

Applying a commercial determinants of health perspective to gambling harm prevention

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A Public Health Framework for
Preventing and Reducing Gambling
Harms in Yorkshire and the Humber
(2024) – Launch Event
Monday, 16th December 2024



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The Gambling Act 2005: building and embedding an industry-favourable policy system

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- 1) **Reframed** the gambling sector as a legitimate leisure industry to be encouraged to thrive.
 - 2) Underpinned by a logic of “**balance**”.
 - 3) Defined “**the vulnerable**” as the problem – to be addressed through public education and treatment for those who cannot or will not **gamble responsibly**.
 - 4) Portrayed industry as a **source of funding** for research, education and treatment and as a **legitimate policy actor** who can help write the rules.

R. Cassidy. *Vicious Games: Capitalism and Gambling*. Pluto Press, 2020

van Schalkwyk MC, Hawkins B, Eisenkraft Klein D, Koon AD. The role of metaphor in the corporate political strategies of health harming industries: Comparing the concept of balance in the gambling and opioid industry discourses. *Soc Sci Med*. 2024 Sep;356:117158.



Framing the deregulatory agenda

“At the core of our proposals are improved protections. We propose an independent Gambling Commission with precisely defined objectives and a formidable array of powers.... All in all, the Commission will be a force to be reckoned with.”

Rt Hon Tessa Jowell, Secretary of State's speech to the Business in Sport and Leisure annual conference, 2003

“If evidence of harm emerges through the research and monitoring that is undertaken, we will act swiftly to toughen the controls. We have powers throughout the Bill to **withdraw or move back from the liberalisation if there is evidence of harm.**”

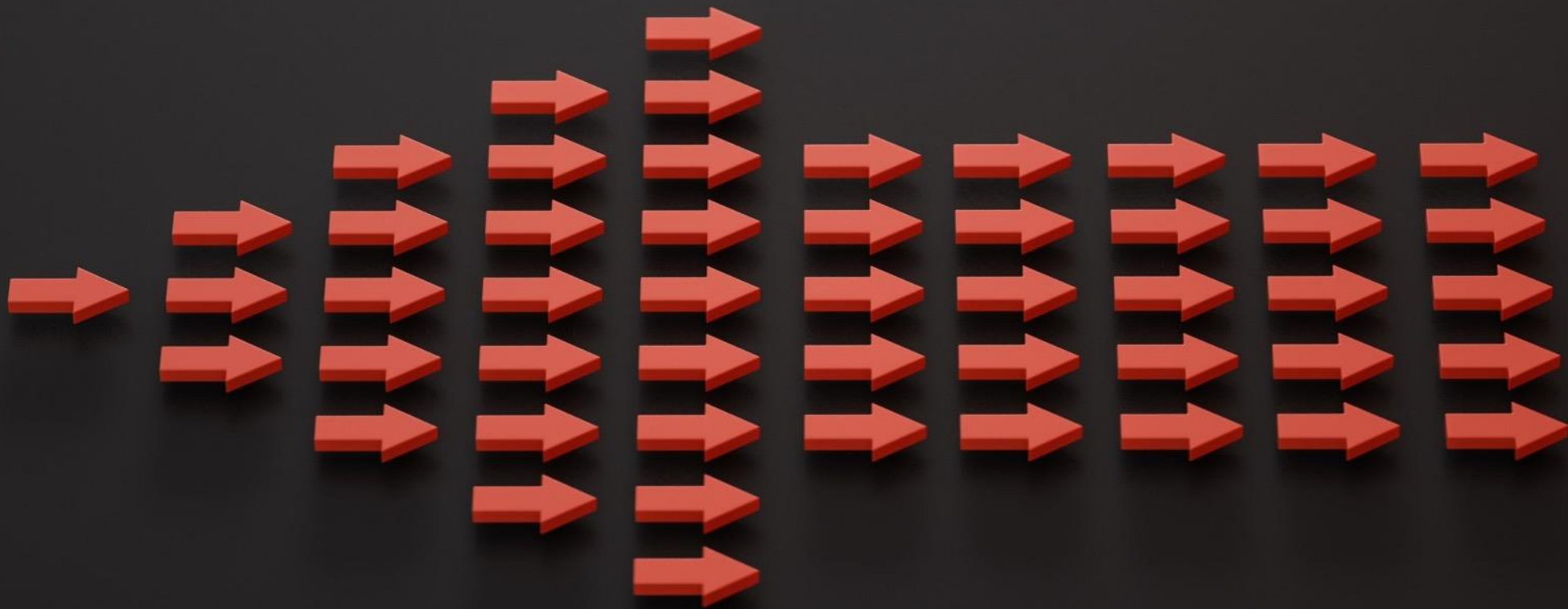
Rt Hon Tessa Jowell, Secretary of State for Culture, Media and Sport, 2004



What is measured, how and who benefits?

