

Responsible gambling in practice: A case study of views and practices of Swedish oriented gambling companies

Nordic Studies on Alcohol and Drugs

2019, Vol. 36(2) 91–107

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DOI: 10.1177/1455072518802492

journals.sagepub.com/home/nad



David Forsström 

Stockholm University, Sweden

Jenny Cisneros Örnberg

Stockholm University, Sweden

Abstract

The Swedish gambling market faces a major change in legislation that will allow foreign-based companies to apply for a gambling licence in Sweden. A key element in the new legislation are consumer protection measures. The Swedish gambling market is currently divided between licensed companies and non-Swedish-based companies providing online gambling services without a licence in Sweden. How these companies view their responsibility for preventing gambling-related harm and how prepared they are for the new regulations are important questions regarding the new Swedish gambling market. **Aims:** To compare and analyse the views and practices on problem gambling and responsible gambling (RG) measures among licensed and unlicensed gambling companies on the Swedish market. **Design/Methods/Data:** Eleven semi-structured interviews were carried out with responsible gambling managers who are members of either of the two Swedish industry associations. Content analysis was used to analyse the interviews. **Results:** Non-licensed companies have implemented behaviour tracking and monitoring of gamblers in a more extensive way than licensed companies. Both the licensed and the unlicensed companies conceptualise problem gambling in a similar manner and rely on informed choice in preventing gamblers from developing problems, seemingly arguing that offering responsible gambling measures on their website is enough. **Conclusions:** There are several similarities in how the

Submitted: 8 April 2018; accepted: 22 August 2018

Corresponding author:

David Forsström, Department of Public Health Sciences, Stockholm University, SE-106 91 Stockholm, Sweden.

Email: david.forsstrom@su.se



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two types of companies define problem gambling and responsible gambling. Both groups lack a critical perspective when discussing RG. There is a need for companies not only to provide RG measures, but to take an active role in preventing harm among gamblers. Future research should focus on exploring how companies work with RG after the legislative change.

Keywords

consumer protection, gambling policy, legislation, online gambling, responsible gambling, Sweden

Gambling has been available in an online setting since the mid-1990s. This fundamental transformation in how individuals gamble has changed not only the gambling landscape, but also entails the need for novel measures to protect people from gambling-related harm. Furthermore, the emergence of online gambling has made gambling regulation challenging, especially for national markets with monopoly systems. Several countries, such as France (in 2010) and Denmark (in 2012), have moved from a monopoly system to a limited licensing market, adapting to the increasingly borderless character of gambling. In both countries, the legal changes have resulted in slightly increased numbers of problem gamblers (Fridberg & Birkelund, 2016; Marionneau & Järvinen-Tassopoulos, 2017). The expansion of online gambling has also increased the discussion on responsibility for preventing excessive gambling. This discussion is fuelled by such features of online gambling as faster games, a higher turnover, and increased availability. Studies have shown that internet gambling is associated with a higher degree of risky behaviour (Kairouz, Paradis, & Nadeau, 2012) and contributes to more problem gambling than offline gambling does (Griffiths, Wardle, Orford, Sproston, & Erens, 2009).

The question of responsible gambling has been discussed from different perspectives during the last 15 years and has been defined as policies and practices to reduce the potential harmfulness of gambling (Blaszczynski, Ladouceur, & Shaffer, 2004). Usually the concept is concerned with the industry's role and a focus on

company strategies ensuring the customers' safe consumption (Griffiths, 2009). An alternative perspective presented by Reith (2008) stresses a general societal shift in responsibility from government to companies that has nothing to do with a responsible consumption of gambling but is, rather, a different way of conceptualising a citizen's responsibilities (See also Alexius, 2014, for a Swedish discussion).

During 2017, the concept of responsible gambling (RG) was debated within the scientific community: the very concept of informed choice within harm minimisation of excessive gambling was criticised (Hancock & Smith, 2017a, 2017b). Informing and providing measures to minimise harm were not deemed to be enough. This critique is substantiated by studies showing that RG measures are not used to a high extent and are therefore unlikely to have much impact on problem gambling (Forsström, Hesser, & Carlbring, 2016; Forsström, Jansson-Fröjmark, Hesser, & Carlbring, 2017; Marionneau & Järvinen-Tassopoulos, 2017; Nelson et al., 2008).

When the term "responsible gambling" was launched, the main argument was that individuals had the responsibility to limit their own gambling with the help of features provided by the gambling industry (Blaszczynski et al., 2011; Blaszczynski, Ladouceur, & Nower, 2008; Collins et al., 2015; Shaffer, Ladouceur, Blaszczynski, & Whyte, 2016). But should gambling companies engage in more far-reaching consumer protection (Hancock & Smith, 2017a)? The major difference from the RG perspective promoted by Blaszczynski,

Ladouceur, and Shaffer (2004) is a shift from an individual responsibility based on informed choice to a more specific operator-based responsibility. The growing global gambling market online, a more liberalised focus, and increased risk-awareness (for example, Kingma, 2008) make this discussion more pertinent than ever. Nevertheless, even though previous research indicates that gambling suppliers have increased the information about problem gambling on their websites and provided gamblers with more RG tools during the last decade, previous research also shows that there is still room for improvement in such areas as age verification, customer service feedback, and direct marketing to players (Bonello & Griffiths, 2017; Smeaton & Griffiths, 2004).

