
FEIGNING CORPORATE SOCIAL RESPONSIBILITY (CSR) THROUGH HEALTH-WASHING: GAMBLING INDUSTRY CON- FLICTS OF INTEREST IN HEALTH SERVICE PROVISION AND TRAINING IN IRELAND

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Abstract

The gambling industry in Ireland, and elsewhere continues to grow. Evidence of the nature and extent of the gambling problem in Ireland has started to emerge. In order to better understand the machinations, tactics and strategies of the gambling industry it is instructive to review the activities of the global tobacco and alcohol industries. The gambling industry in Ireland feigns concern with corporate social responsibility (CSR) to camouflage its activities. Three particular aspects of the gambling industries' CSR activities may be referred to as health-washing. These are the funding of gambling related research, the funding of co-unselling programs for individuals and their families impacted by problematic gambling, and the funding of gambling related third-level courses. This commentary focuses specifically on the last two of these which are funded by the Gambling Awareness Trust (GAT), a representative body of the Irish gambling industry.

Keywords: gambling, corporate social responsibility, health-washing, public health, health promotion, Ireland

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The gambling industry in Ireland, like many other countries, continues to grow. The Irish gambling industry is now estimated to be worth approximately €10 billion annually [1], while the global gambling industry is forecast to rise in turnover from US\$711.4 Billion in 2020 to US\$876 Billion by 2026 [2]. It is interesting to note that although the majority of governmental and academic papers report a moderate decrease in gambling during the Covid-19 pandemic [3], numerous industry commentaries report an increased turnover of online gambling, as well as an increasing turnover generally [4-6].

It is important to note that just as alcohol has been branded as 'no ordinary commodity' [7], so gambling too should be thought of as no ordinary service industry. The gambling industry feeds off both addiction and criminality. Davies has recently explored the psychological tactics employed by the gambling industry to encourage and ensure that gamblers continue to bet when the industry is fundamentally structured against them [8,9]. It should also be acknowledged that the links between organized crime and the gambling industry are extensive [10]. The gambling industry is routinely used for laundering money [11,12]. Such money is often acquired via the production and distribution of illicit narcotics [13].

Evidence of widespread corruption and collusion in state sanctioned gambling in Ireland has a long history, dating back almost a century. In 1930 the Irish Hospital Sweepstakes (IHS) began, with a share of the proceeds going to support most of Ireland's hospitals (a notable exception being the Adelaide hospital, a Protestant hospital which both did not approve of gambling and wished to retain its independence). Although careful choreography, pageantry and the ubiquitous use of nurses in almost all of its staging gave the impression that it was simply a charitable lottery, the IHS was in fact a private for-profit venture. Payments to the hospitals are estimated to have been as little as ten percent of

the sweepstakes' income, while payments to the handful of stockholders were lavish, especially given the impoverished nature of both the Irish economy, and most of its population, throughout the period of its operation. It is important to note that tickets for the Irish Hospital Sweepstakes were also sold extensively in Irish emigrant communities, especially the US and the UK. The Sweepstakes ran for over half a century and were only closed down after dramatic evidence of systemic and widespread corruption and collusion emerged [14,15].

The gambling industry, like Big Tobacco, and the alcohol industry affect a concern with corporate social responsibility (CSR) [16]. However, it is important not to be taken in by such affectations. In order to understand the gambling industry it is instructive to look at the cognate industry of Big Tobacco. It should be noted that evidence demonstrates clear links between the tobacco and gambling industries [17].

The Tobacco industry continues to operate successfully on a global scale, despite numerous and repeated attempts in many countries to curtail its excesses. So effective is the industry in combating and evading public health controls implemented by governments, that it has been referred to as a hydra [18,19]. This metaphor is used with reference to the Ancient Greek myth in which two new snake-like heads grow, to replace each that is cut-off [20,21].

Big Tobacco's history is marked by an ongoing series of scandals that have revealed the nefarious tactics and mindset of this industry. At its most basic this involves not just knowingly selling an addictive carcinogen, but actively working to deny its negative health impacts, while at the same time striving to make it both more appealing and more addictive. Thus industry documents have later revealed that leaders of the major US tobacco brands knowingly lied to the US Congress when they denied the carcinogenic properties of their products [22-25].

