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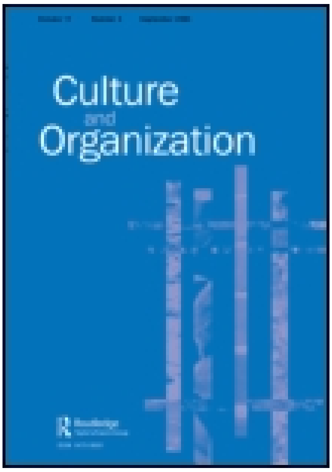

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Paradoxes of risk management: Social responsibility and self-exclusion in Dutch casinos

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This article deals with the basic contradictions of risk management and responsibility regarding problem gambling and self-exclusions, and draws special attention to the role knowledge production and science play in the construction and evaluation of gambling risks. This remarkable case of corporate social responsibility (CSR) is analyzed from a risk-governance perspective. It is grounded on a case study of the CSR practice of the Dutch casino monopoly, in particular the problem gambling mitigation and self-exclusion program of this corporation. The intentions and operations of this 'responsible gambling' practice constitute new business values and working norms. At the same time empirical evaluations of the self-exclusion program reveal that despite all the efforts put in the risk-management strategies, a significant part of the problem cannot be addressed at all. This points toward a major paradox of risk management. Overall the article highlights the ambiguous nature of risk management and responsible gambling.

Keywords: risk management; corporate social responsibility; casinos; problem gambling

1. Introduction

Legal casinos are closely associated with social responsibility first and foremost because of the associations with gambling addiction and crime. In combination with the morally often still controversial nature of gambling, risks of addiction and crime make casino organizations also sensitive to reputational risks associated with bad publicity. Gambling organizations therefore seek to minimize (or negate) these gambling risks, often invest in social responsibility policies and guard their responsibility image. This recent development in the gambling industry is addressed in the discourse on 'responsible gambling' (Reith 2008; Cosgrave 2010; Thompson 2010; Smith and Rubenstein 2011).

In the case of legal casinos, the core issue of corporate responsibility relates to marketing initiatives in the area of player protection by means of voluntary programs in which the casino corporation develops beyond-compliance policies that lead to the reduction of negative externalities. Self-exclusion programs, in which gamblers are offered the opportunity to exclude themselves, often temporarily, from the right to access a casino venue, can be regarded as one of the most far-reaching management tools for dealing with 'problem gambling'. However, to make sure that this social

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responsibility goes beyond 'lip-service', it is of great importance to analyze how responsibility claims are actually realized in everyday organizational practice. Indeed, the leading research question regarding responsible gambling and self-exclusion in this article concerns the way corporate social responsibility (CSR) rhetoric relates to CSR practice. Scientific research should for this purpose be considered integral to the establishment, monitoring and evaluation of any responsible gambling practice (Blaszczynski, Ladouceur, and Shaffer 2004, 153). It could even be argued that knowledge about the adverse outcomes of commercial gambling is productive for the constitution of gambling organizations and markets (Kingma 2004; Cosgrave 2010).

Responsible gambling will in this article first be related to the CSR literature. The concept of CSR is particularly suited for addressing the productive role of risks because contemporary meanings of CSR are closely associated with the anticipation, and the mitigation and prevention of, negative externalities (Carroll 1999; Campbell 2006; Pater and Lierop 2006; Maclagan 2008; Jackson and Apostolakou 2010). Recent CSR understandings epitomize the way externalities are integrated in, and at the same time extend the range of, corporate management. A key argument of this article is that CSR in the case of contemporary casinos can be understood and analyzed from a risk-governance perspective (Renn 2008). Such a perspective extends the notion of the organization which becomes increasingly responsive to a network of external stakeholders and internalizes unintended and adverse consequences in the organization's culture and risk-management practices. This approach toward responsible gambling is in line with the EU commission's definition of CSR as 'a concept whereby companies integrate social and environmental concerns in their business operations and in their interaction with their stakeholders on a voluntary basis' (quoted in: Jackson and Apostolakou 2010, 373). Jackson and Apostolakou claim that CSR now 'forms part of risk management activities of firms', including the protection of 'corporate and brand reputation' (Jackson and Apostolakou 2010, 373). Indeed, a concern for 'reputational risk' (Power 2007) is arguably one of the major drivers behind responsible gambling programs.

Empirically, this article deals with the CSR of Holland Casino (HC), the operator of the Dutch casino monopoly, in particular the so-called 'addiction prevention' policy and 'self-exclusion' program of this corporation. Since the early 1990s this casino corporation already claims to take social responsibility seriously and over the years developed measures to counter the bad consequences of 'problem gambling' (Kingma 2008b). HC claims to be successful in its CSR policies (Holland-Casino 2010). HC's CSR policies have in 2011 even been officially approved by the Dutch Court of Audits (Algemene-Rekenkamer 2011). However, the measurement and assessment of negative externalities in the case of casinos, and gambling more generally, is notoriously problematic and controversial (Smith, Hodgins, and Williams 2007). Assessing responsibility claims becomes even more problematic if we seek to relate the negative consequences and the effects of counter measures in a causal way to a single casino company. In view of the issue of effectiveness and responsiveness, I will critically evaluate the state of the self-exclusion literature and the self-exclusion practice at HC, in particular an unprecedented and rather extensive research in which the prevention policy and self-exclusion program of HC have been evaluated (Bruin de et al. 2001). Both, the advanced nature of the anti-problem gambling practice at HC and the availability of serious evaluations of this practice, make HC ideally suited for probing the interactions between problem gambling and risk management. All in all

I will highlight a fundamental paradox of risk management which says that if we seek to identify and counter the adverse consequences of commercial gambling, it becomes also evident that a significant part of the problem cannot be addressed at all. This paradox may reinforce illusions of control and may unjustly inform decisions to further liberalize and expand the casino market.

In this article I first relate CSR to risk governance in the field of gambling. Subsequently the research into self-exclusion and the casino company will be introduced. After that I examine the addiction prevention policy and self-exclusion program of HC, in particular the way research and management are connected. How does social research on the key issue of problem gambling relate to casino management? Finally, I discuss the findings and highlight the paradoxes between the production and exploitation of gambling risks on the one hand and the mitigation and management of these risks on the other.

