

Building a responsible ecosystem: examining trust and responsibility in the gambling industry

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Abstract

Roulette, cards, casino, gambling - are words that most of us perceive negatively. Despite negative connotations, the global gambling sector is booming and provides even more immersive products vis-à-vis technological solutions. However, just like any industry, gambling providers are eager to embed corporate social responsibility principles of transparency (i.e. informed choice) and prevention of harm (i.e. control and duty of care). Despite existing research covering customer perspectives on the gambling industry's CSR initiatives and their failures to deliver meaningful responsible gambling provisions, the industry perspective is not examined. In this report, we address this gap.

The analysis presented in this report discusses the gambling industry personnel's views from the trust and trustworthiness perspective that belong to corporate management and CSR domain. It is important to note that the participants in this study were excited to share the insiders' voices which they feel are often not heard and very much neglected.

We discovered a dilemma that the corporate side faces – the dilemma of responsibility and fear of disturbing user/customer experience – a long-standing dilemma within the business literature of companies engaging with social responsibility and making a commercial success. In the context of online gambling, this dilemma lies within the technological capabilities to deliver seamless but safe experiences. It is clear that customer data is used in a sophisticated manner within the industry but with the intention to "keep the customer engaged". Despite being a heavily regulated and legally compliant industry, transparency and ethical practices are still an issue within the gambling industry, which inhibit an increase in trust towards gambling industry but also shifts responsibility for problematic gambling in the hands of the industry. Working in silos minimises opportunities for transparent processes where multiple stakeholders (i.e. financial institutions, NGOs, various divisions within companies) play an important role in fostering transparent and ethical

customer data sharing and data usage practices within a wider gambling industry ecosystem.

Keywords: Responsibility; Trust; Trustworthiness; Gambling industry; Business Ecosystems

1 Introduction

There is a growing concern about technology becoming a vehicle for a new kind of behavioural addiction called digital addiction characterised by obsessive, excessive and hasty behaviour (Ali 2018). Today online gaming (Balakrishnan and Griffith 2018), gambling (Wang 2018) and social media (Kuss and Griffiths 2017) are known to facilitate this kind of behaviour. Most research in this area has focused on the psychology of users and addictive symptoms explained by individuals' characteristics, e.g. personality traits, fear of missing out (Elhai et al. 2016), self-control (Osatuyi and Turel 2018) and even genetics (Hahn et al. 2017), or group behaviour factors such as peer pressure (Mascheroni et al. 2015), construction of social identity (Kaye et al. 2017) and impact of cultural communities (Fogarty 2017).

Existing research also covers aspects of technology-enabled in-gambling/gaming features that makes gambling much more accessible for a wider population of users and entice gambling customers to carry on gambling (Drosatos et al. 2018). In some cases, data-drive marketing and advertisement are used to invoke urges to gamble among these individuals who had engaged in responsible consumption by self-exclusion (Hing et al. 2014). This poses a question of how does the gambling industry define responsible gambling and the responsibility.

On the other hand, technology makes it easier for the gambling companies practice measures that are aimed at minimising excessive gambling, vis-à-vis responsible gambling features embedded within gambling products (RGFs) (i.e. informed consent, time and best limits) (Ladouceur et al. 2017). Some authors (i.e. Blaszczynski et al. 2014; Auer et al. 2018) evaluated whether such RGFs are in fact minimising the harm and excessive use of gambling. However, it is clear that at the heart of RGFs sits self-control that places responsibility for responsible gambling in the hands of gambling consumers – responsible gambling consumption. Responsible gambling consumption within offline and online contexts, which is well covered by existing research (Hing et al. 2016; Hing et al. 2018), fails to fully implement the concept of responsible gambling due to various issues associated with the whole notion of 'self-control' but also

complexities of the gambling industry business structures and contradictory in nature actions that prevent consumers to implement self-control (Hing et al. 2014).

In addition to responsible consumption of gambling ('a human body' customer side), academic definition of responsible gambling proposed by Hing et al. (2016) implies a responsible provision of gambling ('a corporate' industry side). Responsible gambling provisions are normally documented within the policies and practices of gambling operators and other industry players and primarily concern marketing gambling in the community (Parke et al. 2015) as well as already mentioned RGFs (Ladouceur et al. 2017). Despite these various industry and policy efforts in implementing responsible gambling provisions, a corporate side of the responsible gambling is not studied. Research on the role of digital services and their social-technical environment plays or can play in facilitating and/or combatting addictive behaviour is scarce (Ladouceur et al. 2017). We found only three studies (Delfabbro et al. 2012; Hing and Nuske 2012; LaPlante et al. 2012) in offline gambling context that explored the type of casino employees training around responsible gambling. These studies, however, have shown that such training failed to support responsible gambling provision, as employees could not effectively identify customers at risk. We yet to discover what the gambling industry does to implement responsible gambling provisions or how digital technologies are used by the gambling industry, to stimulate gambling addiction or prevent it?

Views of the gambling industry personnel should be captured to comprehend what responsible gambling provision means to the industry by, firstly, exploring how does the industry use the digital technology to interact with and engage in customers (research objective 1); secondly, what corporate social responsibility (CSR) actions are practiced within the industry to enable responsible online gambling including barriers and enablers to CSR (research objective 2); thirdly, explore the gambling industry personnel's views on the level of trust in online gambling sector (research objective 3). Research objective 3, in particular, would allow us to evaluate whether existing CSR actions are effective in relation to establishing a trust in the industry. Trust is seen as an ultimate target of any CSR initiative as it evidences a positive reputation for the company/industry and corresponds with the profitability gains as well as the viability of the company/industry. We argue that with the gambling industry having a long-standing negative image associated with the nature of gambling products, CSR actions powered by technology and transparent use of customer data for exercising a duty of care could potentially help the gambling industry to engage in meaningful responsible gambling provisions and, as a result, improve its negative image.

In this technical report, we present the analysis of interviews with nineteen gambling industry employees. The analysis presented in this report discusses the gambling industry personnel's views from the trust and trustworthiness perspective that belong to corporate management and CSR domain. It is important to note that the participants in this study were excited to share the insiders' voices which they feel are often not heard and very much neglected.

