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Disclosive Ethics and Embryonic Developments in E-Gambling Commerce

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Abstract

This research focuses on a relatively complex and neglected topic, namely, unearthing some of the ethical issues associated with embryonic developments in E-Gambling Commerce. Given its significance, it is somewhat surprising that barely any studies are published to date, particularly in the field of Information Systems (IS). This paper seeks to address this void by adapting some aspects of disclosive ethics (deciphering and visualising) (Brey 2000; Introna 2007; Light and McGrath 2010) to reflect on findings from a longitudinal, predominantly UK-based study of E-Gambling Commerce. Various methods are deployed to collect the data, including interviews, participant observation and secondary sources. This paper highlights several new guise ethical issues that should be of interest to several actors e.g. IS scholars and practitioners, commercial organisations, governance agencies, gambling charities, gamblers or those affected by gambling and society at large.

Keywords: Disclosive Ethics, Information Systems, E-Gambling Commerce and Qualitative Research Methods.

Introduction

This paper focuses attention on some of the ethical issues associated in the embryonic development of E-Gambling Commerce. The growth of E-Gambling Commerce is in part due to some fairly favourable economic, social, political and technical reasons. Most organisations recognise that E-Gambling Commerce raises several ethical issues, and many have, or are, to varying degrees, formulating and implementing policies in response to some of these concerns, although most would also acknowledge that there is still much to learn and much to do. This research presents some of the findings from an ongoing and longitudinal (since 2004), predominantly UK-based study, involving several organisations. A range of methods e.g. interviews, participant observation and secondary are used to collect the data and certain ideas from disclosive ethics (Brey 2000; Introna 2007; Light and McGrath 2010) are also deployed to decipher and provide greater visibility to some of the specific ethical issues raised and subsequent challenges involved.

Ethics and Information Systems

Ethics (derived from the Greek, ethos) is the study of morality (derived from the Latin mores) (Tavani 2004). Ethics is a dialectic process of considering beliefs and arguments of right and wrong and
seeking to explain their plausibility and coherent robustness (Johnson 2001) or put another way, a focus on producing a 'corrective vision', reflecting on the distinction between what is, the physical reality, and what ought to be, a logical manifestation (May 1983). It is through this reflective process that we seek to identify which arguments are weak or strong, which morals are interrelated or interdependent and why this is so.

Ethics is inextricably associated with developments in information and computing technology (Wiener 1948; Parker 1968; Weizenbaum 1976; Johnson 1985; Moor 1985; Floridi 1999; Tavani 2007). Ethical discourse thrives in specialist journals and conferences e.g. Ethics and Information Technology, ETHICOMP and CEPE etc. In the last decade, there have been considerable advances in philosophical ethics, especially in respect of some notable discourses in the development of Computer and Information Ethics (Floridi 1999; Floridi and Sanders 2002; Himma 2003; Siponen 2004; Adam 2008). However, despite some rare but notable exceptions within the field of Information Systems (IS) (Walsham 1996; Banerjee, Cronan et al. 1998; Adam 2001; Intron 2002; Wagner and Newell 2004; Intron 2007; Light and McGrath 2010; Mingers and Walsham 2010) and renewed interest at the International Conference on Information Systems (ICIS) and European Conference on Information Systems (ECIS) in 2008-9, ethics remains, a relatively neglected topic. This neglect is noticeable in terms of considerations and uses of philosophical ethical theory (Walsham 1996; Smith and Hasnas 1999; Bell and Adam 2004; Bull 2009; Mingers and Walsham 2010) and is particularly so, in research published in ‘leading or mainstream’ IS journals (Bull 2009; Mingers and Walsham 2010). Furthermore, such neglect, either through implicit or explicit considerations of ethical theory, extends to the coverage of chosen topics for research within IS and ethics. Whilst the coverage in IS of issues such as: privacy, ownership piracy, trust and surveillance are fairly popular and there is interest in certain moral hazard issues in E-Commerce, although often on a narrow range of sites (Bull 2009) or more recently, Social Networking Sites (SNS) (Light and McGrath 2010), research on E-Gambling Commerce is yet to gain any momentum.

