



# The politics and fantasy of the gambling education discourse: An analysis of gambling industry-funded youth education programmes in the United Kingdom

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## ABSTRACT

**Background:** The provision of commercialised gambling products and services has changed radically in recent decades. Gambling is now provided in many places by multi-national corporations, with important implications for public health and policymaking. The United Kingdom is one of the most liberalised gambling markets globally, however there are few empirical analyses of gambling policy from a public health perspective. This study aims to provide a critical analysis of a core element of UK gambling policy, the provision of industry-funded youth gambling education programmes.

**Methods:** Adopting a commercial determinants of health lens, a discourse theoretical analysis was conducted using the logics of critical explanation. The data comprised resources provided by three gambling industry-funded charities (GambleAware, GamCare and the Young Gamers and Gamblers Education Trust) and their partners.

**Results:** The resources present a gambling education discourse that serves to reproduce the 'responsible gambling' agenda, while problematising children and young people. While the resources appear to offer educational content and opportunities for debate, the dominant focus is on teaching about personal responsibility and on the normalisation of gambling and gaming and their industries, while constraining the concept of agency. The resources encourage young people to act as individuals to control their impulses, and to correct what are portrayed as faulty cognitions with the aim of becoming responsible consumers. Our findings demonstrate how the gambling education discourse aligns with wider industry interests, serving to deflect from the harmful nature of the products and services they market while shifting responsibility for harm onto children, youth and their families.

**Conclusions:** Despite being delivered in the name of public health, the resources construct a discourse favourable to corporate interests. Educators, parents, policymakers, and others need to be empowered to address the conflicts of interest that exist in the delivery of gambling industry-funded resources. The promotion of such industry-favoured interventions should not be allowed to undermine efforts to implement regulations to prevent gambling harms.

## 1. Introduction

Gambling policy and the provision of commercialised gambling products and services have undergone radical transformation in recent decades (Sulkunen et al., 2021). Gambling is now provided in many contexts by multi-national corporations, with important implications for public health and policymaking (Cassidy, 2020). It is a highly profitable

industry that continues to grow, facilitated by advancements in product design, marketing strategies, and web-based technologies (Banks, 2014; Sulkunen et al., 2021). These developments have had considerable harmful impacts on many individuals, families, and communities, with an important example being the United Kingdom (UK), where gambling policy changes have rendered it one of the most liberalised markets in the world (Cassidy, 2020; House of Lords Select Committee, 2020;

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Public Health England, 2021; Sulkunen et al., 2021). As in other jurisdictions, the concept of 'responsible gambling' has emerged as a central pillar in UK gambling policy (Cassidy, 2020), a highly contested policy topic (van Schalkwyk et al., 2021a).

The central idea behind responsible gambling is that gambling products, services, and practices are in and of themselves harmless and that harm arises from misuse or abnormal play. Following this line of thinking, it is then argued by industry that when provided with the 'right' information and tools that support self-restraint, monitoring and exclusion, people can, and *should*, learn to gamble responsibly and, by implication, avoid harm. Risk of harm therefore emerges from people not 'playing responsibly' as a consequence of their lack of control, irresponsibility, or faulty decision-making. The responsibility for harm therefore comes to lie with the consumer. This may be seen as a "dividing practice" (Bacchi & Goodwin, 2016), leading to the construction of the 'responsible gambler' as someone who is in control, gambling for the 'right' reasons (e.g. to have fun), as opposed to the 'problem gambler' or 'gambling addict' who is to be understood as deficient or faulty in some way. What constitutes responsible or safe gambling often remains ambiguously defined. The concept of responsible gambling and the trend toward pathologizing those harmed by gambling have been the focus of critical scholarship, which highlights the industry's role in promoting these conceptualisations and how they serve to problematise and stigmatise but not protect people (Cassidy, 2020; Hancock & Smith, 2017; Miller, Thomas, & Robinson, 2018; Miller & Thomas, 2018; Schüll, 2014). This approach is reminiscent of those adopted towards other potentially harmful commodities, such as food and alcohol, where it is for the individual consumer to use information and self-guiding tips, tools and guidelines to control and regulate their consumption, while living within pro-consumption minimally-regulated social contexts (Room, 2011). The role of the gambling industry, and less so the government, is therefore to provide (or fund) information and services that enable consumers to gamble in the 'right' way (Hancock & Smith, 2017). This policy approach places the majority of the burden of managing the risk and consequences of engaging with harmful products on individuals and deflects from the impacts of policy or product design, industry practices and power, the obligation of governments to protect citizens, and business' ethical and social responsibilities (Hancock & Smith, 2017). This conceptual and policy approach is shaped and enabled by, and in turn reproduces, wider neoliberal ideas, values, and policy regimes that are based on the primacy of deregulated markets, marketization and privatization, the conflation of citizenship with the right to consume, and individualised models of health and responsibility (Cassidy, 2020; Harvey, 2007; Schüll, 2014; Schneider, Schwarze, Bsumek, & Peebles, 2016).

However, there are few empirical analyses of UK gambling policy from a public health perspective, and there have been no independent analyses of youth gambling education initiatives, which represent a core element of this policy system and are predominantly funded by the industry and delivered by industry-funded charities. This is despite gambling education ostensibly representing a major policy response to addressing gambling harms. Indeed, teaching about the risks of gambling is now a statutory requirement for all state-funded schools in the UK (Department for Education, 2019). This provides an opportunity for the gambling industry to influence policy discourses and engage with policymakers and other actors through the funding, promotion and provision of gambling education programmes.

Adopting a commercial determinants of health lens, this analysis aims to provide a critical study of the provision of industry-funded youth gambling education programmes. The primary focus of this analysis is to explore whether and how the resources promote a particular account of gambling and gambling-related harms which is amenable to industry interests and their favoured policy regime. In this way, the study supports understanding how the resources may contribute to wider industry strategies, and consideration of the implications from a public health perspective. Using a discourse theoretical approach, we aim to describe,

explain and critique: (1) the ways in which gambling, its risks and harms are constructed, (2) the assumptions, reasonings, and logics, on which these conceptualisations rest, (3) the identities, roles and responsibilities constructed within the texts, and (4) what and how pedagogical practices are employed. The study is therefore concerned with a much broader analysis rather than a narrow focus on whether the content is 'factual' or not. This approach supports understanding how these educational interventions serve to hinder or promote policy and social change that advances the public good.

## 2. Background

In Britain, different organisations, including charities and private companies, deliver youth gambling education programmes. Information provided by them is directed at children, young people, teachers, youth workers, other professionals, and parents. The main charities include GambleAware, GamCare, and the Young Gamers and Gambling Education Trust (YGAM) (GambleAware, 2020; GamCare; ; Young Gamers and Gamblers Education Trust. YGAM resources.; Young Gamers and Gamblers Education Trust. YGAM for parents), which are funded directly by the gambling industry and/or receive funding indirectly through GambleAware. Many gambling industry operators promote their funding of youth education initiatives in high-profile pledges and commitments, and in response to government consultations. In May of 2020, the Betting and Gaming Council (BGC), the self-proclaimed "industry standards body", announced the:

launch of a £10 million independent gambling education initiative [that] will equip a generation of young people to better understand the risks associated with gambling and engage with gambling products and environments in an informed way. (Betting and Gaming Council, 2020)

The programme is delivered by GamCare and YGAM, with the funding being provided by BGC gambling industry members. As part of this programme, GamCare oversees the delivery of the *BigDeal* website (GamCare, 2020). The website provides materials directed at young people, parents, and professionals. YGAM provides a gambling and gaming education curriculum, and also launched an online *Parent Hub* in July 2020, providing materials about the harms of gambling, gaming and how to "establish a healthy online/offline balance" (Young Gamers and Gamblers Education Trust. YGAM for parents). The launch of the parent hub received endorsement by the Gambling Health Alliance (GHA), an alliance led by the Royal Society for Public Health (RSPH), a charity that focuses on campaigning and education in relation to public health issues (Royal Society of Public Health) and funded by GambleAware (Atkinson, 2020). In April 2021, YGAM announced the launch of "a new and improved" version of the Parent Hub website (Young Gamers and Gamblers Education Trust).

GambleAware also provides a range of youth education materials (GambleAware, 2021) in partnership with the PSHE Association (a charity and membership organisation that focuses on supporting the teaching of personal, social, health and economic (PSHE) education). GambleAware have also partnered with Fast Forward, a Scottish-based charity, to develop a "Gambling Education Hub, which is intended to promote gambling prevention and education in Scotland" (Fast Forward, 2020). In partnership with Parent Zone, GambleAware published a resource pack directed at "parents, carers and professionals, so they can support young people to stay in control of their finances and understand the risks of gambling", and a second resource to support families to "learn about the gambling-like risks children may face when playing online games - and simple practical things parents and carers can do to keep gaming fun and safer". (GambleAware, 2021; Parent Zone (a); Parent Zone (b)).

## 2.1. Concerns about gambling industry-funded charities

Concerns have been raised about these gambling industry-funded charities. For example, in 2016 concerns were raised by campaigners in the mainstream media regarding YGAM and the risk of conflicts of interest given the charity's reliance on industry funding and the involvement of gambling executives and industry lobbyists as ambassadors and trustees (Grierson, 2016). In 2021, the Charity Commission launched an investigation into YGAM upon receiving a complaint about its relationship with the BGC (Simmons, 2021). Within 7 days it closed the investigation, explaining that it was satisfied with the working relationship between YGAM and the BGC (Menmuir, 2021). After this episode, YGAM's Head of Delivery wrote a guest blog that was published on the BGC's website stating that by working together with teachers and youth workers "we are educating and safeguarding future generations" (Riding, 2021). The BGC make similar claims about the impacts of the youth prevention programme. However, no robust evidence of preventing harm or improving *understanding* is provided.

Concerns have been raised about GambleAware by academics, members of parliament, and others, particularly in relation to their role as leading fund-raiser and commissioner of gambling-related research, education, and treatment while being dependent on gambling industry-funding. In their interim report on online gambling harm, the Gambling Related Harm All Party Parliamentary Group stated "GambleAware collects funds from the industry to research and treat gambling addiction, but we are deeply concerned about the way they operate and an urgent review of their role and effectiveness is required" (Gambling Related Harm All Party Parliamentary Group, 2019). However the reasoning behind this statement was challenged by GambleAware (Etches, 2020). Some researchers problematise the arrangements that govern the relationships between the gambling industry, bodies like GambleAware, governments, regulators, and researchers and their institutions, drawing similarities with the use of third-party organisations by other harmful industries to distort the evidence-base and influence policymaking and public debate (Adams, 2011, 2016; Cassidy, 2020; Cowlishaw & Thomas, 2018; van Schalkwyk et al., 2021a, 2021b).