We discovered a dilemma that the corporate side faces – the dilemma of responsibility and fear of disturbing user/customer experience – a long-standing dilemma within the business literature of companies engaging with social responsibility and making a commercial success. In the context of online gambling, this dilemma lies within the technological capabilities to deliver seamless but safe experiences. It is clear that customer data is used in a sophisticated manner within the industry but with the intention to "keep the customer engaged". Despite being a heavily regulated and legally compliant industry, transparency and ethical practices are still an issue within the gambling industry, which inhibit an increase in trust towards gambling industry but also shifts responsibility for problematic gambling in the hands of the industry. Working in silos minimises opportunities for transparent processes where multiple stakeholders (i.e. financial institutions, NGOs, various divisions within companies) play an important role in fostering transparent and ethical customer data sharing and data usage practices within a wider gambling industry ecosystem. Gambling industry personnel realises that the only way to stay 'in business' is to win customers' trust and being transparent and ethical is a way towards building trust in the gambling industry.

2 Online Gambling and Responsibility

2.1 Online gambling and the concept of responsibility

Online gambling is now accessible to a wider audience and enhanced interactive features of online gambling products are expanding the number of players and those who eventually become addicted to gambling experiences. Hence it is not surprising to see economic growth and further forecasts for the global gambling industry to reach 495 billion U.S. dollars in 2019 (Statista 2018).

Roulette, cards, casino, gambling - are words that most of us perceive negatively. However, the gambling industry is heavily regulated with various policies introduced to protect customers, prevent gambling-related harm and increase transparency within the gambling provision and consumption (Ladouceur et al. 2017; Parke et al. 2015). Hence, the gambling industry is eager to integrate responsible practices via e.g. transparent product provisions (i.e. informed choice) and prevention of harm practices (i.e. control and duty of care policies and divisions). In 2004 Smeaton and Griffiths

conducted an exploratory study of 30 gambling sites and found that two-thirds of these had no evidence of implementing CSR practices and targeting vulnerable gambling customers. However, since then the situation has drastically improved, due to law enforcement, negative media coverage and financial penalties linked to unethical practices.

Back in 2013 Gainsbury et al. analysed 10838 survey responses of gambling customers from 96 countries. The survey has shown that overall customers mistrust online gambling providers and RGFs should be implemented to decrease the level of distrust, as more customers will be willing to engage with regulated gambling sites. In 2012 Yani-de-Soriano et al. (2012) argued that despite the historically built unethical image, the gambling industry

“... can gain legitimacy on the basis of their CSR engagement ... by meeting their legal and ethical commitments and behaving with transparency and fairness”.

Based on the survey of 209 UK University students, Yani-de-Soriano et al. (2012) came up with the list of recommendation for the CSR implementation in the gambling industry:

- Formalising CSR policies and reporting;
- Reducing advertising and marketing of the gambling products with banning of deceptive promotional techniques.

However, as highlighted earlier, the current studies are capturing the gambling customers' perspective without a deeper understanding of what exactly the gambling industry does in terms of the CSR policies implementation. This particular report aims to shed some light on the industry views.

Ladouceur et al. (2017) in their systematic review of all studies on responsible gambling provisions reported that there are four main practices or, best to say, technological features and tools that are commonly known and used by the online gambling providers. These are (1) self-exclusion programs that enable gamblers to ban themselves from further gambling experiences; (2) analysis of gambling behavioural characteristics based on betting activities and betting patterns; (3) pre-setting gambling limits; and (4) in-game features such as warning messages, time and cash display. However, a recent systematic review (Ladouceur et al. 2017) of effectiveness and impact of implementing such practices shows that responsible gambling and its provisions online are *“nascent and there are few principles of responsible gambling activities that can be considered “best practices”*”. In particular, Ladouceur et al. (2017) are calling for new studies and programmes to be introduced with the aim of

combating problem gambling within the ecosystem of efforts from different stakeholder groups. We argue that before responsible gambling design and programmes are implemented and evaluated, it is critical to define the concept of responsibility within an online gambling context. We also argue that in line with CSR definition by Bowen (2013), not only a consumer and a company, but all key stakeholders within the wider ecosystem are to work collectively to deliver positive benefits for society. Reilly, from the National Centre for Responsible Gaming (2017, p. 4) in her white paper for wrote:

Policymakers and the gambling industry should take a cautious and conservative approach to responsible gambling.... all stakeholders concerned about responsible gambling [should] develop science-based responsible gambling programs that are safe and effective.

2.2 Exploring responsibility through the trustworthiness dimensions

Responsibility is a broad concept and within the information systems domain is defined as a key practice area of implementing secure and user-driven technological solutions. This has alignment with but much narrower view than a business management definition of responsibility in the corporate social responsibility (CSR) domain. Within CSR a responsibility is defined as an obligation to pursue practice(s) that are map against positive values of society (Bowen 2013). It is critical to highlight the concept of values in this particular view of responsibilities. We argue that societal values are largely missing within conceptualisation of responsibility within the information systems domain and, in fact, within the online gambling context, where the focus is largely made on user personal values driven by the fulfilment of own tasks and needs. In line with this, Yani-de-Soriano et al. (2012) argued that when RGFs are in place many gambling customer experience an increase in trust towards the gambling products as being fairer and enabling them to engage in responsible gambling consumption. This trust, however, does not extend towards the gambling companies or the industry. The trust in the industry remains low.

According to Vlachos et al. (2009) at the heart of CSR is trust - e.g. trust towards a product, provider, a customer. It is clear that although trust towards a product is a possibility within the gambling industry via implement of RGFs that currently imposed by the regulators, trust towards a provider or the industry is not the case for the online gambling context (Yani-de-Soriano et al. 2012). CSR policies and activities should be aimed at increasing consumer trust (Bachmann et al. 2015). These also should be implemented within the ecosystem of different stakeholders, not just aimed at customers (Backmann et al. 2015). There are two important elements to establishing

consumer trust, the expectation in the trustworthiness of the organisation and behaviour of the consumer. So if the gambling consumer buys and engages with the gambling provider (the behaviour of the consumer), we could constitute that trust is present. However, that is not always the case.

Trustworthiness, the second element, is a multi-dimensional element, establishing which requires a much more responsible approach within the organisation (in this case gambling providers) and if established this can result in much longer-term benefit for the organisation, its business ecosystem and ultimately consumers.

Dimensions such as integrity (honesty and fairness), competence (skills and knowledge), benevolence (compassion and consideration of others' interests), managerial and technical competences, identification (connectedness of consumers with an organisation, or consumers' insight and knowledge about the organisation), and transparency (openness to sharing thoughts and information) are all critical to form trustworthiness (Dietz and Gillespie 2012; Pirson and Malhotra 2011; Schoorman et al., 2007). However, consumers weight these elements differently, depending on the products and services they consume.