The Swedish gambling market and responsible gambling

The question of measures restricting excessive gambling is increasingly important for the Swedish gambling market due to a change in legislation that will result in a shift from a monopoly to a licensed market for online gambling. The government inquiry on a regulated gambling market was submitted in March 2017 (SOU 2017:30), and Parliament decided in June 2018 on a new gambling law based on a government bill (Prop. 2017/18: 220, SFS 2018:1138). This means that many of the unlicensed gambling companies now active in the Swedish market will apply for a licence and operate legally within the Swedish regulatory framework from January 2019. Both the inquiry and the new law suggest a new gambling market with enhanced consumer protection as a cornerstone of the regulatory framework. A much-promoted concept is “duty of care” (*omsorgsplikt* in Swedish), where the gambling companies will be required to actively alert the players when their gambling pattern is assessed to be risky and offer information on what help is available and where. Other measures are in line with the European Commission’s previous recommendations on online gambling, and include

mandatory measures such as registration of players, game limits (with optional time limits), and a national self-exclusion register. The adherence will depend on the way in which inspections, enforcement, and penalties are implemented (Cisneros Örnberg & Hettne, 2018), but also on the gambling companies’ present work and attitudes on responsibility for gambling-related harm.

Aim of the study

The primary aim of the study is to compare and analyse the views and practices regarding problem gambling and responsible gambling measures among licensed and unlicensed gambling companies in the Swedish market.

The following research questions have been investigated:

- How are gambling and problem gambling defined, and how do the gambling companies understand the relationship between problem gambling and responsible gambling?
- How is responsible gambling defined by the licensed and unlicensed companies and how are responsible gambling practices carried out?
- How do the existing views on industry responsibility correlate with the coming legislative changes?

Data and methods

The focus of the study belongs to the consumer protection field, covering industry measures, voluntary or mandatory by regulation or owner directives, usually referred to as responsible gambling (RG). The material involves companies operating on the Swedish online gambling market, selected from the members of two gambling industry associations. The organisations are Branschföreningen för onlinespel (BOS, Trade Association for Online Gambling) representing 17 members that presently do not carry a licence to supply gambling for the Swedish

market, but hold licences in other jurisdictions and are referred to as “unlicensed” in this study, and Spelbranschens Riksorganisation (SPER, The Gambling Industry’s National Organisation) representing nine members from currently licensed companies. In total these two organisations consist of 26 members, but more than half of the SPER members only provide land-based gambling. Members of the organisations currently provide gambling to citizens in Sweden, with the unregulated industry members covering about 50% of the online gambling market and 23% of the total Swedish gambling market (Lotteriinspektionen, 2017). The few companies providing gambling on the Swedish market without BOS membership have not been included in the study, since they will most likely not apply for a licence in the future and will therefore be sanctioned within the new regulatory system.

The sample consisted of four licensed gambling companies (Svenska Spel, Miljonlotteriet, ATG, and Postkodlotteriet) and 14 unlicensed companies (PAF, Betfair, Betsson, Kindred, MrGreen, Pokerstars, Videoslots, Casumo, Cherry, LeoVegas, WilliamHill, Bet365, Jackpot Joy, and ComeOn). There are more members of BOS that provide gambling, but due to mergers within the gambling field, two companies were excluded. Information about the companies’ responsible gambling work was gathered via semi-structured telephone interviews with RG managers. An interview guide (available at osf.io/8xyr6) was used to carry out the interviews. The interview guide was tested on two SPER members that supply land-based gambling. Minor changes were made to the guide after the pilot interviews. The interview guide was written in Swedish and translated into English. All RG managers at the licensed gambling companies were interviewed as were representatives from seven of the unlicensed companies (11 interviews in all). The interviews were conducted by phone in English or Swedish by the first author between January and March 2018. Telephone interviews were chosen for pragmatic reasons, as most of the

interviewees did not live in Sweden. All of the interviews were recorded. The interviewees received the interview guide in advance and had time to prepare before the interview. The mean interview length was half an hour. One company declined to be interviewed (ComeOn) and six companies (Casumo, Cherry, LeoVegas, WilliamHill, Bet365, Jackpot Joy) did not respond to repeated contact attempts. Information about these companies’ RG measures was collected from their respective gambling sites.

Our study consists of a descriptive formal part (Table 1), where we compare the different companies’ current responsibility tools based on the formal requirements laid out in the new bill (SFS 2018:1138). The second part is a content analysis. Here, both the latent and manifest content of the interviews are examined using an inductive approach generating themes of the content statements (Hsieh & Shannon, 2005). The quotations reflect typical results for certain companies or categories in terms of gambling, responsible gambling, and problem gambling. We chose content analysis in order to be able to combine the results from interviews with the information presented in Table 1. The recordings have been listened to several times, and key messages and quotations have been transcribed verbatim. The quotations were chosen because they provided information about the specific categories and questions. Every respondent was assigned a random double-digit number and information on whether the quotations came from a licensed or unlicensed company to help us understand the distribution of the quotations among the respondents.