## 2.2. Problematizing gambling industry-funded youth education programmes

Here we problematise the educational resources provided by gambling industry-funded organisations. The term *problematise* is used to signal the act of questioning and resurfacing the 'taken-for-granted', rendering it in need of explanation and critique (Howarth, 2010; Bacchi and Goodwin, 2016). Given limited evidence of the effectiveness of gambling education-based initiatives (Blank, Baxter, Woods, & Goyder, 2021), and their continued promotion by industry, those in receipt of industry-funding, and the Government as a means to protect children and young people from gambling harms, scholarly critique of their role within gambling policy and the implications for public health is overdue. Such materials are central to constructing and reproducing certain understandings of gambling, the gambling industry, the role and responsibility of different actors, and what constitute legitimate and possible forms of gambling policy. In this way, they constitute part of the gambling policy discourse whose institution is inherently political in nature and involves the exercise of power by virtue of exclusion of other possible ways of understanding and regulating gambling, and other social identities and practices (Howarth, 2000).

## 3. Theory and methods

The analysis was approached through a commercial determinants of health lens (Kickbusch, Allen, & Franz, 2016; Maani, McKee, Petticrew, & Galea, 2020; Mialon, 2020). This field of research is informed by an understanding that corporate practices and strategies can impact on public health and the determinants of health in diverse ways. This study

draws on post-structuralist discourse theory, PSDT herein, and the logics of critical explanation (Glynos & Howarth, 2007; Hawkins, 2021; Howarth, Norval, & Stavarakakis, 2000; Howarth, Glynos & Griggs, 2016; Laclau & Mouffe, 1985), thereby serving to demonstrate how these provide a set of conceptual and analytical tools that can support conducting critical investigations of corporate political strategy and wider practices. The next two sections introduce PSDT and the logics of critical explanation respectively, followed by a description of the data included for analysis, and how the analysis was conducted.

### 3.1. Post-structuralist discourse theory

PSDT as developed by Laclau and Mouffe and later the work of others, offers a theory of discourse based on the primacy of politics and social antagonisms (Glynos & Howarth, 2007; Griggs & Howarth, 2019; Howarth, 2000, 2010; Howarth et al., 2016; Laclau & Mouffe, 1985). Central to this concept of discourse is "the idea that all objects and actions are inherently meaningful, and that their meaning is conferred by particular systems of significant difference" known as discourses (Howarth, 2000).

The emergence and formation of discourses is historical and contextual and they are contingent in that they represent a partial and contestable account of the social world (Howarth, 2000). The constitution of a discourse in a given social context involves the exercise of power, as it forecloses and conceals other possibilities, with implications for policymaking and people's lives and wellbeing (Howarth, 2000, 2010). Certain discourses (as established 'ways of understanding, doing and being') can become deeply embedded or 'sedimented' and take on the appearance of necessity or permanence (Hawkins, 2021). However, even these *hegemonic* discourses are inherently unstable and potentially vulnerable to moments of *dislocation* that expose the contingent nature of the prevailing social and political order and the *possibility* of understanding and doing things differently (Griggs & Howarth, 2019; Howarth, 2010). Forming and maintaining a sedimented discourse thus involves *hegemonic practices* that manage diverse grievances and demands, and that conceal the contingent nature of the social world (Howarth, 2000, 2010).

PSDT explores human identity and agency through the concepts of *subject positions* and *political subjectivity*. During times of social and political stability, individuals may identify with certain subject positions (e.g. those of mother, teacher, researcher, advocate etc.) whose meaning is determined in relation to the overall discourse. Conversely, at times of dislocation or policy contestation and debate, the contingent nature of the social world is revealed, and agents are called upon to exercise *political subjectivity*, that is, to identify with competing discourses and in this way to reproduce or challenge a given policy or system of policies, contributing to social or policy change (or stability) (Howarth, 2000).

Discourse-theoretically informed analyses aim to study how certain discourses emerge, achieve predominance, are maintained and contested at a given place in time: namely, to support explanation of social and policy change or stability (Jørgensen & Phillips, 2002; Howarth, 2010). To that end it has seen the development of an analytical framework which seeks to operationalise the key tenets of PSDT for the analysis of concrete empirical cases.

### 3.2. The logics of critical explanation

To supplement the conceptual architecture established by PSDT, Glynos and Howarth developed an analytical framework referred to as the *logics of critical explanation*, establishing a methodology for conducting an explanatory critique of social regimes and policy change or stability (Glynos & Howarth, 2007; Laclau & Mouffe, 1985). They identify three types of *logic* – social, political, fantasmatic – as conceptual tools for the analysis of discourse (Remling, 2018a, 2018b). These logics seek to support "the discourse theorist to describe, explain and critique the emergence, maintenance and dissolution of structures of

meaning, rules and practices in the social world” (Hawkins, 2021).

From a general perspective, Glynos and Howarth explain that “the logic of a practice comprises the rules or grammar of the practice, as well as the conditions which make the practice both possible and vulnerable” (emphasis in original) (Glynos & Howarth, 2007). Social logics enable the researcher to ‘come-to-grips’ with what is ‘going-on’ in a particular context (Howarth, 2010). They can be seen as representing the ‘the rules of the game’ or norms and values that guide social practices, the “internal structure of a discursive formation” (Hawkins, 2015). Social logics enable the researcher to describe and characterise discourses.

Political logics capture the practices through which a discourse emerges, and hegemony is established and maintained. Conversely, they are integral to the processes of contestation and challenge, whereby competing discursive projects are formed and seek to bring about a dislocation in the current hegemonic ordering of the social, catalysing its dissolution and a rearticulation of social relations. The logics of equivalence and difference, the formation or disarticulation of equivalential chains of identities and demands, developed by Laclau and Mouffe, are introduced into the framework as the key components of the political logics. The logics of equivalence and difference aid in describing and explaining the processes through which disparate demands or grievances are linked to form counter-discourses to contest existing hegemonic social orders or the ways in which these are ‘managed’ or dismantled to maintain the status quo (Glynos & Howarth, 2007; Hawkins, 2021; Howarth, 2010; Laclau & Mouffe, 1985).

The logic of equivalence describes the processes and practices that ‘bind’ or ‘unite’ disparate elements together to form a coherent discursive formation and that simplify the social space into two antagonistic poles, while the logic of difference involves the relaxing of these bonds to divide and complexify the social realm, to incorporate new grievances and demands thereby preventing the formation of, or dissolving, competing discourses (Howarth, 2010; Laclau & Mouffe, 1985). The logics of equivalence and difference should not be viewed as separate concepts but as interrelated and ongoing processes that involve articulation and reproduction or contestation and dissolution of a social order or policy. The emergence, reproduction or dissolution of a discourse therefore emanates from the dynamic and complex interplay between the logics of equivalence and difference. Political logics thus allow the researcher to explain how certain policies and practices emerge, are reproduced, contested, or transformed (Glynos & Howarth, 2007).

Fantasmatic logics are introduced into the analytical framework to aid in understanding why and how subjects are ‘gripped’ by certain practices, or policy discourses, despite the possibility of other systems of relations, practices, and policies. It is in this element of the framework that the influence of Lacanian theory, particularly the concept of fantasy, is most evident (Hawkins, 2021). It serves to capture the ways in which subjects acquire a sense of completeness and closure through identification with a given discourse – the pursuit of a fully formed and complete social identity and order – described by Glynos and Howarth as the “enjoyment of closure” (Glynos & Howarth, 2007).

Fantasmatic logics aid in resurfacing the ideological dimensions of a discourse that conceal the contingency and contestability of identities and social relations, while naturalising certain discourses as the necessary way of ordering social practices. In this way they capture how and why discourses resist change and public contestation (or the direction and speed of social change when it does arise) and how fantasy acts to conceal the radical contingency of social relations. Constructing fantasmatic narratives thus involves ‘smoothing’ over contradictory and often incompatible dimensions of a discourse that arise from engaging with the promise of complete social closure and control. That is, fantasmatic logics enable engaging with the possibility of realising the impossible. Concealment and ‘smoothing over’ may therefore rely on distributing certain features of narratives between different fora – public-official versus unofficial. Identification of contradictions or differential disclosure of certain features of the narratives employed in the construction and reproduction of a discourse can therefore serve as

markers of fantasy (Glynos & Howarth, 2007).

Glynos and Howarth identify two dimensions of fantasy that come into play in discursive narratives: the ‘beatific’ and the ‘horrific’, which work hand-in-hand (Glynos & Howarth, 2007). Beatific narratives are built around a promise of a ‘fullness-to-come’, a harmonising and stabilising of the social world if a given hurdle is overcome or fantasy object obtained. Horrific narratives mirror the beatific dimension, in describing the horrors or losses that will unfold in the event the hurdle is not surmounted or the fantasy object is ‘taken’ by a discursively constructed ‘other’.

#### 4. Applying the critical logics approach for empirical analysis

Application of the critical logics approach has been operationalised for the study of varied public discourses (Hawkins, 2021; Remling, 2018a, 2018b; Hawkins, 2015; Å m, 2013; Andersson and Ö hman, 2016; Clarke, 2012; Glynos, Klimecki, & Willmott, 2015; Glynos & Speed, 2012; Glynos, Speed, & West, 2014; Griggs, Anderssen, Howarth, & Liefferink, 2016; Quennerstedt, McCuaig, & Mårdh, 2021). The application of the critical logics approach to the analysis of educational materials directed at teachers, children and young people, and parents can aid in understanding ‘what are these texts doing?’: how do they contribute to the maintenance or transformation of the hegemonic gambling discourse, including how gambling is conceptualised as a product or source of harm, the roles and responsibilities of different actors, and the role of regulation.

##### 4.1. Data collection

Educational resources directed at children, young people, teachers/professionals, and parents were collected and collated over the period October 2020 to April 2021 (Table 1). Resources produced by GambleAware in partnership with the PSHE Association, Fast Forward and Parent Zone were downloaded from their respective websites and crosschecked with the relevant page on the GambleAware website (GambleAware, 2021) to ensure all relevant data had been obtained. YGAM educational resources were obtained via the YGAM website, and all online and PDF materials were downloaded from the 2020 and 2021 YGAM Parent Hub and the BigDeal websites (with webpages being downloaded and converted to PDFs for the purpose of analysis). The final dataset comprised a total of 282 texts. Further details are provided in the supplementary materials.

It was discovered that all the programmes address both topics of gambling and gaming (the latter involving the use of a gaming console often with multiplayer web-based features). Gaming-related materials were therefore also included in the analysis, which aligns with the growing recognition of the interconnectedness of the two industries (Banks, 2014; Wardle, 2021). Throughout the analysis the term ‘gambling education discourse’ will be used to refer to the discourse analysed through the corpus of texts, recognising that this encompasses both gambling and gaming.

##### 4.2. Analysis

The analysis proceeded through a sequence of stages. The initial stage involved high-level reading of the entire dataset, followed by a second closer reading to build in-depth familiarity with the content of the texts. The texts were then read a third time to identify and record emerging key themes and associated textual elements. The data was coded systematically using a hybrid approach involving both inductive and deductive coding (Fereday & Muir-Cochrane, 2006). Themes or ‘codes’ were conceptualised as concepts or topics that were identified as distinct entities within and across the resources. This process was iterative, involving constant comparison and refinement of codes and associated textual elements as the entire corpus was coded and a comprehensive initial code book was developed.



