The Framing of Gambling and the Commercial Determinants of Harm: Challenges for Regulation in the UK

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We take the example of Britain as a case study in which, despite recent repeated calls for gambling to be regarded as a public health issue, it continues to be framed primarily in terms of economic activity and consumerism. We argue that this framing is the product of a particular political-economic model and that it is embedded in legislation and regulatory practice. We go on to describe the commercial landscape of gambling that has been produced by this framework as one which produces harm. As such, we make the point that framing is a key component of the commercial determinants of harm in gambling. The final section of our paper considers the various forms of political and commercial influence that infiltrate and shape the framing of gambling in Britain.

1 Introduction: framing

The framing of gambling is crucial for how it is dealt with at every level; from legislative, regulatory and commercial practice to the terms of media and civic debate. 'Framing' refers to the choice of language and the setting of parameters within which gambling can be discussed. This generates a wider climate of understanding, and it is always associated with power. Whoever frames the debate has power over the ways that we can and cannot think about gambling, as well as what we can do about it.

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J. Nikkinen et al. (eds.), *The Global Gambling Industry,* Glücksspielforschung,
https://doi.org/10.1007/978-3-658-35635-4_6

In Britain, despite recent repeated calls for gambling to be re-framed as a public health issue and regulated accordingly (Wardle et al., 2019; Wardle et al., 2021a; Chief Medical Officer, 2017), it continues to be framed primarily in terms of economic activity and consumerism.

This framing has important implications for how gambling is dealt with. Our argument here is that the dominant framing of gambling in Britain as a normal form of economic activity is a product of a particular political-economic model. It is embedded in legislation and regulatory practice, and it underlies a commercial landscape which produces harm. As such, framing is a key component of the commercial determinants of harm in gambling.

We begin by briefly contextualising our argument within the literature on the social and commercial determinants of health. We then move on to outline the legislation that has shaped the current climate of gambling in Britain and situate this within the political-economic model that produced it. We go on to look at the commercial landscape of gambling that has been produced by this framework, before turning to explore how the regulator deals with this. The final section considers the various forms of political and commercial influence that infiltrate and shape the framing of gambling in Britain.

2 The social and commercial determinants of health

The social determinants of health - understood as the social and environmental contexts that determine life chances, health and wellbeing - have been well documented (Marmot, 2005). These refer to the ways that socio-economic factors, such as diet, housing, education and wealth, impact on life chances. Policy and regulatory actions also shape these contexts. More recently, attention has focused on the ‘commercial determinants of health’: the actions of commercial corporations that negatively impact health (Kickbusch, 2012). These range from the production of unhealthy commodities themselves, to the political practices and economic systems they are embedded in (Mialon, 2020).

In gambling, the associations between harm and wider social determinants, such as low levels of income, education, poor housing and economic marginalisation, have also been documented (Korn, 2001; Sulkunen et al., 2019). A number of researchers have also begun to note the role of the commercial practices of the gambling industry in producing harm. Attention has focused on areas such as marketing (Newall et al., 2019a) and product design (Schüll, 2012; Newall et al., 2019b), as well as the ways that industry can influence the fields of research and policy, and resist attempts at reform (Cassidy et al., 2013; de Lacy-Vawdon & Livingstone, 2020).

What has been less well defined is understandings of the relation between the commercial determinants of health with wider social determinants of health in gambling. This lacuna perhaps reflects a broader under-theorisation of power in research on the commercial determinates of health more generally (Lacy-Nichols & Martens, 2021; Maani et al., 2020). To examine these issues fully here is outwith the scope of this short chapter. However, as a precursor to this kind of project, we explore the ways that the gambling landscape in Britain has been framed and shaped by a specific political-economic model. This model has in turn produced a particular kind of regulatory structure and a commercial environment that is characterised by the production of harms.

3 The British Landscape: the 2005 Gambling Act and the neoliberal economic model

The gambling landscape in Great Britain changed dramatically with the introduction of the 2005 Gambling Act. The framing used to enshrine this legislation has been enduring and, as we shall see, looks set to continue. This Act created the current commercial gambling landscape in Britain, shifting it from a tightly regulated and restricted market to one of the world's largest over the course of two decades (Orford, 2018). The regulatory framework that oversees it is one that is exported globally. The practices and framing of commercial gambling in Britain thus have implications for what happens in the global market.