E-Gambling Commerce

Due to its embryonic development, there have, and continue to be, several terminologies used to define digitised commercial gambling e.g. Remote Gambling, e-Gaming, Internet Gambling, Online Gambling and Virtual Gambling etc. E-Gambling Commerce seems to offer the broadest conceptualisation and is preferred for this research. E-Gambling Commerce can be defined as:

“A commercial activity facilitated by a range of information and communication technologies where; two or more parties place something of value at risk (the stakes), in the hope of winning something of greater value (the prize) and where the process of winning or losing depends on the outcome of events unknown to the participations at the time of the bet (the result).”

According to KPMG, the global market for E-Gambling Commerce is expected to grow from US$21 billion in 2008 to US$30 billion by 2012, this despite a prohibition in some of the world’s most potentially lucrative markets e.g. USA, China and Japan etc (KPMG 2010). Given such prohibitions, and for other reasons, the UK has become an important market. Whilst accurate figures are hard to obtain (due to various accounting practices and terminologies), according to a range of agencies e.g. William Hill, UK Gambling Commission, net gambling revenues in 2008, exceeded US$3 billion. In the UK, E-Gambling Commerce is governed by a system of regulation (Gambling Acts of 2005 and
commerce in the UK has experienced phenomenal growth and a level of segmentation (specialism) in the market, this despite recent economic problems arising from the global credit crunch recession. The market is buoyant because of some favourable and associated; economic, technological, social and political developments. These include: the reduced costs associated with automated online gambling provision, advances in online gaming provision e.g. multi-media and gaming, technical infrastructures and access to them e.g. broadband internet, a greater tolerance of gambling in British society since the introduction of the National Lottery in 1994 and the revenue raised for ‘good causes’ and finally, a favourable political climate, where the former and current governments welcome such commercial ventures and the subsequent tax revenue, but also because they view such activities as best managed by a process of regulation in order to reduce criminality and also to promote responsible gambling.

In 2008, this research estimated that there were approximately 45 major commercial operators, with a host of subsidiaries operating in the UK. In 2010, this had grown to approximately 75 such commercial organisations. In addition, most of these organisations had significantly increased the level of their own online provision. From October 2008 to June 2010, Ladbrokes increased its online Instant Win Games (IWG’s) portfolio from 89 to 143 different products and they had developed over 490 additional online casino, bingo and financial products. E-Gambling is also spreading to some unexpected areas of business and commerce, with some recent developments of joint-venture partnerships between newspapers and magazines and the gaming industry e.g. online bingo for the Sun newspaper group with Gamesys Limited based in Gibraltar and versions of online bingo, slots and casino for OK Magazine with CyberBingo Limited based in Malta. According to Nielsen, the UK market looks likely to continue to flourish. From 2009-10, Camelot (the lottery operator) became the fastest-growing online company in the UK as the number of online users grew by 40 per cent, out-performing the growth for that of Social Networking (EGamingReview 2010).

The ethical issues associated with gambling activity and the issue of problem gambling are not new. Commercial gambling is a controversial activity, often dividing opinion in many societies (Griffiths 1999; Collins 2003; Moran 2007). Essentially, such conflicts stem, in part, from those people who gamble, but who experience significant problems with their gambling behaviour and who are often termed ‘problem gamblers’. Furthermore, there are concerns about those who may be affected by those with an addiction to gambling (Turner, Zangeneh et al. 2006; Moran 2007; Wardle, Sproston et al. 2007). In the UK, legislation, organisational policies and a range of social pressures may be significant in influencing the overall levels of problem gambling which have been traditionally limited to a relatively small percentage of the population (albeit a significant issue for anyone either directly or indirectly affected). For several reasons, measuring problem gambling behaviour is a complex activity, where diverse methods are used, either for temporal, national and international comparisons. Two of the most popular measures used are the DSM-IV (Diagnostic and Statistical Manual of Mental Disorders - 4th Edition) and the PGSI (Problem Gambling Severity Index). According to the British Gambling Prevalence Surveys (BGPS) of 1999, 2007 and 2010 (Wardle, Moody et al. 2011), both measures highlight (to varying degrees) an increase in the overall level of adult (age 16 and above) problem gambling behaviour. The DSM-IV measure of problem gambling in 1999 and 2007 was 0.6 per cent of the adult population (approximately 284,000) with an increase to 0.9 per cent in 2010 (approximately 451,000). The PGSI measure was first used in the BGPS in 2007 and was 0.5 per cent (approximately 257,000), this increased to 0.7 per cent in 2010 (approximately 360,000). This research seeks to reflect further on such studies and how some of findings relate more specifically to the increased popularity and development of E-Gambling Commerce. Buried in the detail of the BGPS of 2007, is the finding that whilst E-Gambling activities remained to be a minority pursuit, it
was also measured to be significantly more problematic, with a seven fold difference when compared to many traditional gambling activities (Wardle, Sproston et al. 2007; Bull 2009). This paper will discuss later specifically how the development of E-Gambling Commerce raises several ethical issues in new guises.