**Table 1**  
Summary of the data identified, collected, and analysed.

Programme/ resource	Lead organisations	Intended audience	Materials
Youth education programme	YGAM	Teachers and professionals who work with young people	Workshop and teaching resources with lesson plans, including lesson- specific materials, factsheets, and supporting PowerPoint presentations on certain topics eg. why people gamble/game, probability and luck, the gambling or gaming industry, money and debt, risks of gaming and gambling, addiction, and mental health. Materials for Key Stage 2 through to Key Stage 5, and ages 7–25 years.
Parents Hub	YGAM	Parents	Website, films, and downloadable PDF documents: two main sections covering gaming and gambling. Materials related to: primary-aged children, secondary ages 11–14 years, or secondary ages 15–18 years.
Youth education programme	GambleAware and PSHE	Teachers and students	Teaching handbooks with lesson plans and resources (exploring risk in relation to gambling, KS2 lesson pack, and promoting resilience to gambling, KS4 lesson pack), and general information on how to address gambling through PSHE education. Materials for Key stage 2 (ages 7–11) and Key stage 4 (ages 14–16.)
Youth education programme	GambleAware and Fast Forward	Teachers and other professionals	Gambling education toolkit with general background information and lesson plans and resources on 6 topics: What is gambling, Why is gambling an issue, How does gambling work?, How can gambling be risk?, What is gambling harm? How to reduce the risk of harm? Toolkit states that “session examples are designed to be used primarily with S3 to S6 pupils/ 14–17 years old, in school and youth work settings, although they may be adapted to be suitable also in other contexts”.

**Table 1 (continued)**

Programme/ resource	Lead organisations	Intended audience	Materials
Youth education programme	GambleAware and Parent Zone	Parents/carers/ families, and professionals who work with young people	Two resources packs: <i>Gaming or gambling</i> (FAQ, quiz, lesson plane, glossary, top tips related to the topic or gambling or gaming), and <i>Know the stakes</i> - resources for parents (FAQ, glossary, top tips) & resources for professionals (FAQ, glossary, top tips, guide).
BigDeal website	GamCare	Youth, Parents and professionals	Information sheets, videos, quizzes, and blogs, youth facing section and a section for professionals and parents.

At this stage a second researcher (MP) coded a representative sample of the dataset. Emergent themes were then openly discussed to reach consensus and develop a final coding framework. This was then applied to the entire dataset on a further close reading of the texts, allowing for the emergence of additional themes. The coded data were then analysed to identify the social, political and fantasmatic logics. During this process, coded textual elements were structured in relation to the logics, meaning the data were coded as being relevant to the identification of the social, political and/or fantasmatic logics. Coded data could be assigned to more than one logics-category. This structured data was then used to conduct an in-depth critical analysis involving description, explanation, and articulation, ‘moving’ back-and-forth across the structured data and intermittently returning to the theory and the literature on gambling and corporate strategy (Howarth et al., 2016). This final stage, moving through identification to explanation and critique was supported by the concept of interdiscursivity (Jørgensen & Phillips, 2002; Livesey, 2002). This aided the identification and linking together of the logics by contextualising the gambling education discourse, and revealing the discourses that were drawn on and the ways in which they were reproduced and transformed. In-depth coding and analysis of textual sources were supported using NVivo qualitative data analysis software (QSR International).

**5. Results**

Detailed accounts of the social, political and fantasmatic logics of the gambling education discourse are presented in the results, followed by a discussion section synthesising the logics and placing the findings within the wider literature on gambling policy discourses and corporate political strategies. Exemplar quotes are presented and the intended audience of the text from which the quotes originated is indicated throughout the results. The quotes are referenced using a code generated by the authors to guide the reader to further details about the relevant document provided in the supplementary materials. More extensive and additional quotes associated with each of the logics are also provided in the supplementary materials.

*5.1. The social logics of gambling education*

The gambling education discourse, as represented by the documents analysed, is constructed by a number of social logics articulating the place of gambling and gaming in the wider social context and certain

understandings of gambling and gaming harms, their origins, implications, and required interventions.

### 5.1.1. Constructing gambling and gaming

The meaning of gambling and gaming and their position within the discourse are captured by the logics of consumerism and commodification. Focusing on gambling specifically, gambling is constructed as a normal consumer product and leisure pursuit. Gambling products and the gambling industry are portrayed as normal and ubiquitous aspects of British society and the expansion of gambling's presence, its marketing, and the influence of the industry as an inevitable progression. The role and rise of gaming as a childhood leisure activity and as a commercial industry are similarly portrayed as normal and inevitable. The other side to this normalisation and commodification of gambling and gaming, as constructed in some of the documents, is the recognition that both are potentially harmful. This dual nature of gambling and gaming as normal leisure activities that are also associated with a risk of harm is presented as justification for why children, youth, parents, teachers, and other professionals need to be provided with information and skills-building resources. Education and information are presented as having a central role in addressing the risks of gambling and gaming harms. Furthermore, that gambling and gaming should be approached and learned about simultaneously is presented as a given. The school and home therefore become natural sites in which actions are to be taken to prevent these harms. As the 2021 YGAM Parent Hub explains to parents:

Whether it's on the TV, on the radio, at the football stadium or popping up during video games, gambling ads and influences are everywhere (YGAM-PH-2021-Gbling-09).

Similarly, the 2020 YGAM Parent Hub explained "Gaming has become part of everyday life. Many young people participate in it on a daily basis" (YGAM-PH-2020-InfoSup11to14-Gming-03 & Info-Sup15to18-Gming-09).

A PSHE Association/GambleAware resource directed at teachers of students in years 5/6 (key stage 2, KS2, ages 9–11 years) similarly echoed the increasing exposure of students to gambling opportunities and the need for skills to "navigate" this context:

It is important that even at a younger age, pupils build the skills to navigate a world (both offline and online) where gambling is prevalent and start to develop a nuanced understanding of risky gambling behaviours and the impact of problem gambling on people's health and wellbeing (GA-PSHE-KS2-03).

### 5.1.2. Articulating the harms and the centrality of risk, responsibility, and the moral consumer

Accompanying these understandings about the context from which harms are emerging, the logics of risk, resilience and healthism (the individualising and commodification of health (Crawford, 1980)) are critical in the construction of the gambling and gaming education discourse. Both gambling and gaming are to be understood as risky products when used in certain ways and for certain purposes. Society in general is portrayed as being full of risk and children and young people must be supported to develop the resilience and skills needed to navigate and minimise these risks as individuals. The notion of healthism is evident in the way health and well-being are described in individualistic terms and are to be achieved through individual actions, including being in control, and acting responsibly by making informed and rational decisions. In this way the logics of rationalisation, consumerism, self-restraint, and informed decision-making structure claims about what is needed for children and young people to protect themselves and to justify the suggested pedagogies in the resources. It is here that the moral tone of the materials becomes apparent. There are healthy and unhealthy gambling behaviours, with fun, responsible and safe gambling being achieved through gambling for the right reasons and spending the right amount of money. Parents are advised to have

conversations with their children about gambling and gaming, and to help them think about the value of money and how best to spend their own money. Implicit assumptions and moral judgements are made about what is the "right" type of behaviour and decision, and what is seen as a healthy and moral use of money. For example, YGAM informs parents that:

If someone is playing for the fun of it then they will be happy. However it is good to help your child think about the overall picture so they can approach gambling activities in the right way (YGAM-PH-2020-InfoSup11to14-Gbling-09 & 15to18-Gbling-10).

Building on this idea that it is only certain behaviours, motives, and choices that lead to harm, the inherent risk associated with the products is minimised and the role of informed rational decision making elevated. The content of the materials then rests heavily on a logic of problematising children and young people. It is their tendency to act based on emotion, impulsivity, and their faulty cognitions and lack of knowledge that become the loci of the problem. This claim is made by presenting facts and information about how children's minds work, stages of brain development, known human cognitive biases, such as the gamblers fallacy, and psychology-based evidence about decision-making and delayed gratification. For example, the 2020 YGAM Parent Hub explained to parents that:

**Remember young people aren't prepared to balance emotion and logic to make healthy choices** The rational side of their brain is still not fully developed, they lead with their emotional side of the brain which means their arguments may not seem rational (emphasis in original, YGAM-PH-2020-InfoSup15to18-Gming-07).

The PSHE Association/GambleAware key stage 4 (KS4, ages 14–16 years) teaching resource encourages teachers to introduce their students to the Marshmallow Test as a means through which to explore the concepts of "temptation, impulsive behaviour and delayed gratification" which is then promoted as a way of addressing gambling harms. Strategies adopted by children to delay the consumption of a marshmallow are presented by the teaching resource as being extrapolatable to the aims of gambling education. In this way, the discourse articulates the issue of preventing gambling harms with the use of individual-level coping strategies to control impulsivity and delay the gratification obtained through consumption. For example, after showing them a demonstration video of the Marshmallow Test and presenting the findings of the original and later studies, the teacher is then instructed to:

Ask students how this might apply to gambling ... Emphasise that resisting impulsivity is a skill/attribute which can be learned and that we can avoid situations which require the need for us to exercise this skill/attribute in the first place. With this in mind, we will look at influences which can make it difficult to resist impulsive and/or unhealthy behaviours (GA-PSHE-KS4-01).

While the harms and risks associated with gambling and gaming are acknowledged, the dominant message is that these risks can be known, measured, monitored, and avoided through the provision of educational activities, tools, tips, and facts, the majority of which resemble responsible gambling messaging and tools promoted by the gambling industry and the bodies they fund. By receiving knowledge and skilled-based lessons and by 'staying in control', 'making responsible decisions' and adopting the 'right behaviours', harms can be prevented or minimised. Central to this assertion are the concepts of risk assessment, self-monitoring, the use of family contracts, and blocking tools. All of these are promoted as ways to identify and obtain balanced and healthy lifestyles. The PSHE Association/GambleAware KS4 teaching resource advises teachers that:

Students should consider two alternatives: an 'in the moment' response, not based on all the evidence; and an alternative response, with more accurate beliefs. This is to help young people to see that

effective risk assessment requires a more neutral, fact-based approach rather than an emotional one (GA-PSHE-KS4-01).

The YGAM, GamCare, PSHE Association/GambleAware, Fast Forward, and Parent Zone teaching materials all centre around these logics. Much of the same advice, tools, and tips are interchangeably applied to gambling and gaming. However, the discourse is ambiguous as to what constitutes too much gambling or gaming, which products are safe, and what amount of use or exposure is healthy and safe – this is for individual children and families to identify and adhere to.

All the programmes provide lessons in which students are taught about risk. For example, students are presented with situations or scenarios (such as gambling, drinking alcohol, taking drugs, cycling, going

for a job interview, entering a new relationship) and are asked to identify the risks and influences on the behaviour of the depicted characters, sometimes being asked to rank the behaviours from least to most risky (Fig. 1, see also Fig. 3 in political logics). The key logic is that by calculating, assessing, and managing risk, individuals can be safe, in control and enjoy gambling. For example, a YGAM lesson directed at year 8 students (ages 12–13 years), titled *The House Edge*, intends for students to be able to “identify gambling related harms” which is conflated within the lesson with knowing the probabilities of certain gambling outcomes. Gambling harms are not explicitly presented to the students, despite it being stated in the accompanying teachers’ resource that it can be taught as a stand-alone lesson or as part of an extended 6-

## 1.2 Explore activity: risky behaviours card sort (20 minutes)

Explain that to understand the nature of the risk in gambling, we need to understand the nature of risk-taking in our daily lives.

