

Policy and reality: Corporate social responsibility in the UK gambling industry

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Abstract

This article considers the corporate social responsibility of firms dealing in what could be regarded as “unethical” products, and then addresses the gambling industry in the UK. A brief history reveals that this is now dominated by large firms, who issue careful and regular pronouncements about their social responsibilities. They all make donations to charity, including those which help the problem gambler. There are over one quarter of a million such people in the UK, and the impact of their addiction impacts upon many more. The article contains a case study which interviews the staff in one outlet owned by a major chain and those who work in an independent betting shop. They are questioned about corporate social responsibility in the gambling industry and the statements of their employers, and the policies used to help those with gambling problems. The results suggest while the firms appear to take their responsibilities very seriously, some staff were sceptical about this. Moreover, it would appear that the informal approaches used by the independent trader to deter a heavy loser might be more successful than the formal systems of the big groups. This idea was tested by interviewing the managers of a selection of betting shops, and again, there were doubts about the effectiveness of the policies adopted by the management in the large chains. As problem gambling is the cause of much domestic grief, this is an issue which should be addressed. Further research is recommended to investigate the most effective ways of addressing the problem.

Introduction

Most of the activities which individuals undertake can be harmful if taken to excess. Eating unhealthy foods can cause problems. Even drinking too much water can be lethal. Society expects that we will exercise restraint to prevent self-damage. However, some products may be addictive, and the vulnerable sections of the community may need some protection, which may come from the industries themselves, or be imposed by government. Alcohol is a good example. Jean Coussins, when Chief Executive of the Portman Trust, a UK charity established to ‘promote sensible drinking’ and to ‘help discourage misuse of alcohol’ believed that ‘the majority of people who drink alcohol enjoy it without causing harm to themselves or others’ (Portman Group). How to alleviate the problems to this minority is a question under consideration by many of the world’s rulers. Gambling is another example. For many people it is simply a hobby which combines an element of risk with the possibility of financial reward. As Volberg (2001:1) put it, ‘for most people gambling is an enjoyable, if occasional, experience’. However, the same author added a rider to

this: 'for a few, it may lead to debilitating problems that harm the people close to them and the community'. The Church of England Ethical Investment Advisory Group (2006: 25) believes that all gambling contributes 'to the social ills that result from severe addiction to the activity, and should therefore be avoided'. These social ills may involve economic difficulty, debt and family problems and can lead to theft and suicide. This article does not include any debate on the morality of gambling itself, but investigates the level of responsible control exerted within the industry.

The development of the UK betting shop

In the UK, a series of laws beginning in the mid-nineteenth century allowed betting at racetracks but effectively prohibited alternative venues for gambling. The legislation was hard to enforce, and 'served to drive most "off course" betting "underground" into illegal gambling clubs and onto the streets ... By the start of the twentieth century sporting betting was an integral part of working class culture and it was highly organised' (Jones et al, 2000: 223). It was possible to place wagers with individuals or their representatives in many pubs, workplaces or even on the streets. The Betting and Gambling Act of 1960 recognised the difficulty of policing this system, and allowed the issue of licenses for individuals to operate betting shops. By the end of the decade, there were around 16,000 outlets, largely independent, and often owned by the formerly illegal operators. A small number of chains appeared, and began to dominate the market place, so that the number of betting shops fell to 12,000 in 1980 and 10,000 in 1990. Now, there are 8,800 betting shops. Horses and greyhound racing was initially the dominant source of betting, but more recently other sports have been included, so that it is possible to wager on the outcome of most sporting events.

Initially, as Jones et al (2000) have recorded, betting shops were not comfortable places to enjoy a leisure activity: the terms of the 1960 Betting and Gambling Act insisted that they operate in the side streets of towns and cities rather than the main shopping areas and also limited the facilities available. However, changes in the laws allowed the movement of the outlets to more prominent locations with more comfortable surroundings and encouraged the growth of larger firms.

