford
Maxwell Building
The Crescent
Salford M5 4WT
Tel 0161 295 3484 Email: j.parke@salford.ac.uk

Appendix 2b - Study 1, Consent Form

CONSENT FORM

Name of Participant   _____

Project: Corporate Social Responsibility: An Evaluation of Employee's
                  Role in the Development, Provision and Management of
                  Responsible Gaming

Name of Investigator/s   James Mulkeen

Name of Supervisor/s   Dr. Jonathan Parke

1.   I consent to participate in the above project, the particulars of which - including
            details of the interview - have been explained to me.

2.   I acknowledge that:

            a) I have been informed that I am free to withdraw from the project at any time,
                that I do not have to answer every question and that I can withdraw any
                unprocessed data previously supplied;

            b) I have been informed that the anonymity of the information I provide will be
                safeguarded;

            c) I am aware that although all the information I give will be anonymous and I
                will not be able to be identified from it, some of my words may be quoted in
                the report;

            d) I am aware that my participation is completely voluntary.

Signature: _____ Date: _____
(Participant)

Appendix 2c - Study 1, Debriefing Document

DEBRIEFING SHEET

Project Title: Corporate Social Responsibility: An evaluation of stakeholder perceptions of responsible gambling initiatives within Internet gambling organisations

Study 1 Title: An exploration of the employee's role in the development, provision and management of responsible gaming

Thank you very much for taking part in this research. The aim of the study was to explore the understanding, development, provision and/or management of responsible gambling among employees who have worked or currently work in the gambling industry.

Further information regarding responsible gambling can be accessed at:

http://www.gamblingcommission.gov.uk/Client/index.asp

Further information regarding responsible gambling can be accessed at:

http://www.gamcare.org.uk

If you would like any further information about the results of this study then please contact one of the research team (contact details below).

Thank you once again for your participation.

Research team - Contact Details

James Mulkeen
Salford Business School
Maxwell Building
The Crescent
Salford M5 4WT
Tel 0161 295 2066 Email: j.mulkeen@salford.ac.uk

Dr Jonathan Parke
Centre for the Study of Gambling
University of Salford
Maxwell Building
The Crescent
Salford M5 4WT
Tel 0161 295 3484 Email: j.parke@salford.ac.uk

Appendix 2d - Study 1, Interview Protocol

Study 1 Interview Protocol

The interviews will aim to:

1. Determine employee's perceptions of responsible gambling practices of remote gambling organisations.

2. Identify employee's perceptions of the barriers and motivators to improve both perceived and actual responsible gambling practices of remote providers of gambling products and services.

3. Establish employee's motivations to work within the gambling industry and the effect this has on their own beliefs and practise relating to responsible gambling.

The interviews will be individual and will be based around the following themes:

- Employment history including their reason for working for Internet gambling provider.
- Their perception of the meaning of responsible gambling as it relates to themselves and to general consumers.
- Their perception of current practices including marketing, provision of advice and information, limit setting, self-exclusion, inductions, play for free, organisational approach to identifying and managing those who may have gambling problems.
- Training provided to staff.
- Factors affecting player willingness to engage with responsible gambling tools.
- Potential improvements to responsible gambling practices.

The above principles were approved by the Head of Human Resources, Head of Compliance and Operations Director before individuals were recruited.

Appendix 3

Study 2

Appendix 3a   **Study 2 Advertisement**

Appendix 3b   **Study 2 Questionnaire Including Briefing and Debriefing Document**