2. Social responsibility and risk governance

CSR has always been closely associated with 'beyond compliance' policies, i.e. policies that go at least partially beyond direct economic and legal obligations (Carroll 1999). In his overview of the development of the concept of CSR Carroll (1999), who defined CSR in terms of a firm that 'should strive to make a profit, obey the law, be ethical, and be a good corporate citizen' (289), demonstrates that it is not always clear what is included in this concept, and that there are narrow as well as broad definitions which refer to business ethics and corporate citizenship. In the case of the casino industry, CSR is often associated with a problem solving approach, defined by Fitch (1976) 'as the serious attempt to solve social problems caused wholly or in part by the corporation' (quoted in: Carroll 1999, 281). In this respect I follow a minimum definition of CSR as proposed by Campbell (2006), whose concern is, comparable to this article, with the substantive rather than the rhetorical aspects of CSR. Campbell (2006, 928) mentions two aspects that comprise '… a *minimum behavior standard* with respect to the corporation's relationship to its stakeholders below which corporate behavior becomes socially irresponsible'. Corporations should first not knowingly do anything that could harm their stakeholders, in our case the casino customers and ultimately the legitimacy of the state. Problem gambling might easily undermine the legitimacy of the state in case it is seen as a consequence of defective legislation and failing supervision, or as an instance of immorally profiting from vulnerable citizens. If corporations do harm stakeholders, second, they should '… rectify it whenever it is discovered and brought to their attention' (Campbell 2006, 928). A self-exclusion program is an obvious and good example of such an attempt at 'rectification'. Crucial in Campbell's definition are the notions of 'knowingly', 'discovered' and 'attention'. These notions all refer to the awareness and understanding of the involved risks of, in our case, problem gambling. These notions also anticipate the processes of meaning-making and knowledge creation involved in converting uncertainties into manageable risks (Power 2007).

The actual meaning of CSR will depend upon the situation and is relative to societal expectations and the managerial perception and understanding of these (Pater and Lierop 2006). In his historical overview Carroll (1999, 292) notes from the early 1990s onwards a growing concern with the empirical grounding of CSR as well as theoretical innovations such as stakeholder theory. These developments point toward a need to deal with the socially constructed nature and social practice of CSR

(Jackson and Apostolakou 2010). Jackson and Apostolakou (2010) draw specific attention to the institutional context and social impact of specific industrial sectors, of which gambling may be a case in point. Legal gambling may even be regarded as an extreme case in which both controversies and responsibilities are disproportionately articulated and amplified.

The emergence of risk and responsibility as a governance issue in the field of gambling is immediately related to the legalization and liberalization of gambling markets, which in recent decades took place in many countries (Kingma 1997; Reith 2008; Cosgrave 2010; Chambers 2011). In this process gambling is normalized as an entertainment product on the consumer market. While gambling regulation in the context of illegal markets is mainly concerned with restriction and criminalization, in the context of legal gambling it becomes of increasing importance to distinguish sharply between acceptable and unacceptable forms of gambling. Gambling can, at least in some of its forms, be regarded as 'edgework', characterized by voluntary risk-taking as an end in itself, similar to other kinds of risky leisure pursuits such as sky-diving, mountaineering or drug taking (Lyng 2005; Cosgrave 2008). Paradoxically, gambling in its commoditized shapes is marketed and presented as a 'safe risk', in which the risks of gambling are largely (claimed to be) brought under control (Gephart 2001). In the context of legal gambling distinctions have to be drawn between the consumption of risk, which is regarded as legitimate to exploit, and risky consumption, which might lead to addiction and other adverse consequences (Cosgrave 2009, 47). In this respect it seems only logical that the liberalization of gambling markets is paralleled by the medicalization of gambling and the emergence of problem gambling policies (Castellani 2000).

In a way, the risk-society as theorized by Beck (1992) has a responsible society as its logical counterpart. Beck originally conceived the risk society as resulting from processes of 'reflexive modernization', which entails the self-confrontation of modernity with the side-effects of modernization (Beck, Giddens, and Lash 1994; Beck and Holzer 2007). To a certain extent 'the problem of modernity has moved from solving externally imposed problems to solving self-produced problems' (Beck and Holzer 2007, 8). Problem gambling can largely be regarded as a self-produced social problem, because commercial gambling is based upon political and managerial decisions to liberalize gambling, and because the consumption of gambling products involves a freedom of choice. It is a reflexive attitude toward the side effects of commercial gambling which makes gambling part of the risk-society (Kingma 2004). In Beck's theory, 'reflexivity' refers to a reaction to the consequences of former decisions, in our case decisions regarding the liberalization and exploitation of gambling, as well as to a 'reflection' in the sense of awareness. Beck's risk society perspective is highly relevant for the field of gambling, since problem gambling involves a risk with a number of features that are typical for the risk society: The risk society comprises rather new risks, which are based on human decision-making; of which single causes are hard to identify; which are hard to calculate; and of which the effects take a long time to emerge; and may potentially affect a wide range of people (Lupton 1999; Beck and Holzer 2007). All these features apply to the notion of 'problem gambling' (Rosecrance 1988; Castellani 2000; Smith, Hodgins, and Williams 2007). Decisions which might have problem gambling as an unintended consequence refer to the political and managerial decisions to provide gambling opportunities as well as to the choices of gambling consumers to gamble. With the origin of such a risk in decision-making 'the problem of accountability and responsibility irrevocably arises' (Beck and Holzer 2007, 5). Because of this accountability, and the associated questions regarding blame, the risks of the risk society are often highly politicized. In this respect I would refer to the unresolved debate in the gambling sector on the question whether the blame for problem gambling rests with the gambler or with the gambling industry (Castellani 2000).

The integration of risks in gambling policies and the dynamics of risk management take shape in the context of the development of a new regime of gambling regulation. This regime figures around risk analyses rather than moral considerations and has been coined in terms of the 'risk model' of gambling regulation (Kingma 2004, 2008a; Chambers 2011). Typical features of this risk model are: (a) a liberal political consensus on the legitimacy of gambling as commercial entertainment, (b) acknowledgment of the economic importance of the gambling sector, and (c) control of gambling markets, primarily to confront the risks of addiction and crime. The rise of the risk model can be understood as part of a paradigm shift in regulation, and signals a new phase in the overall commoditization of gambling, a change which claims pleasure as a primary motive for gambling behavior and an expanding commercial gambling sector which has a growing share in and influences on society at large. Organizationally this development implies that casinos: (a) legitimately offer gambling opportunities in the shape of entertainment products and services, (b) exploit gambling in order to make a financial profit and other economic benefits, and (c) develop responsible gambling strategies in order to prevent and mitigate the side effects of gambling exploitation, including reputational risks, related to excessive gambling.

In the risk-regime of regulation, self-regulation at the organizational level of gambling operators is as important as state-regulation. It is here that the connection with CSR can be made. The emergence of problem gambling has prompted political concern about harms, producing forms of 'sub-politics' (Beck 1992, 183–187) which are taking over the leading role of formal politics in dealing with problem gambling. As argued by Beck: 'Governmental monitoring agencies and a risk-sensitive media publicity sphere begin to talk their way into and govern the "intimate sphere" of plant management' (186). A feature of gambling organizations' management of risks is the need to demonstrate that gambling-related social problems can be successfully controlled. This is one of the major assumptions of the risk model of regulation, which in its pure form is grounded on cost-benefit analyses. Characteristic of the focus on risk in gambling governance is further the construction of distinctions between so-called normal or recreational gambling and abnormal, or excessive and problematic gambling (Nicoll 2010).