1. Horse-riding lessons	2. Cycling without a helmet	3. Starting a new relationship
4. Starting your own business	5. Use of class A drugs	6. Smoking every day
7. Stealing from a shop	8. Jumping from a cliff into the sea on holiday	9. Putting £10 on the lottery every week
10. Speeding when driving	11. Going for a dream job interview	12. Playing fruit machines every day

Give students the pack of 12 ‘risky’ behaviours that cover a range of activities [Resource 1]. Ask students to create a continuum from low-risk to high-risk behaviours. There is no definitive answer and students should be encouraged to challenge each other’s views on how risky the behaviours are, recognising that we can have different beliefs about a situation.

Fig. 1. Example activity intended to support teaching about risk, Key Stage 4 (ages 14-16 years) teaching pack, PSHE Association/GambleAware (GA-PSHE-KS4-01).



lesson series (YGAM-Sch-Y8-SOW).

### 5.1.3. The logic of medicalisation

A logic of medicalisation (e.g., referring to symptoms and signs, and directing people to treatment services) also contributes to the construction of the discourse. Children and young people are to be taught about the signs and symptoms of gambling or gaming addiction and about accessing treatment-based services. Parents are similarly encouraged to learn about addiction and to ask their children if they can identify if they are addicted. A parent-facing factsheet featuring on the 2020 YGAM Parent Hub stated:

Would your child recognise if they were addicted to online play?

Ask your child what behaviours someone who is addicted to online gaming would show? ... Can they identify if they play too much? ... If they recognise they may play too long, ask them what they feel is a healthy amount and decide on a time (YGAM-PH-2020-InfoSupPr-Gming-07).

Central to this discourse were the logics of balance and alternatives, that is, promoting the adoption of a 'healthy balance' to gambling and gaming and achieving this through engaging in alternative activities (including building forts, going rock climbing, and holding baking competitions), and setting limits on the amount of time and money spent on gaming and gambling (or gambling-like features such as loot boxes). A YGAM 2020 Parent Hub factsheet for parents, entitled *Helpful Tips*, suggested that "[i]f you suspect your child may be gambling too much there are some activities to help you discuss the topic with your child" (YGAM-PH-2020-InfoSup11to14-Gbling-08). Such activities centre on setting limits, tracking of behaviours, and the need to observe and reflect by exploring "[w]hat do they consider the pros and cons of their gambling activities?", "[w]hy do they gamble?", "[w]hat other activities can create the same feelings?" and "[w]hen do they consider gambling to tip to become [sic] a problem?" Similar advice is presented in relation to gaming and is adopted throughout the YGAM teaching resources, often partnered with promoting the use of surveys and self-monitoring tools.

Parents are to encourage children to use reminders to ensure they remember to move, hydrate themselves and to use the toilet when gaming (Fig. 2). That children are interacting with gaming products that encourage forms of play that can result in physical harm or neglecting of basic needs, are turning to gaming due to bullying or difficulties interacting socially, and that anxiety is provoked when not gaming, as described within the materials, are not problematised in and of themselves. These issues appear to be perceived as inevitable, and it is for parents and their children to address them privately.

Along with the provision of facts, tips, tools and links to services, children and young people are encouraged to actively participate in their creation and dissemination. For example, at various stages in the YGAM curriculum, teachers are provided with lesson plans in which students are instructed to develop communications materials that raise awareness about the harms of gambling or gaming and provide behavioural advice and signpost to services. In this way teaching about the harms of gambling and gaming is articulated with student-led production and promotion of responsible/safer gambling/gaming materials.

## 5.2. Political logics

Analysis of the resources revealed the ways in which gambling education discourses normalise and legitimise certain practices, identities, and understandings while obscuring others. It is here that the logics of equivalence and difference capture the political aspects of the resources – the mode through which social practices are instituted and reproduced while other ideas and possibilities are concealed and marginalised.

### 5.2.1. Logics of equivalence and difference

The logic of equivalence is observed in the way equivalences are drawn between gambling and other industries or issues. This serves to establish a unifying structure to the discourse, incorporating other social projects and elements – simplifying the social space and backgrounding differences. Teachers are advised that gambling is a topic to be taught in schools just like any other risky behaviour, such as the use of alcohol, tobacco, and illegal drugs. Parents are similarly advised to speak with their children about gambling and gaming harms just as they would with other topics like smoking, illegal drugs, and sex. A chain of equivalence is therefore established linking these risky behaviours, which is further extended to include the solutions – building knowledge, resilience, rational thinking, and personal responsibility. Equivalence is similarly established in the way the resources claim that the skills that can be obtained through their delivery will help children and young people in other aspects of their lives, rendering them resilient and resourceful more broadly.

Similarly, the gambling industry and its advertising practices are portrayed to parents and teachers as being just like any other industry. For example, the 2020 YGAM Parent Hub stated that:

**Advertising is a powerful tool used by companies to reach consumers all over the world**, and gambling companies are no different to other organisations, exploring many different avenues to reach the masses (emphasis in original, YGAM-PH-2020-InfoSupPr-Gbling-03, InfoSup11to14-Gbling-02 & InfoSup15to18-Gbling-02).

The PSHE Association/GambleAware KS4 teaching resource similarly explained that:

The purpose of this lesson is not to demonise the gambling industry. They are promoting their trade just like any other potentially risky pastime might, fully sanctioned by law ... The aim is to create a sense of balance by developing a more objective portrayal of gambling (GA-PSHE-KS4-01).

In this way diverse aims and practices such as addressing gambling and gaming harms, teaching children about health and risky behaviours, safeguarding, and promoting the health and wellbeing of children and young people, obtaining financial independence, and building digital resilience are united and seemingly blended into a unifying ethos of personal responsibility and risk management. This articulation involves the logic of rhetorical redescription (Howarth, 2010), whereby the concept and language of responsible gambling are rearticulated and transformed into social practices of preventing gambling and gaming harms among children and young people. The materials display a rhetorical alignment where the logic of responsible gambling is aligned with the need to protect children and young people from gambling and gaming harms. Similarly, market rationality and being an informed, responsible, and in control consumer are conflated with being safe and protected. In this way teachers, children, young people, and their parents are articulated within the larger common project of responsible gambling, and the wider corporate-favoured individual responsibility agenda (Howarth et al., 2000). This is facilitated by the reproduction of the identity of the responsible gambler and gamer (and consumer, more broadly), providing a subject position within the discourse with which teachers, parents and students can identify and strive to assume. Similarly, the notion of problem or unhealthy gambling (and gaming), and the problem or irresponsible gambler (and gamer) is constructed as the antagonistic and undesirable other. Thus, the organising and unifying principle of responsibility and rationality embodied by the informed and responsible gambler versus the problem, uninformed or irrational gambler divides the social space around two antagonistic poles. An instructive example of how this is achieved is through the provision of scenarios or vignettes which describe the right or the wrong type of gambling behaviours. For example, Fig. 3 displays scenarios that are provided to teachers to share with students as part of a lesson on gambling behaviours within the PSHE Association/GambleAware KS4 teaching pack.



# Body Scan



Helping to identify how our body is feeling and when you might need to take a break.

Playing online can be fun, but your child can become totally engrossed and forget to take a break or look after their bodies. These exercises help young people understand their body better.

## Exercise 1

Start from the top of their head and work down to their toes. What signs could their body display to tell them they need to take a break? What could this mean and what actions can they take?

*Example*

My head hurts – is it a headache? Could this be because you are too close to the screen or you have been playing too long? You may need to take a break to rest your eyes and get some fresh air or have a drink as you are dehydrated.

**Note – Include any issues they may not think about but could affect their body to help raise their awareness. Topics such as muscle cramps, bladder issues due to holding on for the toilet, pins and needles etc.**

## Exercise 2

Younger children may need help identifying how their body could be affected. This simple exercise gets them thinking and they will have a better understanding of what they can do to help themselves.

If my eyes hurt I need to...  
 If my head hurts I need to ...  
 If I get pins and needles I need to...  
 If my tummy is rumbling I need to...  
 If my mouth feels dry I need to...

## Exercise 3

Another activity suitable for younger people. Speak to your child about how they may need to look after their body whilst playing online. Discuss how too much screen time can make their eyes and head hurt, and the importance of having regular breaks, having a drink and going to the toilet.

Ask them what they can do to remember to look after their body, putting in place a plan including visual reminders.

*Example*

When was the last time I had a drink?  
 Do I need to go to the toilet?  
 Does my body need a BIG stretch?  
 How long have I been playing? Do I need to take a break?

OR

Don't forget to have a drink!  
 Do some stretches!  
 Go to the toilet!  
 Take a break!



[www.parents.ygam.org](http://www.parents.ygam.org)

Fig. 2. Parent-facing advice and information sheet, gaming-related activities section, YGAM Parent Hub 2020 (YGAM-PH-2020-ActPr-05).

Scenarios		Scenarios	
Scenario	Issues to consider include	Scenario	Issues to consider include
<p><b>1</b></p> <p>Money is tight for Sasha's family so she often wishes that she had the kind of things that her friends have such as designer clothes and the latest phone.</p> <p>When she's out at the newsagents, Sasha sees a story on a newspaper front cover about a man who won the lottery. She has £20 birthday money and sees the lottery kiosk.</p>	<p>The influence of peer pressure (Sasha wants what her friends have) and the media (the front page story in the newspaper provides some evidence);</p> <p>The possible impulsive temptation to gamble, £20 sounds a lot for her to spend gambling given her family's situation.</p>	<p><b>3</b></p> <p>Penny is close with her grandfather who regularly bets on greyhound racing. They go to the greyhound track during half term. Her grandfather loses all the bets he places, gets increasingly cross and asks Penny to choose the winner of the next race. When the greyhound Penny chooses wins, her grandfather is delighted and gives her a share of the winnings.</p> <p>Her grandfather says Penny must be 'a lucky charm' and encourages her to select the winner for the final race, suggesting she puts a bet on too as she's clearly having a lucky day. Penny has £50 in her wallet and the final race is taking bets.</p>	<p>The influence of family pressure (Penny may want to please her grandfather) and types of thinking (grandfather's reference to 'lucky charm').</p> <p>The frequency of her grandfather's gambling.</p> <p>The concept of 'chasing losses' (grandfather continuing to bet even though he has lost heavily).</p> <p>The possible temptation to gamble and win more money.</p> <p>The confirmation bias means Penny might be focusing on the one win rather the rest of the night's losses.</p>
<p><b>2</b></p> <p>Clayton is bored at home one night and sees an advert on his social media feed advertising a new betting site which is giving away free bets.</p> <p>To play, he needs to enter a credit card number. He takes his brother's card, justifying his decision as doing no harm as he only intends to use the free bets and not pay anything on the card. Clayton plays for half an hour and really enjoys it, thinking of ways to spend his winnings if he gets any.</p> <p>At one point he is out of free play but is very close to the jackpot. He is tempted to pay to carry on playing.</p>	<p>The influence of the media (the social media adverts encourage the behaviour).</p> <p>The techniques used to get people interested in gambling and maintain that interest.</p> <p>The belief that people can make money gambling.</p> <p>The draw of gambling sites.</p> <p>The possible temptation to gamble using others' money.</p>	<p><b>4</b></p> <p>Rashid and his friends spend a lot of time gaming online. They have become very successful in various strategy and war games and have discussed whether they should now use these skills to make some money from online gambling.</p> <p>Rashid and his friends are all good at maths, understand odds and card games and think they can make lots of money playing online poker. It's Saturday afternoon and Rashid and his friends start taking steps to make it happen. He has saved up £50 to go to a festival later in the summer.</p>	<p>The influence of peer pressure (Rashid and his friends may encourage each other – 'grouphink').</p> <p>The media (the likelihood that online gaming has brought them into contact with online gambling) and types of thinking (knowing the odds doesn't mean a person can beat them)</p> <p>Different types of gambling and the element of skill v chance (poker has elements of skill unlike a lottery or roulette which is largely about chance).</p> <p>How much he wants to go the festival and the implications if he doesn't go.</p>

Fig. 3. Gambling scenarios, Key Stage 4 (ages 14-16 years) teaching pack, PSHE Association/GambleAware (GA-PSHE-KS4-01).