Greg Mangham (1995: 22), when Management Development and Training Manager at the Corals chain of bookmakers, agreed that most people saw betting shops as 'grubby, dirty and smoky ... places of dubious reputation' and so the firm decided 'to offer both an improved product and presentation. Our product had to include not just a bet, but such things as an exciting environment, a quality service'. Legislation allowed the introduction of gaming machines into betting shops, and permitted live television coverage of sporting events, the provision of non-alcoholic beverages, toilets and decent seating. Thus, a more friendly and welcoming environment could be created. The firms were allowed to advertise, which helped to extend the customer base, and the extension of opening hours to the evenings and Sundays led to further business opportunities. The betting shop was starting to become attractive to a greater part of the population. Mintel (2004) revealed that 78 per cent of adults in the UK made at least one bet during the previous twelve months, and 57 per cent of these used a retail outlet, staking a total of £32,264 million in 2004 (Mintel, 2005).

Unfortunately, there are some people who gamble too much, and can even reach a state of addiction. Problem gambling involves participation to such a degree that it compromises, disrupts or damages family, personal or recreational pursuits (Leisieur

and Rosenthal, 1991). The British Gambling Preference Survey, 2007 (National Centre for Social Research, 2007) has calculated that those number of people betting at this level, according to the technique employed, is either 236,500 or 284,000.

‘There is substantial amount of research indicating that the onset of gambling addiction occurs during adolescence or teenage period’ (Yafee and Brodsky, 1997: 315). Moreover, gamblers tended to be male and young, with low incomes. Some legislation does exist to address this issue. Adolescents under the age of 18 are excluded from even entering a betting shop. The 2005 Gambling Act was designed to regulate the industry. One of its provisions was the creation of the gambling Commission, one of whose responsibilities is to offer advice to government departments on aspects of the gambling industry. This is achieved by commissioning research, which has included the measurement and monitoring of those UK adults with gambling problems. The Gambling Act of 2005 stated as its licensing objectives the prevention of crime and disorder; ensuring that gambling was conducted in a fair and open way; and the provision of protection for the vulnerable. Thus, the government has tried to ensure help for the problem gambler.

Yafee and Brodsky (1996) have argued the dangers of gambling are sufficient to require legislative control, and there is no doubt that the gambling industry is under scrutiny. If it does not behave responsibly, especially in addressing the issue of problem gambling, it may well face far more stringent controls than those which exist at the moment.

Evidence from the alcohol service industry is unlikely to comfort those concerned by the possible dangers of extending gambling activities. In his study of corporate social responsibility within another leisure sector industry, alcohol service, Pratten (2007) found that, due to massive public criticism of excessive drinking in the UK, ‘the owners of managed estates are vying with each other to appear as responsible purveyors of alcohol’. However, they were often criticised for price discounting. They also established targets and bonus payments for individual managers and their staff, leading to ‘the potential accusation that managers will respond by irresponsible sales behaviour’. In a further study of individual licensees within the independent sector of the trade, Pratten (2005) claimed that ‘the ethical licensee aims to make a profit, whilst operating within the law, and exercising the highest standards of professional behaviour so as to discourage anti-social behaviour When a number of licensees were interviewed, it was clear that all were aware of their economic responsibilities ... [but] ... the attitude to legal responsibilities was varied, with some carefully operating within the rules relating to age, hours and sobriety, while others hinted at a more liberal approach, sometimes claiming that the law was unreasonable’.

Corporate social responsibility and disclosure

It is self-evident that any business must make a profit to survive. Friedman (1970: 126) famously suggested that it was the responsibility of firms to increase their profits. From this has emerged ‘the orthodox understanding of a corporation’s principal objectives ... profit maximisation’ (Campbell et al 2002: 268). Indeed, Luetge (2005: 110) believes that ‘under conditions of competition, individuals cannot comply with moral norms in case this leads to higher costs which in turn leave them

worse off than their competitors. Situations like this systematically lead to erosion of compliance with moral norms’.