The remainder of the paper is structured as follows. Firstly, the research approach is presented, which includes a brief overview of the adaptation of disclosive ethical approaches and the challenges in conducting gambling studies, before proceeding to clarify and justify the research methods used and the data collection processes involved. This is followed by several empirical examples that are drawn from this longitudinal and on-going study, which seek to highlight the new guise ethical issues relating to the development of E-Gambling Commerce. The paper concludes with a summary of the main ethical issues disclosed before moving on to discuss some ideas and suggestions for further research.

**Research Approach**

Before the research approach is outlined and justified, it is worth drawing attention to some of the challenges involved in conducting such work. These relate to some issues when deploying disclosive approaches and the multifarious problems associated with the study of gambling and subsequently E-Gambling environments.

**Challenges with Disclosive Approaches and Gambling Studies**

One of the main attractions of using disclosive approaches is not only the focus on unearthing moral issues in neglected areas of computing but also the logic in uncovering such issues prior to a theoretical or application stage (Brey 2000; Light and McGrath 2010). Brey also offers four key values: justice, autonomy, democracy and privacy as the areas of departure in which to evaluate future developments in computing. Thus, disclosive ethics has much to offer in terms of embryonic developments in IS. However, with the benefit of hindsight there are still some issues to relating to the use of disclosive ethics. One of the issues seems to be the difficulty of separating the three stages (uncovering, theoretical and application) as there is often some inevitable (if implicit), overlap between them. In (Light and McGrath 2010) study of SNS, one can see how the issues unearthed are forming themselves into ideas that are distinctive candidates for either duty, consequence, rights or character based ethical theory and application. Also whilst (Light and McGrath 2010) admirably seek to primarily focus on the ethics of technology, their study highlights how difficult it is to always divorce such analysis from the influence of human intervention, particularly in terms of its design and potential use. Finally, given the nature of academia and the potential scope of such studies (including this paper) some authors choose not to focus on all three stages in the one piece of published research.

In terms of gambling studies, previous research highlights several problems when using certain research methods such as case study or action research. Problems include; the reliability of collecting data from gambling consumers, industry attitudes to external inquiry and a range of methodological issues facing the particular researcher (Parke and Griffiths 2002; Bull 2009). According to (Parke and Griffiths 2002), gamblers are often unreliable sources because of the influence of a range of social and cultural norms (and stigmas) associated with certain gambling activities and behaviours. Specific problems include; a failure of gamblers to recognise the value or benefits of such work, opposition to being distracted from being engrossed in gambling itself and a natural wariness of third party
observation and interference (Parke and Griffiths 2002). Thus, some gamblers often offer a range of misleading statements e.g. the tendency to underestimate their participation or overstate their gambling prowess or financial returns to preserve or enhance their social esteem or cultural status, or they value their anonymity or privacy.