Results

The following results are based on the interviews with responsible gambling managers and on information available on the websites of the companies included. While the first part of this section focuses on the formal differences and similarities between licensed and unlicensed companies on responsible gambling tools, the second part is a comparison of the sets of

Table 1. Current responsible gambling measures compared to measures proposed in new legislation.

	Licensed companies			Unlicensed companies							Unlicensed companies (declined interview/no contact)						
	Svenska Spel AB	ATG	Miljonlotteriet	PAF	Mr Green	Betsson	Videoslots	Kindred	Betfair	Pokerstars	LeoVegas	Jackpot Joy	William Hill	Cherry	Casumo	ComeOn	Bet365
Registration	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Individual gambling account	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Links to support group/treatment	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	-	-	-	-	-	-	-
Self-tests	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	-	-	-	-	-	-	-
Self-exclusion: immediate, limited, until further notice	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	-	✓	✓	✓	✓
Behavioural tracking systems	✓	✗	✓	✓	✓	✓	✓	✓	✓	✓	-	-	-	-	-	-	-
Chances of winning, rules for games	✗	✗	✗	✓	✓	✓	✓	✓	✓	✓	-	-	-	-	-	-	-
Mandatory limits for deposits (day, week, month)	✓	✗	✗	✓	✗	✗	✗	✓	✗	✗	-	-	-	-	-	-	-
No bonus offers after registration	✓	✓	✓	✓	✗	✗	✗	✗	✗	✗	✗	✗	✗	✗	✗	✗	✗
Customer service	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Staff education programme	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	-	-	-	-	-	-	-
Age verification	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	-	-	-	-	-	-	-
Game design	✓	✗	✗	✓	✓	✓	✓	✓	✓	✓	-	-	-	-	-	-	-
Credit prohibition	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	-	-	-	-	-	-	-

✓ feature present ✗ feature not present

views that reflect the gambling companies' knowledge, policies, and practices. Even though the RG managers' statements may not reproduce the views or practices of the whole company, they may work as an indicator of more informal similarities and differences between Swedish licensed companies and foreign companies operating without a licence. The Swedish licensed companies work to realise the government-set social mission to prevent gambling-related harm, whereas the foreign unlicensed companies have so far not been bound by Swedish legislation.

Interviews have been performed with representatives from Svenska Spel (providing licensed online and land-based gambling), ATG (providing licensed online and land-based betting on horse racing), and Postkodlotteriet (they declined to present their RG measures) and Miljonlotteriet (both providing licensed land-based and online lotteries and bingo), and with representatives of PAF, Betfair, Betsson, Kindred, MrGreen, Pokerstars, and Videoslots, which provide unlicensed online gambling with a variety of gambling products.

Current responsible gambling measures compared to the proposed legislation

In 2019, the Swedish gambling market is to be divided into a competitive section, which mainly involves online gambling and betting; a section dedicated to gambling for non-profit organisations, which mainly includes lotteries and bingo; and a state-run section, which mainly includes state casinos and gambling on electronic gaming machines (EGMs). As mentioned above, the licensees will have a far-reaching obligation to protect players against excessive gambling through the so-called "duty of care": the licensees shall follow the players' behaviour and help them reduce their gambling when needed.

According to the new law, a licence holder needs to register those wishing to gamble. On registration, the players must enter their name, address, and social security number or equivalent. The licensees shall verify the identity of the

players in a reliable manner by means of electronic identification or equivalent. Games may not happen until the licence holder has verified that the player has not self-excluded from gambling. The licensee needs to be able to identify and register players in order to maintain the age limit of 18 years, and to counteract and prevent cheating, fraud, and other criminal activities. Temporary gambling accounts cannot exceed 30 days, and no payouts can be made. For subscription lotteries, the identification requirements will not be as high. Anyone with a licence to provide online gambling is obliged to create a gambling account for each registered player. All financial transactions to and from the account must be registered, and the players should be given access to information about the account balance, gambling history, winnings and losses, and deposits, payments and other transactions at least for the previous 12 months.

It will be prohibited to specifically design games which give the players the impression that they are close to winning if this is not the case. Similarly, it will not be allowed to provide free games and test games that have a different random outcome than a corresponding game with money. A licensee will be obliged to offer registered players the opportunity for self-exclusion from gambling for a certain period or until further notice. Self-exclusion without a limit cannot be cancelled until after 12 months. A licensee providing online games shall also provide the player with a so-called panic button offering an immediate 24-hour self-exclusion. There is also a requirement for players to set an upper limit for their deposits.

A licensee should also, according to the new law, in an easy and accessible way present relevant information in Swedish about the games, the rules, and the winning chances. A licensee may only offer a bonus the first time the gamblers are gambling at any of the licensee's games. There is also a general credit ban for gambling deposits. Licensees must offer a self-test online for the players to be able to assess their gambling behaviour, and have routines and staff for handling complaints and

other questions about their games. A licensee shall also continuously train all staff, both at their own and affiliated companies, who work with product development, marketing, gaming surveillance, sales, and customer service. This education should create awareness and understanding of the risks of gambling and the factors that influence a gambler's behaviour. In places where gambling is offered, the licensee must ensure that contact information is also provided for support and a helpline.

