'Customer interaction' dominates industry's safer gambling needs for training, research, and support services
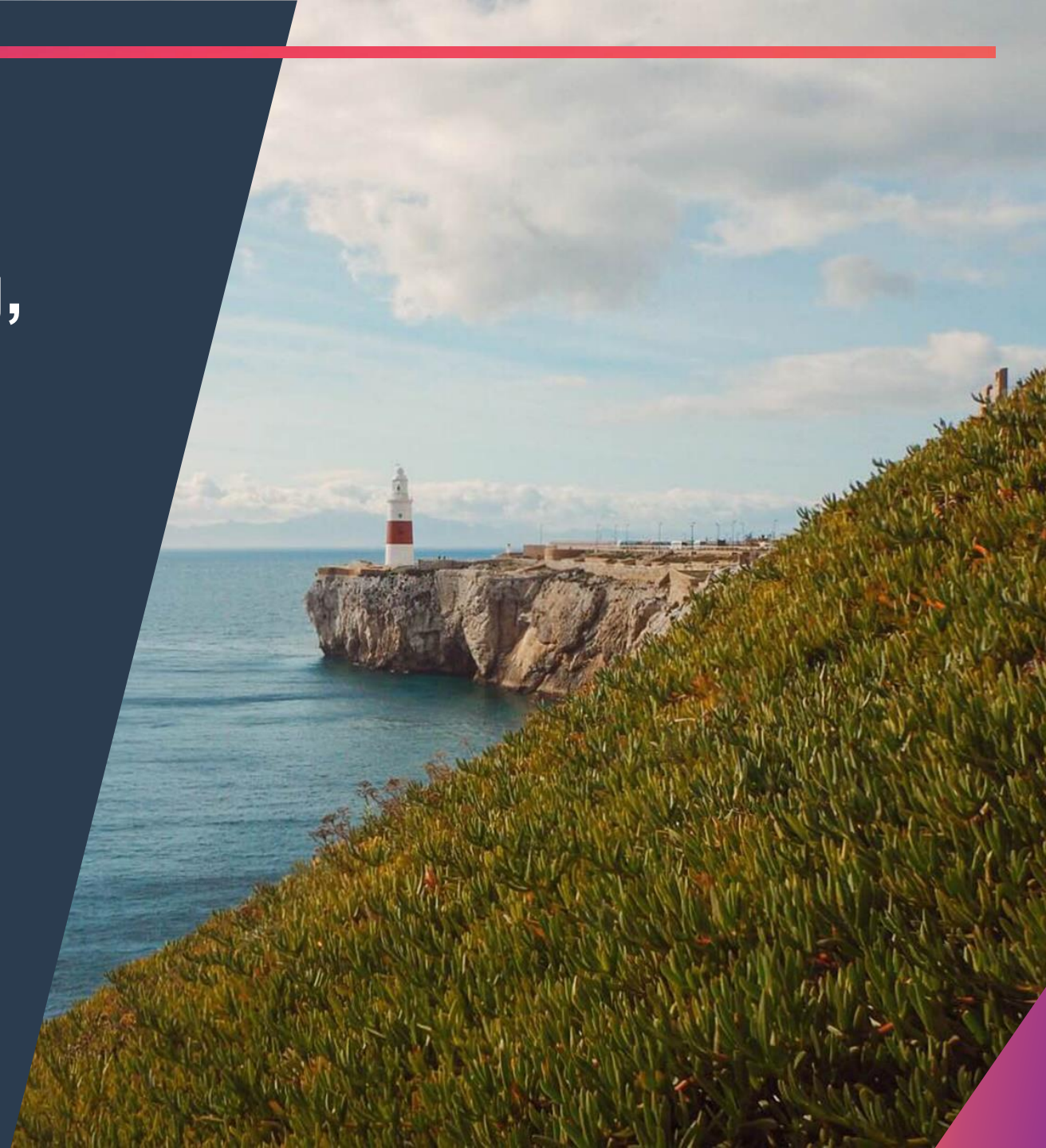
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KPMG eSummit June 15, 2023

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part of PhD research program

- examine the evolving legal, regulatory and compliance environment in Gibraltar in the context of international shifts

- Study 1: political discourse analysis – revision of the Gibraltar Gambling Act

- **Study 2: assessment of the research-related needs of the industry as they develop, implement, and evaluate compliance strategies** – for employee training, research, and support services

- Study 3: evaluation of the impact of responsible gambling training on employees' knowledge, self-efficacy, and attitudes

surprising gap in literature

public policy literature – for state/local government

- to develop capacity, training, and resources
- target: physicians[1, 2], mental health[3, 4], community services[5], juvenile[6] and adult[7] detention

gambling literature – for schools of business, hospitality, tourism

- to develop specialized curriculum for industry roles employees[8 - 13] and managers[14, 15, 16]
- to understand research use in consumer behaviour, marketing, human resources, business, revenue, and growth[17, 18]

problem gambling literature

- responsible gambling training - evaluating or identifying key content[19 - 31]

why the literature gap?

