

# Third-Party Responsible Gambling Accreditation Programs Are Related to Short-Term Improvements at Casinos but No Ongoing Gains: Evidence from RG Check

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## **Abstract**

This study examines how casino operators' responsible gambling program performance changes after entering a third-party assurance program. Using de-identified responsible gambling accreditation data from the 75 casinos employing the "RG Check" program from 2012 to April 2019, this study finds that casino scores improved in the first reaccreditation period ( $p < .001$ ,  $d = 0.92$ ), but failed to improve in the second reaccreditation ( $p < .78$ ,  $d = 0.38$ ). Much of the first reaccreditation changes appear to be a result of one-time improvement in the scores of lower performing venues. There also appears to be inconsistent improvements in tactical areas of RG programs, as some areas improved over time while others were unchanged or declined. The Friedman test revealed statistically significant increases in scores for RG policies ( $p < .001$ ); employee training ( $p < .001$ ); venue/game features ( $p < .001$ ); and access to money ( $p < .001$ ). It also revealed a decrease in informed decision making scores ( $p = .010$ ). The evidence is consistent with accreditation programs being used as a reputation signal rather than a performance management tool. The findings from this study suggest that RG assurance programs lead to some benefit but may not be a source of ongoing and consistent improvement without programmatic changes or other regulatory tools.

*Keywords:* responsible gambling; audit; accreditation; casinos; gambling harm; social responsibility, sustainability

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Responsible gambling (RG) programs are implemented by gambling operators in many jurisdictions. Strategically, these programs emerged from a sustainability framework focused on maintaining both player wellness and ongoing gambling participation (Blaszczynski et al., 2004; Ladouceur et al., 2016; Wood et al., 2017). Tactically, RG programs typically involve a combination of corporate policies, employee training, and player-oriented product features (Philander et al., 2018; Reilly, 2017; Robillard, 2017) that are designed to reduce risk of gambling-related harms (Wood & Griffiths, 2015).

As part of organizational performance management in RG, some stakeholders advocate for oversight in the design and administration of RG programs, due to a perceived conflict of interest at profit seeking firms (Fiedler et al., 2021; Wardle et al., 2022). There are diverse views regarding the role that different stakeholders should play in facilitating responsible gambling (Hancock & Smith, 2017; Ladouceur et al., 2016), but government and private organizations both rely on third-party organizations as part of designing and assuring their RG programs (IGT, 2017; Responsible Gambling Council, 2022b; World Lottery Association, 2022). These third-party organizations may have in-house and/or contracted subject matter experts that identify a set of design and operational standards, evaluate management performance against those benchmarks, and/or “accredit” firms as meeting the criteria (G4, 2022; Responsible Gambling Council, 2020; World Lottery Association, 2021).

Despite the importance of transparency and performance management in meeting stakeholder goals, there is little scholarly research on the effectiveness of RG assurance programs. It is an open question as to whether third-party oversight is contributing to program improvement at firms. More specifically, it remains unclear if third-party assurances have led to operational improvements over time or whether they only serve as a regulatory floor, denoting minimum requirements but not accelerating performance. In this study, de-identified proprietary data is used to assess whether ongoing RG casino audits from the Responsible Gambling Council’s *RG Check* program (Responsible Gambling Council, 2022a) led to performance improvements at 75 casino venues. By understanding the effectiveness of third-party accreditation, stakeholders will be able to determine whether these programs are an effective strategy for improving RG-related outcomes in host jurisdictions.

## Related Literature

Assurance programs often emerge as a solution to problems of asymmetric information, where some parties may have more information than others about quality characteristics (Akerlof, 1970). Gambling-related programs appear to mirror many corporate social responsibility assurance programs, in which the third-party evaluation is designed to inform internal and external stakeholders, with an intention to enhance both credibility of the firm and better management of performance (Perego & Kolk, 2012; Viehöver et al., 2012). Although RG accreditation programs appear to be directed towards informing non-consumer stakeholders, some scholars propose that customer satisfaction would also benefit from promoting the role of third parties in evaluating RG programs (Gainsbury et al., 2013). There is some evidence to support this perspective. Several ecommerce studies demonstrate that third-party evaluations can have an influence on consumers’ trust (D. J. Kim et al., 2008; Özpolat & Jank, 2015) and online gamblers that believe sites are unfair are reported to seek third-party assurance statements (Gainsbury et al., 2013).

There are four institutionalized providers of third-party responsible gambling assurance programs: the venue- and online-based programs from the Responsible Gambling Council (2022a) and G4 (2022), the lottery-only program from the World Lottery Association (World Lottery Association, 2021), and the online-only Internet Compliance Assessment Program from the National Council on Problem Gambling (2021).<sup>1</sup> eCOGRA (2021) also has an assurance program that includes responsible gambling components, which be-

<sup>1</sup>Firms may also be audited on an ad-hoc basis, often by non-specialist government auditors (e.g. Victorian Auditor-General’s Office, 2021).

gan as a self-regulation tool among unregulated operators (Furlong, 2005). The World Lottery Association and National Council on Problem Gambling both rely on external auditors (Gaming Labs International, 2017) as part of their accreditation processes, whereas the Responsible Gambling Council and G4 both use in-house auditors. Although no research studies appear to have evaluated the effectiveness of the assurance programs, one study used RG Check patron survey data generated by the program to assess player knowledge (Christensen et al., 2022).

