

Can gambling-funded research be non-biased?

The case of section 52

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This autumn, a great public debate was raised in the Finnish media regarding the practices of the state-owned gambling monopoly Veikkaus. The company has been severely criticised for acting irresponsibly in the placement of slot machines and in the marketing of its products. Veikkaus was quick to release plans to cut around 3000 slot machines and promised a thorough change in internal company appreciation of acting more responsibly.

The prevention and control of gambling-related harm is a justification for the monopoly system, which all seem to agree upon, whether or not they are in favour of the monopoly system.

The discussion is well timed, as knowledge on how to proceed in gambling policies has recently been comprehensively collected and evaluated in *Setting limits: Gambling, science and public policy* (Sulkunen et al., 2018). The authors of the book suggest a public interest framing on gambling policy. This framing

provides a more overarching perspective that sees gambling provision and regulation in a logic of state accountability and role divisions between sectors and stakeholders. It also takes into account how gambling research is produced, and from which sources its funding stems.

A well-known hurdle for producing valid and reliable knowledge on gambling policies is the influence by the industry sector that is practiced through funding of research. In his *For debate* piece in this issue of the *Nordic Studies on Alcohol and Drugs*, Finnish gambling policy researcher Janne Nikkinen (2019) discusses the well-established circumstance that gambling-industry-funded research often leaves out the kind of evidence that shows the effectiveness of limiting profitable gambling business models (see also Adams, 2016). But likewise, the state and the executive branch can become interest parties that steer research coverage and angles, zooming in on aspects that

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ensures a continuation of its own existence. This is a discussion that has been covered in the Nordic countries on many occasions, but is rather new in the field of gambling research.

In this editorial, I discuss the Finnish gambling research funding system based on section 52 of the Lotteries Act (2001) entitled “Monitoring and researching problems caused by running lotteries and the associated funding”. I present the ways in which I see that the system works on specific Nordic and Finnish welfare-state-systemic premises. These include an autonomous and primarily non-partisan executive branch, an independent sectoral researcher community, and a cooperation structure that ensures the public interest perspective. Crucially, I assess whether the system is able to generate unbiased research at this point in history.

Section 52

The first sentences of section 52 lay down the following: “Problems caused by participating in lotteries shall be monitored and researched. Problem monitoring and research are the responsibility of the Ministry of Social Affairs and Health” (Lotteries Act 2001).¹ The Ministry for Social Affairs and Health takes its statutory responsibility seriously. The monitoring and study of gambling-related problems and the development of treatment and help structures for people with gambling problems is conducted through the funding of research, development, and prevention work at the state-owned Finnish Institute for Health and Welfare (FIHW). The FIHW holds the executive responsibility for the work carried out to ensure a compliance with section 52. However, the gambling prevention and research unit at the FIHW does not execute the work on its own. Some of the section 52 budget covers the annual gambling research grants provided to scholars through the autonomous Finnish Foundation for Alcohol Studies (FFAS). The recipients are research projects and PhD students from all over Finland.

The FIHW also has a partnership contract with the Centre of Excellence on Social Welfare in the Helsinki Metropolitan Area (Socca), which provides lead and research at the Helsinki-based Gambling Clinic. The Clinic, which is a cooperation project between municipalities, the FIHW, and NGOs, develops and offers help services and treatment to people with gambling problems.

A third cooperation structure is carried out with the social scientific research unit the University of Helsinki Centre for Research on Addiction Control and Governance (CEACG), which ensures a continuous systemic and comparative study of harm caused by gambling in Finland. The CEACG also trains new gambling researchers and experts at the university.

Both Nikkinen and I are employed at the CEACG. Our funding stems from section 52 sources of funding, but also, for instance, from grants from the Academy of Finland, where a non-earmarked 17.5% of the total research funding pot of €429.4 million in 2018 originated from the state monopoly Veikkaus (Academy of Finland, 2019). In fact, one could claim that almost all academic research conducted in Finland is part of this non-earmarked funding scheme, which stems from the revenues made on the gambling of Finnish citizens.

Steering of research

The reasoning behind section 52 pertains to a guaranteeing and acknowledging that the harm-related research, prevention, and treatment development work can, in some sense, compensate for the problems caused by the state-governed gambling provision: “the polluter pays principle”. This logic is firmly supported in the common reasoning around the Finnish gambling policy system. When presented with a long list of options, interviewees in a recent gambling policy study identified gambling-related harm research and treatment as the most self-evident and important objects to be funded with public gambling revenue (Egerer et al., 2018).

The section 52 research cooperation as a whole is coordinated by the FIHW in four-year cycles. The cooperation structure meets regularly in order to identify topical themes, divide tasks, and to avoid overlaps. The themes and needs are identified in procedures similar to those of other state-funded sectoral research at public institutions and universities in Finland. These concern a wide range of topics such as health, welfare, consumption, crime, family planning, occupational life, and environmental issues. Publicly governed research in these areas also proceeds in networks and cooperation models that are meant to ensure a wider grasp on matters that refer to the well-being of the population and society at large.

The steering of the Finnish gambling research works on the premises laid down in Finnish law, under the authority of the responsible ministry. As such, it does not deviate from other sectoral research in Finland today. As with other funding by the FIHW, the funding for gambling research is decided in an model that is carried out and overseen by the ministry that governs the institute. However, and uniquely, in order to cover the expenses of gambling-related harm prevention and research in Finland, the state sends the bill to the gambling monopoly Veikkaus. This part of section 52 states that: “Gaming operators shall reimburse the State for costs incurred in the activities referred to in subsection 1 as separately provided on the matter”.²

Veikkaus has no role in the decision-making or execution of section 52. Its function is limited to reacting to the compensation claims from the ministry, which follows a separate ministerial enactment.

