



The Society for the Study of Gambling
www.societystudygambling.co.uk

Newsletter

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The Society for the Study of Gambling

The Society for the Study of Gambling was formed in 1977 to provide a forum for those concerned with research into gambling, to promote its scientific study especially as far as the psychological, legal, social and economic aspects are concerned, and to inform and educate the public about these matters. In more recent times the Society has broadened its focus to include a wide range of issues relevant to the field of gambling.

The membership of the Society is drawn from a wide circle of people who have an interest in various aspects of gambling. They range from gambling operators, regulators, academics, and those who work with problem gambling. It is a condition of the Society that there should be freedom of opinion and practice among its members, so that the Society does not take any particular stance in relation to gambling.

Meetings

The Society holds two meetings a year in London, usually in May and November. Meetings are held under the Chatham House Rule and cover a wide range of topics reflecting current gambling issues. In recent meetings this has included discussion on aspects of regulation, technology, research and social responsibility.

Newsletter

Talks and papers presented at the Society's meetings are often reproduced in the Newsletter at the invitation of the Editor and with the permission of the author. They are not intended to be an alternative to publication in a learned journal.

The Editor welcomes unsolicited manuscripts, book reviews, and other items which would be of interest to the Society's members.

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Editorial

Lorien Pilling, Research Director, Global Betting and Gaming Consultants

The Budget of 2014 certainly gave the UK gambling sector plenty to think about with new tax rates announced and renewed plans to address the horseracing levy. This edition of the newsletter includes an overview of the measures announced by the Chancellor (page 10) and Warwick Bartlett, a former chairman of the Association of British Bookmakers (ABB), gives his view as to what went wrong for the bookmakers in the Budget (page 12).

The article on working with the DCMS (James Barrow) is also a timely one, given the influence that the government department has over UK gambling (page 19).

There has been a great deal of movement in the industry's trade associations in the last six months, including mergers and collaborations. The various developments are summarised on page 7.

This edition of the newsletter includes an excellent article on perceptions of "gambling" and "gaming". The authors of a recent paper state:

"Changing an industry label from 'gambling' to 'gaming' affects what consumers, especially non-users, think of betting online."

"A label like 'gaming' prompts all sorts of implicit associations like entertainment and fun, while a label like 'gambling' can prompt seedier implicit associations like crime."

The final article concludes the series of reminiscences by Chris Moore on his career in gaming. He goes back to 1975 to recollect his time as a casino dealer in Iran, prior to the exile of the Shah and the creation of an Islamic Republic in that country.

Meeting details

The next meeting of the Society will take place on **Thursday 8 May 2014** at the London Mathematical Society, De Morgan House.

New Society website

Be sure to visit the Society's new website: <http://www.societystudygambling.co.uk/>

Speakers at recent meetings have included:

May 2014, London Mathematical Society, De Morgan House

Kevin de Haan QC, Francis Taylor Building

Paul Leyland, Regulus Partners

Dr Henrietta Bowden-Jones, the National Problem Gambling Clinic

Philip Graf CBE, Chairman, UK Gambling Commission

November 2013, CIPFA, 3 Robert Street, London

Clive Hawkwood, CEO Remote Gambling Association - Point of consumption licensing & social gambling – the impact of the new.

Heather Wardle, Research Director, National Centre for Social Research - Current and future plans for research into social gaming.

John Mellor-Clarke, Managing Director, CORE IMS - CORE System - UK standardised quality evaluation for psychological therapy.

Dirk Hansen & Teresa Tunstall, GamCare – GamCare: for the problem gambler.

No speakers from the November 2013 meeting provided their presentation for publication in this edition of the newsletter.

May 2013, London Mathematical Society, De Morgan House

Dr Jonathan Parke, Responsibility in Gambling Trust – The work and objectives of the Responsibility in Gambling Trust.

Dr Joanne Lloyd, Department of Psychiatry, University of Oxford – Mood and gambling, a sample of internet gamblers analysed.

Simo Dragicevic, Bet Buddy – Player tracking data and implications for responsible gambling.

Stuart Tilly, Social Gaming Association – What really is social gaming? Is it gambling? Is it replacing gambling?

Jimmy Thomas, Hippodrome Casino – Lessons from the past and view on the future of the UK gambling industry.

News in brief

UK casino trade associations merge

The National Casino Forum (NCF) and the Casino Operators' Association announced in January 2014 that the two organisations have decided to merge their membership under the NCF banner.

From 1 February 2014 the National Casino Forum will be the sole representative trade association for the terrestrial casino industry in the UK and will speak for the UK's licensed casinos. The NCF will represent 97% of the UK casino industry.

Tracy Damestani, CEO of NCF and Andrew Love, Chairman of the COA, the trade body leaders said:

“For some time now we and our members have recognised that NCF and the COA have been promoting very similar agendas. In dialogue with DCMS and the Treasury on issues like taxation, anti-money laundering and stakes and prizes there has been nothing between us and, similarly, at Sector meetings with the Commission we have been in agreement on a wide range of issues.

However, the immediate catalyst for joining the two organisations has been the very strong agreement between us around pursuing the Playing Safe agenda. All our members have expressed support for Playing Safe and developing the industry in line with its principles. Both organisations believe there is much to be gained, both for the industry and for our customers, through Playing Safe and we have concluded that its success is best achieved through a unified trade association speaking with a single determined voice.”