Appendix 3a - Study 2, Advertisement
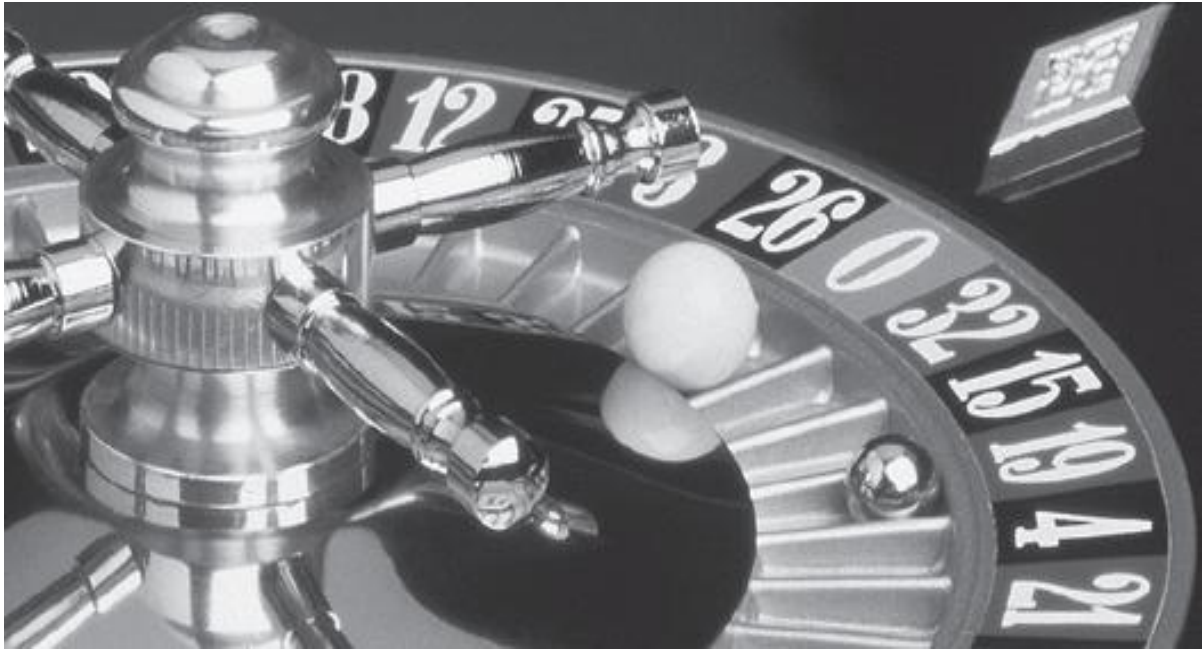
Do you gamble or have you gambled on the Internet?

If yes, we are interested in your views on the responsible gambling practices you have experienced.
This study is part of a PhD and University wide project and all responses will be anonymous.

There is a chance for two respondents to win an I-pad2.

If you are interested in completing the questionnaire please click on the following link

https://www.surveymonkey.com/s/L373KN9

If you are interested in learning more about responsible gambling please click on the following links

http://www.gamcare.org.uk

Appendix 3b - Study 2, Questionnaire Including Briefing and Debriefing Document

Debriefing

Thank you very much for taking part in this research. The aim of the study was to obtain your views on various aspects of responsible gambling.

Further information regarding responsible gambling and related regulation can be accessed at:

http://www.gamblingcommission.gov.uk/Client/index.asp

Further information regarding responsible gambling can be accessed at:

http://www.gamcare.org.uk

If you would like any further information about the results of this study then please contact one of the research team (contact details below).

Thank you once again for your participation.

Research team - Contact Details

James Mulkeen
Salford Business School
Maxwell Building
The Crescent
Salford M5 4WT
Tel 0161 295 2066
Email: j.mulkeen@salford.ac.uk

Dr Jonathan Parke
Salford Business School
Maxwell Building
The Crescent
Salford M5 4WT
Tel 0161 295 3484
Email: j.parke@salford.ac.uk

Appendix 4 - A summary of the questionnaire responses that make up each of the six factors relating to Gambling practices and behaviour

        Factor 1   **Proactive Responsible Gambling**
        Factor 2   **Transparent Terms and Conditions**
        Factor 3   **Customer Service (Reactive)**
        Factor 4   **Self-exclusion and Self-help**
        Factor 5   **Game Design**
        Factor 6   **Player Information, Behaviour and Transaction**