Since CSR represents a way of dealing with the outcomes or (unintended) consequences of managerial decisions and business activities, I will frame the CSR policies of the focal organization HC in terms of a risk-governance approach (Renn 2008) in combination with some basic notions of actor–network theory (ANT) (Callon 1986; Latour 2005). Both are largely constructivist approaches which were developed in the 1980s and subsequently evolved into overarching sociological perspectives. Although these approaches have different backgrounds they are partly overlapping and complementary. The risk approach can be regarded as particularly useful for addressing the unintended consequences of organizational actions. ANT is particularly suited for addressing the organization in relation to a seamless web of heterogeneous stakeholders, which in the context of CSR can be broadly defined as 'anyone liable to be affected by organizational action' (Maclagan 2008, 372).[1] Risk governance and ANT both consider the role of knowledge production and science as particularly constructive for contemporary social formations. With this I am not looking for essentialist codes for the CSR of casinos. Rather, I am interested in the monitoring and meaning-making processes regarding gambling behaviors and self-exclusion programs. In this respect I will focus on how contemporary gambling enterprises 'problematize' gambling behavior, how new, risk management-related, actors are 'interested' in and 'enrolled' in gambling organizations, and how research has been 'mobilized' to account for problem gambling and risk management strategies. These instances can be regarded as successive moments in the 'translation' of actor networks (Callon 1986).

It is important, also for the field of gambling studies, to understand how gambling organizations change in view of gambling risks, and the role organizations play in the constitution and management of gambling risks. Gambling corporations do not simply deal with problem gambling but in the process also transform themselves as well as the gambling problems. In the risk-governance approach risks, or the possible consequences of organizational decisions, are converted into organizing principles and focal points in management processes (Hutter and Power 2005). In processes of risk governance, risk 'represents a specific way in which aspects of reality can be conceptualized and rendered controllable' (Taylor-Gooby and Zinn 2006, 45). Since there is widespread recognition that gambling risks are endemic, the issue appears to have become one of managing an acceptable level of risk, rather than the elimination of risks. Dutch casinos developed their problem gambling policy as part of their overall 'enterprise risk management' (ERM). According to Power (2007) the rise of ERM represents a new phase of corporate governance. In this new phase internal control becomes as important, and sometimes takes precedence over, external control and regulations. Self-regulation and compliance to normative rules of organizational conduct becomes the new standard to which external control agencies develop a complementary role. Power (2007) regards the practice of risk description and risk communication as an important part of ERM.

In the process of internalizing external threats organizations have to address three basic questions (Renn 2008, 40). These questions concern the '(un)desirability' of outcomes, the 'uncertainty' of outcomes and the 'conceptualization' of risks and responsibilities. The answers to these questions all depend upon cultural preferences and social context (Renn 2008, 40). Risk governance thus goes beyond straightforward risk assessments and risk-regulations. According to Renn (2008), 'risk governance looks at the complex web of actors, rules, conventions, processes and mechanisms concerned with how relevant risk information is collected, analyzed and communicated, and how management decisions are taken' (9). In this respect it is relevant that responsible gambling is primarily conceived as a process involving many stakeholders, such as the consumers, operators, health services, community groups and government agencies (Blaszczynski, Ladouceur, and Shaffer 2004, 303). The primary stakeholders implied in the evaluation of self-exclusion programs will in this article be more narrowly defined as the organizational actors of casino managers and employees, the customers as the potential victims of gambling, and the researchers as the representatives of science.

3. Casinos and responsible gambling

The concern over problem gambling, and the interest in risk management within gambling enterprises, has led several casino companies to develop so-called 'responsible gambling policies' (Blaszczynski, Ladouceur, and Nower 2007; Reith 2008; Thompson 2010; Smith and Rubenstein 2011). In the case of casinos, such programs often include a strategy of 'self-exclusion' to limit access to gambling opportunities for problem gamblers, which, in turn, aids in the elimination or reduction of harm experiences. According to Blaszczynski, Ladouceur, and Nower (2007) a self-exclusion program was first formally constituted in Manitoba, Canada in 1989, and in 1996 the Missouri Gaming Commission implemented the first such program in the USA. Currently, self-exclusion programs operate in many casinos worldwide, although there are huge differences as to the logic and design of these programs dependent upon the institutional context of specific gambling jurisdictions (Thompson 2010). Thompson (2010) distinguishes between exclusion bans which are strictly voluntary, such as advocated in North America, and mandatory bans, such as often used against cheaters and professional 'card counters', and which are sometimes also used against compulsive gamblers, for instance, in South Korea and Switzerland. In between voluntary and mandatory bans Thompson envisions a 'third way' of banning for a list of 'unwelcome' gamblers who might be actively discouraged from casino play by depriving them from direct advertising, complimentaries, credit play, or the collection of big prizes.

Although not mentioned as such by Blaszczynski, Ladouceur, and Nower (2007) and Thompson (2010), the Dutch casino corporation HC should be regarded as one of the first and most advanced casino companies in the area of responsible gambling and self-exclusion programs (Nowatzki and Williams 2002). This self-exclusion program has also been seriously evaluated (Bruin de et al. 2001), a report which will be referred to more extensively further on.

From a governance perspective self-exclusion strategies are typical 'technologies of agency' (Dean 1999, 147), which engage us as active and free consumers, and as 'agents capable of taking control of our own risk'. Discourses of responsibility address the individual consumer who is made responsible for his or her own decision-making in the marketplace (Reith 2008, 150). As Reith notes, this decision-making implies not only a freedom of choice, but also the idea of 'informed choice': 'The hope here is that informed choice will result in rational, and therefore responsible, behaviour ...' (152). Because of this, responsible gambling strategies usually start with providing information and education. Individual choice and proper information are also the keystones of the so-called 'Reno Model', one of the first comprehensive frameworks for responsible gambling strategies (Blaszczynski, Ladouceur, and Shaffer 2004, 311). In the Reno model an institution's 'duty of care' forms the flip side of the freedom of choice coin. Blaszczynski, Ladouceur, and Shaffer (2004, 311) emphasize that the extent and nature of this responsibility is 'complex and uncertain' in part because the limits and extent of the duty of care are not legally defined. Smith and Rubenstein (2011, 56) also conclude that the 'responsibilities of the gambler, the gambling provider, the machine manufacturer, the regulator, and others are still unclear'. This means that responsibility objectives and practices have to be developed by the gambling corporation itself in interaction with important stakeholders such as regulatory bodies and treatment agencies.

By definition, self-exclusion offers a clear case of self-regulation in the field of gambling. What is minimally required from a responsibility perspective, and this is consistent with the 'minimum standard' which I in the theoretical section adopted from Campbell (2006), is that the gambling industry 'must not knowingly exploit or take advantage of any player, in particular, vulnerable individuals manifesting characteristics associated with gambling-related problems' (Blaszczynski, Ladouceur, and Shaffer 2004, 312). At the other extreme of the responsibility spectrum one should recognize that the gambling industry 'does not have the expertise or responsibility to diagnose or clinically treat individuals with gambling-related harms' (Blaszczynski, Ladouceur, and Shaffer 2004, 312). For this purpose, responsible gambling organizations usually provide information about treatment services. Self-exclusion contracts can be located somewhere in between these extremes. In such a contract the gambler voluntarily agrees with the casino to be banned from the premises for a fixed or indefinite period (Nowatzki and Williams 2002; Napolitano 2003). The Reno model of responsible gambling specifically calls for the empirical grounding of responsible gambling policies since 'regulatory responses often have been applied in the absence of any evidence that demonstrates or supports the likelihood of effectiveness…' (Blaszczynski, Ladouceur, and Shaffer 2004, 304). Measuring the effectiveness of self-exclusion programs can be regarded as crucial for CSR since it gives a clear indication of the responsiveness of gambling companies to the issue of problem gambling (Nowatzki and Williams 2002). Although often called for, serious and conclusive evaluations of self-exclusion programs are remarkably scarce.