- gambling grouped with hazardous consumption, or risk industries, unable to achieve CSR[32, 33, 34]

- fierce debate over how to prevent gambling industry influence on academic research, and growing divide[35 - 38]

- caution to scholars to avoid reputational risk and career consequences of funding touched by industry[39 - 42]

- strong criticism of the state: entanglement with industry agenda, & not motivated to provide public research funding[43 - 45]

research plan

target population: senior leadership in responsible gambling and compliance

Gibraltar – a highly strategic choice

- serve ~50-60% of global market, 1,800 – 3,500 employees

- full range of remote gambling products

- compliance with many regulatory frameworks globally

data collection

- scan of issues – local, UK, European, and changing markets

- study 1 **online survey** 25-30 minutes to complete, piloted with industry reps

- study 2 **semi-structured interviews**, video or in-person, 30 minutes

analyses

survey: quantitative (SPSS) descriptive statistics, group comparisons, correlations

interviews: qualitative (ATLAS-ti) thematic analysis, deductive and inductive

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scan results

- evolving concepts of RG, PG, harm

- customer risk – identifying it and responding

- measuring effectiveness of performance and outcomes

- employee experiences and support needs

- scientific research – ways for industry to receive/ consume/ collaborate/ apply evidence

- regulatory environments

- customer supports – potential for shared, online services

survey

training	research	support services
RG commitments in employee performance	Rapid Evidence Assessments	External support for customer-facing employees
Basic elements of RG	Research support & consultation	Multi-jurisdictional Helpline
Ways to identify & respond to player risk	Evaluation – employee training	Online PG treatment services
Employee Wellbeing	Evaluation – RG interventions	Online controlled return program (SE)
Understanding gambling harm	Player characteristics & markers of harm	Player Education Resource Centre
	Defining & measuring harm	Online self-assessment tool
	Regulatory policy	Third-Party Exclusion
	Employee experiences	

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sample characteristics

study sample: 18 senior executives in responsible gambling and compliance, representing 15 **B2C** companies

- **management levels**: manager, head, director, managing director, and vice president

- **functional roles**: 33% responsible gambling, 43% compliance, 14% combined, 10% unspecified

response rates

- survey: 100% of participants from 100% of companies
  female 44%, male 66%

- interviews: 93% of *eligible* participants from 92% of companies
  female 47%, male 53%

survey results – **highlights**

overall: strong confirmation of environmental scan

- high importance ratings across topics

- additional topics identified – customer interaction dominated

collaboration across three areas

- strongest evidence of existing collaboration for training and support services, less for research
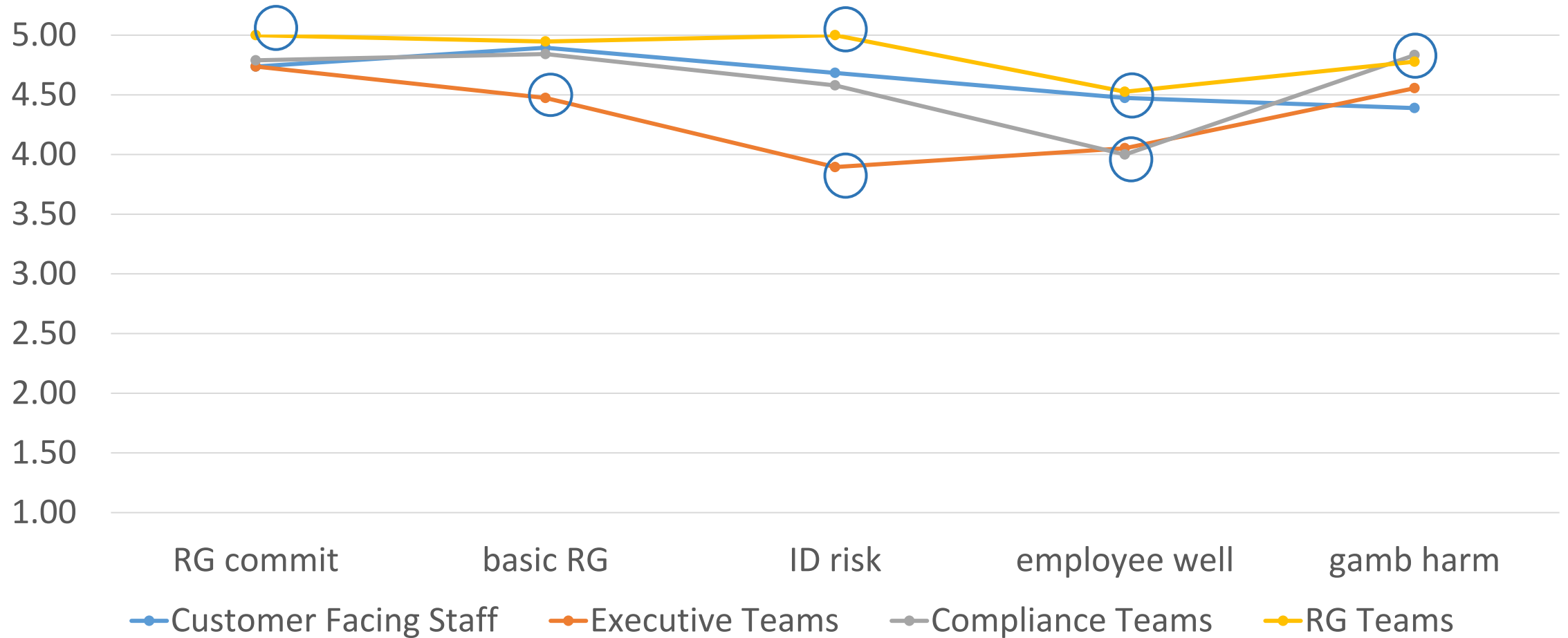
"how likely to collaborate with research institute"