Tracy Damestani, CEO of the merged organisation commented, “We are very pleased that the goodwill we have been able to build between the organisations has made this merger possible. I would like to thank Andrew for his personal involvement and look forward to welcoming former COA members with the experience and knowledge they bring to the NCF meetings and to the Playing Safe Forum. This is a good day for the industry and the gaming public.”

Gambling trade associations create new responsible gambling group

21 March 2014

It was announced in March 2014 that the trade associations across the five sectors of the UK gambling industry have collaborated to form the Industry Group for Responsible Gambling (IGRG).

The associations involved are:

- Association of British Bookmakers (ABB)
- British Amusement & Catering Trade Association (BACTA)
- Bingo Association (BA)
- National Casino Forum (NCF)
- Remote Gambling Association (RGA)

The new group will allow the five associations to work together on responsible gambling initiatives. The establishment of the IGRG will provide a structure to better promote socially responsible gambling in the UK. The new group will also provide a cross-sector forum to consider matters of common interest associated with the three licensing objectives in Section 1 of the Gambling Act 2005.

The IGRG's first matter of business will be to undertake a stock-take exercise of responsible gambling initiatives, with various companies, industry groups and associations set to be reviewed. The IGRG said the project would highlight good practices that could be shared across sectors and inform any future decision about work that the associations could undertake collaboratively through the IGRG.

In addition, the group will also focus on overseeing the review of the Gambling Industry Code for Socially Responsible Advertising, following a request by Maria Miller, Secretary of State for Culture, Media and Sport.

"The trade associations have been working together constructively for some time, especially on consumer protection issues, and the establishment of IGRG is a natural evolution of that," RGA chief executive Clive Hawkswood said.

Tracy Damestani, chief executive of the NCF, added: "There is an enormous amount of work being done by companies and the various trade bodies. Formalising our relationships and looking at the work across all the sectors should ensure that we deliver the best and safest products across the industry."

Dirk Vennix, chief executive of the ABB, also added: "When we launched our new Code for Responsible Gambling and Player Protection in October 2013 we wanted to make a difference to customers who are at risk of problem gambling and we are confident we will. We hope this group will build on the lessons from the ABB's Code and form a hub for ground-breaking cross-sector initiatives in the future."

Playing Safe recruits Professor Yvonne Guerrier

Professor Yvonne Guerrier has been appointed as Social Responsibility Advisor to “Playing Safe”. Yvonne has just retired from the University of Roehampton where she was Professor of Organisation Studies and, previously, Dean of the School of Business and Social Sciences. She has recently conducted two research studies into gambling (both with Dr Guy Bohane): the first looking at the social impacts of a local casino and the second looking at the attitudes of young people to gambling (focusing particularly on university students).

Playing Safe was launched in September 2013 by the National Casino Forum (NCF). Playing Safe is the NCF’s new responsible gambling programme and comprises an agreed set of principles and a new Playing Safe Forum (PSF) which will be pivotal to promoting and developing the principles in their practical application.

NCF envisages the Playing Safe Forum (PSF) will have a core of industry members, but will also be open to other participants – academics, care providers and regulators – with specific interests in working with NCF on a particular issue.

<http://www.playingsafe.org.uk/>

At the Society’s meeting in May 2012 Professor Guerrier and Dr Bohane gave a presentation of their research into the social effects of casino gambling on those involved (both players and casino staff). A summary of their research was published in the Society’s newsletter #48, Autumn 2012: *“Everyone that comes into the casino stays”*: Working lives in a UK local casino.

Overview of the gambling announcements in the 2014 Budget

Lorien Pilling, Director, Global Betting & Gaming Consultants

Chancellor George Osborne delivered some surprises – both good and bad – for the UK gambling sector in the Budget of March 2014. The headlines were surely the reduction of bingo duty from 20% to 10% and the increase in Machines Games Duty (MGD) for B2 fixed-odds betting terminals from 20% to 25%.

The Chancellor's statement on gambling duties:

"Turning to gambling duties.

Fixed odds betting terminals have proliferated since gambling laws were liberalised almost a decade ago. These machines are highly lucrative, and therefore it's right we now raise the duty on them to 25%.

We will also extend the horserace betting levy to bookmakers who are based offshore.

And we'll look at wider levy reform and at introducing a 'racing right' to support the sport.

While betting machines have grown, the number of bingo halls has plummeted by three quarters over the last thirty years. Yet bingo duty has been set at the high rate of 20%.

...my Honourable Friend for Harlow has turned his energy and talent into a vigorous campaign to cut bingo duty – ably assisted by my Honourable Friend for Waveney.

They want the rate cut to 15%. I can go further. Bingo duty will be halved to 10% to protect jobs and protect communities."

Budget 2014: Gambling announcements and timings

Gambling duties

Gaming duty bands – gaming duty bands will rise in line with RPI for accounting periods starting on or after 1 April 2014.

Bingo duty – The rate of bingo duty will reduce to 10% for accounting periods starting on or after 30 June 2014.

Machine games duty – the government will create a higher rate of machine games duty (MGD) at 25% for gaming machines where the charge payable for playing can exceed £5. This change will take effect from 1 March 2015.

Remote gambling taxation – the taxation of remote gambling will move to a place of consumption basis. This will take effect from 1 December 2014. The rate will be 15%.