In the literature regarding self-exclusion programs, and the development of empirical evaluation research, three successive levels of reflection and the monitoring of gambling risks can be discerned. A first concern is with the rationalization and normative outline of self-exclusion programs, such as in the aforementioned 'Reno model'. This literature offers descriptions, gives legitimations and legal considerations but does not teach much about the actual practice, let alone the effectiveness, of self-exclusion programs. This level of CSR compares to the rhetoric and explicit statement of good intentions but usually does not go beyond 'lip-service'.

A second concern is with the registration of self-exclusion procedures in the evaluation of responsibility programs. A fine example of this would be the evaluation of Australian self-exclusion programs (The South Australian Centre for Economic Studies 2003). Other examples of this type of research include the first evaluation of the responsibility practice of the Dutch casino corporation HC in 1998,[2] and the evaluation of the responsibility policy of the US-based transnational casino corporation Harrah's (Ladouceur and Ferland 2007). This second type of evaluation research is based on input measurement and provides figures about the motivation, application and actual practice of self-exclusion programs. This type of research, however, still hardly teaches anything about the effectiveness of responsibility programs because it lacks output measurement. The extensive Australian evaluation report explicitly concluded that:

> Overall, the limited data available on self-exclusion is input not outcomes based; it is not possible to meaningfully comment on compliance by venues, rates of detection or notification rates and hence the effectiveness of exclusion as a protective measure. The reporting of breaches of self-excluded persons is inconsistent and infrequent. There is no systematic procedure followed by venues in regard to reporting and the industry has failed to implement such a system. (The SA Centre for Economic Studies 2003, vi)

In addition, this Australian study concluded that a lack of a reliable system of identification, detection and enforcement seriously hinders the acceptance of self-exclusion programs by the gambling industry. Thompson (2010, 360) also remarks that the 'open door policies' of North American casinos makes it very difficult to enforce bans. In this respect the Dutch casinos have a great governance advantage in view of CSR since in the Netherlands it is required by law that, in order to counter underaged gambling, every casino visitor has to be identified and registered upon entry. In any case, the level of CSR represented by the second type of research compares to an explicit account of the responsibility actions which have been taken.

A third concern is with the measurement of the outcomes and the effectiveness of self-exclusion programs. This type of research is extremely scarce but the Dutch evaluation research of 2000 provides an unprecedented and unique example (Bruin de et al. 2001). Unfortunately, this research has never been published officially and has only been made available in the shape of a Dutch research report. Internationally, it has only briefly been mentioned by Nowatzki and Williams (2002). The few other attempts at output measurement restrict themselves to the self-excluders, and focus on the satisfaction, usefulness and relapse of self-excluded gamblers (Ladouceur, Sylvain, and Gosselin 2007; Tremblay, Boutin, and Ladouceur 2008). However, by merely looking at self-excluders one fails to establish the effectiveness of self-exclusions because it remains unknown how many of the problem gamblers actually do or do not take part in self-exclusion programs. It is crucial to know whether the self-exclusions address a small or a large part of the problem gamblers. After all, the overall objective of responsible gambling programs is to decrease the prevalence of problem gambling, therefore evaluations should give some indication of the effect self-exclusion programs have on the prevalence of problem gambling. The research by Bruin de et al. (2001) explicitly included this overall evaluation criterion. This research evaluated a range of measures regarding problem gambling and explicitly recognized the importance of output measurement which was considered necessary to substantiate claims about the effectiveness of responsibility measures. The research particularly aimed to evaluate the utilization rate of the self-exclusion program among problem gamblers, as well as the compliance with self-exclusion agreements, and the impact of exclusions on the overall gambling behavior of self-excluders.

Because the research by Bruin de et al. (2001) was never published officially, and the report is only available in Dutch, I will provide here the major methodological parameters. This research was based upon extensive interviews with eight casino managers and two responsible gambling consultants, a random survey among 1000 casino customers, in-depth interviews with 40 problem gamblers, and the analysis of approximately 7000 files of customers who got a self-exclusion or self-restriction in the period 1998–2000. The survey was conducted in the year 2000 in 7 of the total of at that time 12 HC establishments. The response of about 58% of the guests that upon entry of the casino were asked to take part in the survey was regarded as quite reasonable (Bruin de et al. 2001, 17–20). It is primarily this unique report which I will refer to in order to ground the responsibility practice of HC.

At HC the responsible gambling program was largely developed top-down in close interaction with personnel. The program involved an attitude change because a significant part of the workforce initially regarded responsible gambling as contradictory or even hypocritical. An external consultancy agency was hired which from the early 1990s onwards provided regular training sessions for the entire work force in which information about problem gambling was shared and practical advice for detecting and dealing with problem gamblers was given. The active approach toward responsible gambling is evident from the sharing of responsibility for problem gambling among the entire workforce, the formulation and electronic registration of a strict business process flow regarding self-exclusions, and the confrontation by casino officials of casino customers which have been signaled with suspicious behavior that might point to gambling problems. A significant nuance in the self-exclusion policy of HC was the provision, already introduced in 1989, that customers could opt for a less rigorous 'self-restriction' regarding the number of visits of, for instance, eight visits per month. Taken together, self-exclusions and self-restrictions are at HC referred to as 'protective measures'. In this article I will regard self-restrictions as part of the self-exclusion program.

It has been estimated that between 1990 and 2000 about a total of 25,000 protective measures (individual customer exclusions or restrictions) had been taken (Bruin de et al. 2001). Between 1985 and 2000 HC expanded from 3 to 12 urban casino establishments, and over this period the gross profit of the company grew from 142 million to 1.1 billion guilders per year (Kingma 2008b). Since 2000 the Dutch casino monopoly entered a consolidation phase in which responsible gambling policies were refined but never again scientifically evaluated. Major concerns of the consolidation phase were with efficiency, standardization and business continuity, and with enhancing the entertainment profile and servicing as well as sharpening the responsible gambling policies. The major management processes were all redefined into a 'risk-management' framework, which not only includes responsible gambling but also the economic returns (which were decreasing between 2007 and 2010), market competition, crime and fraud, compliance, ICT controls and reputation risks. In this way HC's casino management has been turned into a kind of ERM, of which responsible gambling is an integral part. The overall management objective of ERM at HC is to 'diminish the risk for errors, for taking wrong decision and being surprised by unexpected circumstances as much as possible' (Holland-Casino 2010, 17). In 2009 the number of self-exclusions and self-restrictions totaled 4300 and 4900, respectively, out of a total of 1.233 million individual customers that visited a HC establishment.