As Table 1 shows, there are small differences between licensed and unlicensed companies in the formal adherence to the coming RG measure requirements. This is the case even though two of the currently licensed companies are non-profit organisations and mostly offer lotteries. The biggest difference between the licensed and the unlicensed companies is the use of bonuses. None of the licensed companies offer bonuses, while all unlicensed companies except PAF do. Several of the licensed companies do not have mandatory limits for deposits. Two of the licensed companies do not contact their customers when they suspect gambling problems. It is not shown in the table, but it becomes very clear from the analysis of the webpages that there is a big difference in how visible and available the information is about the RG tools and gambling problems. This difference is, however, not based on the companies' licensed or unlicensed status.

The gambling companies use several behavioural tracking systems. Playscan, employed by Svenska Spel and Miljonlotteriet, consists of three parts: a risk assessment, feedback on the risk assessment, and advice on how to limit gambling. Playscan's risk assessment is based on gambling history, markers of excessive gambling, such as night owling (staying up at night to gamble), and chasing losses. Playscan is the only system in use on multiple sites (available on Svenska Spel and Miljonlotteriet websites and also at Norsk Tipping and La Francaise des Jeux). It used to be a commercially available product, but is now a part of Svenska Spel. The other systems in use are company-based and

they also apply different markers to assess gamblers at risk. However, these systems supply feedback to the gambling company, which then assesses whether the gambler should be contacted. In Playscan's case the risk assessment is made available to the individual gambler and is not monitored by the gambling company, although the company can access information about individual risk levels.

The self-tests used to assess the negative consequences of gambling are the GamTest (Jonsson, Munck, Volberg, & Carlbring, 2017) and the Problem Gambling Severity Index (Ferris & Wynne, 2001). Both questionnaires contain items that focus on economic and social consequences that are similar to the criteria in DSM-5 (American Psychiatric Association, 2013).

As Table 1 indicates, the interviewees argue that their companies already, at least on a general level, conform to the legal obligations that will be in place in January 2019 in Sweden. Previous research covering similar changes in France shows that all licensed websites conform to the legal obligations, but qualitatively differ in how they do it (Marionneau & Järvinen-Tassopoulos, 2017). More detailed regulation and practices will be worked out in Sweden regarding the gambling law with the new Gambling Authority as the controlling body. An important part of how the practices evolve, especially if the regulation is not clear enough, will be the views and attitudes among the gambling companies on gambling problems and responsible gambling.

Comparison on key questions concerning responsible gambling

Views of gambling. In the interviews, the licensed companies stress that gambling is about entertainment. Some underline that gambling has existed for a long time and is a part of human culture. Gambling is also seen as having the potential of making dreams come true and about experiencing the excitement of achieving that dream.

The unlicensed companies have fun as a main feature when describing gambling as a type of entertainment that is equal to other types of activities meant to entertain such as going to the movies. Other types of entertainment will pass the time, and gambling in moderation will have the same outcome. It is also argued that it is an old phenomenon that has existed for quite some time and has legitimacy as such.

Most of the interviewees describe gambling as a “fun pleasure with elements of excitement”, as a leisure or recreational activity, or as one interviewee put it:

Gambling is entertainment, for some part of a profession, but for most people just a hobby. (Unlicensed No. 23)

The view of gambling was thus more or less portrayed in a similar way between the two groups. Both have a focus on enjoyment, but the dream of winning was emphasised more among the licensed companies. The licensed companies see themselves as offering a larger number of low-risk games compared to the unlicensed companies, but none of the companies discussed whether gambling could have different purposes depending on the type of game, risk level, or the purpose of the company offering the games. The licensed companies see casino games as the most dangerous form of gambling. The unlicensed companies’ view of gambling as entertainment and also comparing it to other types of activities that can be classified as entertainment can be seen as a way of downplaying the potentially harmful effects of gambling. This can also be a way of attracting new customers because gambling is promoted as something to do to pass the time. None of the licensed companies brings up the fact that their surplus goes to what could be considered public purposes.

A few companies from both groups recognised early on the risks and possible negative effects of gambling. This applied to online gambling in particular; the online setting adds

another risk element, but also increased monitoring possibilities.

How problem gambling is defined. The majority of the interviewees from licensed companies describe different behaviours or feelings linked to problem gambling, including loss of control, increased deposits, and changes in gambling activity or gambling pattern. Other actions that indicate problem gambling are being preoccupied with thoughts about gambling, unable to pay the rent or other expenses, and absence from work due to gambling. The interviewees go on to argue that problem gambling is based on two main feelings, one that gambling is no longer entertaining and the other that gambling is no longer safe. The answer that is present among all interviewees is that problem gambling begins when a gambler experiences negative consequences from gambling. Both economic and social consequences are mentioned. The company representatives also press that if a gambler has severe problems then it is not their duty to provide treatment or help, but to refer to another party. The fact that gambling problems can affect all types of people is also raised.