- lowest for support services where mature relationships exist

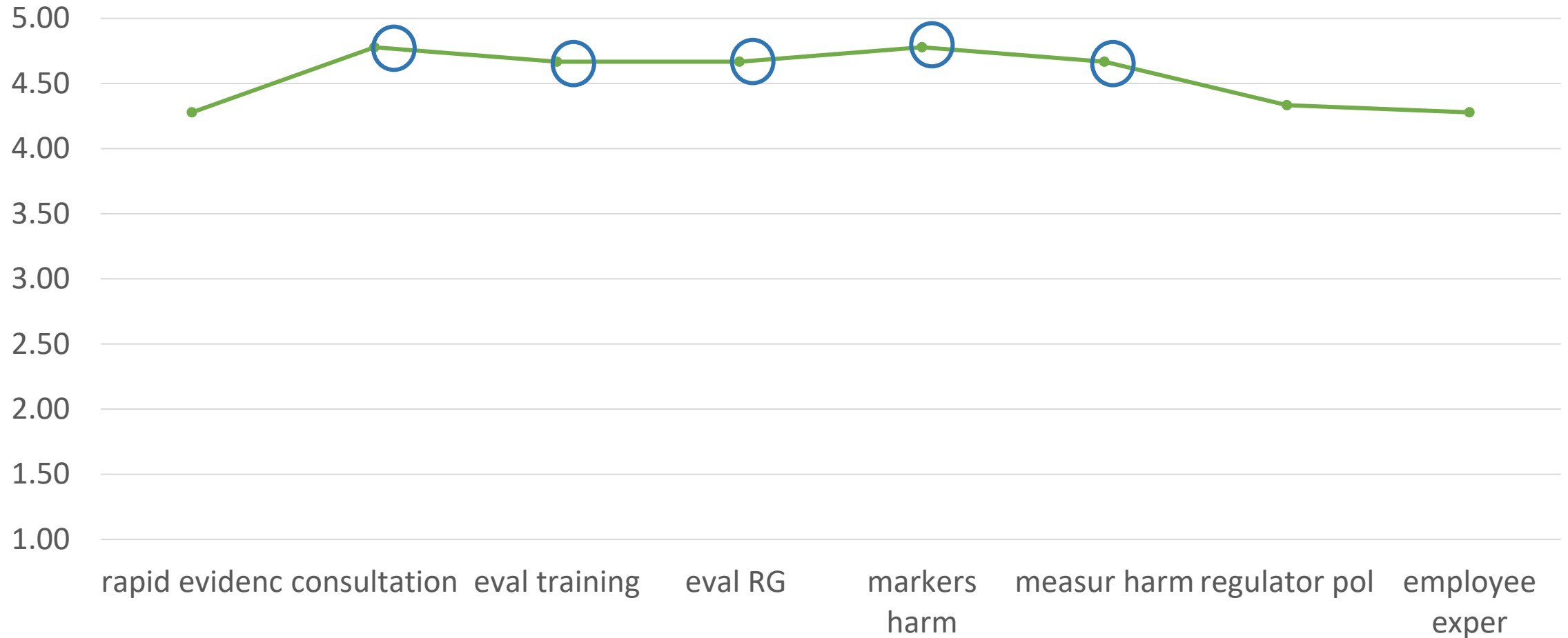- mainly openness to *future* collaboration across all areas