Among other instructions, teachers are advised to:

Allow for a 10-minute class discussion to explore some of the issues that emerge from the scenarios such as:

- the reasons why people might take the risks associated with gambling;
- what each character should do and why;
- the importance of an objective approach to risk assessment.

The logic of equivalence thus captures the emergence of the gambling education discourse structured around the identity and practices of the responsible and in-control gambler (and gamer).

The intersecting logic of difference serves to manage and contain grievances “so that the existing order can be reproduced without direct challenge” (Howarth, 2010). The logic of difference captures the differential incorporation (or even co-optation) of diverse identities and demands into the internal detail of the discourse, thus providing social subjects with different identities and functioning to keep elements “distinct, separate, and autonomous” (Glynos & Howarth, 2007). It is here that the concept of risk is employed to dissolve equivalential chains that may form to contest the presence and tolerance of harm to children and young people and how this should be addressed. In this way teachers, students, and parents are informed that everyone is different, and that risk arises from an individual’s inherent faulty thinking and impulsive decision-making and is related to the ‘type’ of gambler or gamer they are, and what ‘feelings’ and ‘emotions’ they derive from such

activities. It is therefore for individual children, young people, and families to address these issues. This is to be achieved by receiving education and adhering to the advice, tips, and tools promoted in the resources and through making informed, rational decisions. In this way the resources articulate the role that teachers, parents, and students (and industry, governments, and others) have in relation to each other (the logic of difference) and the unifying concept of responsible gambling and the responsible gambler (logic of equivalence). Put simply, the concept of responsibility unites while the concept of risk simultaneously divides.

The articulation of different subject positions rests heavily on problematising children and young people (as outlined in the social logics), supplementing the concept of risk in internally dividing the discourse and creating a system of differences. By identifying children and young people, their lack of knowledge, skills, control, and responsibility as the issue of concern, unique but related subject positions emerge – teachers are to provide knowledge and skills, parents need to have conversations and use parental blocking tools, and children and young people are to engage with the prescribed activities, learn the facts, control their impulsivity, delay gratification, and adopt the right behaviours. This practice reinforces the notion that those who cannot or will not acquire restraint and knowledge thus constitute the pathologized or irresponsible minority and are to be viewed as responsible for the harms they experience. This reveals one of the ways in which the resources serve to reproduce the hegemonic discourse of responsible gambling which rests on problematising people and pathologizing the harms.

### 5.2.2. Hegemonic practices

The act of providing educational resources can be seen as serving to manage and dissipate demands and grievances by giving the appearance that ‘something is being done’ while simultaneously doing little to “disturb or modify a dominant practice or regime in a fundamental way” (Howarth, 2010). A similar process is captured by the way the resources create a veneer of being critical in nature. Each of the school-based resources provide lessons in which teachers are intended to engage students in critical analysis of the gambling and gaming industries’ advertising practices and product design, as well as in several debate and discussion-based activities. Indeed, the resources openly acknowledge the need to provide students with skills to critique the issue of gambling and the associated risks, and claim to teach critical thinking skills. For example, teachers are informed that:

Providing young people with the skills and strategies to think critically about gambling and the risks it poses is therefore crucial. ... This resource intends to fill that gap (GA-PSHE-KS4-01).

These elements of the discourse reveal the reductions, simplifications and omissions that have occurred in the process of its construction and reproduction (Clarke, 2012). Superficially the resources appear to encourage children and young people to learn about and debate topics such as policy approaches to regulating gambling and gaming, who is responsible for keeping them safe from harm, and who is vulnerable to addiction. However, the way in which these issues are conceptualised and framed, the content of the supporting information and references provided, and the aspects and topics that are deemed ‘up for debate’ all potentially shape and constrain how students and teachers engage

critically which the topics. This in turn limits the extent to which they are empowered to question and contest the social, economic, political, and cultural origins and determinants of gambling harms, the distribution of harms and vulnerabilities, and the power dynamics at play – all central pillars of critical pedagogy (Fitzpatrick & Tinning, 2014; Giroux, 2020).

Activities centred on analysing gambling and gaming advertising content and form are designed in such a way as to give the impression that critique is a technical exercise as opposed to one based on questioning industry practices or their right to market harmful products. The resources intend for students to learn how to identify how advertisements ‘work’, about developments in design and technique over time, and to appreciate that different forms of media are used. It is for individuals to use these skills to ensure that they are not influenced by advertisements. Similarly, parents are advised to discuss advertisements with their children, identifying what the advertisements are doing, how they encourage gambling and how advertising makes them feel (Fig. 4).

Other forms of corporate marketing such as corporate social responsibility (CSR), including the funding of research, education and treatment, the use of affiliates, and the promotion of complex highly profitable in-play sport bets, are not included. More contested forms such as VIP schemes, and free bets are mentioned but not explored in any detail. The use of such techniques and others including the portrayal of winning, odds, and glamour within advertisements are problematised and articulated within the discourse in ways that cast them as influences that children and young people are to accept and learn about. Gambling and gaming advertising, as entities of concern, are normalised, and re-articulated within the logics of business conduct and marketing

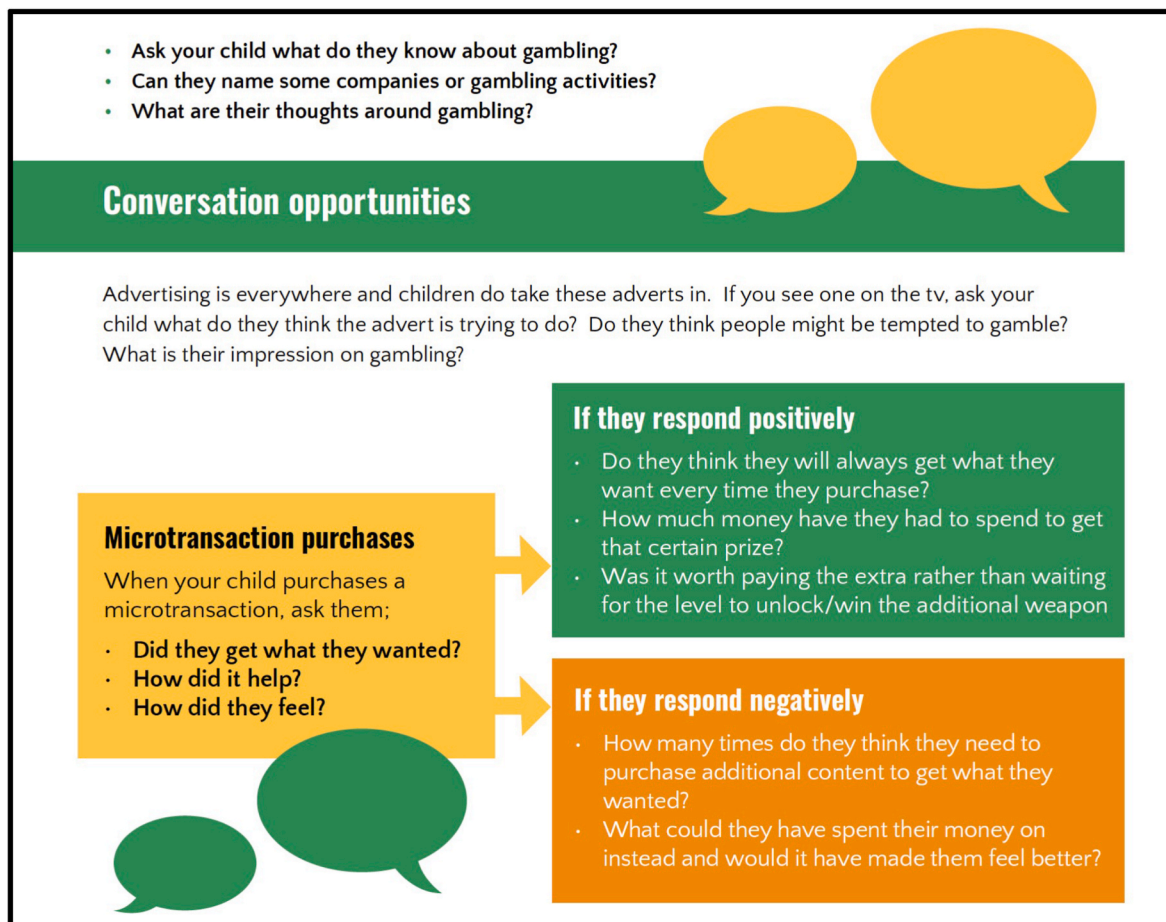


Fig. 4. Section from an information document directed at parents titled *Engaging with your child*, Gambling Information & Support for Primary-Aged Children, YGAM Parent Hub, 2020 (YGAM-PH-2020-InfoSupPr-Gbling-05).



strategies.

The YGAM resources include debate and discussion-based lessons that focus on advertising and the role of the Gambling Act in liberalising gambling advertising. Other lessons call upon students to consider what “the most and least ethical form of marketing?” are or to debate whether advertising should be restricted until after the watershed<sup>1</sup> (e.g. YGAM-Sch-Y11-L5). However, by emphasising concepts like ‘opinions’ and ‘debates’, with no reference to health, equity, ethics, human rights or legal frameworks for example, such lessons potentially lack depth and meaning, and the discourse remains silent on how these debates are conducted in the social and political realm, how different actors seek to influence the policy process, the conflicting views on the impacts of advertising, and whose interests should be seen as legitimate, and prioritised. Policy and regulation are posed as points of discussion or opportunities to express opinions, whereas interventions based on risk assessment, personal responsibility and rational decision-making are presented as the actionable solutions to gambling and gaming harms – these approaches are not offered up for debate. This reinforces dominant industry-favoured framings that ever more research is needed, there remains open debate about the harms, it is too early to undertake decisive far-reaching policy reform, and divergent views are therefore of equal legitimacy (Oreskes & Conway, 2011).

Other critical aspects include understanding how the gambling industry makes profit. However, the link between harms, addiction and the industry’s profits is not elaborated upon in the materials analysed. One example is a YGAM lesson intended for year 8 students titled *The House Edge* (YGAM-Sch-Y8-L4). Students are to undertake activities to learn about odds and probability which are accompanied by the following questions:

#### ACTIVITY: HOW DOES PROBABILITY APPLY TO GAMBLING?

- How do gambling companies make their money?
- Are young people aware of the probability of them actually winning?
- Do you think this would impact the likelihood of them participating?