Detachment from influence

The very formulation of “reimbursement” – the charging of the costs as occurring after the work has been completed – gives a clue about an important difference to the risk scenarios covered in Nikkinen’s debate piece: There is no link of influence – or any connection

whatsoever – between Veikkaus and the researchers that are funded through the system. If truth be told, the section 52 funding scheme constitutes a detachment of the research and prevention work from its original source. This detachment is doubled for the FIHW’s contractual partners – i.e., the Finnish Foundation for Alcohol Studies, the Gambling Clinic, and the CEACG – as they are not operationally situated directly under the funder (the ministry and the state as owner of the monopoly). Contrary to the gambling research and development unit at the FIHW they also have incomes from other sources.

Yet, one could also argue that the prioritisation of ontologies and the actual execution of power and steering occurs when the ministry and executor FIHW carry out the funding schemes in their four-year cycles. The influence that state authorities can have on the prioritisation of research is well known from, for example, drug research funding strategies (Room, 2019). There are, however, three interrelated systemic circumstances that I see as safeguarding the ethical sustainability of this research funding model.

First, the cooperation between the research institutes and milieus that are funded in accordance with section 52 secures a wide coverage and multi-epistemological approach with clinical, population-based, and social science studies into the phenomenon of gambling in Finland. The cooperation structure between the existing institutional gambling research and training units in Finland (FIHW, CEACG), the main treatment development agency (Gambling Clinic), and funding schemes that involves academics in the whole of Finland (FFAS) is likely to, at least to some degree, guarantee that the interpretation of concepts such as “harm” in the concept of gambling-related harm or “treatment” does not rely too heavily on only one ontology, approach, or perspective. In many countries, gambling research is heavily dominated by cognitive sciences or economics, with no public interest perspective in sight. Here, the small Nordic welfare state with its

traditional social scientific emphasis in sector research serves an important safe-guarding function.

Second, and pertaining to the first point, the section 52 system involves no principle level deviation in comparison to the prioritisation of themes and projects in other Nordic sector research. As such it involves the same risks of possible bindings as the “lengthened arms” of state governance, which has been covered in detail in the general Nordic discussions on research funding models and steering (see Fjær, 2006; Nordlund, 2006; Warpenius, 2019). In this, the instrumental views on research production, the influence by commercial interests, unwillingness or lack of capacity to cover complex perspectives in New Public Management have all been identified as jeopardising a critical execution and implementation of research (see, e.g., Bellé & Ongaro, 2014; Head, 2008; Hellman et al., 2012). No doubt, these are risks that need to be taken into account when any public funding scheme is evaluated. My own view is that the section 52 system is ethically durable in its current execution also in view of this argument. At the CEACG, we have felt that our autonomous position detached from detail steering from above has enabled us to confront sensitive and controversial dilemmas in the system, as we are, through our academic autonomy at the university, distanced from the monopoly and its owner. This, while at the same time we are still able to partake in the valuable section 52 work cooperation entity. Nikkinen’s debate piece and the similarly critical work by his colleagues are evidence of the academic freedom safeguarded within the framework of the section 52 system. In fact, researchers at the FIHW provided the evidence that directly led to a change in the dissemination of slot machines in Finland this autumn (Raisamo, Toikka, Selin, & Heiskanen, 2019). A simplified stakeholder or actor network analysis would not be able to capture such an inconsistency: according to such an approach, the FIHW researchers would be biting the hand that feeds them.

Third, I think one can approach the question of section 52 researchers’ non-biased independence in view of some specific Finnish welfare state premises. These pertain to an autonomous and strong, primarily non-partisan executive branch (the ministries); autonomous critical research production both in sectoral and university-based milieus; and an inter-dependable cooperation between NGOs, state, municipality, and other stakeholders.

No doubt, the section 52 system would be likely to fail in systems where, for example, the executive branch is more volatile under different rule, and where there is no tradition of the state research agencies such as the FIWH. Instead, the section 52 research is able, allowed and encouraged to be critical and bold. This structure of gambling research funding reflects the Nordic role of the state as both an agent and a critical counteragent in its own system of role divisions. What this actually implies for the content of Finnish gambling research is an important topic for further inquiry.

More in this issue

Tove Sohlberg surveys former smokers’ support of tobacco control policies in Sweden (Sohlberg, 2019); Emiliussen, Andersen, Nielsen, Braun, and Bilberg have inquired into how goals are defined for elderly alcohol-dependent patients seeking help (Emiliussen et al., 2019); Johansen, Kristiansen, Bjelland, and Tavakoli study the under-researched group of SUD therapists (Johansen et al., 2019); help-seeking in drug-related emergency situations is examined with the help of online surveying in Sweden (Soussan and Kjellgren, 2019); and gambling among homeless people in Poland is explored by Łukasz Wieczorek, Stokwizewski, and Klingemann (2019).

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Notes

1. In Finnish: "Arpajaisiin osallistumisesta aiheutuva haittoja on seurattava ja tutkittava. Haittojen seurannasta ja tutkimuksesta sekä niiden ehkäisyn ja hoidon kehittämistä vastaa sosiaali- ja terveystieteiden ministeriö."
2. In Finnish: "Veikkaus ry: n tulee korvata valtiolle seurannasta, tutkimuksesta ja kehittämisestä aiheutuvat kustannukset. Sosiaali- ja terveystieteiden ministeriö perii yhtiöltä maksuna määrän, joka vastaa ministeriölle toiminnasta aiheutuvien kokonaiskustannusten määrää."

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