Horserace betting levy

The government has said it will consult on extending the horserace betting levy to offshore bookmakers. Later in 2014 it will also consult on what it describes as “wider levy reforms”. These consultation options have been set out before:

- developing commercial arrangements
- modernising the existing levy
- horserace betting right

Commercial and retail development

The government’s review of the General Permitted Development Order will include consultation on creating a much wider ‘retail’ use class. This retail class would exclude betting shops and payday loan shops.

The Budget – where did it all go wrong for bookmakers?

Warwick Bartlett, *past Chairman of the Association of British Bookmakers*

At the KPMG Isle of Man e-gaming Summit in November 2013 I produced a chart that listed the various gambling tax increases that had taken place throughout the world since the onset of the recession from 2008. It was a long list that extended to two pages. The message was simple - during hard economic times gambling is an easy source of revenue.

Even so, gambling taxes do not actually raise much money (in the grand scheme of government spending) simply because not enough people do gamble. So money raised is not the only motive for increasing taxes on gambling. Gambling still has a social stigma attached to it and the tax system is very often used to limit its attractiveness.

Janice Turner wrote in *The Times* (22 March 2014) after the Budget:

“Every government’s relationship with working-class pleasures is contradictory, even tortured. Balancing tax revenue against populism; pricing people out of their vices while profiting from their weakness; declaring we have freedom to spend while carefully funnelling our spending.”

The betting industry has been caught on the wrong foot and has missed the societal change in attitudes that has taken place. During recessions, and the present one has been the worst since the 1930s, attitudes become polarised and politicians are adept at making it so.

For example, the Labour Party has criticised energy companies for charging too much, tour operators for raising prices during school holidays, and Government Ministers are posh boys because they went to fee-paying schools. Not to mention the onslaught on people and companies who choose to handle their tax affairs in such a way that they legitimately pay less rather than more.

As for the consumers, they are shopping in places they would never have dreamed of 10 years ago.

During these difficult and bizarre times, gambling falls out of favour and quickly and easily becomes a political football. Politicians see money spent on gambling as wasteful and thinks it could be put to better use elsewhere. *This is a period in which the industry should be treading carefully.*

Even so, March’s Budget shocked me, especially when a great deal of research is currently being undertaken into FOBTs. I thought the Government should have waited. However, the concern over problem gambling was cast aside as Chancellor George Osborne stated that the B2 class machines in betting shops were “lucrative”, so there was an opportunity to tax them more.

The inference is that no-one is allowed to succeed too much in modern Britain without handing over the booty to the Government.

But there is more to it than that. There is no doubt in my mind that the bookmakers are being punished. Bingo asked for 15% tax and got 10%. I believe that the message from Government is that bingo has behaved and this is their reward. Take note.

I am at a loss to understand why the bookmakers are being punished. The 2005 Gambling Act abolished the demand test. This came from the Budd Report that saw competition as the best protection for the consumer. He was right - the payout to punters has never been higher. They are not being swindled by the market. They have never had it so good.

The competitive environment was created by Government. Bookmakers are driven to compete or lose market share to a competitor who will soon trade next to your locations if you do not trade first.

Limiting the supply of FOBTs to four per shop added to the frenzy of getting more locations. The Government is now reluctant to change the 2005 Gambling Act and re-introduce the demand test which would be perceived as anti-competitive. Instead it opts for the tax system to cause closures of shops.

The pressure against bookmakers has been building for some time. The casino and adult gaming centres have been lobbying against them, their complaint being about an unlevel playing field on tax and regulation.

MPs fell out with bookmakers because so many of them love horseracing and see the FOBTs as a distraction from horseracing revenue in the betting shop. A simple fact is that without FOBTs many shops would close and racing would get less. Even though the horserace levy is paid on bets taken only on horseracing, bookmakers are more inclined to treat the negotiation leniently if they are making money elsewhere.

At the same time the Chief Executives of the major betting companies have become disengaged from the politics surrounding the industry. For good reason. They are now running international companies with revenue coming from Australia, Ireland, USA and Europe. You cannot be in all these places at once. Those that are CEOs of public companies will spend 25% of their time talking to the financial community.

With such pressures on time it is easy to forget that most company revenue still comes from the UK and the moment you let the likes of *The Daily Mail* fill the vacuum you are in trouble. *The Daily Mail* is delighted with the tax increase on FOBTs and has proclaimed it a victory for its campaign.

I can see economic danger in what the Government is trying to achieve through the FOBT tax increase, the Point of Consumption Tax and granting horseracing a betting right to replace the levy.

Martin Waller who writes the *Tempus* column for *The Times* said: "*Ladbrokes' market capitalisation has fallen more than £400 million and William Hill's by more than £500million. Political risk is by its nature unpredictable. I would steer clear of the sector for now.*"

That is a lot of money lost by just two companies - add in Paddy Power, Bet365, Gala Coral, Betfred and all the others and you could be looking at a capital loss of up to £2 billion. This is a situation that is unlikely to improve with financial journalists advising investors to stay clear.

That is quite a lot of money to be lost through a petty tax increase which has completely undermined confidence because of the long list of reviews and potential impositions that await an industry that is seemingly out of favour.

There is another message in the fall in value. For all the hype about internet gambling that has caused managements to focus away from betting shops, the loss in value created by a tax on the 'old sector' caused the biggest drop in share prices.

Every industry which chooses to expand overseas needs a secure home base. My fear is that by undermining the UK's domestic market the prospects to expand abroad will be diminished.