At the same time, scholars have advanced views on the social responsibilities of business. Bartels (1967: 20) noted that ‘demands for standards of ethics have grown up in defence of various rights – of labour, of competitors, of the community’. The reasons for such accountability can vary. Donaldson and Preston (1995) insist that all stakeholders, including employees, customers, suppliers and the local community should be considered in their own right with none necessarily having priority over the others. Lambin (1997) have even argued that companies should seek to benefit society as a whole.

The reasons for making disclosures can vary. Guthrie and Parker (1989) concluded that an organisation needs to disseminate enough CSR information so that it is judged a good citizen. Klein and Dawar (2004: 203) found that ‘firms have been found to engage in socially responsible behaviours not only to fulfil external obligations such as regulatory compliance and stakeholder demands, but also due to enlightened self-interest considerations such as increased competitiveness and improved stock market performance’. Lantos (1999: 224) felt that ‘morally upright behaviour can help fend off government regulation’ which is unwanted as ‘excessive government regulations increase compliance costs’. Indeed, Key and Popkin (1998) noted that the moral or ethical concerns of stakeholder groups could lead to regulation. Hence, companies that operate corporate social responsibility policies like to publicise their activities.

Where products could be regarded as ethically dubious, or socially undesirable or problematical, there is a greater expectation of responsible behaviour. Compliance with the law may be insufficient. Takala and Pallab (2000) have observed that an action may be legally correct but ethically dubious. Thus, firms may have to exceed the legal minimum. For example, Carroll (1991) expected that the alcohol industry should accept responsibility for problems such as alcoholism and drunk driving. Schroeder (2002) identifies three types of ethical business: the first allowed profit maximisation, providing that donations are made to charity; the second concerned firms that dealt in unethical products, whose redemption could come from operating ethical policies; and finally, there were ethical providers of ethical products.

Brammer and Pavelin (2004:88) studied voluntary social disclosures by large UK companies and found that ‘the tobacco and alcoholic drinks industries are associated with highly visible social issues. They are thought to produce large social externalities (e.g. crime and health) and are subject to strong regulatory regimes (competition, safety and taxation)’. In order to appear responsible under such scrutiny, it is possible that the relevant organisations might adopt ‘actions that appear to further some social good, beyond the interests of the firm and that which is required by law’ (McWilliams and Siegel, 2001:117).

This study of what could be regarded as an unethical area, gambling, is made more difficult by the attempt to contrast the attitudes of large and small companies. The collection of evidence can be difficult. Abu-Baker and Naser (2000) and Zeghal and Ahmed (1990) agree that social disclosure can be made through a variety of channels, including advertising. When Campbell and Beck (2004) investigated eight companies which had received public ethical criticism, they found that each had used their

website to offer some refutation. However, a study of websites alone may not reveal the disclosures or views of the smaller companies. Cowen et al (1987) noted that large organisations are more likely to make disclosures in formal documents such as annual reports, and the presence of several large firms within the gambling industry in the UK has allowed the use of such documents and websites to discover their declarations on corporate social disclosure. To find statements from the smaller firms is more problematic. Tilley (2000) has observed that small firms are perceived as lacking sufficient resources; large firm methodology is not easily adapted to small firms; and there is easier access to information with large firms.

Moreover, the larger organisations have a higher public profile and thus attract greater interest (Thompson and Smith, 1991). It has been argued that the key issue with small firms is social responsibility – the ethical relationship between small firms and their customers (Humphreys et al, 1993) and the difference between small firm ethics and the ethics of the owner manager (Vyakarnam et al, 1997, Quinn, 1997). However, Russell (1993) encountered barriers to ethics within small firms. Owners reported that ethics and business did not mix. They maintained that if it was legal, then it should be regarded as ethical and regularly maintained that their own operation was more ethical than its rivals. The very smallest firms, micro businesses, are usually classed as employing fewer than ten full time equivalent employees. There have been even fewer studies of such operations as ‘our knowledge ... micro-businesses remains highly limited’ (Scase, 1996: 570), though Matlay (1999: 287) found that ‘in micro- and small businesses the locus of organisational control rested entirely with owner/managers’.