The Gambling Act reflected the neoliberal, free market model of economic action. It formalised a number of key principles - such as competition in 'free', deregulated markets, minimal state intervention and consumer choice - as a template for how gambling would be organised in Britain. This market ideology entrenched of the idea of competition as the driver of economic growth and the globalization and increasing power of commercial corporations.

The terms of reference that framed this piece of legislation are crucial. From an activity that could be tolerated but not encouraged, the Act reframed the idea of gambling as a mainstream leisure activity and the industry a key driver of economic growth in terms of job creation and revenue. Moving away from the principle of 'unstimulated demand', the new regime was based on the fundamental principle of 'aiming to permit' gambling. This involved 'modernizing' outdated restrictions so that the industry would be able to operate and market itself 'like any other legitimate leisure industry' (Tessa Jowell, Secretary of State for Department for Culture Media and Sport, 2002). Allowing commercial competition and 'releasing [the] industry from regulation', would, it was hoped, ultimately, make Britain a world leader in online commercial gambling (DCMS, 2003).[1]

A powerful argument used for re-framing was the idea of 'modernising' legislation in the light of new technology; as though technology were an unknown, unforeseeable force, divorced from commercial and political concerns, that was somehow able to catch legislators sleeping. This was despite prescient remarks about the ways technology (e.g., interactive TV) may generate new forms of gambling being made by foresighted politicians as early as the 1980s (Wardle, 2021). Similar arguments about technology are repeated today, in statements that claim the 2005 Act is an 'analogue piece of legislation in a digital age' (Labour Party, 2018).

The Act itself has always been based on a contradiction. Alongside its explicitly free market aims, it also aims to protect (some) vulnerable groups. However, exactly who these groups are or how they are to be protected is not clearly defined. The legislation also created an industry regulator — the Gambling Commission. This organization is a product of the legislative framing that created it, and so embedded in the same libertarian principles of 'aiming to permit' so-called 'responsible gambling'. We discuss this in more detail later.

Embedded in the legislation, and the political economic ideas that drive it, are neoliberal ideas about individual responsibility and 'the freedom to choose'. The Gambling Act repositioned gambling as a form of consumerism with a limited risk of harm for the so-called 'responsible majority'. In such a framing, only a 'minority' would develop problems, and even then, it was argued, there were underlying issues that predisposed them to harm. Such ideas about individual responsibility (rather than, e.g., collective welfare or state regulation) is a powerful discursive tool. It is used as a rhetorical framing device across a number of the harmful commodities industries as a means of aligning harm with consumption rather than production and so diverting attention from the corporate practices, economic systems and political decisions that produce harm in the first place (Reith, 2018).

Symbolic of its framing in terms of leisure and consumerism, responsibility for gambling was placed with the (then) Department for Culture, Media, and Sport,[2] rather than the Department of Health and Social Care: the latter being a location which would have foregrounded its relation with harm and health. To date, successive governments in Britain have taken the approach of working alongside

[1] A sentiment that was echoed in the run up to the Act by the then Chairman of Camelot, the National Lottery operator, Michael Grade who declared 'regulation is the enemy of innovation' ("Upgrading the Lottery", 2002).

[2] Now renamed the Department for Digital, Culture, Media, and Sport.

industry, encouraging them to adopt 'responsible' corporate practice, rather than introducing any more legislation to regulate them. Where legislative change has occurred, it has been the result of sustained campaigning by increasingly organized lived experience and advocacy groups, who have challenged the dominant framing of individual choice and gambling as leisure, and have succeeded in leveraging the attention of media and other stakeholders.[3]

The 2005 Gambling Act is currently subject to review. It is notable, and disappointing, that the Terms of Reference through which the Government has set out its public Call for Evidence for the Review uncritically repeat the underlying assumptions of the 2005 Act itself. For instance, they specifically state that the ambition is to develop an industry which contributes to the economy, and are predicated on the idea of 'informed consumer choice' throughout. Notably, the Call for Evidence does not appear to question how the current economic model for gambling may affect harms, nor whether alternative models might exist. Without even acknowledging the underlying ideological assumptions of its framing, it is unlikely that the Review will be able to conceive of gambling in terms of public health. As a consequence of this, it is likely that the new legislation will reproduce the current framing of gambling in terms of consumerism and leisure.