However, this is not the full extent of their duplicity. Faced with negative press and a threat to sales, and thereby profit, the industry

responded aggressively. This involved both adopting a veneer of benign corporate philanthropy, while also systematically striving to undermine and cast doubt on the emerging wealth of scientific evidence that linked tobacco with cancer and ill-health [22-31]. More recently Big Tobacco has continued to try and make its products and activities more palatable through extensive greenwashing [32-35]. Despite ample evidence of the environmental damage caused by the tobacco industry [36,37].

At first, the tobacco industry directly funded research studies which openly disputed the link between tobacco and disease. However, as the researchers that were effectively on the payroll of Big Tobacco began to be identified and discredited, the industry changed tack. Instead, they began systematically funding research designed to cast doubt on the tobacco-disease link through funding a series of researchers with no prior links to Big Tobacco. Research querying methods, analytical techniques and statistics was therefore funded to obscure their clearly direct and causal relationship. These researchers effectively began to undermine public trust in science itself [24].

Big Tobacco also has an established and documented history of targeting specific populations, often disempowered minorities. For example, while targeting women with both pro-equality and weight control marketing, the industry has also targeted children, as well as minority female groups through specific marketing aimed at both African-American women and lesbians [38-47]. Perhaps one of the most notorious examples of such targeting was titled Project SCUM. Ostensibly this title was an acronym for Sub-Culture Urban Marketing [48]. However, the mindset behind the targeting is patently apparent in the title.

With a better understanding of the strategies and tactics routinely deployed by Big Tobacco, it is easier to understand the activities of gambling firms, a cognate industry.

It is now opportune to examine the dramatic growth of gambling in Ireland in recent years, as well as its escalating negative impact. The College of Psychiatrists of Ireland has referred to gambling in Ireland as a 'major Public Health concern' [49]. A number of recent studies have examined the problematic issue of gambling in Ireland [50-52]. Although concerns have been raised given the tobacco industry's funding of one of these studies [53], a recent comprehensive study of gambling in Ireland suggests that 0.3% of the population (which corresponds to 12,000) were problem gamblers [54]. A further 0.9% (corresponding to 35,000 adults) were identified as moderate risk gamblers. 2.3% (corresponding to 90,000 adults) of the adult population met the criteria for low-risk gambling. Further examinations of problematic gambling in Ireland have explored the issue across the population [55], as well as in a variety of sub-populations including young athletes [56].

Other research in Ireland has noted poor online safeguards for gamblers [57], while the need for increased regulation is longstanding [57,58]. Such reports have helped to fuel concerns in the media and in government about the growing problem of gambling in Ireland [60-62]. It is notable that even former executives from the gambling industry have called for increased regulation of the industry in the online era [63].

In this environment, the gambling industry in Ireland have responded with a form of corporate social responsibility camouflage that is best described as health-washing [64]. Health-washing has been described as a 'term ... adapted from greenwashing, which means that a company attempts to attenuate its harmful externalities on environment by a sign of compensatory good will' [65]. Large sections of the gambling industry in Ireland are represented by an umbrella group the Gambling Awareness Trust (GAT). GAT appears to be an independent charity 'set up to establish and operate a charitable fund which will fund gambling addiction counselling, prevention, education, research and awareness services in Ireland' [66]. However, further examination of GAT reveals that it is

in fact funded by over 30 bookmakers [67] (see Note 1).

There are three prime examples of health-washing in the current activities of the Gambling Awareness Trust. These are the funding of research examining the nature and extent of gambling in Ireland, the sponsorship of a course related to gambling addiction, and the establishment of mental health services to respond to gambling issues. The main issue with GAT funding research exploring gambling in Ireland has been explored elsewhere [53]. However, the controversial issues of sponsorship of courses and services in Ireland has not been explored to date.

With associated publicity, the Gambling Awareness Trust recently announced the establishment of a National Problem Gambling Support Service in collaboration with the Family Resource Centre National Forum (FRCNF) [68,69]. It is anticipated that this agreement will see counselling services for those experiencing harmful gambling and their families in 20 Family Resource Centres (FRCs) across Ireland.