- 1) The concept of problem gambling and use of problem gambling prevalence surveys
- 2) Deeply problematic from a public health perspective
- 3) Help to reproduce industry-favourable framing of the problem
- 4) Maintains ignorance about the scale and types of harm being experienced









Health Promotion International, 2024, 39, 1–12

<https://doi.org/10.1093/heapro/daad196>

Article

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Article

Agnogenic practices and corporate political strategy: the legitimization of UK gambling industry-funded youth education programmes

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Constructing **reassuring narratives** about safeguarding children and young people from gambling harms and **producing ignorance** about evidence and effectiveness

van Schalkwyk MCI, Hawkins B, Petticrew M. The politics and fantasy of the gambling education discourse: An analysis of gambling industry-funded youth education programmes in the United Kingdom. *SSM Popul Health*. 2022 May 12;18:101122. doi: 10.1016/j.ssmph.2022.101122. PMID: 35637741; PMCID: PMC9142715.

van Schalkwyk MCI, Hawkins B, Petticrew M, Maani N, Garde A, Reeves A, McKee M. Agnogenic practices and corporate political strategy: the legitimization of UK gambling industry-funded youth education programmes. *Health Promot Int*. 2024 Feb 1;39(1):daad196. doi: 10.1093/heapro/daad196. PMID: 38234277; PMCID: PMC10794875.



High Stakes: Gambling Reform for the Digital Age

April 2023

CP 835

At the heart of our Review is making sure that we have **the balance right between consumer freedoms and choice on the one hand, and protection from harm on the other**. It has become clear that we must do more to protect **those at risk of addiction and associated unaffordable losses**.

This can and should be done in a **proportionate** way. **Millions of us enjoy gambling every year** and most suffer no ill effects, so state intervention **must be targeted to prevent addictive and harmful gambling**.

Prevention or inevitable harm?

DCMS Minister Gerry Sutcliffe said:

"I welcome the Gambling Commission's prevalence survey, which establishes a useful benchmark against which we can assess the effectiveness of the new Gambling Act.

"While the results show that problem gambling still only affects a small minority of people, it remains a serious issue, and one which must be addressed.

"The gambling industry has a responsibility to make the right level of funding available to treat those who are harmed by its products. And we owe it to the public to make sure that they have ready access to the facts that they need to make informed choices about gambling, to help reduce the risks.

Oral statement to Parliament

Gambling reform for the digital age

Oral statement by the Culture Secretary on the white paper

No one should be denied an innocent flutter, but the public should not have to bear the cost of treatment when a punter becomes an addict.

So, one of the most important changes it will introduce - and one backed by both campaigners and many in this House - will be a new statutory levy to turn the tables on problem gambling. One that will see gambling companies required to fund more new groundbreaking research, education and treatment.

Baroness Twycross' speech at GambleAware's annual conference, where she set out the government's work to strengthen protections against gambling harms.

From: [Department for Culture, Media and Sport](#) and [Baroness Twycross](#)

Published 4 December 2024

This has provided invaluable funding for efforts to tackle gambling harm. But I am unapologetic in wanting a system for the future that is clearer, fairer and sustainable. It is only right that all operators pay their fair share and that contributions reflect levels of harm and the financial realities of the land-based sector.

Using the commercial determinants of health evidence base

- 1) **Learn** from history and the **compelling evidence** for a **highly consistent cross-industry** use of corporate political **practices**
- 2) **Reframing** the problem and recognising commercial **products** and **practices** as drivers of harm
- 3) **Moving beyond** the concepts of **problem** and **responsible** gambling
- 4) **Protecting** health policy, research and education from **undue industry influence**
- 5) **Strong** systems of **governance** and **prevention** of conflicts of interest: Good Governance Tool Kit
<https://www.adph.org.uk/resources/good-governance-toolkit/>
- 6) **Building coalitions and skills**: CDOH Essentials
<https://www.adph.org.uk/resources/cdoh-essentials/>
- 7) **Promote** core public health concepts: prevention, safety, independence, evidence, and effectiveness





Thank You!

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