(Parke and Griffiths 2002; Bull 2009) also highlight the problems of working with the gambling industry, which is often somewhat wary or sceptical of the findings produced by some academic research as it is perceived (rightly or wrongly) to be adopting an anti-gambling agenda. Finally (Parke and Griffiths 2002; Bull 2009), highlight a range of problems that are research specific including; the problems of gaining access within such environments without becoming a participant, distraction resulting from the need to participate whilst trying to facilitate covert observation, the knowledge required to understand the range of gaming services, understanding the unique social and cultural norms associated in such environments, e.g. protocols, language or terminology, the problems of gaining trust from either overt or covert observation, the problems of subjective sampling or representation of the range of consumers and the problems of a acquiring quantitative data. (Parke and Griffiths 2002; Bull 2009) highlight some practical advice for addressing such issues but ultimately conclude that whilst such research is important it could always be challenging.

Research Methods

Given the issues discussed and the challenges raised, a range of research methods are deployed in this particular longitudinal and ongoing study (from 2004 onwards) of E-Gambling Commerce. These include face-to-face interviews with industry experts, participant observation of E-Gambling Commerce and the use of various secondary sources e.g. governance, industry and market reports and social studies of gambling attitudes and behaviour.

The use of expert interviews was particularly useful in helping to grasp how and why such issues evolve and also enhance understanding of some political, commercial and cultural dimensions involved in commercial gambling. However, given the nature of such work, the potential controversies and the perceived repercussions (rightly or wrongly) involved, it proved difficult to gain access to several people or organisations working within the gambling industry. Thus, much of the data is collected from the new opportunities presented by E-Gambling Commerce, namely, the vast and rich source of online activities that are available for scrutiny in the public domain. This research places value on the use of relatively new guise methods often deployed successfully in internet research such as virtual ethnography and participant observation. In order to conduct this aspect of the research the following processes were used. The researcher registered and participated on a range of organisational web sites of various governance or commercial organisations engaged in and considered to be, influential in shaping the development of E-Gambling Commerce. Once access had been gained, data was collected and stored on a frequent (often daily) and sustained basis. It is extremely important to frequent such sites regularly and store data independently because of the temporal and dynamic nature of Internet and web-based environments e.g. many pages, hypertext links and where much data is often changed, over-written, moved or deleted. Furthermore, such longitudinal observation and documenting helps to provide a range of insights that are more rigorous and informative in terms of their validity, insight and representation. The data itself came from various observations (or online lurking) at various times of the day, week or year and through participating by using a range of demonstrational gambling products or online help and guides. The commercial operators have been chosen carefully based on a range of legacy positions and other
diversities of operation, in order to provide a broad representation of behaviour and activities. These organisations include: Camelot (the state licensed operator of the various national lotteries and other permitted gambling products), Ladbrokes (a long established and the largest UK operator, increasingly diversifying into E-Gambling Commerce) and 888.com (an offshore, Gibraltar-based, relatively new-entrant operator, that has always primarily focused on the provision of E-Gambling).

Ethics and E-Gambling Commerce

It is impossible, given the scope of this research paper to focus on all of the ethical issues raised or unearthed in this longitudinal and ongoing study of embryonic developments in E-Gambling Commerce. Thus, what follows is a discussion of some of the new guise ethical issues involved. Firstly, there is an insight into industry practices relating to payback approaches, that aren’t easily visible within either an online environment or to the general public. Such an insight not only sheds light on commercial strategy and ethical behaviour, but also highlights some of the obstacles involved in the use of internet research methods. The work then proceeds to reflect further on some of the specific techno-ethical issues involved in E-Gambling Commerce and details some fundamental departures in terms of access and accessibility, and interaction and interactivity. However, whilst the focus is primarily on technical issues, it is worth repeating the views expressed earlier, that such issues are difficult to assess in isolation and thus, sometimes the discussion will consider to a peripheral degree, some of the associated economic, social, cultural and political issues involved.