4 The commercial landscape

The framing of British gambling legislation, and the political-economic system that underlies it, has created a highly competitive industry, whose business model is predicated on harm. In Britain, the majority of the population do not gamble. In fact, gambling on products other than the National Lottery is, and remains, a minority pursuit (in 2016, 42 % of British adults gambled on things other than the lottery, with just nine per cent gambling online, Conolly et al., 2018). This means gambling companies, especially online companies, compete with each other for a relatively small number of potential customers, yet rely on them for a high volume of turnover.

The economic sustainability of companies thus relies on them maintaining and supplementing their customer base and extracting as much profit as possible from these players. They do this through what are increasingly described as predatory practices, including aggressive forms of advertising, targeted marketing, special VIP schemes, and special offers on odds and prices. Exceptional amounts are

[3] For example, the organisations Campaign for Fairer Gambling, Gambling with Lives, The Big Step, among others.

currently being spent by gambling companies on advertising, marketing, sponsorships, and promotions as they compete to recruit and retain their player base. In 2018, gambling companies spent over 384.9 million EUR (328 million UKP) per year on paid-for advertising, an increase of 24 % since 2015. In 2019, estimated spend on TV, radio, cinema, internet, and print press advertising was on average 7.8 million EUR (6.7 million UKP) per week (over 408.4 million EUR (348 million UKP) in 2019; Ipsos, 2020).

There is growing evidence that the gambling industries in Britain, as elsewhere, have an unhealthy reliance on those harmed for substantial portions of their profits (Fiedler et al., 2019; Harrison et al., 2020). Recent research by Wardle et al. (2021b) showed that 40 % of spend on online sports betting within a three-month period was generated by just 15 % of those classified as moderate risk or problem gamblers. Recent analysis by the University of Liverpool and NatCen Social Research of online gambling accounts showed that 70 % of Gross Gambling Revenue (GGR) was generated by just five per cent of players, with a disproportionate amount of spend being generated from those living in the most deprived areas. These figures were even more marked for certain sectors, for example five per cent of the highest staking accounts contributed 83 % of GGR for online casino products (NatCen, 2021). Furthermore, a large-scale study of bank transactions found that one per cent of gamblers spend 58 % of their income on betting and suffer a range of financial, health and personal harms (Muggleton et al., 2021). These more recent studies replicate findings from Orford et al. in 2013 who showed that a greater proportion of spend was generated from moderate risk or problem gamblers in Britain.

Ethical issues aside, an industry which derives substantial profits from those harmed does not embody the values of longevity and sustainability that a healthy economic model is based on, and which the Terms of Reference of the Gambling Act Review claim to value. Furthermore, it can be regarded as resting on the exploitation of those consumers who governments and regulators should be seeking to protect.

The current framing of gambling in Britain has resulted in a fiercely competitive climate. Alongside advertising, they compete on game and product design, as well as price, odds, special offers, and promotions. To do this, they draw on a global infrastructure of technology and communications systems - including operators, game designers, programmers, marketers, and other (in)vested interests - to produce more ‘competitive’ (and so more harmful) products. Immersive and geolocation technologies, machine learning and predictive personalisation as well as the use of cashless and digital currencies are used to keep one step ahead of the competition, drive up customer numbers and increase retention. Lucrative deals with sports clubs have been struck and whilst sponsorship may be the visible face of this relationship, these partnerships are crucial to facilitate a more modern type of gambling: in-play betting. This is a form of live betting that goes on while the event is actually taking place, with odds changing as it unfolds. It is regulated by the Gambling Commission in Britain but banned in many other jurisdictions. Without direct feeds and data sales from stadium operators to betting companies, the in-play betting market could not exist (on the relationship between gambling and sport, see also Nosal in this volume).

The complex odds and arcane algorithms that drive these kinds of products make the concept of 'choice' that underlies the economic model problematic. Research from Britain has found that many of the new types of complicated bets and in-game forms of wagering, which have high profit margins, are based on highly complex odds and price returns that many players do not understand (Newall et al., 2019b). The result is that the kind of 'free' and 'informed' choice over basic actions - such as, for example, how much and when to bet, and what the likely return might be — is simply not possible in many situations.