In this way, gambling industry revenue is portrayed as being generated from the loss of customers due to the low odds of winning. The addictive nature of products, the placement of gambling outlets in deprived areas, the use of advanced marketing techniques such as VIP schemes and third-party affiliates, and gambling policy are not connected in the materials to the industry’s accumulation of profit.

Notably, the YGAM resources include lessons in which students are intended to debate gambling policy and the regulation of gambling advertising and gaming features. However, the scope of these activities is narrow and limited to a specific product or policy question and the ways in which the teachers and students engage with the debates topics are potentially influenced by the details and references provided by the resources. Debates on gambling-like features of games are focused on loot boxes, and debates about gambling policy are focused on advertising. Teachers and their students are not informed about the highly contested and political nature of gambling policy more broadly, how, where and by whom gambling policy is formed, how to engage with this process, and the rights of citizens to decide the role of gambling in their societies and to shape their gambling environments. That gambling policy has undergone radical changes in the last 40 years and that multiple advocacy groups are seeking reform to gambling policies and the industry practices and products sanctioned by these policies, are not

addressed in the debates, despite lessons specifically referring to the Gambling Act 2005 and the need to protect vulnerable groups, for example. The debate activities are preceded, followed-up by or presented alongside suggestions to design or discuss individual-level actions that can be taken to achieve responsible gambling behaviours and reduce risk, such as designing responsible gambling posters or asking students to list actions they are going to take to change their behaviour. Students are instructed to take action, but in the form of responsible gambling-like marketing and personal behaviour change.

The gambling education discourse may therefore be seen as pseudo-critical as many of the critical elements are detached from the social and political context and do not challenge or contest the current order of things in a comprehensive or actionable way. It is in this way that a logic of incrementalism can be seen to be at play serving to give a sense of challenging the status quo while posing little threat to business-as-usual (Smerecnik & Renegar, 2010).

### 5.3. Fantasmatic logics

Fantasmatic logics help in understanding and critiquing *how* and *why* certain social practices or policies appeal to, or ‘grip’, agents and in this way explain how and why certain social practices or policy systems resist change, and conversely the speed and direction of change when it does occur. As described above, two dimensions of the fantasmatic narrative, beatific and horrific, are often observed. The former is captured in the stated aims and expected impacts of the resources. Many of the materials analysed made claims that the resources promote skills acquisition and understanding, and that their delivery would ensure children and young people’s safety, resilience, health, and well-being, now and into the future. This is particularly evident within the explanatory letter provided by YGAM for distribution to parents:

The topics covered will provide children and young people with the knowledge, understanding and skills to live safe and healthy lives, empowering them to make informed choices (YGAM-PrSchRes-01 & YGAM-KS5-04).

YGAM materials directed at professionals working in the youth sector state:

Our programme aims to prevent and reduce gaming and gambling related harm, empowering children, and young people to make informed choices developing critical thinking skills and resilience for life (YGAM-KS5-16-05 & YGAM-NCS-03).

Speaking directly to young people, a BigDeal website blog explains that:

Gambling can be fun, but it also has the potential to cause harm. Gambling should also never become a way to help you deal with anything else in life you don’t feel able to cope with. The tips below can help you reduce your risk of harm, and protect your mental health if you gamble (GC-BD-yp-08).

The 2020 YGAM Parent Hub explained to parents that by adopting the suggested steps outlined on the website they could ensure that children could gamble in a balanced and healthy way:

Children gambling at young ages does not mean they will turn into problematic gamblers, however there are steps you can take to ensure that when they do gamble they can establish a healthy attitude and balance (YGAM-PH-2020-InfoSup11to14-Gbling-03).

Having discussions and conversations about the topics of gambling and gaming were explicitly described to parents as measures through which harms could be prevented. The 2020 YGAM Parent Hub also proposed that by teaching children about certain life-style skills and involving them in household functions such as cooking, shopping and budgeting they would be less likely to adopt harmful behaviours and activities (see the supplementary materials for additional quotes related

<sup>1</sup> The term ‘watershed’ here describes the time after which content deemed unsuitable for viewing by children can be broadcast, which in the UK is set at 9pm. Content unsuitable for viewing by children should not be broadcast before 9pm or after 5:30am.



to the fantasmatic and other logics).

Therefore, while it is acknowledged that children and young people are being exposed to risks of harm, the dominant messages are that by learning about gambling, gaming and the risks, how to control their emotion-driven and irrational thinking, how to appreciate the value of money and make financial plans and perform risk assessments and self-monitoring, they will be protected from these harms and lead healthy lives. Thus, the political nature and origins of current gambling practices and policy regimes from which these harms emerge and the ideas and assumptions that inform these remain in the background and go uncontested. Similarly, the normalisation of gaming in children and young people's lives and the largely unregulated ways in which these products are designed and marketed, are predominantly constructed in the discourse as incontestable and inevitable, particularly in the information presented to parents. In this way, education and parental conversations are promoted as not only being sufficient and effective in preventing (or minimising) gambling and gaming-related harms, but they are also presented as the route to lifelong health and resilience.

This beatific narrative serves to deflect from the void created by the unknowns surrounding the risks posed by gambling and gaming and their rapid evolution and expansion, the unpredictable impacts of technological innovation, and the industries' conduct. By structuring this narrative around concepts like knowledge, understanding, control, resilience, skills, risk assessment, and choice, the discourse creates a sense of order and reason, defending against the emergence of challenges to the status quo and potentially rendering other perspectives on what is needed to adequately protect children and young people from gambling and gaming harms unthinkable or extreme in nature.

The horrific narrative was apparent through the use of value-laden statements which created an implicit understanding of what would transpire if children and their parents did not adopt the choices and recommendations detailed in these resources. Much of the content adopts a moralising tone (as described in the social and political logics), with the implication being that behaviours that do not conform with what is depicted as being the right, informed, and rational choices are therefore foolish, faulty, or wrong. Harms incurred are therefore the fault of parents, children, and young people.

### 5.3.1. *Markers of fantasy: contradictions and slippages*

Close analysis of these narratives reveals the presence of noteworthy contradictions and slippages, exposing the ways in which the fantasmatic logics 'smooth' over or conceal the discourse's lack of completeness or points of weakness. Of particular relevance here is how the discourse handles and obscures the uncertainty around gambling and gaming harms, including their form and likelihood, the highly contested nature of gambling policy in the UK, and the lack of robust evidence on how to prevent gambling and gaming-related harms. This was evident in the slippage in how different concepts and meanings were inconsistently and interchangeably used within and across the materials. For example, signs, symptoms, risk factors, risks, harms, prevention, and treatment were used interchangeably and there was a tendency to conflate the risk aspect of gambling as a game of chance or 'risk' and the concept of risks of harm associated with engaging with gambling activities. By not attending to the lack of conclusive data on, and understanding of, the risks of experiencing harms and at what levels or forms of gambling (or gaming), the resources obscure the contradiction present in instructing students and parents to assess and manage the risks. For example, the PSHE Association/GambleAware KS4 teaching resource instructs teachers to:

Ask students to remember that **risk = the potential harm × the likelihood of the harm happening** (emphasis in original, GA-PSHE-KS4-01).

How children, young people, parents, and teachers are intended to apprehend and consider the risks associated with gambling and gaming when the likelihood of different harms occurring is still widely unknown

and contested in broader social and political contexts is not addressed within the discourse. The concepts of risk and harm are articulated as given entities that can be grasped with certainty while simultaneously described inconsistently and ambiguously both within and between programmes. Serious harms (such as relationship breakdown, job and home loss, violence, and suicide) or their implications are rarely mentioned (if at all) and, when mentioned, explored in little detail. Finally, and contrary to the stated goals of educating about and preventing gambling harms, it is notable how little gambling harms and determinants of their emergence and inequitable distribution were explicitly discussed in the resources. The discourse disproportionately focuses on building understanding of why people gamble or game, the products and their producers, how advertising 'works', risk, self-monitoring and risk assessment, personal responsibility, lifestyles, and people's, particularly children and young people's, impulsive and irrational decision-making.

There is also contradiction in the way the nature of the problem is articulated, particularly regarding the location of the problem. While overwhelmingly portrayed as an issue of personal responsibility and decision-making, at times reference is made to the addictive and seductive nature of gambling and gaming products as well as industry advertising. The 2020 YGAM Parent Hub explained to parents in a document exploring the issue of microtransactions within games that:

The issue being raised is both activities [gambling and microtransactions] are similar in the psychological sense; They have addictive content which activate the brains [sic] chemical reward system and create feelings of uncertainty, anticipation and excitement ... The issue starts as their brain becomes used to the rewards and craves more (YGAM-PH-2020-InfoSup11to14-Gbling-04).

In this way the discourse constructs an understanding of gambling and gaming addiction as being like a drug addiction, with references to downers, highs, addictive products, and the need for substitute products or activities. The 2020 YGAM Parent Hub provided a list of "Top games" in which some were described as being "seriously addictive". That games with such addictive potential are available and that children and young people are habitually playing these games are not called into question, and the ways in which the concepts of choice and informed decision-making may be incompatible with the normalisation of addictive products that are strategically designed and marketed remain unexplored. Instead, there are instances when teachers are provided with lessons in which they are advised to instruct students to identify steps they can take as individuals to "stay safe" while gaming.

These moments in which the addictive potential of the products, the ways in which they interact with the brain's reward system and alter consumers' neurochemistry and when the power and sophistication of marketing are articulated reveal the tensions at play in the discourse. On the one hand the serious nature of the context and the potential for harm is acknowledged but the dominant discursive construct is that people are the problem, and their understanding, choices and behaviours are to be changed and rendered the focus of interventions. The materials guard against these sites of contradiction becoming potential opportunities for contestation and conflict by reassuring teachers and parents that speaking with and informing children and young people will protect them from harm - the education fantasy.

Contradiction is also evident in the discursive construction of the drivers behind children's behaviours and the actions parents and teachers are advised to take. As described under the social logics, children and adolescents are portrayed to teachers and parents as being irrational and driven by emotion. Their brains are described as not having developed the capacity to make rational decisions: "**Remember children and teenagers aren't prepared to balance emotion and logic** to make healthy choices – they won't be considering the consequences of their actions" (emphasis in original, YGAM-PH-2020-ActPr-10).

Despite these assertions, most of the learning activities directed at

children and young people are based on teaching about facts, risks assessment and self-monitoring, and parents are instructed to have conversations with their children about harms, how to spot signs of addiction, the responsible use of money and budgeting for a household. For example, one document provided by the 2020 YGAM Parent Hub stated:

At this age, a child's brain is very much dictated by their emotions and feelings. The rational part of their brain has not fully formed. Opening a loot box, purchasing a skin, winning on the tombola or having enough tickets to 'win' an amazing prize generates rewards in the brain which a child enjoys and wants to repeat again and again (YGAM-PH-2020-InfoSupPr-Gbling-04).

The same document goes on to encourage parents to educate their children about the odds of winning and making informed purchasing decisions.