The Payback Pyramid

One of the insights gained from the interviews with industry expert e.g. a former CEO of a major commercial gambling organisation, was the significance placed on the philosophy of payback mechanisms (known as the payback pyramid), used within fixed odds gaming. In terms of such payback mechanisms, it is considered essential to have a strategic mix of prizes, often based on the following design. Firstly, it is crucial that there is the lure of a significant but extremely limited jackpot prize, as this is the most sought after or valued prize for many gamblers. Interestingly, many gamblers are undeterred by the obstacles to winning such jackpots, as witnessed by two of the most popular gambling products in the UK, where according to Camelot, the actual chances of winning the jackpot prize for ‘Lotto’ is approximately 1 in 14 million and for the ‘Euro Millions Lottery’, 1 in 76 million. Next, there should be a significant number of original stake money prize returns (e.g. £1 staked, £1 paid back), these can represent up to 95 per cent of all prizes. Such prizes are considered important as they can help install a belief that it is possible to win and they are relatively low risk for commercial companies, given the neutral value of the prize and the fact that most gamblers re-spend such returns which eventually turn into a loss for the gambler and a gain for the commercial provider. Medium range prizes are thought by many to have a limited affect on encouraging the consumer and thus, whilst many of these prizes are widely advertised, relatively few funds (often less than 2 per cent of total payback) are allotted and awarded. Such specific insights are interesting as they reveal the acquired knowledge commercial operators already have relating to the psychology of some gamblers and their propensity to behave in certain ways. Whilst it is true that some operators could be said to be acting more responsibly by publishing the probabilities of payback within fixed odds gaming, many
choose not to disclose such information, and even those who disclose, continue to deploy such methods widely, knowing the likely outcomes involved. Thus, from an ethical perspective, there are only degrees of openness relating to the commercial use of such products.

**Access and Accessibility**

In terms of technology access and accessibility, E-Gambling allows commercial operators (old and new) significant potential to increase and improve the level of gambling provision to a wider range of consumers. Before the following analysis is discussed, it is worth noting that in the early developments of E-Gambling technology, little attention has been devoted to resolving accessibility issues for certain groups in society e.g. those with physical impairments etc. However, in the main, E-Gambling does depart from traditional forms of gambling e.g. bookmakers, horse or dog racing events, bingo, casino’s etc, in many respects as gambling products are able to be potentially consumed, not only in a wider market, but in a more convenient place and time for many consumers. The convenience of E-Gambling Commerce changes in the context of gambling consumption e.g. the nature of existing gambling environments. Thus, this means that gambling can be consumed more anonymously in relative isolation e.g. in the home or increasingly via mobile technology access. This may have an affect on the level of problem gambling as gamblers are able to avoid some aspects of public observation, scrutiny or disapproval e.g. from trained staff in gambling premises, their peers or family and friends.

There are several other potential operational challenges and moral hazard issues related to changes in access and accessibility. Some of these include the need to offer and maintain secure systems and guarantee consumer privacy, the need to recruit and retain customers in a highly competitive and innovative market, as well as the difficulties of competitors replicating innovative ideas in gaming provision or other aspects of commercial practice. In terms of recruiting and retaining customers, many operators offer a series of introductory offers and some offer loyalty rewards. In 2008, both Ladbrokes and 888.com had similar inducement and loyalty schemes e.g. register and spend £10 and receive a free £25 bet. It is also common for smaller or new entrant operators to offer greater incentives e.g. during the same period, Victor Chandler and Bet365 offered £100 of free bets for a £5 registration. As the sole provider of government licensed lottery schemes, Camelot is one commercial operator not able to offer such packages. Such incentives are fairly and strangely unique to the gambling industry and raise several moral issues relating to a lack of governance in relation to the excessive promotion of gambling through to intimating the true levels of profitability involved, given that commercial operators are seemingly able to absorb such costs. In terms of improving customer orientation and accessibility, commercial operators are deploying various approaches. During the period of this study, both Camelot and Ladbrokes mostly used text-based information and instruction guides and free-play multi-media demonstrations of IWG’s. The 888.com site was often one of the most innovative in terms of considering such accessibility issues, as the operator not only deployed such services, but also used a range of avatars, invoked in the main, as and when customers seemed to be in need of guidance.