In the case of the online gambling industry, transparency, for instance, could be viewed as one of the essential elements for building trustworthiness. Theory around trustworthiness dimensions (Rousseau et al., 1998) suggests that transparency leads to all forms of trusting behaviour, (1) cognitive (knowledge and opinion about the organisation), (2) relational (emotional connection with consumers) and (3) action-based (actual engagement with the product/organisation). It is clear that transparency, through informing and educating consumers, leads to various forms of positive behaviour but overall acts as a foundation for meaningful and long-term relationships with consumers. Any lack of transparency, miscellaneous untruthful claims lead to immediate consumer trust erosion, repairing which might become an impossible task (Bolat et al., 2017). As reported by Yani-de-Soriano et al. (2012) and Gainsbury et al. (2013), gambling customers see the gambling industry as unethical and manipulative. In this study, we are using the trustworthiness dimensions to evaluate the gambling industry personnel's perceptions of the industry's trustworthiness.

3 Methodology

In this technical paper, we particularly were interested in exploring the gambling industry personnel views around responsible gambling provision and CSR actions undertaken by the industry with a particular emphasis on trust (for reasons justified in Section 2).

3.1 Participants

In our study, 19 interviews were conducted with the gambling industry personnel with various degrees of experience of working in the industry and different roles and responsibilities. We used the hybrid non-probability sampling via contacting known to the lead researcher (RA) gambling industry professionals (convenience sampling) and then identifying further contacts through the interviewees (snowballing sampling). The full profile of the participants is presented in Table 1.

Table 1. Participants profile

Characteristic	Details	Number of participants
Sex	Female	2
	Male	17
Geographical location	UK	10
	Sweden	3
	Netherlands	2
	Malta	3
	US	1
Years of experience in gambling	< 5	6
	5 – 10	9
	> 10	4
Roles and responsibilities in gambling	Marketing and advertising	1
	Strategic management	1
	Product owner	3
	Customer service	1
	User experience architect/designer	3
	Technology officer	2
	Software engineer	2
	Information / web / business analyst	4
	Responsible gambling research	1
	Compliance	1

Majority of interviewed gambling industry personnel are male and have had up to 10 years of experience. These that are the most experienced have had various roles and responsibilities. One of the interviewees, for instance, in the past acted as therapist and counsellor and currently works in customer service. Few interviewees shifted from being a web developer to being a product owner, responsible for both *“the commercial aspect of the business and the technical aspect of the business”* [Product Owner, Male, Sweden]. Majority of the gambling industry personnel interviewed in this study work in

the UK but one comes from the US and few - from the EU, Sweden (3), Netherlands (2) and Malta (3). The detailed profile of each participant is presented in Table 2.

Table 2. Detailed profile of participants

Participant ID	Sex	Geographic location	Years of experience in gambling	Roles and responsibilities in gambling
I1	Male	UK	< 5	Marketing and advertising
I2	Male	UK	5-10	Information / web / business analyst
I3	Male	Sweden	> 10	Strategic management
I4	Male	Sweden	5-10	Product owner
I5	Male	UK	< 5	Information / web / business analyst
I6	Male	UK	< 5	Information / web / business analyst
I7	Male	UK	5-10	Customer service
I8	Male	UK	> 10	Compliance
I9	Male	UK	5-10	User experience architect/designer
I10	Male	Sweden	< 5	Product owner
I11	Male	Malta	5 – 10	User experience architect/designer
I12	Male	UK	> 10	User experience architect/designer
I13	Male	Malta	< 5	Product owner
I14	Male	UK	5-10	Technology officer
I15	Male	Netherlands	5-10	Software engineer
I16	Male	Netherlands	< 5	Information / web / business analyst
I17	Male	UK	5-10	Technology officer
I18	Female	US	> 10	Software engineer
I19	Female	Malta	5-10	Responsible gambling research

3.2 Data Collection

The semi-structured interviews with the gambling industry personnel lasted ~1 hour and were remotely conducted using teleconferencing services during July - September 2018. All three authors were involved in this data collection phase. The interviews with the gambling industry personnel began with the interviewees being questioned about their profile (i.e., expertise and experience in gambling). Afterward, the interviewees were about their views and experiences around responsible gambling provision and views on trust towards the gambling industry. Most interviewees were very happy to take part in the research and express their views. They appreciated questions regarding the image of the industry and wanted their voices to be heard.

All interviews were audio recorded and transcribed verbatim. Data collection and analysis of data was conducted with full compliance of the Bournemouth University's Research Ethics Policy by formal ethical approval prior to data collection and by collecting a written and informed consent from all of the interviewees who participated in this study. To maintain anonymity and confidentiality, as per Table 2 each participant is identified with the abbreviation [I], followed by the order of the interview, i.e. [I1].

3.3 Data Analysis

Data from the interviews were analysed using thematic analysis (Braun and Clarke 2006) but using a three-stage coding process. The second stage required engagement with the literature and pull of empirical codes to determine sub-themes around the responsible gambling provisions, as per views of the gambling industry personnel. The third stage involved the identification of key themes that integrate all the sub-themes identified in the second stage. The analysis was carried out by the first author (EB) and was conducted and recorded using the qualitative data analysis software, Nvivo 11. In the following Section 4, we present the results of this analysis.

4 Results

The first stage involved the line-by-line reading of words, phrases, and sentences to determine empirical codes. In total 128 codes were created as a result of the first stage coding. The 128 initial codes were sub-grouped into 27 sub-themes as a result of the second stage coding. Four key themes were identified as a result of the third stage coding process:

- I. Data-driven marketing;
- II. CSR practices;
- III. Barriers to and enablers of CSR;

IV. Trust.

In the following sub-sections, we present the key four themes against the three research objectives outlined in the introductory section.