Although many operators are based offshore for e-gaming, they all employ substantial staff in the UK. These operators have developed world-class businesses that are of real benefit to the UK.

We run very good gambling businesses in the UK. **We are good at this.** I suspect politicians would hope we would be better at something else but the fact is we do this well and it is better that we develop our skills in sectors where we excel than those where we do not.

In my lifetime I have seen Government overtax businesses simply because business does not vote. I saw it all through the 1970s and 1980s when we destroyed our manufacturing base.

The UK casino industry suffered over-regulation and high taxes since it was legalised. When the last Labour Government thought it a good idea to have "Super Casinos" they invited the US operators to show us how. Our domestic industry did not have the resources to make such large investments. I hope betting is not going the same way.

‘Gambling’ by any other name

James Rutherford, *gambling journalist*

What’s in a name? Quite a lot if your business is gambling.

No, better make that gaming.

Or that’s the advice implied by a new study in the U.S.-based *Journal of Consumer Research* (December 2013) that found that people are more likely to place a bet on the internet depending on how internet gambling, or ‘gaming’ rather, is presented.

“Changing an industry label from ‘gambling’ to ‘gaming’ affects what consumers, especially non-users, think of betting online,” say the authors, Ashlee Humphreys and Kathryn A. LaTour, who reached their findings through an analysis of media coverage, personal interviews and a bit of psychological profiling.

“A label like ‘gaming’ prompts all sorts of implicit associations like entertainment and fun,” they say, “while a label like ‘gambling’ can prompt seedier implicit associations like crime.”

And implicit associations are what it’s all about, as any advertising executive will tell you.

Humphreys and LaTour are academics in the field of marketing—Humphreys teaches at Northwestern University in Illinois, LaTour at the Cornell School of Hotel Administration—and they explain the process by which positive associations are formed as one of “legitimation”. It’s common to many industries. When the media get involved it’s called “framing”, and its effects, in their words, can be “profound”. This is true, they say, both in how it affects individuals by altering associations that influence behaviour, and in a societal context in terms of its impacts on what might be called the collective “consumer memory”.

Legitimation in the chance business has been going on for decades. Long before the American Gaming Association and the Interactive Gaming Council and the European Gaming and Betting Association and the International Masters of Gaming Law and scores of like-minded advocacy and trade groups got hold of it, governments were consciously “framing” for the sake of revenue-generation. The Independent Liquor and Gaming Authority of New South Wales dates back to 1976; the Philippine Amusement and Gaming Corporation (PAGCOR) to 1977, the year the New Jersey Division of Gaming Enforcement was established. The granddaddy of them all, the Nevada Gaming Control Board, has been around since 1955.

When the internet grew to be a force, the same approach was taken up by agencies like the Government of Gibraltar Gaming Division and the Lotteries and Gaming Authority of Malta—and it continues in the land-based sector as new jurisdictions need to be legitimised—the Pennsylvania

Gaming Control Board, the Gaming Board of Hungary, the Massachusetts Gaming Commission and so on.

Of course, there are plenty that don't quibble—the UK Gambling Commission springs to mind, the California and Washington State Gambling Commissions, Belgium's Commission Des Jeux de Hasard, the Alderney Gambling Control Commission, Montenegro's Uprava za Igre na Sreću, the Victorian Commission for Gambling and Regulation, the Buenos Aires-based trade group Asociación Latinoamericana de Juegos de Azar.

In their research into *The New York Times* and *The Wall Street Journal*, among other media outlets, Humphreys and LaTour keyed on coverage of the April 2011 “Black Friday” indictments, when the U.S. government all but shut down three of the world's largest poker sites. Newspapers shifted the way they described online gambling, framing it more as a crime, and they discovered this led to a shift in consumer judgments about the legitimacy of online casinos, especially among non-users.

Exploring what causes individuals to make such judgments, they found that “rags-to-riches” or “get-rich-quick” pitches prompted both favourable and unfavourable associations. But when they changed only the words “gambling” or “gaming” in those narratives, they found “gaming” caused non-gamblers to view them as more legitimate.

‘Seeming’ Legitimate

A long time ago, on the other side of the world, Stanley Ho grasped the power of imagery when he wangled Macau's last casino monopoly from a Portuguese governor dissatisfied with the previous monopoly's efforts to promote the city as a destination. The governor believed it was time to call a spade a spade, out of which came an official definition of “games of fortune” to describe its principal business. Ho was quick to reassure his colonial sponsors by including “tourism” and “entertainment” in the name of his new company—*Sociedade de Turismos e Diversões de Macau*—though it would take another 50 years and the breakup of his monopoly before “tourism” and “entertainment” came anywhere near to describing the place, by which time the public agency that oversees the largest pure gambling market in the world, the *Direcção de Inspeção e Coordenação de Jogos*, would be regularly translated (not quite accurately perhaps) as the Gaming Inspection and Coordination Bureau.

As for Ho's clientele, then and now, no euphemisms have been necessary because “games of fortune” have always been embraced unabashedly by the Chinese as just that. Of course, it's an association as old as humanity, steeped in divination, rich with allusions to a plenitude of unseen forces directing the destinies of men, and probably it was for these reasons that, with the arrival of Christianity, gambling in the West began to acquire the moral opprobrium it retains to this day, which may have been why in English “gambling” and “gaming” wound up going their separate semantic ways, as they've done in other European languages.