As soon as there are any negative consequences, social, economic, things that make you lie or feel bad. (Licensed No. 15)

Problem gambling is when you feel that you’re not in control of your gambling . . . when there’s no awareness of and distance to the gambling . . . when you can’t disconnect from it. (Licensed No. 34)

The unlicensed companies define the absence of fun in the same manner as the licensed companies regard the absence of entertainment as a sign of problematic gambling. They too talk about negative consequences in a general way, and recognise the salience of loss of control. A few companies mention the negative influence of alcohol and drugs on gambling behaviour.

Gambling problem: as soon as someone gambles for another reason but fun... It's a continuum: betting for more money than you can lose, chasing losses, self-exclusion, different deposit methods... (Unlicensed No. 76)

Gambling problems is when you lose control and it affects your life in a negative way. This period can be temporary. (Unlicensed No. 54)

The unlicensed companies also point out that individuals can lose different amounts and that different levels of losses have different consequences for individuals who gamble. The unlicensed companies also refer to negative consequences such as loss of control and gambling for more than you can afford as “markers” of excessive gambling. As with the licensed companies, the unlicensed companies declare that severe gambling problems should be treated by experts and that the companies themselves should not be responsible for treatment.

You don't have to have a gambling problem just for gambling with bigger amounts [...] To look at a specific limit, it's an old-fashioned way of looking at it. Some may spend a very small amount and it's still a problem, Zlatan could bet 100,000 without having a problem. (Unlicensed No. 54)

Most of the views of both licensed and unlicensed companies on problem gambling concur with DSM-5 criteria on problematic gambling (American Psychiatric Association, 2013), such as loss of control and negative consequences. The main difference is that the unlicensed groups stress the lack of fun to a larger extent and the subjective element of interpreting the concept with a focus on different individuals' economic situations. There is also a larger discrepancy in views among the unlicensed group regarding what should be considered as problem gambling than within the licensed group. A few companies do not even want to define their customers as problem gamblers, but as gamblers at risk. A possible explanation for the difference in classification of gamblers might be

different owners' directives: the licensed companies are state-owned and/or have a public mission, while the unlicensed companies have different directives on dealing with customers who gamble a lot and may be at risk. Also, in an attempt to attract and retain customers, the unlicensed companies have strategies – such as bonuses – to ensure that their customers are satisfied. Furthermore, with one exception, neither group discusses problem gambling from an addiction perspective. Nor do they claim responsibility for severe gambling problems whatever their origins. Both groups also remain silent over the paradox regarding loss of control and informed choice or how loss of control can impair the ability to make rational decisions based on information rather than feelings.

As will be discussed later, none of the companies are in favour of mandatory fixed deposit limits, arguing instead that the gamblers themselves are the best persons to know their limits in terms of both time and money. How individual limit setting could be problematic for problem gamblers and pathological gamblers is not discussed by the respondents. Nor do they discuss how to change the limits or what is the best way of achieving effective limit setting.

How responsible gambling is defined and used. The licensed companies describe responsible gambling from a company perspective with a vocabulary such as “preventive” and “diminishing negative consequences”. The companies also stress the structural circumstances where they offer games with less risk compared to companies with a pure economic purpose. One of the companies also contends that the level of gambling responsibility should be based on the level of risk among the games offered. Some interviewees maintain that providing information about an individual's gambling can be enough to change gambling behaviour.

The company will work to offer games that are joyful and safe and do not encourage excess. (Licensed No. 69)

Responsible gambling is everything that companies do to work preventively; internal development, communication, the tools we offer to customers. (Licensed No. 15)

As to who is responsible for problem gamblers, all licensed companies indicated that the responsibility was spread among several actors, but the individual gambler bears the main responsibility.

It's a responsibility at all levels. [...] Of course, the player has a major responsibility. The gaming companies have a responsibility to prevent, and the state to regulate. (Licensed No. 91)

The ultimate responsibility always lies at an individual level. (Licensed No. 44)

The licensed companies also express what they see as a conflict between well-developed responsible gambling work and economic considerations. The major licensed gambling company has as their slogan "responsible gambling before profit". Several of the other companies express the view that ownership is decisive for commitment to responsible gambling.

Basically, it's very difficult to get good corporate responsibility as an equity company. (Licensed No. 44)

We will not generate gambling revenue on unsound players or by cheating on gambling responsibility. (Licensed No. 44)

I'm having difficulty seeing how profit maximisation and gambling responsibility can go hand in hand. (Licensed No. 44)

Also, the licensed firms see that the unlicensed companies are there to maximise their profits and that this leads to their being less responsible. The licensed companies clearly view themselves as the more responsible section of the gambling market.

The unlicensed companies have a more diverse view of what RG entails, from a pure individual responsibility to an expanded discussion on the different actors' responsibility. Some companies have elaborate behavioural

tracking systems, which might influence their views on responsible gambling. Monitoring is an important part of RG, keeping track of changes and patterns of excessive gambling behaviour. Two of the companies brought up the possibility to permanently close an account, but only one had used this measure more regularly.