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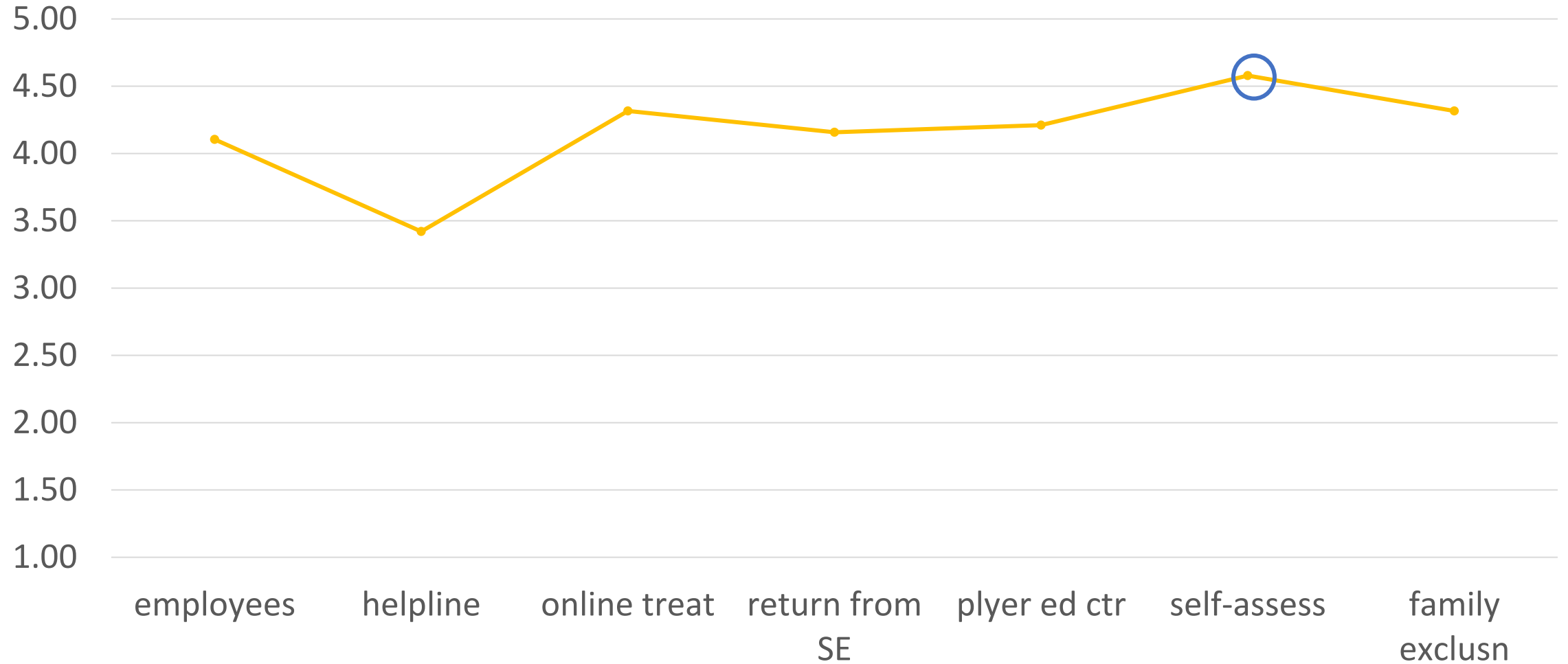
importance of topics