Since 2008 the number of protective measures figures fairly constantly around 4 per 1000 visitors annually (Intraval 2011, 84). Although since 2000 HC's responsible gambling program has not been subjected again to specific scientific evaluations, HC has in 2005 and 2011 been subject to general nationwide prevalence studies on problem gambling. The 2011 research even devoted special attention to HC but explicitly cautioned that this did not include the measurement of policy effects (Intraval 2011, 81). The problem with nationwide prevalence studies is that they do not provide statistically significant information about problem gambling on the organizational scale level of corporations such as HC. In 2010 the Dutch Court of Audits, as mentioned in the introduction, indeed evaluated HC's responsible gambling policy positively (Algemene-Rekenkamer 2011); however, this evaluation was solely based on information provided by HC about the corporations' problem gambling measures, such as the number of self-exclusions, and did not include any reference to the effectiveness of the responsible gambling program. This one-sided positive focus on HC's problem gambling measures, and the virtual lack of attention for effectiveness, also characterizes the risk-communications concerning HC, including corporate communications, official policy reports and media accounts. Consistent with Power's et al. (2009, 310) analysis of 'reputational risk' as a relatively new logic of organizing, in the case of casinos and responsible gambling, the 'first-order' risk of problem gambling and the 'second-order' risk of reputation have become intertwined, to the extent that it has become virtually impossible to distinguish between a self-exclusion program as a means for tackling problem gambling or as a means for managing a casino's legitimacy and reputation. This distinction has rather become an empirical question and depends upon the responsiveness of casinos to the responsibility issue of problem gambling.

4. The logic and practice of self-exclusion

4.1 *An active approach*

Responsible gambling and the practice of self-exclusion represent a truly new dimension in late modern casino management. As indicated above, at HC the responsible gambling policies were introduced around 1990 and seriously improved in the course of 1990s, regarding both personnel training and problem gambler registration. Before that time, employees were not always convinced of the necessity of such policies. In the early days of responsible gambling a manager 'security and risk control' (SRC) witnessed a clear controversy over responsible gambling between the employees servicing the guests and the security personnel that had to execute the self-exclusion program:

> They thought: the security department is going to talk our guests out of the casino … they will light-heartedly impose self-restrictions and self-exclusions, therefore our returns will decrease … We hardly knew how to deal with that controversy; we felt under great pressure … There was serious resistance by these people and it was very hard to initiate it [the self-exclusion program] (manager SRC; Bruin de et al. 2001, 29 [translation by the author])

There were also significant differences in the responsiveness between the various casino establishments to the responsible gambling policies. And the interviewed HC managers offered varying rationales for responsible gambling policies. Some emphasized the long-term economic interests of the company or feared possible damage of its public image because of problem gambling. However, compared to the initial period, in 2000 there appeared to be a companywide commitment to responsible gambling and the self-exclusion practice. According to the SRC officer cited above:

> I believe that the way things are going now, we have found a good balance between the protection of customers on the one hand and gambling returns on the other. As an organization you have a choice, either you do it or you don't. And if you do it, you have to do it well … There is no fighting any more over [problem gambling] policy or not. That's clear now. (Manager Security & Risk Control; cited in Bruin de et al. 2001, 104 [translation by the author]).

In official statements the company communicates this overall idea of a 'good balance between optimal returns and social responsibility' (Holland-Casino 2010, 5). However, it is not clear what a 'good balance' means and by what standards it is judged. As indicated in the previous section, in order to be able to assess this balance evaluations should include output measurement. The research by Bruin de et al. (2001) provides several measurements regarding the effectiveness of the HC self-exclusion program.

A first level of responsiveness concerns the familiarity with the responsible gambling program among casino customers. Knowledge and awareness can be regarded as a pre-condition for the operation of any responsible gambling program. In 2000 about 75% of the customers was aware of the self-exclusion option and 40% had taken notice of HC's responsible gambling brochure *The risks of the game*. Although this familiarity was regarded as reasonable, the research advised, and HC aimed to improve, the familiarity rate among regular casino customers as well as customers with signs of problem gambling (Bruin de et al. 2001, 129). However, whether this familiarity has actually increased can be doubted. In 2011 a national gambling survey of which the sample included 300 HC visitors found that over half of them did not agree with the statement that 'problem gambling brochures at HC are visible enough' (Intraval 2011, 84).

A second level of responsiveness concerns the detection and confrontation of casino customers which carry signs of problem gambling. This is a crucial part of the responsibility program. The intervention program starts with 'signals' given by casino employees, by gamblers or their relatives, or by the customer registration system that keeps track of the frequency of individual casino visits. The intervention can be intrusive:

> If we get a signal, we first check the guest: how often does he come? What does he play? Do we have a record in our database on him? Does he come more often than eight times a month? … If he could be a PG [Problem Gambler] we give him an observation. This means that we watch what he is doing. Following somebody with the cameras is pretty easy. If we think something's wrong we invite him for a personal conversation. This is done by our division. (Manager Security & Risk Control, cited in Bruin de et al. 2001, 65 [translation by the author]).

Since 1997, when a systematic companywide registration with an electronic database for 'gaming control' came into effect, the number of reported signals increased significantly from less than 400 to about 1300 annually in 2000 (Bruin de et al. 2001, 62). The number of 'Problem Gambling Conversations' (PGC's), i.e. a talk with an individual gambler about his or her gambling behavior, either on request of the customer or the casino, increased as well. Between 1994 and 2000 the number of these talks more than doubled from about 3000 to about 7000 annually (Bruin de et al. 2001, 66). Roughly 55% of these talks were on initiative of the casino. The most likely reason for a successful confrontation by the casino had to do with a significant increase in the gambler's frequency of play or with desperate behavior during or after a gambling session. However, the in-depth interviews with the 40 problem gamblers revealed that most of them had never been confronted by the casino, while they had the idea that they must have sent out signals that casino personnel could or should have noticed as signs of problem gambling (Bruin de et al. 2001, 70).

Especially the confrontation of customers with their gambling behavior by casino personnel is a highly sensitive matter because this might come unexpected and may be experienced as intrusive, embarrassing or even insulting. For a number of potential problem gamblers the confrontation actually worked. About 60% of the customers who were ever confronted by the casino judged this intervention as overall positive (Bruin de et al. 2001, 61). As one of these customers recalls:

> I think that it was plain to see that I was in bad shape, but they could have seen this much earlier … I was desperate, playing with a lot of money on more than one table. And I was sweating. Then a floor man came to me and asked how I was doing. We agreed that it was better for me to ask for a self-exclusion, which I did … (Problem gambler, 51 year old male; cited in Bruin de et al. 2001, 69 [translation by the author]).

However, other potential problem gamblers were surprised or annoyed by this interference. About 20% were plainly negative. A comment in this direction:

> At a certain moment I came at the desk where you have to register, and the woman said 'wait a moment; somebody is coming to see you'. I didn't get it … And guess what, the

> casino thought that I was visiting too often! ... What bothered me was that they wanted me to take a self-restriction, and that I couldn't do much about it. (Problem gambler, 36-year-old female; cited in Bruin de et al. 2001, 68 [translation by the author]).

About half of the customers that were ever confronted by the casino even claimed that they never had experienced any gambling problem. These findings indicate that the PGCs point at a considerable number of false-positives (those incorrectly suspected of problem gambling) as well as false-negatives (the unaddressed problem gamblers).