A recent example of this is the failing of Football Index. Football Index, with its strapline of 'Fantasy Sports + Betting = Football Index', was a British licensed and regulated gambling product that offered customers the opportunity to buy shares of players and receive dividends on their payments. Some invested thousands in their 'player' portfolio — making its subsequent collapse all the more notable — with the ensuing backlash demonstrating that consumers really weren't at all clear about how the product worked, what the risks involved were or even how much they could lose. When Football Index marketed itself as a product for punters who wanted to 'take back control', it was not consumer control that was being offered, but corporate. The fight for market share, the framing of gambling as 'consumer choice' and the neoliberal principles underpinning gambling provision created the conditions in which Football Index could both rise and fail.

This commercial environment leads to specific regulatory challenges, which themselves are constrained by the political-economic model in which they are embedded. It is to this we now turn.

5 The regulatory system

5.1 The Gambling Commission

The 2005 Act did not anticipate the kinds of technologies and products that would develop to feed the market model. And, because of its framing in terms of economic competition, choice, and responsibility, neither the legislation, nor the regulator that it established, are equipped to deal with them.

The Gambling Commission, at least in its initial set-up, was a product of the libertarian framing that created it. Although it is tasked with protecting children and other vulnerable persons from being harmed or exploited by gambling, its remit is also to '*ensur[e] that gambling is conducted* in a fair and open way' (emphasis added). This is a similar unresolved tension that underscores the Act itself.

This raises various problems in terms of regulating new technologies and products. Based on the underlying assumption that gambling should be permitted, the Commission has tended to be reactive in the face of industry innovation. Rather than being based on the precautionary principle, the Commission tends to lean towards permitting the introduction of new products (so long as they meet certain standards) and appears to only reluctantly use its regulatory powers to gather evidence of harm when pressed. As a result, the British system has been characterised by a lack of regulatory foresight and roundly criticised in a review by the National Audit Office (NAO, 2020). Marion Nestle (2002) talks of 'regulatory capture' in the case of vested interests within the food industry influencing, or 'capturing', regulators. We can add to this the idea of 'regulatory escape' to describe how fast-moving technologies and products, as well as migration to new platforms, can be deployed by industry in ways that enable them to out-pace the regulator and so avoid regulation or scrutiny.

In addition, and arguably as a consequence of its framing of gambling in terms of consumption, the Commission's initial approach to regulation encompassed a mix of industry self-regulation and outcomes-based approaches. This tendency is problematic in terms of regulating in the public interest and has arguably produced a state of 'regulatory capture'. For example, in 2019 the Commission established three Working Groups to review problematic areas of industry practice, including VIP schemes (high value customer incentives), advertising online and responsible product design. Each of the groups was led by a senior industry figure. The situation led the tabloid newspaper, *the Daily Mail*, to quote: 'It's like putting the mafia in charge of looking into organised crime' ("Betting Watchdog", 2020).

5.2 Industry self-regulation and political influence

Against this backdrop, the industry in Britain have volunteered to regulate themselves. They have taken ownership of the 'responsible gambling' discourse and used it to promote an image of the efficacy of voluntary industry codes of practice. For example, in 2014 four of the biggest operators in Britain (William Hill, Ladbrokes, Coral and Paddy Power) established their own industry watchdog, The Senet Group, to ‘promote responsible gambling practice’, including funding an educational advertising campaign on problem gambling: ‘when the fun stops, stop’. Such measures — all of which went beyond what was currently required by the government or the regulator — were, however, intended to see off further attempts at regulation, and establish the industry as its own watchdog.

The responsibilities of the Senet Group were, in early 2020, transferred to the newly formed Betting and Gaming Council (BGC) — itself a merger of various gambling industry trade bodies. However, there should be no doubt who is the master of the Betting and Gaming Council — it is first and foremost a trade association, charged with protecting the interests of its members and equipping itself with a board comprising of those with extensive expertise in public (and political) relations.