across all three areas
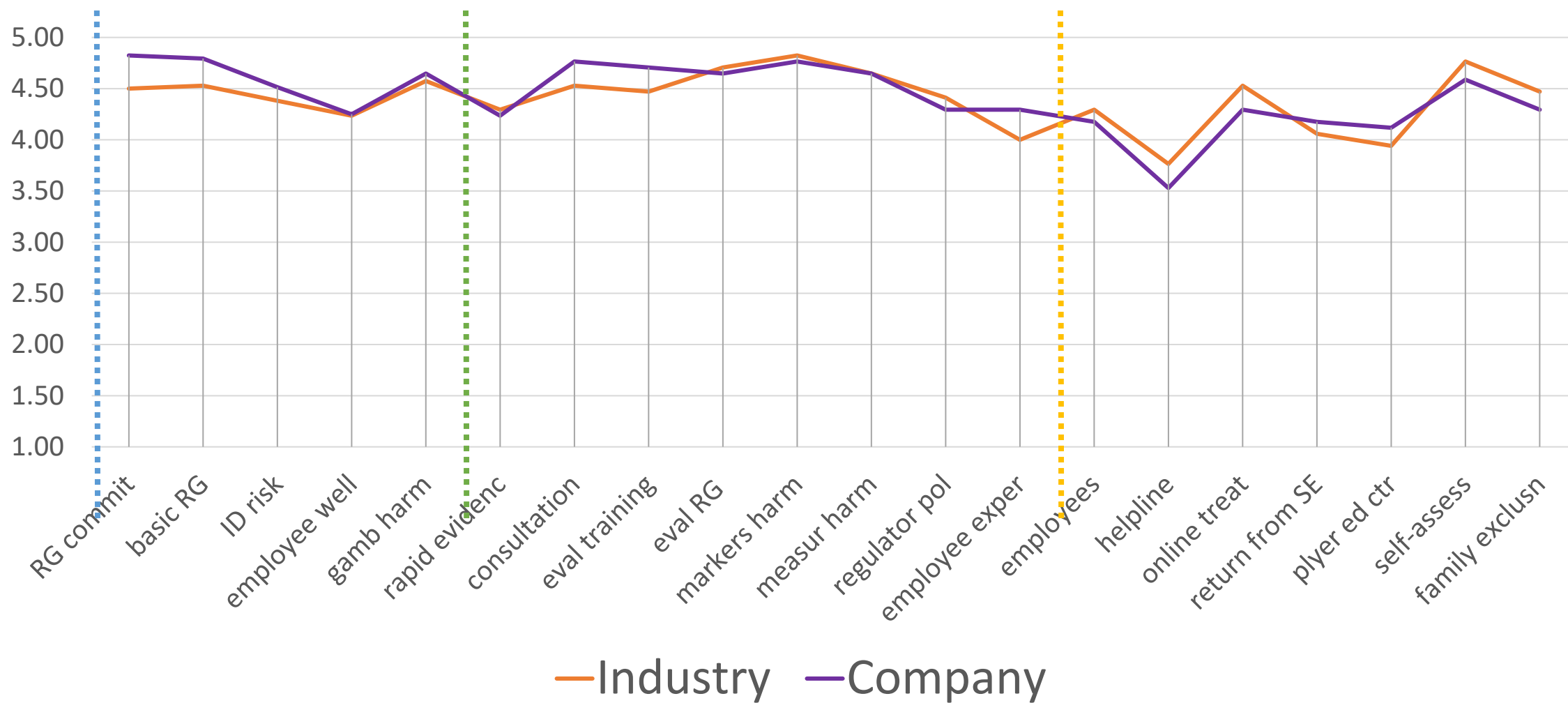
importance of **training** topics/employee groups