Factor 1 Proactive Responsible Gambling	SD (%)	D (%)	Sl D (%)	NA/D (%)	Sl A (%)	A (%)	SA (%)	Mean	St Dev	Loading
Gambling operators should co-operate with stakeholders (e.g. researchers, government, charities) in order to advance our understanding of player behaviour (n=357)	2	5	8	26	21	25	13	4.87	1.45	0.808
Gambling operators should analyse player behaviour patterns to identify problem gambling (n=356)	1	3	8	26	24	27	11	4.94	1.3	0.795
Gambling operators should allow researchers to have access to the player information so that they can better understand problem gambling (n=357)	4	7	10	23	22	22	12	4.64	1.57	0.765
Customer service staff should take action if they see signs of problem gambling (n=353)	2	3	6	22	25	28	14	5.06	1.34	0.759
Customer service staff should be trained to recognise signs of problem gambling (n=356)	1	3	5	21	24	31	15	5.2	1.28	0.725
SA	Strongly Agree									
A	Agree									
SL A	Slight Agree									
NA/D	Neither Agree nor Disagree									
Sl A	Slightly Agree									
A	Agree									
SA	Strongly Agree									
St Dev	Standard Deviation									
Cronbach										
Alpha	0.873									

Factor 2 Transparent Terms and Conditions	SD (%)	D (%)	Sl D (%)	NA/D (%)	Sl A (%)	A (%)	SA (%)	Mean	St Dev	Loading
Terms and conditions for bonuses are clearly communicated (n=373)	10	13	20	24	21	11	1	3.71	1.52	0.778
Terms and conditions for bonuses are fair (n=374)	7	12	17	32	19	12	1	3.84	1.44	0.769
Internet gambling sites are open and honest regarding the terms of conditions of gambling on their site (n=375)	8	13	17	30	18	11	3	3.83	1.52	0.72
Terms and conditions are necessary to ensure some players do not abuse the bonus system (n=373)	4	8	8	26	29	19	6	4.51	1.45	0.715
Online random number generators are used to determine the outcome of games (n=372)	7	8	12	30	22	16	5	4.22	1.52	0.493
Terms and conditions for bonuses are deceptive (n=356)	1	3	13	34	21	19	9	4.64	1.3	-0.451
Online gambling software is fair (n=377)	8	15	23	28	14	9	3	3.62	1.47	0.414
SA	Strongly Agree									
A	Agree									
SL A	Slight Agree									
NA/D	Neither Agree nor Disagree									
Sl A	Slightly Agree									
A	Agree									
SA	Strongly Agree									
St Dev	Standard Deviation									
Cronbach										
Alpha	0.715									

Factor 3 Customer Service (Reactive)	SD (%)	D (%)	Sl D (%)	NA/D (%)	Sl A (%)	A (%)	SA (%)	Mean	St Dev	Loading
When I have spoken to customer services staff they seem to know about issues related to problem gambling (n=354)	3	8	11	59	10	6	3	3.94	1.14	0.859
When I have spoken to customer services staff they put my welfare first (n=354)	5	9	14	53	12	5	2	3.77	1.18	0.85
Gambling operators should not be under any obligation to do research other than to advance their own commercial objectives (n=357)	13	18	16	30	13	7	3	3.44	1.55	0.527
SA	Strongly Agree									
A	Agree									
SL A	Slight Agree									
NA/D	Neither Agree nor Disagree									
Sl A	Slightly Agree									
A	Agree									
SA	Strongly Agree									
St Dev	Standard Deviation									
Cronbach										
Alpha	0.675									

Factor 4 Self-exclusion and Self-help	SD (%)	D (%)	Sl D (%)	NA/D (%)	Sl A (%)	A (%)	SA (%)	Mean	St Dev	Loading
Self-exclusion is ineffective since players can simply choose to play at another site (n=359)	2	3	4	23	21	33	14	5.16	1.39	0.787
It is easy to get around the self-exclusion system for any one site (self-exclusion being where a player requests to be denied access to a site for a specified period of time) (n=362)	3	6	7	42	19	17	6	4.42	1.35	0.734
For self-exclusion to work all sites need to co-operate to have an industry-wide 'self-exclusion' system (n=360)	2	2	4	20	18	32	22	5.34	1.35	0.684
Internet gambling websites should provide information regarding how to spot problem gambling (n=360)	1	1	4	19	19	33	23	5.45	1.26	0.497
Internet gambling websites should provide information regarding where to get help (n=360)	1	2	4	17	16	33	27	5.57	1.3	0.473
SA	Strongly Agree									
A	Agree									
SL A	Slight Agree									
NA/D	Neither Agree nor Disagree									
Sl A	Slightly Agree									
A	Agree									
SA	Strongly Agree									
St Dev	Standard Deviation									
Cronbach										
Alpha	0.834									