To put it another way, how would a lobby calling itself the “American Gambling Association” ever have fared on Capitol Hill?

Actually, the AGA defends its choice of nomenclature by arguing that “gaming” is the term honoured by time and usage, citing for support the Oxford English Dictionary, which dates it to the early 16th century. “Gambling”, on the other hand, an 18th century upstart, originated as pejorative slang. Not all sources agree on this, though. The American Heritage Dictionary of the English Language wonders if the two aren’t more closely allied, noting that “gamble” may have derived from *gamel*, a verb with roots in the Middle English *gamen/gamenen* (“to play”) and the Old English *gamenian*, which meant “fun”.

At any rate, our common understanding of “gambling” as an activity defined by material risk on chance outcomes, or at least uncertain ones, a hazardous enterprise resulting in the likelihood of material loss, and tainted as this is with images of avarice, recklessness, the fecklessness of fate and possible ruin, is too ingrained to admit “gaming” on an equal footing. One may go to a casino to “gamble” or to “play”, but to say one goes to “game” would indeed sound as archaic as the AGA inadvertently suggests.

This is enshrined in the very word “hazard”, which has come down to us to mean “*a chance of being injured or harmed; risk or danger; a possible source of danger*” (AHD, 5th edition), but started life as a medieval dice game, its name likely derived from the Arabic word for die: *az-zahr*. The association with sport survives on the golf course, where it’s often used to describe a sand trap or other obstacle. The association with gambling is retained rather unequivocally in continental Europe in the Spanish *juegos de azar*, the French *jeux de hasard*, the Italian *gioco d’azzardo* and the Portuguese *jogos de fortuna ou azar* and the German *Glücksspiel*.

In light of which, looking back to when Las Vegas took off after the Second World War and became attractive as a source of tax revenue, it’s not surprising that the powers that be in Carson City found it expedient to distance gambling as a business from gambling as a pursuit. In 1959 the Nevada Gaming Control Board was followed by the Nevada Gaming Commission. A generation later, the distinction was picked up by the University of Nevada’s renowned Institute for the Study of Gambling and Commercial Gaming, which was founded right around the time the industry was speeding full-bore into the mainstream of American culture with the opening of The Mirage and beginning to spread nationwide.

“Over time, industries gain or lose legitimacy through a complex process involving both cultural representations and individual responses to those representations,” write Humphreys and LaTour. “For example, marijuana seems illegitimate when grouped with so called ‘hard drugs’ like heroin in public service announcements, yet it begins to seem legitimate when associated with medical treatments in news coverage. When a product like Botox is framed as a poison on a television show ... its legitimacy is called into question, yet it begins to seem legitimate when classified as a cosmetic procedure like a skin peel on reality television.”

The big trick for the casino industry in this regard has been to find a way to frame the social fallout that has come with success and which has made it necessary to draw a still thicker line between the imagery. By the mid-’90s, when the industry had proliferated to such a degree that it was attracting

unwanted attention from the federal government, Gamblers Anonymous had been in existence almost 40 years, the National Council on Problem Gambling for 25. “Problem gambling, gambling addiction, gambling disorder, pathological gambling,” all had entered the lexicon. “Responsible gambling” might have struck politicians and the public as oxymoronic, “pathological gaming” as silly. The response of the then-fledgling AGA: the National Center for Responsible Gaming, founded in 1996. “Responsible gaming” is a mantra the industry has invoked ever since.

With online gambling, though, fraught as it is with unique hazards, the forces of legitimation could find themselves facing an entirely less tractable beast. Yet the need to tame it in its largest prospective market is tremendous, and it will grow more urgent as more U.S. states endorse online “gaming”—which, as Humphreys’ and LaTour’s research suggests, they surely will.

Reference

Ashlee Humphreys, Kathryn A. LaTour

Framing the game: Assessing the impact of cultural representations on consumer perceptions of legitimacy

In: *Journal of Consumer Research*, Vol. 40 No 4, December 2013, pp773-795.

Culture of influence: working with DCMS

James Barrow, Public Affairs Manager, Association of British Bookmakers

This article first appeared in *The House* magazine (February 2014). It is republished here with the permission of the author.

Since its inception in 1997 DCMS has greatly influenced my life: initially as an international swimmer and small businessman and more recently as a patron of the arts and a representative of the gambling industry.

DCMS is a relatively small department with a wide range of responsibilities – everything from the Arts, Leisure, Tourism and the Creative Industries to Telecommunications, Media and Alcohol and Gambling Licensing. Many of the cultural institutions, leisure pursuits and industries covered by the department are crucial to the social life of the country, vital to people in terms of their sense of identity and well-being, and make a substantial contribution to the economy. Representing the interests of these organisations is a big responsibility which may, at first, seem straightforward; however, there are some do's, don'ts and challenges.

It is important to identify the key people within the department and Parliament and to keep them regularly updated with any news or developments. Briefings should be short and simple, as time with decision makers is at a premium. Support your key messages with evidence and be prepared to make concessions if your position conflicts with public opinion or the department's priorities, even if the evidence is on your side. If the issues you face span four or five departments always keep DCMS in the loop - they may prove a useful ally - and never shy away from mobilising your members and customers.

Treat those working in Whitehall with respect. This may sound like common sense but it never fails to surprise me how many people leave meetings and publically criticise departments and ministers, which always proves counter-productive.