importance of **research** services & topics
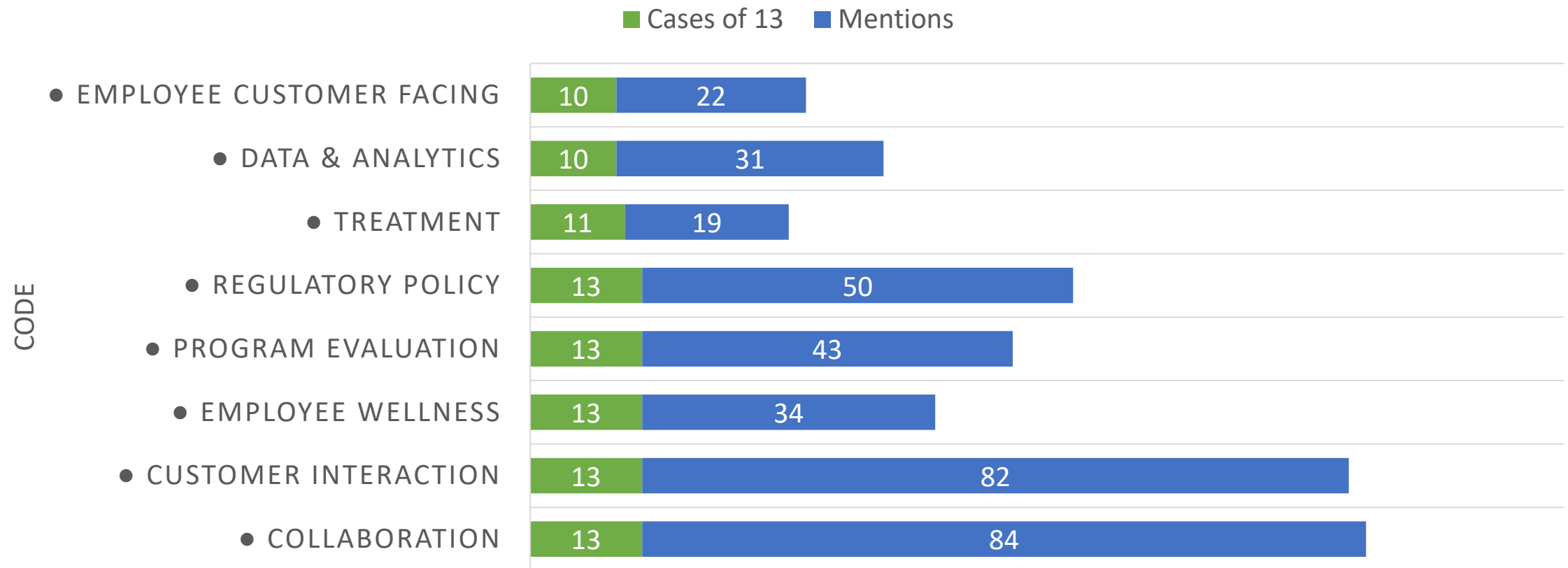
importance of support services
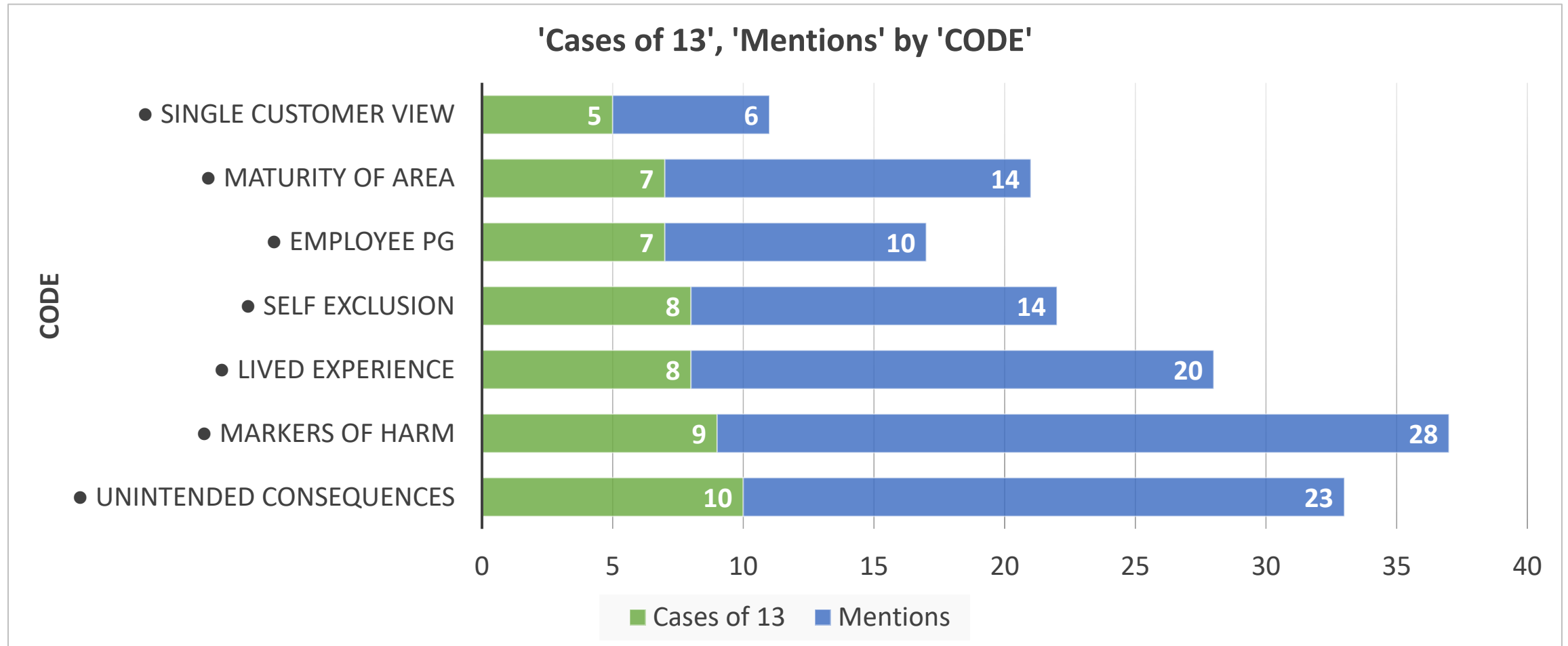
interview analysis – deductive