Factor 5 Game Design	SD (%)	D (%)	Sl D (%)	NA/D (%)	Sl A (%)	A (%)	SA (%)	Mean	St Dev	Loading
Play-for-free versions of a game should be exactly the same as the real version (n=375)	2	5	5	18	14	28	28	5.33	1.56	0.67
Gambling operators should not design games using characteristics they know to be addictive (n=375)	3	7	10	27	18	20	15	4.7	1.58	0.634
The main priority for customer service staff is to keep customers happy so they keep spending money (n=374)	4	7	9	18	18	31	13	4.85	1.59	0.612
Having detailed information on my gaming and betting choices is useful (n=372)	2	6	5	25	25	25	12	4.89	1.41	0.448
In relation to player protection and social responsibility, gambling operators should NOT be held accountable to regulators provided they are operating within the limits of the law (n=358)	10	11	14	32	16	12	5	3.87	1.58	-0.41
SA	Strongly Agree									
A	Agree									
SL A	Slight Agree									
NA/D	Neither Agree nor Disagree									
Sl A	Slightly Agree									
A	Agree									
SA	Strongly Agree									
St Dev	Standard Deviation									
Cronbach										
Aplha	0.542									

Factor 6 Player Information, Behaviour and Transaction	SD (%)	D (%)	Sl D (%)	NA/D (%)	Sl A (%)	A (%)	SA (%)	Mean	St Dev	Loading
As a player I would like to receive information about how I play (n=361)	2	8	6	19	25	29	11	4.88	1.48	0.883
I should get information about how I play regardless of whether or not I request it (n=359)	4	9	9	23	21	25	9	5.59	1.59	0.799
Having detailed information on how much money I have spent would be useful (n=360)	1	2	5	18	19	33	22	5.34	1.36	0.599
Having detailed information on how much time I have spent would be useful (n=360)	1	4	7	20	22	28	18	5.12	1.42	0.58
SA	Strongly Agree									
A	Agree									
SL A	Slight Agree									
NA/D	Neither Agree nor Disagree									
Sl A	Slightly Agree									
A	Agree									
SA	Strongly Agree									
St Dev	Standard Deviation									
Cronbach										
Alpha	0.82									

Appendix 5

a.   **Stepwise Regression of PGSI (Dependent Variable) and the six extracted factors relating to Gambling Practices and Behaviours (Regression Model R_1)**

b.   **Multinomial Regressions of the six extracted factors relating to gambling practices and behaviours based on categorical information (Multinomial Regression MR_1 - PGSI grouping, age, gender and frequency of play).**

c.   **Stepwise Regression of Age group (Dependent Variable) and the six extracted factors relating to Gambling Practices and Behaviours (Regression Model R_2)**

d.   **Stepwise Regression of PGSI score and factors that may cause harm (Regression Model RM_3)**

e.   **Multinomial regression of factors that may cause harm and age (Model MR_3)**

f.   **Multinomial regression of factors that may cause harm and frequency of play**

g.   **Multinomial regression of factors that may cause harm and gender**

h.   **Correlation Matrix - Six behavioural factors**

i.   **Correlation matrix - Motivation factors**

j.   **Correlation Matrix - Factors that may cause gambling related harm**

Appendix 5a Regression of PGSI (Dependent Variable) and the six extracted factors relating to Gambling Practices and Behaviours

Regression using PGSI as a dependent variable and the six extracted Factors relating to Gambling Practices and Behaviours