There are a couple of challenges of particular relevance to DCMS: the effect of coalition politics and the inevitable effect of cuts which has resulted in a greater reliance on external expertise.

As the department has no dedicated Liberal Democrat minister, decisions are run past the Office of the Deputy Prime Minister. This may cause delay, increase the risk of political point scoring or force concessions as part of wider negotiations. It is, therefore, equally important to engage both coalition parties.

A consequence of downsizing has been a greater reliance on quangos and, in particular, regulators. This may present a challenge or an opportunity depending on the quango or regulator and your relationship with them, and will certainly have a significant impact on future policy making. No-one is against good regulation, but my experience is that regulators have an insatiable appetite to do more. This being said, regulators now have a legal requirement to take proper account of the economic consequence of their actions and to carry out their existing duties in a proportionate manner – a useful counter-balance.

Budget cuts and a diminishing remit continue to fuel speculation about the department's future. I for one believe that DCMS will continue to play an important role in government and I think it would be politically unacceptable to scrap the department responsible for culture and sport - two pursuits close to the public's heart, which are at risk of being marginalised in larger departments.

Recollections of a career in gaming: Iran 1975

Chris Moore, Independent Casino Consultant

This article first appeared in *Casino Life* magazine and is republished here with the kind permission of the publisher, Glyn Thomas, and the author.

Casino Varian, Karaj Dam, Persia (Iran)

I can recall the relaxing feeling of reclining on a cushioned sun lounger, covered in olive oil and lemon, daydreaming under a blazing Persian sun. I can picture the stunning lake views and the snow-covered mountains in the crystal clear distance. I can almost hear Nina Simone playing on the eight-track and in my mind's eye see my tall vodka and orange standing next to my pack of half-smoked Dunhill Internationals. I can recollect being overwhelmed by a feeling of unquenchable optimism, wondering where the casino world might take me next.

The new casino had been a terrifying two-hour drive from Tehran. We climbed aboard an old coach adorned with hundreds of cheap, hanging trinkets and window stickers. The scruffy driver grinned mischievously at each of us as we boarded, then giggled as he drove away at speed towards the dark, ominous mountains. An hour later on a pitch-black mountain road, we approached a terrifying switchback corner above a cavernous drop. The driver started to giggle again, then accelerated quickly. He suddenly turned off all the coach's lights, including its headlights. He laughed like a maniac as those of us that were still awake screamed in terror as the lightless coach barrelled headlong into the blackness. The crazy driver switched the lights back on with only seconds to spare before steering around the huge bend in the road. A month later, on a taxi ride from Tehran, I witnessed smoke rising from a burning vehicle that had recently driven over the edge and lay in the dark ravines thousands of feet below the road. I now suffer from vertigo, which they say increases in intensity with age. Perhaps those days in the mountains outside Tehran were the catalyst.

The new casino had its delightfully chaotic opening on the last night of 1975. The customers were an eclectic mix of local dignitaries, new world millionaires and random, enigmatic characters. However they all shared the same unerring enthusiasm for gambling. Their lack of knowledge and experience of the casino world did not detract even slightly from their overwhelming desire to participate in each and every one of the casino games. We were the new show in town and they seemed determined to enjoy every moment of it. The Rial was the currency of the time and cash was seemingly the only transaction. A phalanx of cashiers spent most of the evening counting bags full of cash and handing out non-negotiable, mother-of-pearl plaques to the eager customers. The expat waitresses served trays full of alcohol and toasted chicken sandwiches all night in return for tips that easily exceeded the casino manager's entire income.

The gaming staff had mostly been recruited from casinos in London. We were, on reflection, a slightly comical blend of experience, over-confidence and naïve enthusiasm. Take-home pay was £100 per week, with a £500 annual bonus. Accommodation and food were provided along with two return flights a year. We had our own bar and made our own entertainment. The casino and hotel complex was isolated on the shores of a lake, in view of the massive Karaj Dam that controlled Tehran's water supply. There was a ski-resort a few hours drive further into the mountains. I remember a handful of us driving there one day in an open Jeep, dressed in jeans and borrowed anoraks. Driving back soaking wet, after spending the day falling over in the snow, was probably the coldest I have ever been in my life.

Early in the life of the casino, after a few food poisoning incidents in the staff canteen, the French chef eventually fell under the spotlight. He served every single meal accompanied by ratatouille, a dish I still cannot eat today. I can remember him standing defiantly in the doorway to his kitchen, with a massive carving knife in one hand, animatedly defended his culinary assertion that chicken should be served with blood running out of it. It transpired that, although a genuine Frenchman, he was not a genuine chef. He was in fact a bricklayer who had simply lied about being a trained chef, or in fact being able to cook at all. His ultimate test came when he was made to prove his claimed culinary prowess by simply frying an egg. He made such a mess of the task that he was fired on the spot. A few of us took over in the staff canteen for a week until a genuine chef was employed – a lot of fried eggs were served that week.

The casino itself was the most tasteful I have ever worked in. Many of the industry norms of the day were ignored, resulting in a fabulously inviting, vibrant atmosphere. The huge panoramic windows had no curtains, delivering a view across the lake to the snow-covered peaks that was quite simply breathtaking. At night the moon on the lake and the lights over the dam gave the gaming floor a timeless unearthly glow. The furnishings were expensive, carefully selected, European antiques. The naval paintings on the oak panelled walls were original and somehow absolutely in keeping with the comfortable style. The staircase that led down to the main gaming floor housed a splendid collection of antique model ships sitting on lighted shelves at eye level that somehow seemed perfectly in place. The gaming floor itself was expansive, spacious and at the same time inviting. On the opening night the snow fell steadily past the windows, catching the moonlight as it settled on the wrap-around balcony; it felt like a big-budget film set.