The proposed provision of services by the GAT is particularly problematic in the context of recent developments in the UK. The UK's National Health Service (NHS) formerly had a formal agreement with GambleAware for the commissioning and funding of services. GambleAware is remarkably similar to the GAT and also receives significant funding from the gambling industry [70]. However in Spring 2022 the NHS ended this relationship stating:

"Our decision has been heavily influenced by patients who have previously expressed concern about using services paid for directly by industry. Additionally, our clinicians feel there are conflicts of interest in their clinics being part-funded by resources from the gambling industry" [71]

That GAT is proposing to initiate gambling industry sponsored counselling services in Ireland, almost immediately after the

rejection of such services by the NHS for such important reasons appears highly suspect.

In relation to health training, the Gambling Awareness Trust website currently includes an advert for a Certificate in Gambling Addiction run by Munster Technological University (MTU) [72]. This is highly problematic for a number of reasons. Firstly, the link to one of Ireland's new Technological Universities offers a level of respectability, legitimacy and credibility to GAT activities that is undeserved. Secondly, the advertisement appears to indicate a genuine level of concern in the industry for gamblers. However, this health-washing is little more than corporate camouflage. Thirdly, the Certificate is also part-funded by GAT. The MTU website states that because of GAT support '70% of fees will be reimbursed on successful completion of the programme' [73]. A financial relationship has therefore been established involving GAT and both MTU and students on the course. Impartiality is threatened when such financial relationships exist. However, the major issue with this GAT sponsored course relates to its nomenclature and framing. The website states that the 'Certificate in Gambling Addiction is a 10 credit, level 8 special purpose award involving a single module (Recognising and Responding to Problem Gambling: Contemporary Approaches)' [72]. The full name of the course involves the broader term 'Problem Gambling', while the Certificate is referred to by the much more narrow and specific term 'Gambling Addiction'. Gambling is not portrayed as an issue per se, rather the focus is diverted to gambling addiction. Such a tactic is similar to that observed by the alcohol industry where there is evidence of deliberate moves to remove troublesome phrases [74,75]. Concerns over GAT's health-washing appear more relevant given reports of the group's shortfall in fund-raising from the gambling industry [76].

The negative impact of gambling in Ireland is being exposed through an increasing number of research and media reports. In response to such exposure the Irish gambling in-

dustry has formed a representative group, the Gambling Aware, which attempts to minimise negative publicity by feigning corporate social responsibility. Three elements of such health-washing are the gambling industry funding research, training and counselling services. It is an unfortunate reality that although article 5.3 of the WHO's Framework Convention on Tobacco Control (FCTC) requires all signatories to protect health policies 'from commercial and other vested interests of the tobacco industry' [75,77], there is no such agreement framework in relation to gambling. The gambling industry must not be allowed to finance research, education or health services. To do so gives it a status, legitimacy and power that is wholly inappropriate. Public health, mental health, and community campaigners concerned over the negative impact of the gambling industry need to be vocal and vociferous in their opposition to such developments.

Notes

BAR ONE RACING; bet365; BETDAQ; betway; Boyle Sports; Bwin; Casumo; Celton; Chieftain Bookmakers; Coral; Fox Bookmakers; Foxy Casino; Gala; Irish Greyhound Board; Ladbrokes; mintbet; Mr Green; Paddypower betfair; Party Casino; partypoker; Quinn Bet; redbet; Roncol Sports; SBOBet; Sean Graham; Sportingbet; SportPesa; The Stars Group; The Track; 32 Red; +o+e; Tully bookmakers; William Hill; Winners Enclosure; Winning Room.

Resumo

La hazardludindustrio en Irlando, kaj aliloke daŭre kreskas. Evidentoj pri la naturo kaj amplekso de la hazardludproblemo en Irlando komencis aperi. Por pli bone kompreni la mahinojn, taktikojn kaj strategiojn de la hazar-

dluda industrio estas instrue revizii la agadojn de la tutmondaj tabakaj kaj alkoholaj industrioj. La hazardludindustrio en Irlando ŝajnigas zorgon pri kompania socia respondeco (CSR) por kamuflaj siajn agadojn. Tri apartaj aspektoj de la CSR-agadoj de la hazardludindustrio povas esti referitaj kiel sanlavado. Ĉi tiuj estas la financado de hazardlud-rilata esplorado, la financado de konsilaj programoj por individuoj kaj iliaj familioj trafataj de problema hazardludo, kaj la financado de hazardludo rilataj al trianivelaj kursoj. Ĉi tiu komento temigas specife la lastajn du el tiuj, kiuj estas financitaj de la Gambling Awareness Trust (GAT), reprezenta entrepreno de la irlanda hazardludindustrio.

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