Factor	β	Std Error	t stat	Sig	VIF
Proactive Responsible Gambling	0.314	0.329	0.954	0.341	1.341
Transparent Terms and Conditions	-.710	0.291	-2.436	0.016	1.049
Customer Service (Reactive)	0.027	0.304	0.090	0.929	1.045
Self-exclusion and Self-help	0.208	0.325	0.642	0.521	1.151
Game Design	0.206	0.312	0.659	0.511	1.141
Player Information, Behaviour and Transactions	0.092	0.334	0.276	0.783	1.255

Model	
F-Value	1.674
R^2	0.035
R^2 Adjusted	0.014
Sig	0.127
Df	6

Dependent Variable: PGSI Individual Score

The model is not significant and accounts for approximately 1.4%, R^2 Adjusted, of changes in PGSI individual scores. Of the independent variables, only 'transparent terms and conditions' (p value = 0.016) is significant at 95% suggesting it affects and individuals PGSI score more than other variables. The VIF figures suggest there is no collinearity and that correlation is acceptable in the sample. In order to explore changes in terms and conditions, Multinomial Regression was undertaken to determine if there are significant differences within respondent group views of the six factors relating to gambling practices and behaviours.

Appendix 5b. Multinomial Regressions of the six extracted factors relating to gambling practices and behaviours based on categorical information (PGSI grouping, age, gender and frequency of play).

Comparison of Responses to the six extracted factors relating to gambling practices and behaviours based on PGSI group.

PGSI Group	Factors	β	Std Error	Df	Sig
No	Transparent Terms and Conditions	0.335	0.200	1	0.094
Low	Transparent Terms and Conditions	0.427	0.188	1	0.023
Moderate	Transparent Terms and Conditions	0.313	0.180	1	0.082

Reference Group: Problem

PGSI Group	Factors	β	Std Error	Df	Sig
Moderate	Game Design	0.403	0.191	1	0.035
Problem	Transparent Terms and Conditions	-0.335	0.200	1	0.094

Reference Group: No Problem

Model	Fitting Criteria (-2 Log Likelihood)	Chi-Square	Df	Sig
Intercept Only	759.357			
Final	736.603			
Pseudo R^2	0.083	22.754	18	0.200
Overall Classification Accuracy	35.9%			

Although the model is not significant it accounts for approximately 8.3% of differences in PGSI group classification and has a classification accuracy value of 35.9%.

Appendix 5c. Regression of Age group (Dependent Variable) and the six extracted factors relating to Gambling Practices and Behaviours

Comparison of Responses to the six extracted factors relating to gambling practices and behaviours based on age.

Age Group	Factors	β	Std Error	Df	Sig
Intercept		1.766	0.276	1	0.000
Less than 21	Self-Exclusion and Self-help	-0.711	0.325	1	0.029
21 to less than 27	Self-Exclusion and Self-help	-0.569	0.315	1	0.071
27 to less than 32	Self-Exclusion and Self-help	-0.566	0.341	1	0.097

Reference Group: 46 and above

Age Group	Factors	β	Std Error	Df	Sig
21 to less than 27	Transparent Terms and Conditions	0.293	0.157	1	0.062
Player Information, Behaviour	and Transactions	0.342	0.176	1	0.052
46 and above	Self-Exclusion and Self-help	0.711	0.325	1	0.029

Reference Group: less than 21

Model	Fitting Criteria (-2 Log Likelihood)	Chi-Square	Df	Sig
Intercept Only	807.828			
Final	775.303			
Pseudo R^2	0.112	32.525	24	0.114
Overall Classification Accuracy	44.9%			

Although not significant, the model accounts for 11.2% of differences between the responses based on different age groups and has a predictive value of 44.9%

Appendix 5d. Stepwise Regression of PGSI score and factors that may cause harm

Factors	β	Std Error	t stat	Sig	VIF
Constant	5.372	1.164	4.616	0.000	
The fact that you are not playing with actual cash	0.531	0.294	1.804	0.072	1.558
You can play more than one game at a time	-0.711	0.368	-1.929	0.055	1.632

Model	
F-Value	1.044
R^2	0.028
R^2 Adjusted	0.001
Sig	0.406
Df	10

Dependent Variable   PGSI Score

The regression model is not significant. The VIF figures suggest there is no collinearity and that correlation is acceptable in the sample.