Each night after the casino closed a group of us congregated in one of our hotel rooms to smoke cigarettes, drink vodka and play 5-card-stud poker until long after the sun came up. There were always six players fully immersed in the game with up to a dozen eager reserves waiting for players to drop out. I was a careful player with the sole nightly ambition of leaving the game with more than I started with. I always kept one careful eye on a French Roulette dealer who was by far the best poker player. I learned an awful lot by just watching how Colin played. Amazingly, he earned enough playing poker in the first three months to buy a house in his hometown of Liverpool. During the same period I made more playing poker than I did working on the tables, which really only went to show how bad many of the other protagonists were.

One of the highlights of my short stay in Persia was a brief introduction to a game that I developed an instant passion for. *Chemin de fer* is an old classic casino game played without house involvement. It is basically a highly sophisticated open-auction version of its far newer counterpart - *Punto Banco*. The game was run single-handedly by one of the real characters of the industry. Eddie would direct his glamorous show for six hours at a stretch, without a break. The game would start around midnight, attracting the most flamboyant casino customers. It would run non-stop until six in the morning, two hours after the main casino had closed. I pestered Eddie every day for well over a month before he finally relented and agreed to teach me the basics of his beloved game. I never got to deal for more than a few minutes but I did act as Eddie's "Changer" a number of times. I quickly learned that there were two essential ingredients to becoming a professional *Chemin de fer* dealer – absolute total, focused concentration, coupled with legendary bladder control.

The casino's *Punto Banco* game was also unique, a format that has probably never been repeated since. Instead of the usual five percent tax charged on winning bets on the Bank, this game charged ten percent on winning Bank bets and an additional five percent on winning Player bets. None of the players thought to complain or seek alternative entertainment. The table was packed every night and never suffered a single loss. It is interesting how casino games evolve in the absence of gaming regulations.

Days off were usually spent in Tehran. Taxis for the arduous two-hour trip were surprisingly cheap, mostly because they kept stopping to pick up more roadside passengers until they were crammed full. Tehran was an impressive, vibrant city with wide, tree-lined avenues and long straight, bustling streets. Almost every taxi and private car on the streets of Tehran in those days was a Pekan, a basic Hillman Hunter made under licence. One interesting feature of the car of choice was that it came without a rear-view mirror as standard. Tehran's drivers focused only on what was in front of them, never on what was behind, resulting in literally thousands of fender-benders on the crowded streets every day. Our days off usually began at the brightly lit bazaar in the centre of the city and ended in a darkly lit bar nearby. Not speaking the language or knowing the city never seemed to slow us down at all. The Persians were delightful people with wonderfully positive attitudes, open doors and ready smiles. It seems so unfair that today's Iranian people are regarded in such a negative, international light. They are, I am sure, the same delightful people they have always been.

One of the unusual fixations that all the croupiers seemed to share at that time was for quality wristwatches. Most of the staff had cash burning a hole in their pockets, especially the poker winners. Most trips to Tehran would involve scouring the up-market shops for the latest Swiss imports. An inspection of the croupiers in the casino on any given night would have revealed a myriad of brands such as Patek Philippe, Cartier, Piaget, Omega, Baume et Mercier, Vacheron Constantin and Rolex on almost every wrist. The unwritten rule on the gaming floor was that if you were not sporting an expensive watch it was better not to wear one at all.

Within six months Noel, the owner, had sold his shares in the Varian. We were all given the choice to stay and work for the new owners or to honour our original contract and move to Noel's other casino in Ramsar, north on the shores of the Caspian Sea. I chose to move on to see what the next casino adventure would bring. But that is a different recollection.

Caspian Sea Casino, Ramsar, Persia (Iran)

The Grand Hotel sat below green rolling hills facing the Caspian Sea. An arrow-straight, tree-lined boulevard stretched from the front of the hotel all the way to the sea, over a mile away. At the heart of the imposing building was the Caspian Sea Casino. For pure dramatic impact, it rivalled any casino that I had seen before or since. The vast ceilings, massive chandeliers and marble columns made the gaming rooms feel like something out of a dreamlike movie.

I arrived in Ramsar on a bright Spring morning in 1975. As I paid the sleepy driver, I discovered that my suitcase had fallen from the top of his battered taxi somewhere during the four-hour drive from Tehran. Fortunately I had my passport, money and valuables in my man-purse, a compulsory fashion accessory of the day. Incredibly, later that night, a customer turned up with my battered suitcase at the casino reception. He had briefly examined the contents and concluded that the black dinner suit and white dress shirts most likely belonged to one of the staff members at the casino he was on his way to visit.

On the day I arrived I was offered an unusual new career option. One of the casino managers informed me that rather than continue to ply my trade as a croupier, I could join his newly formed "work crew". With great enthusiasm he explained that his group of ex-croupiers began work at eight in the morning performing a multitude of manual tasks, geared toward upgrading the resort. I weighed the options for a few moments and concluded that dealing Blackjack and Roulette was a far more attractive option than actually working for a living. During my stay in Ramsar I often witnessed the work crew clearing debris, building walls, laying paths and painting random objects in the hot sun. I never regretted my decision not to change jobs.