Most recently, in response to the Gambling Act Review, the Betting and Gaming Council has gone on the offensive, attempting to instil fear into government around the idea of regulatory change. One of its key strategies has been to mobilise the perceived ‘threat’ of the Black Market. Claims about the importance of the economic contribution of the gambling industry, as well as the rhetoric of ‘responsible practice’ coalesce around this issue which, again, is a result of a particular framing of gambling. In 2021 the BGC issued a report claiming that 200,000 people and 1.6 billion EUR (1.4 billion UKP) is waged on the Black Market in Britain, with their Chief Executive commenting: ‘These figures…demonstrate the danger of unintentionally driving punters into the arms of the illegal, online black market — which offers none of the protections of the regulated sector’ (PWC, 2021).

Yet content analysis of industry responses to the House of Lords Select Committee on the Social and Economic Impact of the Gambling Industry shows that the gambling industry itself has confidence that there is *not* currently a significant black market for gambling in Britain and that the current regulator is effective at suppressing this when it arises. The Betting and Gaming Council agreed, stating ‘Great Britain has been highly effective in suppressing the development of a Black Market in Britain’ citing effective enforcement action by the Gambling Commission and other authorities as one reason for this. Other submissions echo this statement, though William Hill’s submission suggested that greater regulation may have the unintended consequence of encouraging some to gamble on unregulated websites. However, it is unclear why regulatory enforcement action which the industry itself has stated has been effective previously would be considered inadequate in the face of greater regulatory restriction.[4]

[4] We are currently preparing this analysis for publication, please contact the authors for further details.

The regulatory structure that the Gambling Commission operates within is part of the wider political climate, and it is beholden to government for what powers it does have. And herein lies the bigger problem — the network of vested interests and influence at the political level.

6 Political- commercial influence and (in)vested interests

The global gambling industry have built a network of influence that extends well beyond the commercial sphere. This is similar to the influence of other harmful commodity industries who use a variety of strategies to foster relationships between corporations, policymakers, regulators and academics in ways that reinforce their power (Jahiel & Babor, 2007, see also Adams, this volume). Knai et al. (2018) have shown how the unhealthy commodity industries intervene at different levels of the policy system to gain agency over policy formation and politics. This kind of political influence is interwoven throughout the British system. From politicians at the highest level, to government committees and the advisory boards who serve them, there are deep, long running interconnections between gambling industry actors and political circles in Britain.

At its most straightforward perhaps is the issue of party-political connections and financial donations. Sports and betting companies are among the largest donors to the ruling Conservative party (Peck, 2017) with, for example, the owners of the bookmaking chain Betfred, Fred and Peter Done, making substantial donations as well as profiting from government contracts to supply treatment to those harmed by gambling (Davies, 2020). At the same time, many individual Members of Parliament (MPs) declare receiving financial interests from gambling companies. In the 2019–2021 Register of Members Interests, at least three MPs received gifts or money from gambling companies. Notably, Philip Davies, MP, received 58,451 EUR (49,800 UKP) over a three-month period between August and October 2020 from GVC Holdings (the parent company of Ladbrokes-Coral among others) for 'advice on responsible gambling and customer service'. This was reportedly for 124 h worked, a fee of 469 EUR (400 UKP) per hour. Laurence Robertson, MP, in addition to declaring numerous gifts, was appointed Parliamentary Advisor on sports and safer gambling to the Betting and Gaming Council, being paid 2,347 EUR (2,000 UKP) per month for ten hours of work. Caroline Noakes, MP, accepted hospitality from GVC to attend the Cheltenham Festival, Britain's premier horse-racing festival with an increasing reputation for corporate hospitality.

And of course, former parliamentarians who know the system and have strong connections are feted by industry. After resigning from government, former gambling reform advocate and Deputy Leader of the Labour Party, Tom Watson, announced he had taken a role at Paddy Power to 'advise them on safer gambling'. Michael Dugher, a former Shadow Secretary of State for Culture, Media and Sport (i.e., the government department which has responsibility for gambling), is now the current Chief Executive of the Betting and Gaming Council, charged with advocating on behalf of the industry.

These examples extend also to the House of Lords. Lord Anthony St John is an advisor to Betway, where he advises on its international expansion, and is listed as part of the company's leadership team on its website. He also sits on a government committee tasked with scrutinising legislation that would force the company to register in the UK. Betway is owned through a shell company in the British Virgin Islands which obscures the ownership of the bookmaker.