Appendix 5e.   Multinomial regression of factors that may cause harm and age

Multinomial regression of factors that may cause harm and age

Age Group	Factors	β	Std Error	Df	Sig
Intercept		0.386	1.045	1	0.712
21 to less than 27	There are better tools to help you gamble safer	0.482	0.268	1	0.072
Intercept		-0.141	1.140	1	0.902
32 to less than 46	Promotions	-0.603	0.351	1	0.086
Model		(-2 Log Likelihood)	Chi-Square	Df	Sig
Intercept Only		1.014E3			
Final		952.691	61.360	40	0.017
Pseudo R^2		0.159			
Overall Classification Accuracy		43.7%			

Reference Group: 46 and above

Age Group	Factors	β	Std Error	Df	Sig
Intercept		0.386	1.045	1	0.712
21 but less than 27	Availability of better odds	0.420	0.205	1	0.041
	There are better tools to help you gamble safer	0.344	0.154	1	0.026
Intercept		-0.141	1.140	1	0.902
27 but less than 32	Availability of higher jackpots	0.545	0.292	1	0.062
Intercept		1.426	1.166	1	0.221
32 but less than 46	Availability of better odds	0.558	0.287	1	0.052
	Faster games	-0.583	0.309	1	0.060
Model		(-2 Log Likelihood)	Chi-Square	Df	Sig
Intercept Only		1.014E3			
Final		952.691	61.360	40	0.017
Pseudo R^2		0.159			
Overall Classification Accuracy		43.7%			

Reference Group: under 21

The model is significant at 0.05 and accounts for 15.9% of differences in age group perceptions of factors causing harm.

Appendix 5f. Multinomial regression of factors that may cause harm and frequency of play

Multinomial regression of factors that may cause harm and frequency of play

Frequency	Factors	β	Std Error	Df	Sig
Intercept		-1.628	0.793	1	0.040
At least one a day	The fact that you are not playing with actual cash	0.431	0.183	1	0.018
Intercept		-0.918	0.501	1	0.067
At least once a week	Privacy and anonymity	0.112	0.154	1	0.066

Model		(-2 Log Likelihood)	Chi-Square	Df	Sig
Intercept Only		667.508			
Final		646.560	20.948	20	0.400
Pseudo R^2		0.064			
Overall Classification Accuracy		56.5%			

Model		(-2 Log Likelihood)	Chi-Square	Df	Sig
Intercept Only		667.508			
Final		646.560	20.948	20	0.400
Pseudo R^2		0.064			
Overall Classification Accuracy		56.5%			

Reference group: At least once a month

Frequency	Factors	β	Std Error	Df	Sig
Intercept					
At least once a week	The fact that you are not playing with actual cash	-0.488	0.193	1	0.011
At least one a month	The fact that you are not with actual cash	-0.431	0.183	1	0.018

Model		(-2 Log Likelihood)	Chi-Square	Df	Sig
Intercept Only		667.508			
Final		646.560	20.948	20	0.400
Pseudo R^2		0.064			
Overall Classification Accuracy		56.5%			

Reference Group: At least once a day

The model is significant at p=0.10

Appendix 5g.   Multinomial regression of factors that may cause harm and gender

Multinomial regression of factors that may cause harm and frequency of play

Frequency Factors	β	Std Error	Df	Sig
Intercept	0.393	0.497	1	0.429
Model	(-2 Log Likelihood)	Chi-Square	Df	Sig
Intercept Only	434.717			
Final	428.479 6.238		10	0.795
Pseudo R^2	0.016			
Overall Classification Accuracy	56.5%			