Corporate social responsibility statements from the gambling firms

Most people are able to control their gambling and enjoy the pastime as a leisure experience. For this group, the industry needs to offer little more than suitable surroundings and reliable service. However those with a level of addiction need some protection. The firms involved in the betting industry have attempted to demonstrate that they can provide responsible operations to address all of these issues.

In 2003 the Association of British Bookmakers introduced an account of good practice in its Code of Social Responsibility, dealing with issues relating to responsible and underage gambling and cover such areas as advertising and promotion, age verification, staff training, customer communication and support for social impact initiatives.

Charities such as GamAid, Gamblers Anonymous, Gam-Anon, GamCare and Gamstop have been founded to offer assistance to anyone who feels an addiction to gambling. In addition, gamblers can involve themselves in “self exclusion” whereby they inform the bookmaker that they wish to close their accounts, and no longer place bets. This will be done automatically, with the customer unable to simply re-activate the account, and the former customer is refused entry to all local betting shops. They may provide photographs of themselves to facilitate recognition if they wish. This is essential for the scheme to be able to work. The alcohol industry has experienced problems identifying local customers banned for anti-social behaviour from outlets through Pubwatch schemes (Pratten and Grieg, 2005, 2006; Pratten and Bailey, 2006). In the gambling sector, someone who has realised the need to self-exclude may

weaken and try to place a bet, so photographs are needed. Of course, the same person could enter any betting shop outside of his normal area and bet normally. However, in reality, it is difficult to know how the system could be improved.

Some of the small operators have their own websites. The majority of these represent little more than advertisements, with limited corporate social responsibility statements. However, all of the major chains do have websites, which contain frequent references to their desire to ensure responsible gambling.

Ladbrokes, with 2,100 betting shops, have issued a social responsibility document on their website. It informs readers that it has made regular donations to GamCare since 1996. Its 'focus areas' are 'awareness and support for problem gamblers, staff training on social responsibility and prevention of underage gambling, investment in people, charitable fund raising and environment'. It is proud to note its role in drafting the 2003 Code, after which it 'became the first bookmaker to adopt and implement the code which set industry standards for dealing with problem gambling'. It offers information in its shops so that customers can take away leaflets on how to obtain help. Its 'staff are trained in their responsibilities regarding problem gambling ... to inform problem gamblers where they can get any help they require, and can also implement requests for self-exclusion'. Pollitt (2006: 24) noted that its Investors in People accreditations demonstrated that all of the staff possessed a "shared vision and values", and that 'managers effectively lead and manage their people'. This implies that Ladbrokes' staff are fully conversant with their corporate social responsibilities.

The Hills Group have 2,100 betting shops in the UK. In 2004 it introduced voluntary self-exclusion procedures for problem gamblers. In their 2005 Annual Report and Accounts the firm recognised that 'the Group has a responsibility to the wider community, as well as its shareholders and employees'. It pointed out that it works with GamCare, a charity offering information and assistance regarding problem gambling, and contributes to the Responsibility in Gambling Trust. It listed what it regarded as its most significant CSR issues:

'compliance with existing and future laws, regulations and codes of conduct relating to responsible gambling; underage gambling and protecting the vulnerable; prevention of crime and disorder, and product integrity issues; the ongoing training, development and motivation of employees to retain the widest possible range of talented staff; provision of a safe and healthy workplace in accordance with relevant legislation; providing appropriate levels of customer service; and protecting customer privacy and the proper handling and use of data within the Group in accordance with relevant legislation'.

The Gala Coral Group make similar pronouncements. It boasts that it contributes to Gam Care, and makes other charitable donations, especially with the NSPCC, breast cancer, community projects and the environment.