Responsible gambling is about staying in control. (Unlicensed No. 52)

Responsible gambling is to guide the gamblers to choose sustainable decisions and in extreme situations also exclude players who play too much. (Unlicensed No. 54)

The unlicensed companies to a larger extent describe actions that can be classified as proactive: the goal here is to minimise excessive gambling whether or not the gamblers use RG measures or are aware of their excessive gambling patterns. Also, these companies present RG as way of retaining customers. In the interviews, the emphasis is on long and sustainable customer relations rather than on gamblers who spend all their money and never return to the site.

There is a great consensus among the big companies on the importance of gambling responsibility, both ethically and for the industry's survival. It is no secret that the percentage that gambles in Sweden has decreased, and it is important for the industry that this development does not continue. We want long-lasting, healthy relationships with our customers. (Unlicensed No. 15)

RG is the most sustainable approach that you can have. (Unlicensed No. 76)

Customers are more committed to the brand with good RG. (Unlicensed No. 76)

At the same time, both the unlicensed and licensed companies place the main responsibility for preventing gambling problems at the individual level. There is also a slight tendency to stress the individual differences and needs among the gamblers.

Ultimately, it's down to the individual. Companies and governments to put up the framework. The gambling company is responsible for the tools in place to help, analyse, monitoring the risks. (Unlicensed No. 52)

Every person is different – there is no one-size-fits-all. (Unlicensed No. 52)

A common theme among both groups was that the companies use specific terms when describing their RG work. They “provide” and “offer” measures in presenting RG features to customers. They also refer to research, but are very unspecific about the type of research and sources. None of the companies provide any theories on how to explain changes in gambling behaviour and how this is connected to their RG work. Words such as “consumer protection” or protecting the customer are not used. Behaviour tracking is used by both licensed and unlicensed companies, but the biggest difference is how far the companies have gone in their use of such tracking devices on gambling behaviour. Both groups seem to end up in an individual-centred definition model of responsible players. The gambling companies also describe providing a safety net for people at risk, using metaphors of braces, belts, and safety belts. There is, however, a slight difference between the companies regarding the view on risk. Where the licensed companies focus on the risk with specific games, the unlicensed companies, rather, stress different individual behaviours and conditions.

There are different views among both the licensed and unlicensed companies on who should use RG tools. Some feel that these tools should be more or less mandatory and used by everyone. The problems would then diminish drastically. One interviewee states that “it’s just like setting a household budget”, indicating a view of the player as a rational individual able to make good decisions continuously. Other companies rather emphasise that RG tools should be used by those who really need them – again as rational individuals. Responsible gambling tools it is argued, then, help gamblers at risk to get back on track. It is also clear that

some companies see RG as a checkbox, while others have a deeper discussion about the need to develop the tools.

Responsible gambling measures tend to be regarded as something practical that the gambler should take care of, and the companies should only provide help for gamblers to do this. The question of who should use RG tools and for how long is further complicated by the lack of studies investigating the effect of RG tools. The lack of follow-up on the customers’ use of RG measures may be partially explained by the perspective expressed in the interviews that the individual customer has a responsibility for utilising the RG measures adopted by the gambling companies. Depending on how detailed the regulation and practice around the gambling companies’ duty to follow-up their customers will be, there will be a need for the companies to frame their RG work in a different way.

The standard response from all companies that all staff are working with responsibility issues indicates that the discourse of responsible gambling has increasingly pervaded the gambling companies’ rhetoric and business.

Responsibility for gaming should permeate the entire company. (Licensed No. 69)

Everyone in the staff should work with responsibility. In-store sellers, Customer Service, Game Advice . . . (Licensed No. 15)

Everyone at the firm knows that this is an important issue. (Unlicensed No. 52)

However, the content of staff educational programmes and how this is carried out in practice is not elaborated in detail. The most common external educational programme used for most of the licensed companies and some of the unlicensed firms is supplied by the Swedish company Sustainable interaction.

Use and follow-up of the measures provided

Previous research shows that RG tools in general are underutilised (Forsström, Hesser, &

Carlbring, 2017; Forsström, Jansson-Fröjmark, Hesser, & Carlbring, 2017; Nelson et al., 2008). This is also confirmed by our interviewees' comments regarding the RG measures available at the licensed sites. The take-up rate is estimated to be in the range of 10–30%. According to the respondents, it is not possible to give an accurate figure, as the companies do not have the exact numbers. To estimate the levels of use is difficult because of the different measures available and because one customer can use one or several measures. There is thus a general lack of knowledge on how much RG is used among customers and also what RG means to them. Overall, the companies have not investigated the use of or attitudes towards RG tools among their customers. One company has performed focus groups with a limited number of gamblers on their sites, but without specifically targeting RG measures and how they are perceived. On a general level, the licensed companies express a poor understanding of how RG measures are used and perceived. This, in turn, limits the knowledge about who actually uses the RG measures. As individual cases are not reviewed, there is no follow-up on how gambling patterns change for excessive gamblers. Furthermore, the respondents explain that very little is being done at the moment, since the new legislation will change the RG work at most Swedish-oriented sites.