For individual gamblers, interventions by the casino may constitute significant moments in the development of their gambling problem. However, this ambiguity and unpredictability in responses toward confrontations by casino employees also highlights a fundamental paradox regarding the principle of self-exclusion. Since self-exclusion is by definition regarded as a voluntary act, any urge on behalf of the casino is at odds with it. At the same time problem gamblers are by definition less capable than ordinary customers of taking control and responsibility for their own consumer choices and gambling. As Reith remarks: ... 'it is precisely a lack of power that characterizes those who have lost control of their gambling behavior. For problem gamblers themselves, and those with a predisposing vulnerability to the development of such problems, responsibility is not a particularly helpful concept' (Reith 2008, 153). This *freedom paradox* at the same time legitimates and limits interventions by the casino as it accounts for a number of significant weaknesses of self-exclusion programs. Some problem gamblers simply are not likely to be patronized by casino officials while others seem to deny and hide their problems. Those who agree on self-exclusive measures sometimes evade these measures by gambling abroad, on the Internet or in amusement arcades. Further, not all customers that request self-exclusions are actual problem gamblers. Some self-exclude just because they fear excessive gambling and seek to prevent this from actually happening.

Nevertheless, as already mentioned in the previous section, a significant number of casino customers does take protective measures. In 1999, the HC database showed 4200 'protective measures', including 2400 self-exclusions and 1800 self-restrictions (Bruin de et al. 2001, 84). About half of these protective measures concerned measures for the duration of one year; a quarter concerned duration of half a year, and the remaining part concerned exclusion for an indefinite time period. Of the customers who took a self-restriction most (80%) restricted their visits to a maximum of 4 per month. The survey also included a number of respondents (7%) which at any point in their gambling career had taken protective measures; corrected for frequency of play this would mean that the survey indicated that about 2% of the HC visitors had ever taken a protective measure.

All these figures and considerations clearly indicate that around 2000 HC had developed an active responsible gambling and self-exclusion program. However, this information hardly gives an idea about the effectiveness of this program. For that purpose we need to know more about the utilization of the self-exclusion option among problem gamblers.

4.2 *The utilization of self-exclusions*

To learn more about the utilization of protective measures we first have to know more about the actual number of problem gamblers that frequent HC establishments, otherwise it would be impossible to know which part of them actually comes in contact with the casino about their gambling problems. In the evaluation research the prevalence of problem gambling among casino customers was measured with the so-called 'South Oaks Gambling Screen' (SOGS) (Bruin de et al. 2001, 22). The SOGS is a straightforward and internationally widely used screener for gambling problems designed by Lesieur and Blume (1987) on the basis of the DSM-III (Diagnostic and Statistical Manual of mental disorders) criteria for pathological gambling (Smith, Hodgins, and Williams 2007). Pathological gambling – more or less synonymously used for 'compulsive gambler', 'problem gambler', 'excessive gambler' and 'gambling addict' – was included in the DSM in 1984, indicating that pathological gambling constitutes a comparatively new 'disorder of impulse control' with growing significance. The SOGS basically scores an individual on a list of 20 problematic gambling items, such as gambling more than intended, feelings of guilt, arguments, and the borrowing of money in relation to gambling. This screener regards those with a positive score on five or more of such items as 'probable pathological gamblers'. As applied in the survey at HC the SOGS indicated a prevalence of about 6% problem gamblers among the respondents of the survey ($N = 972$) (Bruin de et al. 2001, 43). Corrected for the main gambling outlet of the respondent (HC or otherwise) and the frequency of play, this percentage was redressed to 2.2% problem gamblers in the survey sample. Based on their judgment of overestimation attributed to the SOGS the researchers further adapted this figure to 1.3%, which at that time would lead to an estimate of about 24,000 problem gamblers among HC customers.

It is interesting to note the ways in which the SOGS almost instantaneously turns a hard to detect controversial syndrome into a scientific fact represented by a straightforward percentage. It is even more interesting to note that casino managers, regulators, journalists and politicians take this scientific fact as a matter-of-fact. Similar to previous and other prevalence studies of problem gambling in the Netherlands, the 1.3% of problem gamblers at HC was undisputed in any kind of risk communication outside of the academic world. Apparently, de facto, this means that this percentage was widely regarded as an acceptable level of problem gambling at HC. This again is highly significant from a risk-governance perspective because, as indicated in the theoretical section, from a governance perspective there is no such thing as an 'objective risk'. Although there usually is a realist basis for uncertainties, risks, and the social, managerial and political assessments of risks, result from the perception and sociocultural valuation of uncertainties (Beck and Holzer 2007; Power 2007; Renn 2008). In this sense the objectification of problem gambling and the 1.3% should be considered as the outcome of a specific measurement practice, and the matter-of-fact acceptance of this figure should be considered as the reflection of a specific risk concept. In order to understand the specificity of this risk concept we need to know more about the measurement practice of problem gambling.

Scientifically, the validity and reliability of the SOGS are not undisputed. As many studies have indicated there is a range of problems with the SOGS (Stinchfields 2002; Orford 2003; McMillen 2007). Although the evaluation study of HC's responsible gambling practice did make a correction for the likely overestimation of problem gamblers by the SOGS, this report did not discuss further critique on the SOGS and regarded this instrument overall as a 'psychometric reliable' screener (Bruin de et al. 2001, 42). However, from a risk governance perspective the SOGS can be criticized for its positivist epistemology in that it assumes a one-on-one relationship between a social phenomenon and its representation in scientific figures. In this respect the SOGS has its roots in the medical approach to gambling addiction.

The medical approach is largely derived from studies of gamblers and addicts in clinical settings and focuses on the bad consequences of gambling behavior (Dickerson 1984; Lesieur 1984; Lesieur and Custer 1984; Meyer and Bachman 1993). However, there has been a serious controversy over the pathological or disease model versus the problem gambling model of excessive gambling (Castellani 2000). Where the disease model, as advocated by, for instance, Gamblers Anonymous, recommends abstinence, and accentuates the responsibilities of the industry, the problem gambling approach emphasizes the feasibility of controlled gambling and accentuates the responsibilities of the gambler for correcting his or her own excessive behavior. In this respect the problem gambling approach follows the logic of the sub-cultural perspective on gambling addiction, which contrasts with the medical approach (Kingma 1997). The sub-cultural approach is largely derived from studies of gamblers and addicts in natural, everyday circumstances, and focuses less on the consequences and more on the cultural meanings of gambling (Goffman 1972 [1967]; Livingston 1974; Herman 1976; Oldman 1978). Addiction is from this understanding regarded as a label that, in principle, can be put on all games and gamblers. This perspective relativizes gambling addiction and is consistent with a cultural relativist perspective on risk in western culture such as outlined by Douglas and Wildavsky (1982).