Thus, it would be difficult to fault the statements made by the major firms in the industry for their statements on corporate social responsibility, not for their contributions both to charities to mitigate the effect of excessive gambling and to other worthy causes. In fact, the firms in the gaming industry are required to

contribute to a voluntary levy to fund charities and other worthy causes. Many do not do so, leaving the financial targets unmet. GamCare receives its funding from the Responsibility in Gambling Trust which itself receives finance partly from this levy. The major companies do not state if their donations exceed the amount expected, so it is not possible to judge their philanthropic contributions.

The industry also needs to ensure that all of its employees support the declarations and adhere to the arrangements. Staff must know, understand and empathise with company policy, or it is likely to be ignored at branch level. Of the 77,667 people employed in the gambling industry, almost 20% are counter clerks and 18% managers and proprietors. They tend to be poorly qualified: 16% lack any qualifications and 28% have attained only the most basic level (People 1st, 2006: 6-9). The large number of betting shops and the relatively low level of educational achievement attained by the staff suggests that effective training could be difficult. However, the industry insists that it has met the challenge.

Corals claim that all of their staff had been trained in Gamcare Social Responsibility in Gaming by the end of 2004, and then the Group began a new GamCare training programme in late 2005. It is now satisfied that all of its general managers, support managers and new employees have been involved. It has a GamCare Code of Practice in every betting shop. The firm insists that staff are reminded regularly of a key expression: 'responsibility for an individual's gambling is their own. Responsibility to exercise a duty of care is ours'.

Corals has informed its staff that its 'operations are subject to national and local regulations, and ... operate within Association of British Bookmakers' guidelines'. This has meant that in-house rules exist 'to protect the business, ensure the safety of staff, and enhance the visit experience for our customer. Therefore it is important that all staff adhere to regulatory requirements, read and understand this document, and follow the company Code of Practice'.

Staff are reminded that they are encouraged 'to make customers feel welcome' but when they win, they should not be encouraged to continue betting. The group has a written policy and procedure for staff if they recognise a problem gambler, so that discreet advice can be offered.

An investigation of other chains reveals that they all use websites to make similar sorts of statements. All support CamCare, and all carry appropriate literature in their outlets. Coral's uses the "mystery customer" technique to check that its shops are performing properly, and Ladbrokes is happy to state on its website that it relies on checks to ensure that its policies are observed, telling us that staff are monitored 'by having random covert audits' in their shops and call centres 'to check on compliance'.

Such policies, training and anonymous checks suggest that the gambling companies are serious about their stated aims. However, the key to all of this is what actually happens in the retail outlets. If staff ignore their instructions and ignore their responsibilities towards vulnerable gamblers, then the firms have wasted their money and efforts, and, moreover, are failing in their stated duties and obligations. The case study represents a way of checking on compliance.

The Case Study

Walking in to a variety of betting shops in central Manchester and towns in Cheshire revealed that they were clean and tidy, offering a pleasant environment for anyone wishing to be involved in their activities. There were no youngsters inside or hanging around outside, and posters about problem gambling were prominently displayed with leaflets readily available. So far, then, the shops conformed to the standards which they claimed.

The most important part of the research involved interviews of staff to discover the levels of training received together with their attitudes and actual work practices. This type of research is notoriously difficult. Dalton and Metzger (1992: 207) have pointed out that ‘virtually every empirical enquiry of issues relevant to applied business ethics involves the asking of questions that are sensitive, embarrassing, threatening, stigmatizing or incriminating’, while Cowton (1998) also noted the difficulties of obtaining the truth on occasions in interviews. Given the sensitivity of the possible questions and the possibility of employers finding out about potentially embarrassing statements, it can be difficult to find suitable respondents. However, under the promise of strict anonymity, most of the staff in one chain and several in a small independent, did agree to answer questions. Both betting shops are located in a small town, and in the independent outlet the customers are regulars, with strangers a rarity. In the chain shop, there was a greater mixture of regulars and occasional punters.