4.1 Use of data-driven marketing to engage the customers

Data is the new currency

In the era of technology-enabled solutions and considering the online nature of gambling provisions today, it was not surprising to see the emphasis made by all of the participants on the data-driven marketing techniques within the industry. This has been emphasised by all of the interviewees. It is apparent that data plays a critical role in the business of gambling:

“Data is the new currency when it comes to marketing and the more information you know about a customer, the more valuable it becomes to the business.” [I1]

Such an approach seems to be essential and needed for all online businesses:

“Basically, they have a collection of information not exclusive to gambling companies, it's happening across all online businesses essentially, they have a wealth of information they collect.” [I5]

It is also emphasised that the collection of data is not of benefit to the business profitability only but critical for the user (gambling customer) experiences:

“I don't think it's necessarily a bad thing. I know that the ulterior motive of e-commerce websites is to make money, but the more data you have, the more able you are to provide a service that is what the user wants.” [I5]

“Marketing-wise, I do not see a problem with using data as this is done by everyone.” [I13]

Fuelling the acquisition and retention strategy with the correct data

Data sits at the heart of data-driven marketing processes within the gambling industry, as acknowledged by participants whose work directly involve marketing processes (i.e. I1), information analysis (i.e. I2 and I5) and those who are software engineers (i.e. I15). In particular, data is used to engage customers with the gambling products and segment the customers based on their profiles – data-driven segmentation that divides the customer journeys into acquisition and retention phases:

"I would analyse and identify different trends to initially segment different customers or users into buckets. These buckets will be identified as people who have an affinity towards a certain sport like football betting or horse racing or Formula One, or it could be that they are in a particular life stage and they have just made their first deposit and we are wanting to encourage them to make their second deposit or it could be that they have shown signs of leaving the company or the websites and we want to put these users into buckets so that we can pass that on to the marketing teams so that they can target them with customized messaging to ensure that we are fuelling the acquisition. That's like acquiring new customers and retention, retaining existing customers. Fuelling the acquisition and retention strategy with the correct data." [I1]

This particular quote describes complexities of processes behind the data-driven marketing where monitoring is required to identify behavioural changes that the gambling consumers go through as well as continuous marketing and customer services work is involved to keep the customers engaged. It is critical to highlight, however, that such data-driven segmentation and use of data to maintain customers engagement are conducted in compliance with regulation (i.e. GDPR) where customers consent is part of the customer profiling:

"We are not sneaking in the messages to try to hit and try our luck with converting players across the brands. This is something that is clearly communicated during registration, for example. The players can change it at any time from their account, from their profile. They are well aware that they can opt-in and opt-out of this marketing cross initiatives." [I10]

The participants who are involved in the analysis of customer information have acknowledged that profiling and data-driven marketing are business-oriented strategies to increase the number of customers and keep customers 'engaged' with the gambling products. This, however, presents an internal conflict where keeping engaged to generate revenues and in some cases targeting 'vulnerable' customers is justified by delivery of 'seamless' customer/user experience:

"I think there was a silly diagram somewhere that said that every single data point that we capture for a customer is worth £50 for the business, and if somewhere I don't think it's £50 but if somewhere that definitely feel like it's more valuable because our core areas is to personalize customer journey from the moment they step into the store to the point where they log in online, to the point where they make the first transaction or the last transaction. We want to make sure that the entire journey is personalized and make customers feel

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valued and I think that's starting to bridge the gap between user experience and data and collection." [I1]

"On the website and we've got a marketing team that focuses on getting customers in, obviously, and a lot of what they do is getting a customer so-- I suppose it works like any other business. They try to get repeat business. Sometimes it can seem a bit like, once they're in, let's try and trap them in. Which obviously doesn't sit well." [I3]

You have the customer focus where you are trying to minimise harm

With the internal conflict present within the gambling industry, it is acknowledged that the gambling industry has to handle data responsibly with available tools (i.e. add blocker) or within a responsible ecosystem with other stakeholders (i.e. media centres):

"When it comes to more responsible gambling in my area there are a lot of initiatives from an academic point of view so there is anonymised data to better understand customers, to protect. Then you have the kind of main of initiative like and this ad blocker I mentions, collaborations with medial centres somewhere on the social aspect then you have the customer focus where you are trying to minimise harm but detecting by offering a assistance by not offering bonuses to player but offering the possibilities to closing the account that sort of thing." [I19]

Participant 2 adds that data-driven segmentation and profiling aid responsible gambling provisions with the promotions to be done *"in the right way"* and reflecting *"what is right to that individual"* customer:

"I don't necessarily think there is anything wrong with tailoring a promotion to a particular customer or customer segment. But I think if there is a promotion that is offered, it shouldn't just be based on the profile of the customer. It shouldn't just be kind of the profile of the customer to drive a particular type of behaviour. It should also be reflective of that customer's risk. It shouldn't just be, "This customer bets a lot with us so therefore we should give them more promotions to encourage betting." It should be reflective of that, "This person bets with us a lot, is that the right behaviour for that customer?" If that customer is behaving in a way that there might be a lot of activity but is that unsustainable amount of activity for that individual, so you could argue not promoting to that person at all would actually probably be a better response to that." [I2]

It is evident that data-driven marketing plays a dual role in the gambling industry. In addition to boosting sales and improving customer experiences, with the right tools it

has potential to detect vulnerable customers, stop further promotion and, hence, minimise harm:

"I think that very much depends on how responsible an operator is. Because ultimately if they are sending responsible offers then, well they've got to be appealing obviously but if they are sending responsible offers another challenge is how well the data has been collected and segmented so the people who are at shouldn't be in that segment to receive that offer." [117]

4.2 CSR practices employed by the gambling industry

As per the previous section, responsibility is very much on agenda of the gambling industry. The industry personnel is emphasising the 'making money more ethically' aspect that is a now and future practice to be adopted:

"Taking the lead on all things responsible gambling related fundamentally businesses exist to make money and he has his business to consider and conquered away from it, businesses are in the industry to make money but that doesn't mean we can't make it ethically and we can't make it the right way. Maybe that means a little bit less revenue in the short term." [18]

All the interviewed participants are aware of the CSR activities and practices that are in place in their own companies or generally practiced by the industry. CSR is highlighted as a path to building a much more positive image which should be a priority, as it would deliver long-term results – much more beneficial for the industry as opposed to short-term monetary gains:

"Yes, I know that the business is going to change in trying to make itself more socially responsible, which is great." [15]

Participant 7 highlighted that "focusing on healthy" and "happy customers", "providing a safe environment for people" is beneficial for the industry and its beneficiaries:

"It's just about making sure you make money in the right way and I suppose that's what the gambling industry needs to get across that making money is a good thing, it's good for the company, it's good for the country, it's good for the employees within the industry, it allows us to innovate, it allows us to do things differently. Making money is not the wrong thing to do. Treating customers fairly, treating customers right, make sure that get what they're expecting, make sure they know what their expectation they are expecting." [17]

There are various CSR activities practiced in the gambling industry that were mentioned by all of the participants. These are:

- (1) Corporate communication to emphasise responsible gambling provisions. This comes from internal messages from CEOs:

"We did have a message from the CEO saying we will be pushing very hard to make sure that we're protecting our customers essentially from themselves." [11]

or company-wide understanding of socially responsibilities to be actioned by the company and/or the industry:

"It's all to do with communication, and we all have to be on the same page, and that's where we do these workshops. We have meetings every week or so to make sure we're on the same page and that's what we're doing next week because we're flying people from their offices, that's how serious we are. We don't do Skype calls and all that. We're doing face to face. Then we have as many ideas as we can and what is feasible and technically possible." [19]

Such practices are elementary CSR provisions to be adopted by businesses and already well documented by the responsible gambling literature.