The scale, nature, and impacts of external influences are similarly articulated in ways that are contradictory and inconsistent with proposed responses to address these influences. The influence of product design and marketing strategies are at times described as being able to "hook" or "trick people". For example, a PSHE Association/GambleAware KS2 teaching resource, titled *Chancing it*, specifies that teachers should:

Take feedback. Draw some conclusions, such as:

Adverts or pop-ups are often designed to try and 'hook' people into gambling or to keep them trying over and over again; people can be persuaded or tricked into thinking it is easy to win (GA-PSHE-KS2-03).

The same presentation instructs teachers to explain to their students "that gambling is an activity meant for adults, but that sometimes even adults can find it difficult to manage the risks and feel they can easily lose control".

While a number of influences are mentioned within and across the different resources, peer pressure is often elevated in relation to other influences. This is done despite the fact that at other stages in the materials Gambling Commission survey data collating responses from young people on why they gamble is displayed suggesting that 6% of those surveyed listed peer pressure as a factor associated with their reasons for gambling, ranked below a number of other factors including fun and winning. YGAM teaching materials reported that peer pressure was ranked 5th among the reasons why young people engage in gaming, however, as with gambling, peer pressure is emphasised as a key influence of gaming behaviours. The YGAM resources outline lesson plans in which students are instructed to "create a poster to help young people stand up to peer pressure when it comes to gambling".

That children and young people are exposed to such an array of influences and are to be expected to identify, resist, and build resilience to these forms of manipulative environments and products are not challenged within the materials. Contrastingly, the central theme throughout the resources is that children need to build resilience and take personal actions to mitigate the impacts of these influences. For example, the PSHE Association/GambleAware KS4 teaching resource provides teachers with prompts to share with students advising them on how to avoid being influenced, including "avoid friends who are gambling", "build a fulfilling life where the stimulation from gambling would not be required", and "balance the likely outcomes to recognise the reward could be a false reward; it is the buzz not the money itself which is the draw which can be gained in healthier ways e.g. exercising, finding a subject/job/cause which motivates a person" (GA-PSHE-KS4-01).

A contradiction in the approach to safeguarding is also observed. The materials adopt a pedagogical approach in which students are encouraged to share if they have gambled or gamed and in what form, while instructing teachers to establish that students should refrain from

divulging personal negative experiences relating to their own or other's gambling. The materials instruct that open disclosures should be avoided and students should be informed of how to access specific individuals or services to discuss such experiences and receive help. While efforts to safeguard students in this way are clearly important, it is unclear why open and often trivialised sharing of gambling participation should be portrayed as unproblematic and beneficial to student's learning. For example, the Fast Forward toolkit and YGAM materials include lesson plans in which students are to take part in "Stand-up-if" or people bingo-based activities (including encouraging students to shout "Bingo" when finished, Fig. 5). In the former exercise students are instructed to "stand up if" they have, for example, placed numbers on the lottery or have a betting shop near them, interspersed with other statements like having a dog or eating pizza, with a similar approach described in the YGAM resources. While the Fast Forward toolkit activities also ask students to stand up if they "can name one effect problem gambling has on relationships" or "can tell me what a young person could do in order to be resilient towards peer pressure" for example, such activities, partnered with efforts to suppress personal disclosures about real-life negative impacts, tip the balance in favour of voicing gambling experiences that make it appear normal and harmless, no different from owning a dog or eating pizza, while the harms of gambling remain in the realm of de-personalised facts and figures. It also may normalise gambling as something that children and young people can discuss among their peers and friends. This minimises the potential for contestation and contributes to the construction of the fantasmatic logic that simplistic classroom-based activities such as these will be effective in preventing harms and in promoting critical thinking by minimising the problem and framing harms as risks and not ongoing realities for children, young people, families, and communities.

## 6. Discussion

The analysis reveals how the gambling education discourse reproduces the broader UK gambling policy regime, and how the resources contribute to wider corporate strategies and the ideas and values they seek to embed within public understandings and policy debates. The gambling education discourse serves to reinforce the problematisation of people and their 'poor' choices and lack of responsibility while downplaying the role of products and policies as determinants of harm. The central (but contradictory and ambiguous) logics of responsible gambling remain firmly embedded. This demonstrates the pervasive and hegemonic nature of this gambling discourse.

### 6.1. Interpreting the gambling education discourse

When viewed through the lens of the social, political and fantasmatic logics, a nuanced and detailed critical analysis of the gambling education discourse is enabled revealing the potential sites of contradiction within the discourse and the assumptions drawn on in its construction. Exploration of the social logics has revealed the discourse's internal structure, while the political logics aid in identifying how contestation is displaced and coalitions and divisions are formed through the interplay of the logics of equivalence and difference. The appeal of the discourse, how it conceals contradictions, and the ways in which subjects are provided with an ethos of closure, control, and progress is revealed through the lens of the fantasmatic logics. Identification of the fantasmatic logics also allows for a critique of the ethical dimension of the discourse, that is, the attendance (or lack of) to alternative possibilities and perspectives and the contingent nature of gambling policies and systems.

On the surface, the resources for teachers, children, young people, and parents appear to teach and inform about the harms of gambling and gaming, the concept of risk, how gambling and gaming products and their respective industries function, and to provide opportunities for debate and critical thinking. Indeed, that the materials contain no

**BINGO**

Find someone who knows the answers!

- Write down the name of the person in the box (not their answer!)
- REMEMBER - You can only use each name twice, and yours only once!
- Shout **BINGO!** When you've filled them all in!

What is the minimum legal age for buying a lottery ticket?	What is a risk associated with problem gambling?	What word is used to describe the probability, expressed as a ratio (e.g. "10-to-1")?
Can you name three bookies?	What is the minimum legal age for going to a casino?	What is the gambling game more common amongst women than men?
How much money is spent in the UK on gambling every week?	Do you like ceilidh and Scottish country dancing?	Where could you go for help if you were concerned about your gambling or about a relative's or friends' gambling behaviour?
How many clocks are there in total in Las Vegas gambling casinos?	What strategy could you use to increase your chances to win at the roulette?	How much does a lottery ticket cost?

Fig. 5. Activity sheet, Bingo-based "ice breaker" activity, Fast Forward Gambling Education Toolkit, 2020 (GA-FF-Toolkit-01).

factual or educational content is not the intended argument or main concern. However, the gambling education discourse avoids disrupting business-as-usual or the taken-for-granted by contributing to the quelling of concerns and contestation that children and young people be placed at risk of harm and by promising to protect children and young people and enable their empowerment and resilience.

As demonstrated through the critical logics approach, core values

and assumptions of neoliberalism, and the responsible gambling discourse specifically, underpin the dominant discourse that is consistently adopted across the corpus of documents. At play in the discourse are the processes of problematising decisions and 'lifestyles', individualising risk, depoliticization, and incrementalism. In this way key elements of the responsible gambling discourse and the neoliberal project more broadly are reproduced and rearticulated in the construction of the

gambling education discourse. By casting the issue in the light of neoliberal rationalities, namely, personal responsibility, the individualisation of health ('healthism'), risk-assessment, and incrementalism, responsibility is passed onto children, young people, and their parents to measure, monitor and master the consumption of gambling and gaming products, the outcome being that when harm does arise it is the fault of the individual child or the inadequacy of the parent. This is taken as the normal way of conceptualising and acting upon gambling and gaming harms. The adoption of more transformational and critical views of the issues and what is needed to address them are marginalised and, by implication, dismissed as legitimate ways of understanding and acting.

## 6.2. Alignment with corporate interests

Comparison with the literature on corporate strategies reveals noteworthy consistencies with the findings of this study. This is particularly evident when comparisons are made with Powell's research on health education resources which are funded and promoted by food and beverage corporations in the name of addressing childhood obesity (Powell, 2014, 2018, 2019a, 2019b). These corporate-produced and sponsored resources deliver a 'brand' of education that places the responsibility onto children to make the 'right' decisions in order to lead good and healthy lives, defined narrowly as being slim and eating the 'right' foods, including those made by the corporate sponsors (Powell, 2019a, 2019b). The resources claim that their content and use support students' critical thinking, including through critique of commercial advertisements, but opportunities to contest the role of corporations in shaping education and obesogenic environments, and broader political and social contexts that restrain choice and determine the inequitable distribution of health threats such as obesity are not provided. Students are also encouraged to produce materials that align with corporate perspectives, thereby transforming students into marketers of corporate-sanctioned messaging (Powell, 2019a, 2019b). Powell concludes that the resources represent a form of 'mis-education' in the way "they portray the path to good health as making 'good over bad' choices in life" and serve to "reproduce the dominant assumption that health is primarily one's individual responsibility to make the right choices and that all children have the same freedom to choose" (Powell, 2019a, 2019b).

There is similar alignment with the literature on the activities of other commercial actors in schools. Tobacco and fossil fuel corporations and their representative organisations have a long history of influencing youth education and the school environment, and indeed the business corporation more generally is known to have actively sought to influence education curricula since at least the early 1900's (Assunta & Chapman, 2004; Boyles, 2008; Carter, 2003; Eaton & Day, 2020; Landman, Ling, & Glantz, 2002; Lee & Glantz, 2012; Mandel, Bialous, & Glantz, 2006; Proctor, 2011; Saltman & Goodman, 2011; Sebríe & Glantz, 2007; Sukarieh & Tannock, 2009; Tannock, 2020; Zou, 2017). Analyses of corporate strategies in relation to schools and youth education demonstrate that such activities range from more overt attempts to sell and advertise branded-products within the school environment to efforts centred on embedding curricula materials and programmes that serve to disseminate and promote certain corporate-favoured ideas, values and identities to children and young people (Boyles, 2008; Saltman & Goodman, 2011; Sukarieh & Tannock, 2009; Tannock, 2020; van Schalkwyk et al., 2022).

The promotion and funding of educational resources and programmes serve another purpose in supporting corporate arguments against the need for government regulations. The provision of education forms part of multiple industries' promotion of self-regulation and represents a core component of their CSR activities. The tobacco industry saw their efforts to deliver youth education as serving in part to preempt regulation, including potential advertising restrictions (Landman et al., 2002). The alcohol industry similarly promotes their funding and engagement with education-based interventions as eliminating the need

for restrictive policies. Parallels can be seen in the alcohol and the gambling industry's funding of DrinkAware and GambleAware and YGAM respectively, as bodies intended to provide education to the public, parents, and schools. These efforts synergise with (and deepen) broader, pervasive societal trends towards consumer information and education as the dominant form of health promotion which relies heavily on individual behaviour change as the assumed mechanism of action (Ayo, 2012; Baum & Fisher, 2014; Kelly & Russo, 2018). This approach somewhat contradicts the vast literature on the social and structural determinants of health, being described as the 'lifestyle drift' within public health practice and research (Glasgow & Schrecker, 2015; Popay, Whitehead, & Hunter, 2010).