E-Gambling Commerce also changes other issues relating to accessibility as it allows for the extension of instantaneous and rapid forms of gambling provision. The interviews with industry experts revealed that this isn’t necessarily a unique feature in gambling, as there have always been some products that could be consumed on a fairly instantaneous basis e.g. Roulette, slot machines and
scratch cards etc. However, apart from special cases e.g. places such as Atlanta and Las Vegas, in the USA; these were often restricted to certain premises or the opening of premises at certain times. During this study all of the leading operators of E-Gambling Commerce were increasingly scheduling an unprecedented range of gambling products for consumption, one after the other, or even simultaneously. Furthermore, E-Gambling products are increasingly being designed for use on the basis of autonomous (pre-programmed) and rapid play forms of gambling rather than the more lengthy pursuits, common in traditional gambling. Thus, one of the most popular products to develop in E-Gambling Commerce are fixed odds IWG’s (briefly discussed earlier), which are rapid play products with a cycle time of between two, and, on average, twenty seconds. Consumers at Ladbrokes are allowed to stake anything between 10 pence and £1000 per play. Thus, whilst what follows may be a new guise, extreme case, allowing for the time to place a stake, and for any payback to be shown, it is possible, for E-Gamblers of IWG’s, if they are adept, and they can afford it, to spend up to £12,000 each and every minute. Thus, E-Gambling Commerce does change the nature of rapid and instantaneous gambling. Both Camelot and 888.com also have an extensive range of IWG’s provision in their portfolio and 888.com now has a vast array of similar online services in casino, bingo and poker.

The potential problems associated with such rapid and instantaneous forms of gambling enabled by E-Gambling, have, and are to some degree, recognised by those who govern the industry and by commercial operators themselves. Codes of conduct include the training of staff to understand and manage such issues more closely and most operators have implemented pre-set spending limit systems or spending limits managed by customers. Many operators have re-designed such systems over the course of this research. Again, Camelot is in a different position to most operators and it has some of the strictest exclusion systems in the UK market. In 2008, Camelot extended their customer self exclusion scheme to include 6 months suspensions or options for a permanent exclusion. However, spending limits remained unchanged at a maximum of £350 per week, £18,200 per annum. In terms of player controls, Ladbrokes operate a policy for consumers to exclude themselves from participation e.g. for periods starting at 6 months. Also Ladbroke consumers are allowed to manage their own accounts and set their own financial limits. In contrast to Camelot, in 2008, Ladbrokes allowed (subject to approval) consumers to set their own financial daily / weekly limits which range from £20 minimum deposits to a maximum of a no limit deposit. Customers can also request increases to below no limit settings and receive notification about the decision after a period of 24 hours. Like Ladbrokes, 888.com also allowed customers to set their own upper spending limits but departed on exclusion periods by offering a week, month and six month series of options. In 2008, in the UK, there were 45,277 individual self exclusions, 6807 known attempted breaches and 1678 cancellations of self exclusions before the expiry period (UKGamblingCommission 2009). Such statistics not only highlight the significance of this issue in relation to problem gambling but also highlight another neglected discussion. Whilst there are some procedures deployed by individual operators on self exclusion, there are few, if any joint strategies operated in the industry. Thus, if problem gamblers in breach of a self exclusion are detected by an individual operator, they can simply move to another operator and open a new account, or an account with another identity.

**Interaction and Interactivity**

Another new guise technology departure in E-Gambling Commerce is the ability to change the way in which gamblers interact through the design and use of a range of multi-media interactive features in most gaming provision. It is very apparent that most leading commercial operators seem to value such
features as many are deployed in many games. Presumably such decisions are taken on the basis that the use of images and sounds help to enrich the gambling experience and thus may be related to increased levels of consumption. 888.com have always placed a significant emphasis of the gaming experience and in addition to the pioneering use of avatars were one of the first operators to deploy very high end multi-media features, so detailed that consumers had to download such software on to their own computers. In the Ladbrokes’s IWG ‘Win Spinner’, a range of prominent and fairly rapidly changing text messages are displayed during play e.g. ‘Have a Spin’ etc. Thus, many encouraging messages are deployed during the course of play. Players are sometimes offered nudges which generate flash images and a heightened sound. If a player wins a prize, the game opens up another web page called the ‘Win Spinner’. The Win Spinner window uses lighter colours and offers players a number of free spins (between 1 and 25) depending on the value of the three symbols. Each win spin always generate a prize either; 1,2,5,10,25 and 500 times the original stake which is then accumulated. The Win Spinner symbols used all represent luxurious goods e.g. champagne, speed boats, sports cars and flights etc. A win generates a fairly euphoric piece of music and several flash images, the euphoria is sustained throughout the entire prize winning session and is thus greater the higher the prize. In other IWG’s e.g. ‘Virtual Horses and Dogs’, Ladbrokes actually advertise that the features within the game are ‘almost as good as being there’. Finally, many operators offer the IWG version of ‘Deal or No Deal’ which is a fairly good replication of many of the features deployed within the television game show e.g. audience noises of approval (cheers) or disapproval (groans) depending on the value of the boxes chosen, the same ‘tense’ music is used during play and decisions of the deal or no deal option and the uplifting music at the end of the game.