The unlicensed companies have, in comparison with the Swedish licensed firms, in general better documentation of how the RG measures are being used. However, a similarly low level of use seems to be present among these companies as well. As mentioned previously, the unlicensed companies to a higher extent stress that not all gamblers need to use RG measures and that low-risk gamblers can probably handle their gambling and should perhaps not be targeted by RG tools. Some unlicensed companies have performed surveys about the experiences and views of RG measures, which have resulted in a better but not comprehensive understanding of how customers perceive the available measures. Some of the unlicensed companies

have also conducted surveys and focus groups to find out what their customers think of their RG initiatives. However, the communication is not initiated from a responsible gambling perspective, but rather from an inquiry about the customers' general gambling habits and how satisfied they are with the gambling site. Overall, the customers seem to be content with the communication from the companies about their gambling habits, even though several companies describe the need to adjust the protocol for contacting customers to different cultural contexts. In the interviews, the unlicensed companies also stress the importance of interacting with customers on all matters, including RG, as a part of the overall effort to keep customers gambling at their site.

Both company groups express the need of more knowledge of how and why responsible gambling measures are used. As mentioned, previous research (Forsström, Hesser, & Carlbring, 2016; Forsström, Jansson-Fröjmark, Hesser, & Carlbring, 2017; Nelson et al., 2008) supports this as well as a more comprehensive feedback system aimed at customers who use RG measures. The licensed companies have made almost no effort to investigate the use of RG measures and customer attitudes towards these tools. This has led to a view of the potential customers and their needs in relation to RG without an empirical basis. However, the licensed companies express frustration over the current legislation, which in parts hinders them from monitoring customers. The unlicensed companies have more contact with their customers, but this could also reflect an interest in keeping customers and marketing new products.

Measures taken when a gambler shows signs of excessive/problem gambling

From their standpoint, the licensed companies do not have any possibilities to freeze accounts or ban a gambler from their sites unless the company has proof of fraud or money laundering. They therefore do not have a rationale for

how to deal with gamblers who exhibit signs of excessive gambling over time even though the gambler has used many or all of the RG features available on their sites. One of the licensed companies has, as part of their work on responsible gambling, launched a pilot project on actively calling customers who show signs of an excessive gambling pattern.

The unlicensed companies' websites show a range of options for how to deal with gamblers exhibiting signs of problem gambling. Some of the sites (three in total) block gamblers or freeze their accounts when problem gambling is suspected. However, only a handful of gamblers are blocked or banned annually. As most of the companies are customer-oriented, several stages of customer communication have been carried out before customer blocking. The goal is to help the customers to change their gambling habits or take a break before the companies block or freeze an account. Here is a difference to Swedish licensed companies, who indicate that current legislation stops them from blocking customers unless it is a customer request. As one of the unlicensed interviewees said:

It's enough to get an indication during a telephone call that there is a gambling problem for us to block that customer. We don't even need a history of data from our tracking system. It could be that this customer gambles too much at a different site. (Unlicensed No. 54)

Some of the unlicensed companies take a greater responsibility, similar to the duty of care obligation in the new legislation, than do the licensed companies. Also, many of the unlicensed companies have several steps of customer communication and claim that this type of intervention can stop individuals from excessive gambling. The new law expects licensees to be able to control and counteract excessive gambling. However, most of the licensed companies do not monitor individual gamblers in the same way that the unlicensed companies

do, making it harder for them to find gamblers whose accounts should be blocked or frozen.

Adapting to a new regulation

The licensed companies tend to view the companies that do not have a licence in Sweden as conducting business without any rules. The fact that the unlicensed companies have promoted high-risk gambling is seen as problematic. Also, they are seen as doing something wrong or at least unethical by providing gambling to Swedish customers. However, the criticism seems to be based on the volume of marketing by the unlicensed companies directed at the Swedish market rather than on a suspected lack of work with responsible gambling issues.

At the same time, some of the licensed companies maintain that it is a good thing that they will be able to compete with the unlicensed companies on equal terms in future. This will level the playing field and make the unlicensed companies adhere to Swedish regulation. However, companies that provide gambling to support charities express their concern about stiff competition on the new market and about losing capital that could be used to help people.

The unlicensed companies argue that they do not need to change their routines or will not have any major difficulties in doing so. All the companies are operating and competing on several markets, which means that the unlicensed companies are used to adapting their RG initiatives to different national requirements. From this point of view the potential opening of the Swedish gambling market is not seen as a major change or adaptation but rather as a standard procedure.

The two company groups have different views on what the new regulation will mean for responsible gambling measures on the Swedish market. However, the fact that a majority of the unlicensed companies have adapted their business model and RG work to several markets might make them more prepared to apply for a licence in line with the new regulation. Hence, the supposed levelling of the playing field,

which the licensed group sees as a result of the new legislation, might not occur. On the other hand, the currently licensed companies have a well-established relationship with the Swedish government agencies and possibly a better understanding of the Swedish context, which might give them, at least in the beginning, an advantage.