Similarities can also be seen in the adoption of a risk rhetoric. As Proctor describes, the tobacco industry went to great efforts to influence how the risks of tobacco smoking were conceptualised by the public and policymakers (Proctor, 2011). They sought to trivialise smoking as no different to other "naughty yet legitimate pleasures" that adults choose to engage in, such as brandy, coffee, and chocolate (Proctor, 2011). The industry cast smoking as safer than it was previously and safe enough to the extent that associated risks are acceptable and no different to the risks of consuming too much of any consumer product such as apple-sauce or Twinkies. They also sought to trivialise nicotine addiction comparing it to other hobbies or habits such as watching television or jogging, drawing analogies with mainstream terms like "chocololics" (Proctor, 2011). Similar trivialising and normalising framings were present in the gambling education resources. This demonstrates the subtle, yet important ways notions of risk and addiction can be articulated within a discourse, appearing to inform while simultaneously dissipating concern and public contestation about the harms associated with a product, the industry's conduct, and how a given industry should be regulated.

The construction of a narrow conceptualisation of agency, which was observed in this analysis, is also noted within the literature on corporate strategy. This is well-documented in relation to the coal, oil and alcohol industries and their public-facing campaigns, for example (McCann, Kyri, Miller, Hawkins, & Hastings, 2014; Schneider et al., 2016; Smerecnik & Renegar, 2010). Borrell documents the narrow economic and free-market lens through which agency is conceptualised within gambling industry and gambling research discourses (Borrell, 2008). Narrow understandings of agency that prescribe how people should act and that limit agency to acts of consumerism and not citizenship, expose an important contradiction within corporate-favoured discourses. Namely, that they promote a rhetoric that government should not interfere with or seek to control people's choices and behaviours and that regulation should be viewed as a threat to individuals' freedom, yet in stark contrast, corporate-funded and sanctioned resources and other measures are prescriptive and limiting in what is to be seen as legitimate ways of thinking and acting and selective in what and how information is provided to the public.

Constrained conceptualisations of agency align with the corporate promotion of personal responsibility, and the problematising and pathologizing of people. Observed across time, location and type of industry, a central pillar of corporate strategy draws heavily on the blaming of consumers for the harms associated with the consumption or use of a product and the assertion that public health policy should therefore be limited to education-based interventions that inform individuals, including children and youth, about how to consume and act responsibly. The tobacco industry started to rely regularly on the notion of personal responsibility from at least as early as the 1970's (Mejia et al., 2014), and reference to the right to consume and the responsibility of individuals for the consequences of their choice to do so formed core arguments deployed in later legal proceedings, what Freidman et al. describe as "Disguising Freedom to Blame as Freedom of Choice" (Friedman, Cheyne, Givelber, Gottlieb, & Daynard, 2015). Review of the literature on the alcohol industry again demonstrates the reproduction of this line of argument (Savell, Fooks, & Gilmore, 2016). The concept of



personal responsibility enables the blaming of people and their 'choices' for the harms that arise and accompanies the pathologizing of a minority of the population – the majority just need more information and a minority need professional help. Children, young people and parents are consistently problematised in industry-funded educational/informational materials, as observed in this study and in other analyses (Powell, 2019a, 2019b; van Schalkwyk et al., 2022). Similarly, in the early 20th century, the US lead industry sought to deflect from their own responsibilities and the harmful nature of their product by shifting responsibility onto parents to prevent the harms of childhood lead ingestion, and by constructing the idea of pica (the tendency of infants to place items in the mouth) as being abnormal and confined to a minority of pathologized children (Markowitz & Rosner, 2013).

### 6.3. Who benefits from gambling and gaming education?

Employing the critical logics approach and placing the findings within the literature on corporate strategies reveal the ways in which the resources analysed in the study are concerning from a public health perspective. The practice of developing and disseminating resources of this nature in the name of preventing gambling and gaming harms serves to recast these issues as arising from a lack of awareness, understanding, resilience and self-control, and from faulty decision-making. This helps to reframe the issue in a way that is favourable to the gambling industry and those who depend on its funding, and rearticulates responsible gambling with education, safeguarding, and gambling policy aims. The resources contribute to the shifting of responsibility and blame onto children, young people, and parents, and deflect attention from harmful industry practices and products. Simultaneously, the industry is enabled to portray itself as socially responsible by presenting their funding of education programmes as evidence of their commitment to addressing the threats posed to children and young people. They, in turn, can argue that other forms of intervention unfavourable to their interests, such as restrictions on advertising or product design, are not required.

In this way, the promotion of education as an intervention and the dissemination of industry-funded and endorsed resources may undermine efforts to address gambling harms as a public health issue by substituting for other policies more likely to be effective, while reassuring parents, policymakers, and the wider public that something is 'being done'. This exposes the ways in which power is exercised through the delivery and dissemination of the education-based resources at the exclusion of other possible policy responses (Howarth et al., 2000). Furthermore, the fact that children and young people have no choice or control over being harmed by another person's gambling goes unaddressed. Such eventualities are only more likely to occur if other policy measures beyond education-based interventions are not adopted. Furthermore, no consideration is given to children whose parents are not as involved in their children's welfare and play, or those who do not have the time or other resources to be so.

The resources obscure and undermine counter-discourses that have emerged in the UK. These seek to problematise the conduct of the industry, particularly predatory marketing strategies, the contemporary design and regulation of gambling products, the industry's influence on research, education, and treatment, and to contest the dominant framing that downplays the scale and nature of the harms that have emerged alongside liberalisation of gambling (van Schalkwyk et al., 2021a). Parents and teachers are not informed about the existence of charities and other not-for-profit groups advocating for policy change, which have been formed by those impacted by gambling harms, many of whom have lost their children or other loved ones due to gambling-related suicide. The materials are limited in the extent to which they attend to the agency of youth, teachers, and parents to influence and inform gambling policy and environments and to hold those responsible for protecting children, young people, and other vulnerable groups to account. By devaluing the role of critical citizenship and through the curtailing of agency, these resources undermine the ability of students,

teachers, and parents to engage with the issues associated with gambling and gaming in meaningful and effective ways to prevent harm. This is counter to core elements of public health – creating health- and equity-promoting environments and empowering people and communities to shape the wider determinants that influence their health, as articulated in the Ottawa Charter for Health Promotion, for example (World Health Organization, 1986). Similarly, the resources undermine the adoption of a rights-based perspective, overlooking the rights of children to live in health-promoting and safe societies, the right to a quality and empowering education, the right to inform decision-making, and the obligation of governments to fulfil these (Todres & King, 2020).

This is not to imply that children and young people should not be taught about the dangerous and addictive nature of gambling and the spectrum of harms that can arise. Similarly, the importance of teaching skills for effective and responsible decision-making, coping strategies, and financial independence and the impact of advertising is not being questioned. What this analysis serves to explain and critique are the ways in which the resources contribute to a wider corporate-favoured gambling policy discourse in which individuals, including children and young people, their choices, thinking, and behaviours are articulated as the problem, the extent and nature of harms remain cast in doubt, and the need for major policy reform highly contested. Furthermore, health education should be held to high evidential and evaluation standards, and delivered within evidence-led, well-resourced whole-school approaches to youth education that are independent of industry influence and that are part of a comprehensive policy regime designed to prioritise prevention of gambling harms.

It is also critical that the potential opportunity costs related to the delivery of these lessons is not underestimated. Education is an important social determinant of health. The use of schools as sites to deliver potentially ineffective and at worst harmful materials is, therefore, not only concerning from the perspective that the population remains at risk of gambling harms but also undermines the health benefits gained from quality education, and potentially widens social and health inequities (Cohen & Syme, 2013; Raghupathi & Raghupathi, 2020; Zajacova & Lawrence, 2018). This becomes even more of an issue given that corporations and others advance the view that schools can be sites in which multiple major public health concerns – obesity, alcohol, tobacco, climate change, and now gambling – can be addressed. Consequently, schools become places to shift focus away from social, political, and economic contexts that are harmful to children and young people. Corporations thus benefit from the provision of materials that promote corporate-sanctioned viewpoints, and influence the ideas and world-views of students, teachers, and parents in ways favourable to corporate interests, while using their funding and dissemination of education programmes to pre-empt regulation and burnish their image.

### 6.4. Strengthens and limitations

The analysis is the first empirical study of gambling education resources funded and promoted by the UK gambling industry. It is novel in the application of the critical logics approach to educational materials of this form and in using a commercial determinants of health lens. It strengthens understanding of the nature of the resources and the potential mechanisms through which they serve to promote or undermine social change towards governing gambling and the industry based on public health principles. The analysis reveals several contradictions. These are moments of potential disruption or dislocation of a hegemonic discourse and can serve as potential spaces to open for debate, thereby revealing other possible interpretations and social practices (Howarth, 2010; Jørgensen & Phillips, 2002). The study findings are of relevance to other jurisdictions who adopt similar gambling policies or those pursuing liberalisation of their gambling regulation. Our findings are also of relevance to those researching other policy issues within the field of the commercial determinants of health given the consistency in approaches and strategies adopted by corporations. This includes the ways in which

ideas of personal responsibility are reproduced within broader neoliberal discourses. Our study also complements efforts to study the long-term strategies of corporate actors, such as the tobacco and alcohol industries, in advancing understanding of how harmful industries can shape the underlying norms and beliefs informing policy debates (Hawkins & Holden, 2014; Hird et al., 2022).

Our analysis has not sought to document or measure industry input into the content of the resources or to comment on the motivations or reasoning that guided their development – the study did not aim to “get behind the documents” (Jørgensen & Phillips, 2002). By adopting a discourse theoretical approach, the analysis treats the documents as a form of sedimented discourse and aims to explore how the resources, and their provision constitute forms of social and political practices that have impacts and consequences, with implications for public health. Through their funding of certain interventions and organisations, the gambling industry can promote approaches to gambling harms that do not threaten their business interests, ensure reproduction of certain values and understandings, burnish their corporate image, and cast them as part of the solution. This can be achieved irrespective of direct industry input into the content of education resources and ‘proof’ of any motivation to favour industry interests.

However, the current study focuses exclusively on the gambling education materials available at the time of the analysis. In this way no comment or conclusions can be made about the ways in which the resources are used by teachers, parents, and youths or their impacts. The study is approached from the disciplinary and philosophical perspective of the researchers and is problem-driven, explanatory, and critical in nature. In this way the researchers have sought to be transparent about the lens through which the analysis was conducted, the ontological framework that informed the research, and to provide in-depth descriptions with substantiating quotes to justify the explanations and critique that are presented.

### 6.5. Policy implications

The analysis helps to make the case for much greater scrutiny of school-based curricula and the processes governing the sourcing of educational resources and how conflicts of interest are addressed. Clearly, more needs to be done to support schools and parents to consider the conflicts of interest that exist in the provision of resources funded and delivered by corporate actors and their charitable partners who have a financial interest in the prosperity of the gambling industry. Beyond analysis of the factual content of such materials, educators, parents, and policymakers need to be empowered to scrutinise the values, assumptions, ideas, and identities constructed within educational materials, especially but not exclusively those that are industry-funded, considering how they may serve to maintain corporate-favoured perspectives and policies instead of their purported aim of protecting children and young people from harm and fostering of critical thinking. It is also important to build greater understanding of how the funding and dissemination of such materials forms part of wider corporate political activities that seek to pre-empt policies that would likely be more effective in creating gambling environments less harmful to children, young people, their families, and communities.

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### Ethical statement

This work forms part of a PhD fellowship which received ethical approval from the London School of Hygiene & Tropical Medicine Ethics Committee.

### Declaration of competing interest

The authors declare no conflict of interest.

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### Appendix A. Supplementary data

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