A questionnaire approach was not used, as the intention was to allow the respondents to develop their views. Each interview was conducted privately, on a one-on-one basis. The staff were all asked the same questions, and allowed to make observations to explain and develop their responses. Each began with an explanation of the nature of the exercise and a few questions about their position in the firm. The questions were as follows:

1. Do you understand the meaning of the term “corporate social responsibility”?
2. Do you think that your business incorporates its principles?
3. Do you know what GamCare does?
4. Is your company involved with GamCare?
5. If so, does it work successfully?
6. Do you serve young people?
7. How could your firm operate more responsibly?
8. Do you think your firm acts merely within the law in its social policies or does it go beyond this?

The high street chain had a clear policy relating to the problem gambler. He had to approach the staff and seek assistance. His privacy was not to be respected, and he had to seek assistance. Thus, one person, probably the manager, was trained to counsel in these circumstances. Other staff must not comment on an individual’s gambling style, and must not approach the customer to discuss this.

The manager who was interviewed also acted as a recruiter and inductor for new employees, was confident that he knew about corporate social responsibility, and quoted the encouragement of GamCare as an example. He was delighted that his firm

supported the charity, and was fully aware of its aims and how it operated. He believed that it was a suitable organisation to help problem gamblers. He, like all of the chain's other managers, had attended courses which familiarised them with GamCare activities. He himself was the shop's counsellor for problem gambling. He felt that this was appropriate, as he knew few of the customers personally, and thought that they would be more willing to talk with him than to cashiers they met regularly. The idea of allowing young people to place bets shocked him, saying that all staff were meticulous on checking ages. He supported the use of the mystery customer to ensure that all outlets were equally careful. He said that area managers always asked about problem gamblers and young gamblers when they visited the shops. Thus, the manager was confident that at the operational end, suitable arrangements were in place to refuse service to those under the age of eighteen and to assist anyone who wanted help.

The assistant manager was aware of social responsibility, but was not as comfortable with company policy. He knew that staff could not mention what they perceived as excessive gambling to a customer, as this was the responsibility of the manager. However, he wondered if this was the most effective method of prevention. He knew about GamCare, but wondered if his company's support of it was something of a publicity stunt '*a bit of paper just to get a good rep*'. He felt that his firm was more interested in its profits than anything else. He was adamant that they were meticulous about checking the ages of anyone who looked young.

A relief manager was also interviewed. He was aware of corporate social responsibility, and quoted as an example of his firm's response its support for GamCare, and the display of appropriate posters and leaflets, although he did say that this '*helps the company look more socially aware*' and was '*the most they could do*'. He discussed the possibility that staff could try to persuade customers to wager less, but decided that this was counterproductive. He concluded that the firm could do no more '*because it is conflicting with making money*'. However, he was critical of the new opening hours, which means that the shops could operate from 8.30 a.m. to 10.00 p.m. as he thought that this would encourage some people to spend all their time and money gambling.

One cashier was concerned about potential high losses: '*working in the industry I know how addictive that the gambling excitement is. Sometimes there is a barrier between winning and reality. It isn't until they have no money left that they realise they haven't any more disposable income to pay for the essentials such as petrol in their car or food for everyday living*'. All of the cashiers interviewed had a limited knowledge of GamCare. However, they all knew that any query should be referred to the manager. None had ever been asked about it. When it was explained to them, all felt that it would be ineffective, especially as the problem gambler had to approach the staff, which many would be reluctant to do. They all said that they regretted that they could not initiate any conversation relating to the losses of a customer.

Thus, it is possible to draw some tentative conclusions from this one outlet. It is acting in accordance with the law regarding age limits, and also head office's demands on the display of material for problem gamblers. The company has established a system for addressing the issue of problem gamblers. The shop manager is happy with these arrangements, but the cashiers have greater reservations on the

company's formal policy relating to problem gamblers, as they believed they could be more effective.