- themes/codes planned in advance, driven by:
  - areas & topics probed
  - plus themes directly related, e.g., collaboration, unintended consequences
- sentiment analysis
- code co-occurrence analysis

themes by frequency (1 of 2)

'CASES OF 13', 'MENTIONS' BY 'CODE'

■ Cases of 13 ■ Mentions

CODE	Cases of 13	Mentions
● EMPLOYEE CUSTOMER FACING	10	22
● DATA & ANALYTICS	10	31
● TREATMENT	11	19
● REGULATORY POLICY	13	50
● PROGRAM EVALUATION	13	43
● EMPLOYEE WELLNESS	13	34
● CUSTOMER INTERACTION	13	82
● COLLABORATION	13	84

themes by frequency (2 of 2)

'Cases of 13', 'Mentions' by 'CODE'

interview results – customer interaction

- We have to understand the line of advisor and where counselling starts, they are not trained counsellors.

- They are not specialists in financial advice or vulnerability so we would reach out to experts…

- Suicide awareness is a big one. We are not trained to deal with serious Mental Health issues, …we cannot help them. I know passing them off to someone else, a charity, is the right thing to do but it may not be right for them in the moment.

interview results – research

- Research piece we covered is still our weakest link at a company level but at an industry level too – as a collective group of operators and as regulators

- We do a lot of research work internally. We haven't done much with a partner… That's something we could do in the future.

- we should be funding into a pool but have control over meeting our needs for research. Contributors should have a say. Need to show there is a benefit to our customers

interview results – collaboration

- We need all operators, collaborating – one organization to be able to run a collaboration and join it all together and bring it together.

- I DONT think RG and protecting customers should have IP [intellectual property] on it, we should be sharing - otherwise it's a race to the bottom.

- Independent third party could say, "have you looked at this differently?" We have an internal function here, need external outside lens, greater collaboration, diversity of perspectives.

interview results – **unintended consequences**

Theme co-occurred with regulatory policy, and the need for a single customer view

- We need someone to actually give us the single customer view. Otherwise, we are scratching at the surface.
- we will close accounts – what happens now, they've dropped off the edge, not just enabling but probably encouraging – less scrupulous, less knowledgeable operators.

- We have restricted a number of accounts because we have not been able to have that interaction... if they are experiencing harm they will just move to another operator. Then it's not just us blocking account, but we are aiding them to go to another operator. It's a vicious cycle

interview results – gaps

- Interaction training

- a gap across industry with employee support

- Causes of recovery, triggers, debt management, those who play safely

- Gambling harm, understanding early intervention points – if stopping when they are too far gone – it's too late

- player messaging

- growth of esports

- best practice around responsible game design

- jurisdictions are not opening with the necessary help services in place…international availability of help and support is so patchy

- Family stuff is also a weakness

interview analysis – **inductive**

- driven by data – what else did participants tell us?
- important context for understanding industry experience and perspective related to the needs they identified

  - new codes developed
  - refine terms and definitions for each new theme, including literature searches to identify them in organizational literature
  - new round of coding and checking
  - examine co-occurrence and relationship with other themes

interview analysis – inductive themes

- **Compliance/ regulatory fatigue**[46, 47]
- scepticism[48]
- **organizational pride**[49, 50]
- sustainability
- **reciprocal accountability**[51]
- staffing challenges

- investment in RG & compliance
- **organizational stigma**[52, 53, 54]
- direct benefit to our customers