However, any controversy over the meaning of problem gambling remains hidden behind the objectifying classificatory method of the SOGS. The SOGS turns the ambiguous, subjective and largely invisible phenomenon of gambling addiction into straightforward and calculable, and therefore seemingly controllable, 'scientific risks'. In this way the SOGS epitomizes as much an act of 'fact finding' as an act of 'fact making' in the sense of Latour's (1987) 'science in action' studies. In a way the SOGS draws a sharp line between, and therefore introduces a normative standard for, acceptable and unacceptable gambling. It may very well be that the objective and quantitative aspect of the SOGS especially appeals to casino managers and regulators because it suggests opportunities for control. With this managers implicitly adopt a rational choice concept of risk. Renn (2008, 24–27) distinguishes this rational choice concept on the one side from a critical concept of risk because it does not relate risks to broader social structures. On the other side Renn distinguishes the rational choice concept from a risk society and cultural concept of risk because it assumes a realist and not a constructivist basis for risk. In the rational choice concept of risk: actions are reduced to individual choices; means and ends are clearly separated; people optimize individual utility, have stable preferences, and have knowledge about the potential outcomes of their actions. In the rational choice concept the understanding of the seriousness of a risk is 'modified by personal preferences or values of organizational culture' (Renn 2008, 27). This rational concept of risk is implicit in scientific accounts of self-exclusion such as expressed by Blaszczynski, Ladouceur, and Nower (2007), as discussed in a previous section. However, with the rational concept of risk casino managers may in their quest for control very well end up with an illusion of control to the extent that the SOGS gives them the false suggestion that a real risk has been captured which can be brought under rational control.

Irrespective of this further paradox of risk management, which might be called the *objectivity paradox* the report by Bruin de et al. (2001) indisputably indicated that as much as 60% of the customers who in the survey were objectively classified as potential problem gamblers, were never confronted with their behavior by HC employees. For this reason the evaluation report concluded that the scope of HC's prevention policy was rather limited (Bruin de et al. 2001, 130). The researchers concluded that although the detecting capacity for problem gamblers among HC employees might be enhanced, there probably would remain a significant fraction of potential problem gamblers that is unlikely to be confronted by the casino. With this the evaluation research made manifest that the described 'technologies of agency' not only point to a reflexive monitoring of risks, but also point toward a major paradox of risk management. For, with an increasing precision in identifying problem gamblers and for facilitating self-exclusions, it becomes, as a corollary, equally clear that there is a certain bandwidth of problems that is reasonably beyond control and has to be accepted. In addition to the apparent acceptability of the 'scientific fact' that at HC 1.3% of the customers are problem gamblers, it also appears to be acceptable that a considerable part of the problem cannot be identified at all. In other words, in responsibilized gambling organizations such as HC we witness together with a growing risk-awareness a growing awareness of the 'limitations of expertise'. This means that 'no expert system can be wholly expert in terms of the consequences of the adoption of expert principles' (Giddens 1990, 125). Learning from this *knowledge paradox* that a problem is hard and partly impossible to identify and control may be an unintended and unwelcome side effect of the efforts put into responsible gambling policies.

5. Discussion

In this article I have examined the CSR of HC, the operator of the Dutch casino monopoly. CSR in the case of casinos is part of the broader move toward 'responsible gambling' in the gambling industry. I theoretically framed CSR in the casino business into a risk-governance and stakeholder perspective (Renn 2008). Casinos typically fall in the category of organizations 'that are both centers for processing and handling risks and potential producers and exporters of risk' (Hutter and Power 2005, 1). I have basically argued that the growth of HC is part of the expansion of legal gambling interests which has created an 'institutionalized risk environment' (Giddens 1990, 124, 128), where the risky activities of gambling have produced new forms of consumption and problems which also require the production of knowledge for the management of the activity. It seems only logical that a focus on the side-effects of organizational production processes irrevocably enhance the responsibility for these side-effects. The risk-society as defined by Beck (1992) therefore has a responsible society as its logical counterpart.

The risks that legal gambling organizations such as HC face not only revolve around the need to ensure consumer safety – i.e. to prevent the 'primary risk' of 'problem' – and 'pathological' gambling from occurring but also involve the 'secondary risk' of 'reputational risk' (Power et al. 2009). Regarding CSR, I have drawn special attention to the actual responsiveness, and therefore the knowledge creation and empirical grounding, of HC's responsible gambling policy and self-exclusion program. This is particularly important in order to be able to distinguish between responsible gambling policies which are primarily informed by gambling problems or rather informed by reputational concerns and other legitimacy problems. In this discussion, I would like to draw attention to three major issues.

First, CSR is not a self-evident feature of casino organizations. In the early phases of development, such organizations, as was HC, are usually preoccupied with legal responsibilities and with fighting fraud and crime (Kingma 2008b). When HC's top-management in the early 1990s introduced active responsible gambling policies this was a controversial issue which was experienced as contradictory by many employees. The 'problematization' of the social responsibility for problem gambling clearly required a learning experience and an attitude change. That HC was worldwide among the first casino corporations to take responsible gambling seriously can partly be attributed to the monopoly situation and the close involvement of the state. However, responsible gambling can more generally be understood as a logical counterpart to the liberalization of gambling markets which require the normalization of gambling as an entertainment activity and thus a push back of unacceptable forms of excessive gambling. In the context of legal gambling an increasingly sharp line has to be drawn between normal and abnormal, i.e. excessive and problematical gambling behavior (Nicoll 2010). However, the acknowledgment of problem gambling and the organization of self-exclusion programs creates a freedom paradox, because the basic idea of freedom of choice and voluntariness is at odds with interference by the company (Reith 2008). This freedom paradox accounts for several weaknesses of the self-exclusion program in which the ultimate decision resides with the customer, who can always deny problems, deceive employees, ignore advice and work around agreements. As demonstrated in the case of HC, responsible gambling is aimed at the individual who is, in the last instance, enjoined to manage his own gambling risks. Blaszczynski, Ladouceur, and Nower (2007, 67) even suggest that self-exclusion programs should be more focused on ‘enhancing the internal controls of the individual to assist them in regaining control over gambling behaviour’. Thus, self-exclusion programs are effective in redistributing risks from the state and the gambling industry to individual consumers.

Second, the organization of a responsible gambling policy and a self-exclusion program did not so much end the ignorance about and exploitation of excessive gamblers but the beginning of a transitional phase in which the casino corporation developed standards and procedures, managed by the division ‘SRC’, for detecting and dealing with problem gamblers. The development of this self-exclusion practice involved a differentiated network of organizational actors who gradually ‘enrolled’ in the program, notably the HC managers, IT specialists, trainers and consultants, the servicing employees, and the researchers for evaluating the program. They all had to make sense of the confusing notion of problem gambling and of their new responsibilities. In these processes the various actors related their understanding of problem gambling to their specific organizational practice, i.e. their position, tasks and identity within the company. In these processes, organizational practices were modified and new practices emerged. In terms of ANT (Callon 1986; Latour 1987, 2005), the diffusion of the responsible gambling practice went together with the ‘translation’ of problem gambling into the terms of the various organizational actors involved. The consultants and trainers, for instance, redefined gambling harms in the psychological terms of ‘problem gambling’ and operationalized this abstract concept for practical purposes. The HC managers designed a business process flow chart for the detection and registration of problem gamblers and allocated various tasks and responsibilities throughout the organization. Finally, the researchers offered reflexive feedback about all these actions with their measurements and evaluation of the self-exclusion program. The researchers even produced an objective figure for the extent of the problem, namely 1.3% problem gamblers among the customers of HC. Apparently, this figure was widely regarded as acceptable. However, the absence in HC’s responsible gambling program, and in the Dutch gambling policies, of a clear and explicit governance goal regarding the acceptable standard of problem gambling, in itself indicates that these policies do not fully comply with the ideal model of risk governance. Risk-based approaches ideally express how far governance should intervene to manage, rather than eliminate, adverse outcomes (Hood, Rothstein, and Baldwin 2001).