An independent bookmaker was asked the same questions. He was aware of the meaning of corporate social responsibility, and pointed out that his firm operated it in a different way from the large chains. He was aware of GamCare and displayed its literature, but said that it was ineffective as it had never been used. He felt that the personal approach was far more effective. He knew all of his regular customers by name, and was quite prepared to go up to one who had lost heavily on the day and suggest that they should give up and go home. He felt that there was really little more that could be done to deter such customers. He believed that the larger companies were supporting GamCare for the sake of publicity: *'don't think that the big corporate business competitors are bothered. They will take and take your money'*. He said that knowing his customers meant that he would be told if anyone under the age of eighteen years of age had been served, but his office tried hard to enforce the regulations.

One of his cashiers did not recognise the term "corporate social responsibility" but was aware of the work of GamCare, and dismissed it as *'not important in the everyday running of the shop'* and *'it has never been used or asked about. There is just a poster and some tatty leaflets'*, and was unlikely to have any impact on the customers. Indeed, the cashier maintained that *'the customers are responsible for themselves and it is not for the company to have to think for them'*. However, cashiers were allowed to speak to those perceived to be wagering excessive amounts, and he believed that this would be effective as it would be more personal. Once more, the cashier was insistent that youngsters would have to prove their age.

Conclusions

It is now commonly accepted that business organisations have a responsibility to all of their stakeholders. Carroll (1991) has argued that the prime responsibility is to the shareholders, and this is clearly true. Without suitable profits, there would be no shareholders, and thus there would be no firms. Another group worthy of consideration is the customer, and, of course, there is a potential conflict between the desire for profit and the needs of the customers. On the other hand, if the customers are treated well, and are not exploited, the two groups can be reconciled. This can be difficult, especially when the product could be regarded as unethical. The gambling industry in the UK is dominated by several large companies, but also involves a proportion of small operators. The facilities offered by both types of operators is improving, to both attract and retain custom. For most of those who enjoy the thrill of gambling, this merely adds to the experience. However, the vulnerable may be persuaded to bet more than they can afford. The young are precluded from betting shops by law, and our research indicates that this is well enforced. There is also a need to help those who have become addicted to gambling. The industry has helped to establish a system of help and counselling for such people. The evidence suggests that the firms involved claim to be actively aware of their responsibilities in this respect. As a matter of course, betting shops offer readily available information on how to recognise problems and who to contact for assistance. The major chains have established formal procedures for this, and publicise their actions on their websites. By doing this, they appear to be socially aware and responsible. Indeed, this may be

the case. Shroeder (2002) would probably accept that the firms are behaving ethically as they are making major contributions to charities, operating legally and attempting to assist problem gamblers. However, a compulsory levy ensures that much of this is financed. Our studies suggest that more could be done. The formal systems established by the large chains might be less effective than a casual word from staff, but this is prohibited. The customer must ask for help. In any addition, self-recognition of the problem is the first step in seeking to change, so there is logic in such an approach, but it is also a valuable indicator if others make a similar point. It could cause the addict to contemplate their actions. The lower level staff of the firm also doubted the effectiveness of the policy. On the other hand, the small, independent concern, while physically supporting the use of posters and leaflets, adopted a more pro-active policy, encouraging heavy losers to leave the premises. He felt that his method might work, while the voluntary system of the chains was merely a way of satisfying the requirements to demonstrate a duty of care. In the same way, self-exclusion relies on the individual recognising the need to stop betting. More needs to be done to help those incapable of such an insight. The owner who was interviewed demonstrated a genuine concern for the customer. This conforms with the established view that small business ethics involve the owner and his customer and also suggest that there is a real level of ethical concern to ensure that the customer does not overspend. Of course, his views could be different from those held by many other operators. If a satisfactory method of tackling the problem gambler is to be found, then much more work of this type needs to be undertaken, addressing questions relating to the number of people involved and how they can be identified. Then they need to be interviewed, to discover their views on their gambling and how they could be dissuaded from excesses. Until this takes place, the efforts of the industry will have little effect.

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