- (2) Company-wide involvement with charitable and sponsorship work:

"We got a deal to sponsor the football league so I would say in that case we would pay that money back to society to the sport society at least." [111]

"What we do it's a little bit outside gaming but we have three corporate social responsibility days a year for employees so you can do any kind of charity work and the company will pay your salary for those days." [13]

It is clear that employee engagement is quite often part of CSR initiatives and practice. However, as participant 8 (18) notes, a lot of such charitable involvement is not really publicised by the industry:

"I know the gambling industry donates a lot of money to good causes, without screaming for any publicity." [18]

Moreover, many participants emphasised particular work related to tackling gambling addiction by supporting and funding charities and research:

“I think that's a very difficult thing to evaluate. I know that the gambling industry does do a lot of work directly with kind of, well, not anti-gambling charities, but sort of like recovery charities and a lot of work in the area.” [I16]

“Many companies have roles of corporate social responsibility. When I have been working in the charity sector in gambling therapy, I had a lot of companies that were really helpful and they wanted to get involved in projects. There were other companies that didn't want to get involved, for example. In my current company, it's one of our objectives for all employees to be involved in corporate social responsibility.” [I6]

The latter quote highlights the dilemma of the gambling industry of trying to be responsible but at the same time lacking support from their business ecosystem that includes charities and non-profit organisations that tackle gambling addiction. It is clear that the gambling providers are willing to be involved and understand the gambling-related harm by cooperating with the charities. Such efforts, however, are not reciprocated by the charities.

As a move forward from such paradoxical situations, some gambling companies are noted to form alliances that support gambling addiction-related work:

“I might have this wrong but there is a group of gambling companies, the major ones in the UK I'd pretty much say. For example, things like responsible gambling, and when the funds stop, that's a movement from the gambling companies to carry on supporting gambling addiction research and work. They fund things like Gamble Aware I believe, as an industry, when you look at that, and I don't know what you would compare it to but I would probably say, you go look at industries like alcohol, tobacco, so why are they consumed products that are known to be bad for you to some extent? Right? Such companies do not do half of what the gambling industry does.” [I6]

- (3) Adoption of responsible gambling features (RGFs), referred to as ‘red flags’, such as self-exclusion, time and money limits and customer profile checks:

“Our system has red flags in place to make sure that if a customer is exhibiting higher than normal betting frequency or they are depositing money that's outside of their means because obviously, we do have checks to make sure that we have a solid idea of how much money a person is able to spend with us... We also have a self-exclusion option. This means that all customers, this is more induced by the customer rather than the company, but if the customer feels like they are losing their grip on the situation, then they can exclude themselves from the site for an X amount of days or X amount of months before they feel that they are ready to get back into it. Once that flag has been raised, then we immediately exclude them from any betting games or any of nature as well as we exclude them from any marketing communications as well, we stop sending them emails, texts, on-site banners, popovers, anything of the sort.” [11]

RGFs are part of the regulatory requirements but it is clear that the gambling industry personnel acknowledges the reasoning for making the gambling products more responsible and understand what are ‘must’ features of the modern gambling products.

- (4) Gambling literacy that incorporates work with schools and education on the negative impacts of excessive gambling is also practiced by some of the gambling companies:

“I know gambling organisations that work with schools to help develop skills within those schools from a cordon perspective.” [18]

Participant 7 (17) stated that gambling literacy perhaps should be embedded within responsible gambling provisions:

“At some level, the industry should have been more proactive in educating their customers and look at the long-term impact of telling customers about the side effect of gambling.” [17]

In addition to the above-listed CSR initiatives, one participant (15) has also mentioned that in his company they have a dedicated team that implements all CSR initiatives including transparent approaches to data sharing and using data to inform and educate customers:

"In our business we've set up a sustainability team that focuses specifically on problem gambling and ways that we can, I suppose re-built the trust that's been lost. I mean since I've been here for the last six months or so, there's been a lot of effort from people in that team to focus on ways that we can help customers and make ourselves aware or socially responsible. Like I said, about giving ways of users to track their data and just allow them to get more information, those sorts of things." [15]

Moreover, it is also evident that the gambling industry personnel agree with the fact that responsible gambling involves the responsible gambling consumption. All the participants we have interviewed share this view. For instance, participant 6 (I6) was debating about whom the responsibility of making substantial losses, while gambling, lies with:

"On those grounds, if someone has lost £20,000 and there was no intervention of any kind or no-- They can identify it and then that's an issue to the business but then, it's the responsibility of those at the gambling company and the responsibility of the consumer. I guess what preventive measures do you think could have come into place in that scenario because I haven't seen this article you're referring to? It's a tricky one because whom do you think the responsibility lies with?" [16]

Self-imposing was highlighted by the majority of participants I2-I8, I12-I17. It was however questioned as being ineffective but unavoidable as consent to data sharing and use is in the hands of customers.

4.3 Barriers to and enablers of CSR

Barriers to CSR

In addition to previously mentioned lack of cooperation with the wider gambling industry ecosystem (e.g. with the charities), there were two main barriers to the implementation of meaningful CSR actions, mentioned by the participants. These are lack of transparency and profit versus responsibility dilemma. Lack of transparency was linked to the fact that the responsible gambling provisions should be adapted to a wider ecosystem of data sharing:

"Maybe there should be more of that, maybe there should be, "Can we also get your latest payslip," or something on those lines. Maybe that to be optional. You could use that person's information but you can make that optional to the point where, "Look, we won't pester the information because we want to help. Just in

case we feel like you might be putting yourself to risk, we'd like to go to intervene. This would improve our ability that's to identify and intervene." [12]

Turning 'a blind eye' to problem gambling, unfortunately, was a common aspect mentioned by the majority of the participants:

"If the customer is betting or depositing money regularly and has been consistent over the last year, we might see that as a perfectly healthy customer but what we might not know is that even though they're behaving consistently, they are consistently getting further and further into debt. From a pure data perspective, we're going to continue sending them promotions and special offers but from a human point of view here, this is a solution that we can't seem to fix at the moment and maybe corporate greed is just as turning a blind eye to them." [11]

"Sometimes, gambling companies, I would say less than now but more so maybe years ago, they might have been turning a blind eye to this kind of stuff." [16]

"I think there's a historical bias and I think the big operators they have focused on short-term profit." [17]

Nevertheless, it has been highlighted previously that the gambling personnel recognises the long-term benefits of prioritising responsibility for profit gains. Moreover, lack of cooperation within the wider industry ecosystem could explain the lack of enthusiasm for a meaningful change.