Even some recent Committees and organisations who are currently raising the profile of gambling harm also possess links to industry. For example, the membership of the recent House of Lords Committee on the Social and Economic Impacts of the Gambling Industry included a number of Lords with ongoing or historical interests in various sectors of the gambling industry. It was chaired by Lord Michael Grade who in the past has acted as Chairman of Camelot (the company that, at the time of writing, runs the British National Lottery); and is an ex-CEO of First Leisure Corporation (a company that includes bingo in its portfolio). At the time of serving on the Committee, Lord Grade was also a founder of the Northern Lights Arena Company, a business with links to e-sports.

This is an example of a form of influence whereby industry-friendly framings and connections may potentially be brought, unexamined, to a powerful body involved in the re-framing of gambling legislation. The House of Lords Select Committee's final report made a number of recommendations for reducing the harms of gambling. However, what it did not do is question — or even acknowledge — the framing of gambling in terms of economic growth and market expansion. As we have hopefully shown, without a fundamental re-framing of the issue of gambling in terms of public health, serious reform of the regulatory and commercial landscape is unlikely to be possible.

7 Concluding remarks

Britain is a key player in the global gambling industry and its political-economic and regulatory practices, as well as its framing of those practices, are exported around the world. The current trend for increasing centralisation of gambling firms by large supra-national parent organisations (Entain (formerly GVC); Flutter Entertainment, etc.) provide channels through which practices, experiences and narratives can be shared and re-framed by gambling businesses worldwide.

In Britain, although gambling companies are currently resisting the potential threat of stricter regulation, the fundamental model that underpins their business model does not appear to be under similar threat. Narratives of responsible gambling, economic growth and consumer choice continue to dominate the language of both government and corporate circles, and both intersect with and influence the other.

Crucially, this framing is one that is exported beyond Britain to other jurisdictions. The global nature of gambling corporations means that as regulations in one jurisdiction become stricter, and markets increasingly saturated, companies practice ‘regulatory escape’: shifting to new, less regulated markets and so displacing harms to poorer countries. There is no requirement for companies who operate in Britain and adhere to British regulatory standards to apply these same standards elsewhere. In this scenario, the only way to regulate without simply shifting harms to another jurisdiction is to regulate globally.

But we must also question the fundamental ways in which our approach to gambling is framed, and who it is framed by. Despite its embedding in terms of consumption and economic growth, gambling is not, to paraphrase Thomas Babor (2010) on alcohol, an ordinary commodity. It is, rather, one with an inherent risk of harm to the health and wellbeing not only of those who participate in it, but to the wider population and society as a whole. Accepting this point involves a paradigm shift in terms of the way that gambling is framed, and — by extension — in terms of the way is it is governed and regulated. Britain has experimented with its current framing for too long. Only the outcome of the Gambling Act review will indicate whether or not government has adopted a new framework for discussing and, crucially, addressing gambling and its related harms.

Declaration of conflicts of interest

Gerda is currently funded by the National Institute for Health Research, the British Academy, the Economic and Social Research Council, and the Medical Research Council for research relating to gambling. In the past three years she has received funds for travel and subsistence from the Society for The Study of Addiction, Public Health England, and the World Health Organisation. Between 2008–2013, she was a member of the Responsible Gambling Strategy Board: the independent body that provided advice on policy to the UK regulator.

Heather is currently funded by Wellcome Trust, the Economic and Social Research Council, the National Institute of Health Research, the University of Glasgow's Lord Kelvin Adam Smith Fellowship scheme, and the Greater Manchester Combined Local Authority for projects relating to gambling. In the last three years, she has received funding from The Gambling Commission, the Department of Digital Media Culture Sport, Gambling Research Exchange, the Irish Institute of Public Health, John Hopkins University and has worked on one project for GambleAware. She has received funds for peer reviews from the Victorian Responsible Gambling Foundation and the New South Wales Office of Responsible Gambling. She has received travel and subsistence funds from Alberta Gambling Research Institute. Between 2015 and 2020, Heather was Deputy Chair of the Advisory Board for Safer Gambling, an independent body providing advice on policy to the UK regulator. Heather runs an independent consultancy, providing research advice to public and third sector bodies. She does not and has not provided any consultancy services to the gambling industry.

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