frequency of inductive themes (13 participants)
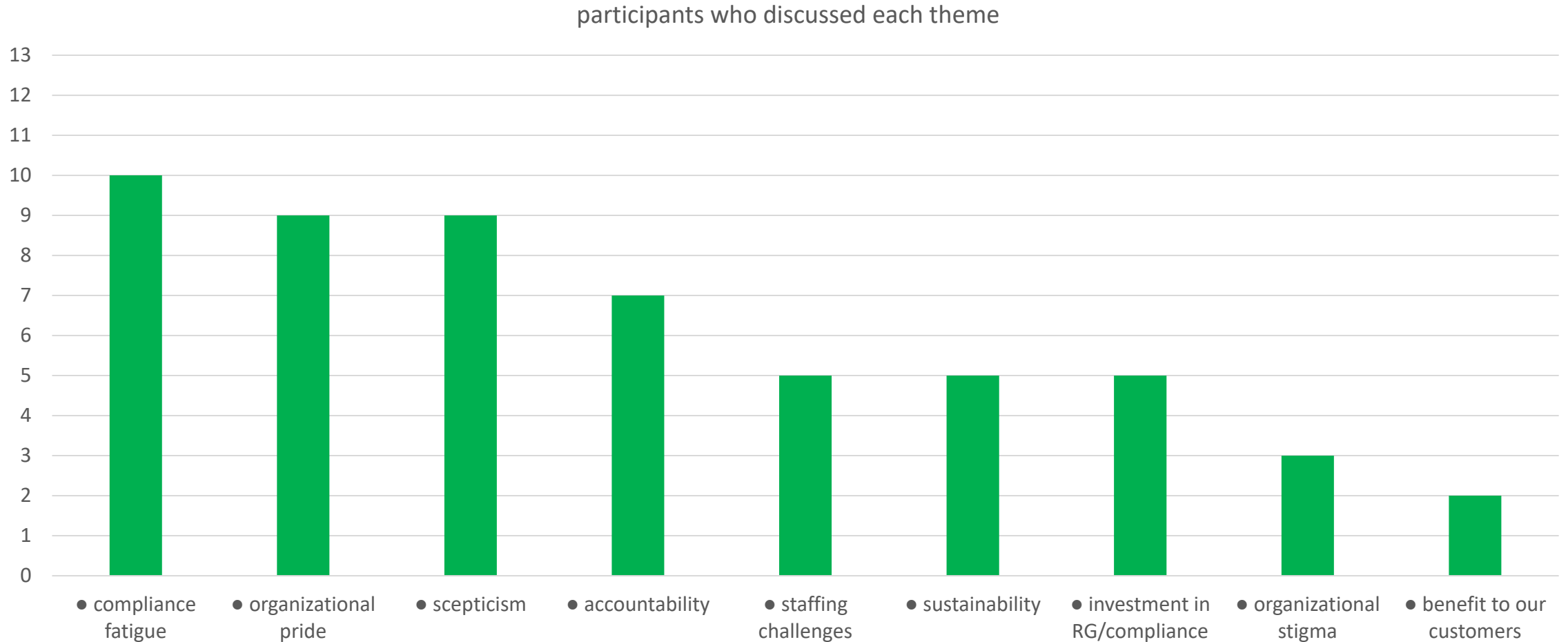
interview results – compliance fatigue

- So many times, you see a company is fined or given a slap on the wrist for something that was never written anywhere for someone to do, but all of a sudden it becomes a policy. It needs to be clearer, not so ambiguous...

- we'd like to be helped to achieve what's expected... We won't get the opportunity to have an open conversation about it, what we could have done. What is the regulation based on?

interview results – organizational pride

- I and [my company] will invest as much as needed to become strong for Safer Gambling.
- we are encouraged and get support from the business
- Wellbeing of team is important, we have a lot in place in regards to wellbeing
- we are really leaps and bounds above other operators

- We feel proud of the amount of effort, and we feel good about our systems, AI, customer journeys, we feel so proud as a company and yet all we get is slap on wrist every time

interview results – **reciprocal accountability**

- No one link in the relationship should be held accountable. Unfortunately, now accountability is only with providers

- we [industry] can't solve this problem in isolation. Others have a part to play – research, government, and consumers – they have a part to play too.

- We make contributions to charities, we should know the outcomes of that funding

- we work with [service provider] on three levels of training but how effective is that...how many people are implementing that without knowing

- we'd like to be helped to achieve what's expected...

interview results – **organizational stigma**

- It feels like such a constant attack for organizations that are trying to do a good job.

- We are seen as bad. But when I talk to my family about the things we do - Financial stress tests, interactions, they are blown away.

- We had someone join us from banking, and he said the level of governance and controls that you have is far beyond banks. But being from a bank has social status, where being a bookie is dodgy.

interview results – **highlights of deductive and inductive analysis**

- highest priority **topic**: *customer interaction* – highest frequency/density across all three areas
  - when and how to effectively interact
  - training and support for staff who conduct interactions
  - evaluating the impact

- highest priority **area**: *scientific research*
  - wide variation in responses, "maybe" in response to collaborating question
  - wide variation in understanding scientific research
  - need for development in terms of engagement, trust and application

- runner-up: *regulatory/industry relationship*

discussion – **regulatory/industry relationship**

findings

- strongest theme in inductive analysis
- evidence of strain and dysfunction

implications

- research needed founded on organizational concepts
  - in gambling industry & regulatory bodies
- program evaluation in gambling industry
- regulatory capacity, theories of regulation
- assessment of impact of regulatory policy changes

discussion – customer interaction

pressing needs across all three areas

- hands on **training**, role play, common protocols
- **research** on progression of risk, how and when to intervene, what to say and do, and how to measure effectiveness
- **employee support** to prepare for, manage, process such interactions

discussion – research

- large gaps in applied research topics to be addressed

- need for trust, well-defined collaboration, especially across multiple operators

- need for secure methods of sharing and analysing customer data, compliant with data privacy laws across borders

- potential for module(s) on critically evaluating research

- potential for knowledge translation tools purpose-built for gambling industry "practical real-life insights"

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