Enablers for effective CSR

Despite all the major barriers to CSR initiatives, the gambling industry personnel we interviewed proposed few interesting suggestions on how to enable much more effective CSR measures within the gambling industry. In particular, it was proposed to "rethink the relationships with media":

"I think we are a bit behind the queue on this. The reality is the gambling industry is losing the publicity even if it does a lot of good. I see from the media industry, a lot of support for local community but I don't think the gambling industry has many friends in media, in parliament and it's up to the gambling commission, the gambling industry to actively demonstrate the good that it's doing.... I think the gambling industry has to recognize all that and work harder and smarter to build that trust back up and we are starting to see some of the

beginnings of that now with XXXs new campaign, also the Scandinavian organisations are really pushing that side of things hard." [18]

"I don't feel comfortable to say this, but, thank God for these incidents. Because I think authorities don't have their ear to the ground when it comes to real gambling problems. I'm not talking about the player that loses 400,000 in one blow and then the company tries to hide it and tries to offer him better bonuses. I'm talking about the average Joe, who just about, puts enough money to put his family into jeopardy. He slips beyond the net and then basically, the company's happy, he's happy because he doesn't know he has an addiction, and there are many people like him. I'm not talking about these as isolated incidents, I'm talking about the average Joe. When these isolated incidents happen, they are the catalyst for legal action, because, of course, they create a lot of controversy on the media. There should be more channels where the data is monitored and a clear picture of what is happening is painted basically. Companies like us have a part to play, a very big part to play in that." [110]

It is clear that relationships with the media, relationships with charities are not managed in a right manner to truly deliver a responsible gambling provision.

Moreover, complimenting what has been said in relation to the theme I (section 4.1), *"rethinking how you are targeting customers"* was also mentioned as a way to deliver responsible gambling provisions that benefit customers and restore the industry's image. Quotes from participants 5 (I5) and 13 (I13) present a detailed explanation to how this should be done:

"Suppose moving forward, you should probably rethink how you're targeting customers. The way that marketing is going, you can target people based on their locations that perceived demographic in a sense of that how much money they are making. If we can get that target marketing, then you shouldn't be targeting people in poor areas... The way that these marketing systems work, usually they've got so much data on. It's not just gambling data they get but based on all different systems. It's like Google and et cetera, or the big data companies, they can make a guess as to who they think-- basically, put customers in buckets and say that this person is likely to be from an A, B, C, or D background or something like that. Also, obviously, it isn't perfect, but it's something that you can target people based on how much money you think they might have to spare. If clients do that, then it makes sense to not target people with low income in that sense." [15]

“Gambling companies have been much more diligent in how they are targeting people. The problem with it is, how do you determine those, they have a success rate to try and identify some gamblers off behaviour but you can't always get it right.... Then you need to be able to take that survey so I would survey, let's say your customer base is 100,000 people online, you want to survey maybe 10 to 20% of those people. Let's say you can append that data back to transaction information then you can begin to identify customers. This person has been identified as average, this person has been identified as right, what are the differences between the two?... Then you can use predictive modelling to say, "Right, so and so has increasingly stakes, the stakes increased a lot going up exponentially. This is what we proof to identify as problem gambling behaviour." That's what you can do with the current data. Another option would be alternative, proof of funds before they signup. You can maybe place a small bet there eventually, they're going to ask you, you need to have provided proof of your address, proof of data, proof of identification, maybe a photocopy of your passport and they'll let you spend all you have.” [I13]

4.4 Trust and trustworthiness: the industry evaluation

All participants also felt that there was a lack of trust in the gambling industry due to its historically and media portrayed 'evil' image:

“There's a lot of people with the opinion that gambling is bad and is evil. Of course, I don't think they're going to view it as ethically compliant because they will feel that the reasons that they think that gambling is bad means that just by doing what they're doing is unethical.” [I4]

Participants also felt that 'fair experience', 'customer control' and 'good intentions' are critical elements of customer trust in the gambling industry:

“I guess trusting for me, trusting a gambling brand is about not feeling like they'll rip you off potentially. That for me, a lot of them there can be stuff like promotions and offers that are a bit just a bit crap. Tied up in loads of terms and conditions, which means you will never actually be able to walk away with money. They're written in a way where there can be sometimes room for misunderstanding which means you can actually chase your money back, the problem is it's a long painful process. I would say that kind of stuff. In terms of information provided to me, I don't need much. I would just make sure that they pay out and they're not trying to rip you off.” [I6] – fair experience

“For a customer to trust a gambling company, I think it would be for the customer to feel like they are in control of the situation, that they are not being influenced by advertising and promos and enticing offers, that the company is operating in a very neutral and objective manner and another customer is making his or her own decisions without the influence.” [I1] – customer control

“The idea for me of trust is that people would do stuff with good intentions. If I ask something of a person or a company or they ask something of me, that it's going to be used in a way that it's not harmful to me. That is within the boundaries of the agreement of what you're doing. If I'm giving you my contact information, for example, for the purpose of you contacting me, that's great, but I'm not giving it to you to give to someone else just as an example. It's this idea that you will do what you would describe as the common sense thing would be to do or the way to act would be the way you would expect people to act and the way you would like people to treat yourself if you were to do this to someone else versus if someone were to do it to you, what would you want out of this?” [I4] – good intentions

Such elements are underpinned by the complexity of trustworthiness with its multi-dimensional nature (Bachman et al. 2015; Dietz and Gillsespie 2012). Overall, we found that 19 participants see the industry as (see Figure 1 for the overall analysis of trustworthiness dimensions):

- Dishonest and lacking integrity and fairness (dimension 1).