Reference group: At least once a month

Appendix 5h. Correlation Matrix - Six behavioural factors

Dimension		Factor 1 Proactive Responsible Gambling	Factor 2 Transparent Terms and Conditions	Factor 3 Customer Service (Reactive)	Factor 4 Self-exclusion and Self-help	Factor 5 Game Design	Factor 6 Player Information, Behaviour and Transaction
Factor 1 Proactive Responsible Gambling	Pearson Corr Sign. (2 tail) N						
Factor 2 Transparent Terms and Conditions	Pearson Corr Sign. (2 tail) N	.012 .840 290					
Factor 3 Customer Service (Reactive)	Pearson Corr Sign. (2 tail) N	.020 .731 290	-0.035 .550 290				
Factor 4 Self-exclusion and Self-help	Pearson Corr Sign. (2 tail) N	.044 .450 290	-0.051 .384 290	-0.072 .244 290			
Factor 5 Game Design	Pearson Corr Sign. (2 tail) N	-0.040 .498 290	.011 .846 290	0.030 .614 290	.024 .682 290		
Factor 6 Player Information, Behaviour and Transaction	Pearson Corr Sign. (2 tail) N	-0.002 .975 290	-0.023 .700 290	.026 .654 290	-0.040 .495 290	-0.016 .786 290	

Appendix 5i. Correlation Matrix - Motivation factors

Dimension		Excitement	Escape and relaxation	Escape and relaxation	Autonomy and Mastery	Social and competition
Excitement	Pearson Corr Sign. (2 tail) N					
Escape and relaxation	Pearson Corr Sign. (2 tail) N	-0.019 .707 378				
Escape and relaxation	Pearson Corr Sign. (2 tail) N	.081 .114 378	.001 .991 378			
Autonomy and Mastery	Pearson Corr Sign. (2 tail) N	-0.365** 0.000 378	.272** 0.000 378	-0.169** 0.001 378		
Social and competition	Pearson Corr Sign. (2 tail) N	.165** 0.001 378	-0.383 0.000 378	.027 .595 378	-0.352 0.000 378	

**   Correlation is significant at the 0.01 level (2 tailed)

Appendix 5j. Correlation Matrix - Factors that may cause gambling related harm

Dimension		Convenience	Privacy and anonymity	Availability of higher jackpots	Availability of better odds	Faster games	The fact that you are not playing with actual cash but e-cash (i.e. there is no physical transaction of cash)	You can play more than one game at a time	It is not as exciting as land-based gambling	There are better tools to help you gamble safer	Promotions
Convenience	Pearson Corr Sign. (2 tail) N										
Privacy and anonymity	Pearson Corr Sign. (2 tail) N	.458** 0 402									
Availability of higher jackpots	Pearson Corr Sign. (2 tail) N	.396** 0 399	.405** 0 398								
Availability of better odds	Pearson Corr Sign. (2 tail) N	.339** 0 402	.347** 0 402	.479** 0 399							
Faster games	Pearson Corr Sign. (2 tail) N	.522** 0 401	.405** 0 400	.473** 0 398	.500** 0 401						

The fact that you are not playing with actual cash but e-cash (i.e. there is no physical transaction of cash)	Pearson Corr	.426**	.347**	.442**	.378**	.486**				
	Sign. (2 tail)	0	0	0	0	0				
	N	399	398	396	398	397				
You can play more than one game at a time	Pearson Corr	.368**	.335**	.407**	.330**	.458**	.456**			
	Sign. (2 tail)	0	0	0	0	0	0			
	N	402	401	399	402	401	398			
It is not as exciting as land-based gambling	Pearson Corr	0.043	0.085	0.093	0.09	0.057	0.061	.216**		
	Sign. (2 tail)	0.396	0.092	0.065	0.071	0.258	0.222	0		
	N	400	399	397	400	399	396	400		
There are better tools to help you gamble safer	Pearson Corr	0.079	.144**	.151**	.180**	.110*	.119*	.147**	.358**	
	Sign. (2 tail)	0.114	0.004	0.003	0	0.028	0.017	0.003	0	
	N	401	400	398	401	400	397	401	399	
Promotions	Pearson Corr	.269**	.278**	.376**	.402**	.415**	.393**	.382**	.181**	.341**
	Sign. (2 tail)	0	0	0	0	0	0	0	0	0
	N	397	396	394	397	396	393	397	395	396

**. Correlation is significant at the 0.01 level (2-tailed).

*. Correlation is significant at the 0.05 level (2-tailed).   This is final version