Still, none of the companies discuss whether the proposed RG measures in the new legislation are comprehensive enough to limit an increase in at-risk and problem gambling. This is interesting from the view point of responsibility. The companies have a clear focus on adhering to a changed legislation, not on how the population of problem gamblers might change or expand. This indicates the importance of a strong gambling authority with concrete regulatory directives.

Conclusions

The primary aim of the study has been to compare and analyse the views and practices regarding problem gambling and responsible gambling measures among licensed and unlicensed gambling companies on the Swedish market and to establish how these correlate with the coming legislative changes.

Gambling was more or less portrayed in a similar way by the licensed and the unlicensed companies. Both had a focus on fun and enjoyment, but the dream of winning was more in focus among the licensed companies, while the unlicensed firms stressed gambling as a leisure activity. The views that the two company groups have on problem gambling concur on several points with DSM-5 criteria such as loss of control and negative consequences. The main difference is that the unlicensed companies stress the lack of fun to a larger extent and highlight the subjective element in interpreting the concept, with a focus on different individuals' economic situations.

The results also show that most companies already claim to conform to the legal obligations – at least on a general level – that will

be in place in Sweden by January 2019. This applies to both the licensed and the unlicensed companies, who also say that they will have few problems doing so. There are nevertheless some differences between the licensed and the unlicensed companies in their formal adherence to the coming RG measure requirements; bonuses, for example, are only apparent among the unlicensed companies. This is the biggest difference between the two groups. Another difference is among those companies that use Playscan as a behavioural tracking system. Here, the gamblers get direct feedback on their gambling behaviour, while other tracking systems supply the data mainly to the gambling companies. On the other hand, the unlicensed companies seem to have more developed programmes for customer communication.

Both licensed and unlicensed companies use terms such as “provide” and “offer” in presenting RG features to customers. While the licensed companies express frustration over the current legislation, which in parts hinders them from monitoring and contacting customers, the unlicensed companies have more contact with their customers. This also reflects an interest in keeping customers and marketing new products.

The licensed companies see themselves as more responsible operators, since they do not offer high-risk games and do not seek to maximise profit. Several of the licensed companies argue that ownership is decisive for commitment to responsible gambling. What will then happen in terms of risk and RG with increased competition and when all companies have the possibility to apply for an online casino licence?

The unlicensed companies have a more diverse view of what RG entails, ranging from a pure individual responsibility to an expanded discussion on the different actors' responsibilities. When talking about problem gambling and RG, none of the included companies commented on the paradox between individual responsibility and loss of control as a sign of problem gambling. This paradox might highlight one of the problems with corporate

responsibility; providing safety measures is considered enough. Some of the included companies neglect follow-up even where gamblers show an excessive gambling pattern, while others carry out proactive measures (actively contacting individuals with an excessive gambling pattern). Overall, the unlicensed companies seem to have a longer tradition of communicating with customers and taking proactive measures. Nevertheless, more use of behaviour tracking systems will be needed to fulfil the true sense of the duty of care obligation. The unlicensed companies might be able to adhere to the new regulations faster due to their previous experience of different regulations. For the licensed companies, competing with foreign companies and adapting to change may prove to be a big challenge.

Presented in this article are the gambling companies' own views on how they meet the criteria. Few companies display a self-critical or reflective attitude to gambling responsibility measures. For the future, it is important that the gambling industry not only provides tools but also takes active responsibility. Many companies, both the licensed and the unlicensed firms, are aware of the problems, but very few have any concrete solutions of their own. This makes it all the more important that the vague description on duty of care in the current gambling law is clarified considerably in future regulations and that social protection considerations are raised. When introducing new laws, there is a golden opportunity to establish rules that really have an impact on detrimental behaviour and on enhancing industry responsibility. Practices of and attitudes toward problem gambling and RG will have a big impact on how the consumer protection on the Swedish gambling market will develop if the regulatory requirements are not sufficiently well defined.

Future research

This study has focused mainly on the gambling companies and their views on problem

gambling, responsible gambling, and their adherence to future Swedish gambling regulation. An important aspect for future research is of course how these questions are viewed from a gambler perspective. This might answer a question that casts its shadow on this study: Are the companies really doing what they are saying when it comes to RG?

To follow up how the included companies have adapted to the new Swedish legislation is also an important future research endeavour. For example, how will the work with the duty of care turn out or how will the ban on bonuses affect the marketing of gambling in Sweden?

From a comparative perspective, it would also be important to investigate how countries that have kept a monopoly market, such as Norway and Finland, view RG. To examine how Swedish customers that have used RG measures at licensed and unlicensed sites view these measures is another important topic.

Declaration of conflicting interests

The authors declared no potential conflicts of interest with respect to the research, authorship, and/or publication of this article.

Funding

The authors disclosed receipt of the following financial support for the research, authorship, and/or publication of this article: This study is a part of the project "Responding to and reducing gambling problems: Studies in help-seeking, measurement, comorbidity, and policy impacts", which is financed by the Swedish Research Council for Health, Working Life and Welfare (Forte). The grant number is 2016-07091.

ORCID iD

David Forsström  <https://orcid.org/0000-0003-2004-2366>

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