“The problem stems quite further into human society in general. It's this whole lack of accountability and the concept of hyper-normalization. At first, when I accepted this job, it was quite difficult for me to process this information that I may-- It's not the most noble profession. Within weeks, I loved it because it was such a challenge for me just from a data perspective. I don't see the other side, the dark side of it. I simply see ones and zeros, an interesting problem I need to solve, a slightly obscure trend that I've somehow detected. It becomes a bit of a challenge and a game for me. A lot of us have this way of compartmentalizing our job to the bigger picture. That's how we deal with that moral dilemma. Yes, I'm not proud of doing this job but if I don't do it, someone else will. At the end of the day, every company is out there to influence and borderline manipulate our customers.” [I13]

Moral dilemma is something many gambling employees are highlighting. They do enjoy their specific responsibilities and roles, find these enjoyable and challenging. However, outside of their own work they do realise the overall negative perceptions associated

with the gambling industry. It also clear that many of the dishonest practices are established historically:

"I see stuff like where organisations and actually the gambling commission and CMA was for the last 18 months or so, was indicative of about where organisations are allowing people to gamble, win money and then not paying out and relying on poorly written terms and conditions as a rationale for not paying out, and avoiding the bet. I think because they've got the systems available to them, if you happen to rely on terms and conditions for why you are not going to pay out winnings then you are on a pretty weak front to start with." [18]

- Despite being altruistic (via charity work and supporting research and regulatory efforts to combat gambling addiction) but suffering from 'profit versus responsibility' dilemma, participants view the gambling industry as not ethically compliant (dimension 2):

"I'd say no. I'd still say if you call it historical or whatever, it is not considered one of the cleanest industries, it's like alcohol and anything like that. It's very hard to be ethically compliant in the industry of gaming." [16]

As per narrative around dimension 1, many of the unethical practices are historically established 'business as usual' practices but also the 'taboo' nature of the products sold.

- Legally compliant due to regulations, sanctioning and licensing aspects of the modern gambling industry (dimension 3):

"Actually think because of the government especially the UK, UKGC government commission has taken quite a stand on this and now coming down on problems. It forces companies including us to be better and we get chased. That's obviously, I don't think you have much of a choice because you lose your games license if you don't comply. It's very good that the government comes in and put more pressure and more demand on this kind of things. At the end of the day, it's all about the license, if you don't have a license you can't place legally for the gaming and then become an illegal operator, which at least our company doesn't want to be." [13]

All 19 participants highlighted that the gambling industry is one of the most heavily regulated industries. However, lack of cooperation with media, charities and other stakeholders within the wider industry ecosystem prevents establishing the responsible image.

- Managerially and technically competent (dimension 4):

"Yes, I believe so. From my small experience, because we are handling a lot of money, we are handling a lot of transactional data, and in some ways, we are under the microscope more so than any other vertical. We have to be competent in our roles individually and as a group to make sure that things are done in the best way possible." [11]

In particular all 19 participants take pride in level of expertise and creativity employed by the gambling industry highlighting state of the art technological solutions (technical competence), marketing and customer service practices (managerial competence). It clear that data is at the heart of such competent image and acts a foundation to seamless customer engagement. It is also evident that much more innovation is driven by the regulatory requirements (i.e. RGFs, GDPR) imposed on the industry.

- Largely linked with the certain types of customers (i.e. male, interested in sports) (dimension 5):

"Then there's obviously the gender split which is much more male-focused in our industry both on that. Especially on customers, but also under on the staffing side of it too. Even though we're becoming more and more equal but I think it's still 2/3 males and 1/3 female in this company. Again, because of the interest in the product. I think more males will get into the industry than females, still." [13]

"From a customer perspective, I think especially with sports products, so people that like to follow sports might be more interested in placing a bet on the match to make it a bit interesting to watch the match because they're watching the match anyway." [17]

Many employees agree that online context expanded the customer markets for the industry with many non-tradition (male, interested in sports) customers engaging with the gambling products. It is seen as a plus for business profitability but at the same time creating more risks in terms of reconceptualising the typical customer profile(s) and hence a need to understand further the gambling addiction and these who can be affected by it.

- Impervious and being reluctant to share information and be open (dimension 6). Three interviewees (all being working in software engineering and user experience design – I1, I4, I8) admitted that a great amount of data available could be used 'wiser' to ensure faster and responsible actions to prevent a harmful consumption of gambling products:

"My instinct is that the answers are probably more "no" than it is "yes", just because of the nature of gambling, and turning a blind eye to it is probably the unspoken motto. That's probably across the entire vertical. At the same time, the legislation or regulations are becoming more and more strict, and more and more specific, so at the same time, the issue is being addressed. Whether it's happening quick enough, I don't know, and I can't say. I think that we all are becoming more and more transparent, especially, as I keep going back to the GDPR, now we are obligated to provide every single data point for a customer if they chose to request it. That sort of transparency is a step in the right direction and hopefully encourages more of it, basically." [11]

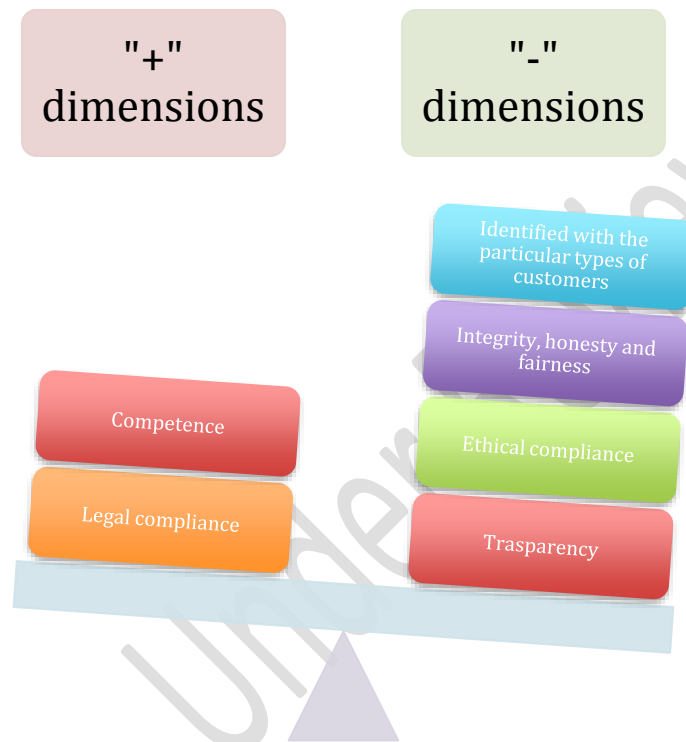
Once again lack of transparency is well linked to already mentioned 'blind eye' practices, historically adapted and quite rooted within the industry. Participant 4 (I4) in the follow up long quote described the problem in a great detail:

"No, I don't think so. Maybe this is more of personal opinion. The casinos, they don't share everything you would want them to share. For example, if you go to a casino and ask them, depending on where you go, if you're online, a lot of slot providers will tell you the RTP of the game. Not all of them do that. A lot of land-based casinos, they're supposed to tell you the RTP of the games, but they make it very difficult. There's a lot of cases like that where I feel like they don't want to tell you the information. They're not deliberately lying to you but they're trying to polish everything up and make it look a bit shinier than it is sometimes. As I said, they will hide all of that. You've got these terms and conditions things that are actually really important, but they hide that in the websites and just present you with the glorious lobby like, "Hey, why don't you play with us? It's going to be super fun." They're not very good at being open about all the details. They're not very good about sharing information on the games with players. They just say, "Here are all the games, we're going to recommend these ones to you. We're not going to tell you why we have recommended them to you." Is it because they're lower RTPs or make more money off you or is it because we think they're going to be more fun for you? I don't feel they share a lot about their reasoning, why they do things with people." [14]

The participants linked the last dimension (dimension 6) to other trustworthiness dimensions highlighting the importance of establishing transparent and accountable business practices in the gambling industry. They felt that lack of transparency would lead to the industry being seen as less competent, particularly in technical terms. GDPR compliance, broadly emphasised by all interviewees, were seen as an insufficient and quite passive measure of data management. As discussed in the previous sub-section

(4.2), participants suggested that accountability and rethinking data handling should support the industry's corporate and socially responsible measures.

Figure 1. The gambling industry trustworthiness evaluation: the industry personnel's perspective



All interviewees, despite acknowledging historically built negative image of the gambling industry, felt that a lot can be done by the industry to enhance their corporate social responsibility by promoting responsible gambling and building trust amongst the public and customer, which is a more profitable strategy in the longer term. Five actions were identified as key to building trust in the gambling industry:

(1) Image 'whitening':

"We actually have specific teams in the company that works in improving the situation and having a lot of workshops and learn improvements and decides on our behavior, how our customer service handles things. We are definitely doing things internally a lot and there's quite I would say the clear thing that the image of this company is to be, we call it, I'm sure white is the right word, but you know you're not in a grey or black zone. That you're very clean in your behavior and stuff. That's always been a thing that our company is trying to do."

[13]

This corresponds well with the themes II and III (sections 4.2 and 4.3) and trustworthiness dimensions (current section) where historically rooted practices, the nature of the gambling product, and hence the 'evil' image led to the paradoxical environment where many of linked stakeholders who can support the gambling industry with providing the responsible gambling are not cooperating (i.e. media, charities).

(2) Sanctioning:

"I'm hopeful because of action by the gambling commission, because of action within the industry, that if we look back in 12, 18 months is a completely different picture. I know of one organization whom the customer won half a million-pound check very recently. After all the mandatory checks, the EML, etc. They paid virtually immediately and they wouldn't have done that six months ago, three months ago even, probably six months ago, they would have to face the payout and I suppose for me, it's just an indication of some of the cultural shift. They were paid I don't know 100,000 one month and 100,000 the next month, and then 100,000 pounds a month after that, and stagger it that way in the hope that the customer would spend the 100,000 execution if they actually paid out straight away. It's a small thing but it's a positive thing for me to see." [18]

Sanctioning is already well used to punish unethical and illegal practices in the industry. According to our participants sanctioning reassures the customers that they are protected.

(3) Transparent sharing of data:

"We let them know who you are so that if you register with them that we can keep track of what you're doing so that we can help you out even if you're playing across multiple casinos." I think that is definitely very interesting. I haven't thought about it enough that I would want to say it would solve a lot of problems. For me, I believe that the more information that we have, the more potential we have to do good things. There's also the potential for things to do bad things as well. We have to be extremely careful. By sharing it, the more information, we get more ability to act upon it." [14]

As per discussion of trustworthiness dimensions, it is clear that transparency is the first step to recovering other, negatively perceived, trustworthiness dimensions. However,

such transparency is only possible with the a closer cooperation with other stakeholders within the gambling industry ecosystem.

5 Discussions and conclusions

The analysis of the gambling industry personnel views and experiences provides valuable insights into what CSR practices are in place in their gambling companies. It is clear that CSR initiatives are prioritised by the gambling industry and seen as a strategic priority to benefit the industry in the long-term. This is a different finding from what existing research present as customers' perspective CSR initiatives of the gambling industry (Yani-de-Soriano et al. 2012; Gainsbury et al. 2013). It is also clear that in line with the definition of responsible gambling, the gambling industry personnel specifies the responsibility of the customer which is largely associated with currently imposed by the regulators RGFs, but these being quite ineffective in minimising gambling-related harm.

Responsible gambling provisions, however, are positioned on a continuum of two conflicting ends where financial gains are always in conflict with responsible provision practices. This is also the case for the data-driven marketing practices used by the gambling industry to increase profitability but, as suggested by the participants, such practices could potentially be effective in delivering the meaningful responsible gambling provisions. This particular finding is important to highlight and note for future managerial, policymaking and research implications.

Trust is a foundation to business sustainability but our results show that largely the gambling industry is seen as being untrustworthy. Despite it being seen as managerially and technically competent as well as legally compliant, some key dimensions such as transparency are yet to be rethought and repositioned to potentially build trust towards the online gambling industry. All participants we interviewed emphasised the significance of transparency if the industry to move forward and 'whiten' its image.

In terms of the limitations of the current study and potential future research, it is apparent that the gambling industry is a multi-stakeholder sector that operates in a complex ecosystem with various key players that are key to auctioning transparency dimensions (Bolat et al. 2018). These are the existing partners of CSR initiative, i.e. charities, government, but also other players that are yet to cooperate with the gambling companies, i.e. financial institutions. Our findings demonstrate that the gambling operators/providers are finding themselves in paradoxical situations with, for instance, charities that deal with the gambling addiction issues refuse to cooperate with the gambling industry. From other industry examples it is clear that strategic

alliances, coopetition and ecosystem functioning present all stakeholders with sustainable, responsible, innovative and mutually beneficial outcomes.

However, this requires further exploration by capturing the perspectives and views of other stakeholders concerned. Interviews with them can enrich our understanding of what measures should be in place to deliver 'right' responsible gambling initiatives. Moreover, we have not captured views of main strategic decisions makers within the industry, i.e. CEOs. However, many of the strategic CSR initiatives were still mentioned by the industry personnel.

Acknowledgements. The research is jointly supported by GambleAware and Bournemouth University.

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