The casino customers on the Caspian coast were much the same as the pleasant eclectic mix I had dealt to in the mountains above Tehran. The casino action was insanely frenetic, with most of the gaming tables in action for sixteen hours a day. The owner, an ex-French Roulette dealer, had somewhere developed a hatred for slot machines. He felt that the noise and flashing lights detracted from the elegance of the casino that he was so rightly proud of. But, rather than forego the serious profits they produced, he erected a large marquee in the grounds and filled it to capacity with state-of-the-art slot machines. Most evenings there were queues to get into what became known as the "slot tent". The tent quickly developed an unpleasant, all-pervading smell of human body odour mingled with stale cigarette smoke. The mobile air conditioning units and extractor fans broke down on a very regular basis, leaving the tent virtually uninhabitable. Working in the slot tent came with a sizable daily bonus, but volunteers were still few and far between. I volunteered one night and spent eight hours handing out change, holding my breath and regretting my greedy decision.

I can recall the heady combination of nerves and adrenaline from my first night at work. Being a newcomer in such an iconic casino, filled with so many genuine characters, was an exhilarating but also slightly intimidating experience. The all male gaming staff was an amazing collection of individuals, ranging from an ex-Harrow School Head Boy, to an illiterate Irish Gypsy, with a rainbow of characters in between. The managers and pit bosses were a random mix of old school veterans and young, talented, high-flyers. The action dictated that you needed to be at the top of your game

to stay afloat in a very stormy but exciting casino sea. The Blackjack games would usually have two players for every box, sometimes three. In the days before machines, two human chippers were needed at each of the American Roulette tables just to keep the games moving. The French Roulette and Baccarat tables were packed every hour of the day and night. Breaks came spasmodically, often three or four hours apart. Occasionally during a day shift, on a rarely empty table, I would be granted an insight into the histories of some of the more fascinating characters. With only a little encouragement, they would regale me with wonderful anecdotes about Las Vegas, Nassau, Hobart, Dubrovnik, Cuba and even Steubenville, Ohio.

One of the owner's pet community projects was the upgrading of the small, derelict local football stadium. We celebrated the reopening with a match between the casino and the town of Ramsar. The standard was not very high and I was fortunate enough to score a few goals in front of the sparse but enthusiastic crowd. A few weeks later I was invited to play for Ramsar in the under-21 national championships. I was not at all keen to go on a two week tour with a group of complete strangers, but was persuaded to participate when the boss offered to double my wages for the fortnight. Speaking not a word of Persian, I boarded the dilapidated tour bus and set off on another new adventure. We stayed in very cheap nasty hotels, each one somehow more uninviting than the last. A few times we slept on the bus, which I actually preferred. We played a series of matches culminating in a knock-out match in Tehran, which we lost heavily. Despite the fact that the Ramsar team was actually a really nice bunch of guys, I was happy to lose that game and get back to dealing.

On our days off we learned to water-ski off the back of a speed boat that the boss had bought to keep us entertained. The work crew had by then begun an intense campaign of picking up stones from the beach and dumping them behind the dunes in an attempt to create a Caribbean-like beach club on the shoreline. Unfortunately the tide unrelentingly swept in tons more pebbles every day and eventually the boss had to follow King Canute's example and give up his dream. Evenings were spent eating sturgeon kebabs and drinking beer on the boardwalk, or just drinking, smoking and reminiscing at the staff pub in the grounds of the hotel. A few budding impresarios organised the occasional staff show that brought out the very best in some of the more talented performers amongst us. Being tone-deaf and stage-shy, I was recruited to design and paint the one-off posters advertising the upcoming events featuring comedy routines, Elvis impersonators and drag-queens.

The staff pub in Ramsar was like a real one from back home: a long wooden bar, with high shelves stocked with booze, a dart board on the wall and a jukebox in the corner. The only beer served was a bottled domestic brand called Menjadi that was delivered by truck-load. One week in the height of summer there was a national news story about some unfortunate people who had died in a poisoning incident in a remote part of the country. Investigations were ongoing but there was strong speculation that a contaminated batch of Menjadi beer was responsible for the tragedy. After two days of nobody drinking beer and no further news, a large group of us assembled in the pub. Each of us took an open bottle of beer as a countdown was delivered by the barman. We all drank the entire contents of our bottles and waited in silence for any adverse reaction. Fortunately it tasted exactly the same as it always did; clearly there was nothing wrong with our batch of beer. A few days later the news revealed that the deaths had been caused by something entirely different.

Over the short time that the casino had been open a strange tradition had evolved which took place when a person had quit their job. After the person had finished their final shift there would be a quick rendition of “we’ll meet again” in the staff pub followed by their dinner jacket being ripped from their shoulders and torn to pieces. I was blissfully unaware of this quaint ritual when I naughtily headed for the bar half way through my final shift for a reviving vodka and orange. The bar was busy with people on their days off and the work crew who had been drinking for hours. I smiled as they sang the song then stood horrified as the two guys standing either side of me ripped the sleeves, collars and pockets from my jacket. I spent the last few hours of my shift dealing in a suit held together with safety pins and sticky tape.

As the Persian winter began, I finally received a long awaited letter from London offering me a job as a dealer in the Bahamas. I considered staying for a few months to complete the year but the call of the Caribbean was too strong.