There are obvious potential concerns if gambling behaviour could be, or is, affected by the uses of multi-media interaction. However, there is still much to discover about the impacts of interactivity (Bucy 2004; Stromer-Galley 2004). In addition, this research also found that whilst it is the case that a range of commercial operators are deploying an increasing range of multi-media interaction in their provision of E-Gambling, some of the most popular IWG’s e.g. Roulette, have some of the lowest or fewest levels of interactive features. This may be due to gambler preferences not to be too distracted or because they seek more rapid forms of gambling. Finally, during the time of this research, it was also interesting to witness how access and interaction developments in E-Gambling Commerce were influencing, and being extending to, traditional forms of gambling. Thus, re-introducing a range of new guise moral hazard issues in a segment of the industry that seemed to be stable. Some of the changes are: extending the once-a-week national lottery to several lotteries, including daily play, and a range of additional betting provisions for 90 minute football games e.g. half time scores, forecasting times of or people to score etc. In addition, there has been a notable increase in the deployment and use (subject to regulation) of rapid play machines such as Fixed Odds Betting Terminals (FOBT’s), in licensed gambling establishments: bookmakers, bingo halls, casinos etc.

**Conclusion**

This paper helps to focus attention on some neglected but important areas of research. It not only contributes to the relative neglect in IS and Ethics, but also addresses a greater void in relation to a dearth of studies on E-Gambling Commerce. This paper clarifies E-Gambling Commerce, its significance and some of the challenges involved in its study. The main objective is to shed more light on E-Gambling Commerce and disclose and assess some of the potential ethical issues and challenges arising from such embryonic developments. Whilst various things are disclosed about E-Gambling Commerce e.g. some new interpretations of previous research on problem gambling and disclosures
relating to the psychology underpinning the payback pyramid etc., for the purposes of scope and contribution, the discussion mainly centres on some new guise issues relating to changes in access and accessibility, and interaction and interactivity.

In terms of some of the issues associated with the new guises of access and accessibility, this paper briefly discusses some fairly familiar themes in E-Commerce: the potential for new markets, the threat of competition, protecting innovative practices and issues in relation to accessibility, there are several issues raised in this study that appear to have special characteristics when applied to E-Gambling Commerce. These include the ethical issues raised by the nature of fairly unique inducement and loyalty schemes, issues in user orientation and guidance strategies, the development of instantaneous and rapid forms of gambling commerce and the inherent problems within self exclusion systems for problem gamblers. In terms of interaction and the ethical issues arising from the design and use of interactive features, this paper highlights, not only how a range of multi-media features are used or seemingly valued by many commercial operators, but also raises some questions over our understanding of their affects or of the value of their excessive use within this industry. The discussion ends by highlighting how features common to E-Gambling Commerce, e.g. fixed odd machine and more rapid forms of gambling are also extending into traditional gambling environments.

As E-Gambling Commerce develops in terms of multiplicity it inevitably becomes more complex for anyone individual or perhaps organisation to work in. Only some of the findings from this longitudinal and ongoing study have been raised here. However, even within this specific remit, there are still many more things to discover. Future research could focus on any further new guise ethical issues arising from the expected growth of E-Gambling Commerce, particularly in its development in different cultures and countries. More research is needed on the potential harms caused by the use of virtual cash, seemingly generous inducements schemes and other marketing or advertising practices. Finally, we still know little about the impact of more rapid forms of gambling and the affects and use of interactive multi-media.

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