In my examination I have drawn special attention to the ‘mobilization’ of research and knowledge in the development of responsible gambling policies because these policies can hardly be conceived without the scientific identification and evaluation of risks. With the conceptualization and measurement of problem gambling researchers bring this adverse consequence of the exploitation of gambling inside the management realm of casinos. In this sense problem gambling should not be regarded as a mere unintended consequence but as an adverse consequence that is now incorporated in the late modern organization of gambling. With the analysis of these processes a light can be shed on how precisely responsibility is interwoven with the entire corporation. I have emphasized in particular the ‘objectivity paradox’ which is created by the rationalization and researching of gambling risks; a paradox which easily leads to illusions of control by casino managers and regulators.

Third, the organization of a responsible gambling policy and self-exclusion practice at HC involved the design of new distinctions and interactions between management and casino employees on the one hand and the casino customers and other stakeholders on the other. With this, new norms were instituted in the corporation. The responsible gambling policy and self-exclusion program at HC produced a sharper distinction between regular customers and problem gamblers. The attentiveness of casino employees to problem gamblers, the problem gambling conversations, the customer registrations in the database, the self-exclusion agreements and the evaluations, all constitute a new matrix of protective measures for casino customers and, to the extent that this care is communicated to external stakeholders, creates a new image of the casino company. As a whole this company is redefined into a responsibilized gambling corporation. In a way HC has been redesigned around a new norm in the gambling practice, demarcating the pleasurable gambling experience from the problematical one. This redesign affects the entire organizational culture as it involves deep-rooted assumptions – embodied in the self-exclusion practice, the measurement instruments and the evaluation standards – concerning the individualization of risks and responsibilities, a rational choice conception of gambling risks, and a technocratic approach of risk management. It is in this respect significant to point out that HC’s responsible gambling policy is embedded in a more encompassing framework of ERM in which responsible gambling is linked to the management of reputational risk as understood by Power (2007). As argued by Power this concern for reputational risk is particularly relevant for companies that operate in a highly evaluative institutional environment, a circumstance that certainly applies to HC; a corporation which almost continuously has to account for its policies, not only to the media but also to the Dutch gambling committee, to the ministries of economic affairs and justice, and to Parliament.

It is important to point out that responsible gambling should be understood in relation to irresponsible gambling and always remains a matter of degree. Instead of speaking of responsible companies I, therefore, prefer to speak of a gradual process of ‘responsibilization’ and responsibilizing companies. A responsibilized casino company addresses problem gambling but does not necessarily have to be effective with this. Regarding this crucial point I have emphasized the ‘knowledge paradox’ of risk management, as substantiated by the evaluation of the effectiveness of HC’s responsibility program. While the evaluation made clear that those who took part in the self-exclusion program were over all rather positive about it, the research at the same time revealed that a significant number of problem gamblers were not, and most likely would never be, identified and confronted by the casino. It is also striking that risk communications by, or dealing with, HC, positively evaluate the good intentions and active engagement of problem gambling by HC, and virtually ignore the actual effectiveness of this policy, as was the case with the Dutch Court of Audits (Algemene-Rekenkamer 2011). From a risk governance perspective one could therefore argue that 'the problem of the problem gambler . . . has become a highly productive discursive object, and is not really a problem to be solved so much as a risk to be managed' (Cosgrave 2010, 115).

This discussion bears of course on the criteria that would determine whether a program is effective or not. According to some authors self-exclusion programs can lead to an improvement in behavior control and a reduction of harm amongst gamblers, even if some people return to a casino while taking part in or shortly after a self-exclusion program (Blaszczynski, Ladouceur, and Shaffer 2004; Ladouceur, Sylvain, and Gosselin 2007). While I would not refute that an increase in awareness and participation in a self-exclusion program might in itself contribute to the reduction of gambling harms, I would hold that a symmetrical assessment of the effectiveness should not only address gamblers that take part in exclusion programs but should also include the problem gamblers that do not participate in the program. This seems particularly relevant in cases where 'responsibilization' is used as an argument for liberalizing gambling corporations. After all, in that case risk management might paradoxically lead to more risk taking.

6. Conclusion

Gambling regulators and operators commission research and hire scientific experts and consultants to identify and measure problem gambling. The idea behind this is that scientific methods will improve the management of gambling organizations, and thus contribute to a better, i.e. a safer exploitation of commercial gambling. But does it really work this way? As discussed in this article, gambling enterprises such as HC apply scientific management principles for the development and evaluation of their responsible gambling policy. In this process it became clear that positive science offers only a limited basis for the management of problem gambling. All in all, three paradoxes have been specified which account for the weaknesses of responsible gambling: (a) the freedom paradox, which puts primary responsibility on the individual gambler and undermines corporate control; (b) the objectivity paradox, which produces the illusion that problem gambling can be brought under rational control; and (c) the knowledge paradox, which addresses the limited effectiveness of responsible gambling and causes reputational problems. While the freedom paradox and, to a lesser extent, the objectivity paradox have been acknowledged in the field of gambling studies, and might be countered with tougher exclusion policies and more sophisticated measurement instruments, the knowledge paradox has hardly been acknowledged and is much more alarming.

The paradox of risk management discussed here, makes clear that while science is called upon to improve the control over gambling, it has to be admitted that science can only identify and address a limited range of gambling problems. My conclusion is that there is interplay between science and management that is part of, and contributes to, the redefinition of casinos into responsibilized corporations. Responsibilized gambling corporations are increasingly preoccupied not only with the management of problem gambling, but also with the management of public expectations and perceptions toward a casino's ability to manage risk. To the extent that casino corporations are unable to provide convincing proof of effectiveness in countering problem gambling, they remain vulnerable to allegations of merely deploying responsible gambling for enhancing the reputation of their business.

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Notes
1. It should be noted that the approaches are overlapping and that in particular the all-encompassing risk governance approach as outlined by Renn explicitly includes the notion of an actor network, comprising 'all those with a stake in the risk and its possible outcomes – which could involve a large set of actors, such as national, regional and local governments; different sectors of industry; regulators; NGOs; the media; and members of the general public' (Renn 2008, 354).
2. Interestingly, the first Dutch evaluation was not released for review to a wider audience, although it has explicitly been used by HC and the Dutch Casinos Council to illustrate the 'effectiveness' of the responsibility practice to the Dutch media and to Parliament. The transparency and responsiveness regarding problem gambling of the Dutch casinos should therefore, at that time, be regarded as still comparatively low.

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