Empirical evidence suggests that RG programs can enhance perceptions of gambling venues by multiple stakeholders, including employees (Gray et al., 2021; C.-K. Lee et al., 2013; H. J. Song et al., 2015; Tan et al., 2017), customers (Abarbanel et al., 2018; J. Lee et al., 2014; H.-J. Song et al., 2012), government (Leung, 2019), and nearby residents (J. Kim & Lee, 2019). Leung and co-authors demonstrate that gambling operators in some jurisdictions use social responsibility-related disclosures as an organizational legitimacy (Dowling & Pfeffer, 1975) tactic, but avoided RG-related disclosures (Leung, 2019; Leung & Gray, 2016; Leung & Snell, 2017). It therefore appears reasonable that gambling venues actively engaged in RG accreditation programs will attempt to extend that tactic to the domain of RG. As part of that analysis, this study examines total scores and tactical subcategories of the RG Check program called *Standards*, to assess whether firms reorient their efforts towards specific aspects of RG programs.

### Method

Access to the “RG Check” responsible gambling accreditation scores for land-based gambling venues was received from the Gambling Research Exchange Ontario Scholars Portal Dataverse (Responsible Gambling Council, 2019a). This dataset includes all deidentified RG Check evaluations from the time of the program launch in 2011 through to April 2019 (Responsible Gambling Council, 2019a). Assessment of venues began in 2011 but no accreditations are recorded in the dataset prior to 2012 (Responsible Gambling Council, 2019a). Code to replicate the analysis is available in the supplementary materials and data access may be requested from Gambling Research Exchange Ontario.

The RG Check program is particularly popular in Canada. It is used by all regulated casinos in British Columbia and Ontario, other Canadian provinces, and some non-Canadian properties in Asia and Europe (Gaming Policy and Enforcement Branch, 2018; Responsible Gambling Council, 2022b). As a result of Ontario’s licensing process, most major sports betting and online casino operators will be required to receive RG Check accreditation as a future condition of licensure (Responsible Gambling Council, 2022b).

The assurance program includes assessment of 361 unique venue features that are intended to reduce gambling-related harm. These variables are divided into eight *Standards*, each with respective weights in the final score outlined in brackets (Responsible Gambling Council, 2020):

Responsible Gambling Policies (Policy) (20%) — “The venue and operator demonstrate awareness of the harms caused by gambling as well as prevention and mitigation measures. Issues are addressed with integrated policies, strategy and culture-related measures.” (p. 2)

Employee Training (Training) (15%) — “Employees understand the importance of responsible gambling and how their jobs impact player protection as well as the fundamental concepts of responsible gambling and problem gambling.” (p. 2)

Self-Exclusion (15%) — “A well-managed and communicated self-exclusion program is in place that facilitates access to supports.” (p. 2)

Assisting Patrons (20%) — “Assistance for players who may be experiencing harms from gambling is readily available, systematically provided and documented.” (p. 2)

Informed Decision Making (IDM) (10%) — “A systematic approach is used to support, integrate, and disseminate information to enable players to make informed decisions and encourage safer play.” (p. 2)

Advertising and Promotion (Ads) (5%) — “Marketing, including advertising and promotions, does not mislead players, misrepresent products, or target potentially vulnerable players.” (p. 2)

Venue/Game Features (Features) (10%) — “Venue and game design helps prevent extended, continuous and impulsive play and enables low risk play behaviours.” (p. 2)

Access to Money (Money) (5%) — “Money and money services are provided to players in a responsible manner that helps prevent financial harm.” (p. 2)

To be accredited, venues must score 70% or higher in aggregate weighted score with a minimum of 50% in each of the eight *Standards* (Responsible Gambling Council, n.d., 2019a). Each *Standard* has 15 or more variables, which articulate targeted program elements. Although the scoring mechanism for the variables is not provided in the data dictionary, each variable is described in the data dictionary and accreditation variables files (Responsible Gambling Council, 2019b). The *Standards* differ somewhat from the current program description, which reflects updates since 2019 (Responsible Gambling Council, 2023). The dataset includes gross scores that sum each *Standard* score and weighted scores that sum the *Standard* scores after weighting by the percentage contribution to the final score.

Data used in the accreditation process is collected through site visits, surveys of employees, and surveys of patrons. The Responsible Gambling Council (2020) describe the audit process with seven steps:

- #1 Data gathering, including documentation collection and an employee survey.
- #2 Analysis of all material collected.
- #3 A two-day site visit that includes a self-exclusion demonstration, employee interviews, and a survey of players.
- #4 Scoring, report writing, and quality assurance review.
- #5 Draft report is provided to the venue for feedback.
- #6 Final report of findings and recommendations is reviewed by the Accreditation Panel.
- #7 Final report and decision to accredit is conveyed to the venue. (p. 2)

RG Check Accreditation is valid for three years after which firms must be reaccredited through the same process for another three years. The dataset contains data from 152 assessments of 75 different venues. A total of 17 venues completed three accreditations, 43 completed two accreditations, and 15 completed one accreditation. As shown in Figure 1, the occurrence of second and third accreditations appears to be a function of the when the venue first enrolled in the program rather than attrition from the program.

### Analysis Plan

To assess whether accreditation scores changed over time, a repeated measures ANOVA and the non-parametric Friedman test (Friedman, 1937) were estimated on the total accreditation scores, using the accreditation count (one, two, or three) as the time variable and the venue as the grouping variable. Friedman tests were also estimated for changes in the percentage score for each of the eight accreditation category *Standards*. Since only 17 venues completed three accreditations, post-hoc tests were computed for all variables of interest using pairwise *t*-tests across the three time periods to provide more statistical power in comparing accreditations in the first and second periods. Post-hoc *t*-tests were adjusted using the Holm–Bonferroni method for multiple comparisons (Holm, 1979). Summary statistics of the variables of interest are provided in Table 1 for each of the accreditation periods. All analyses were estimated using the “Spotted Wakerobin” version of RStudio (2022.07.3) in R version 4.2.2 for MacOS.

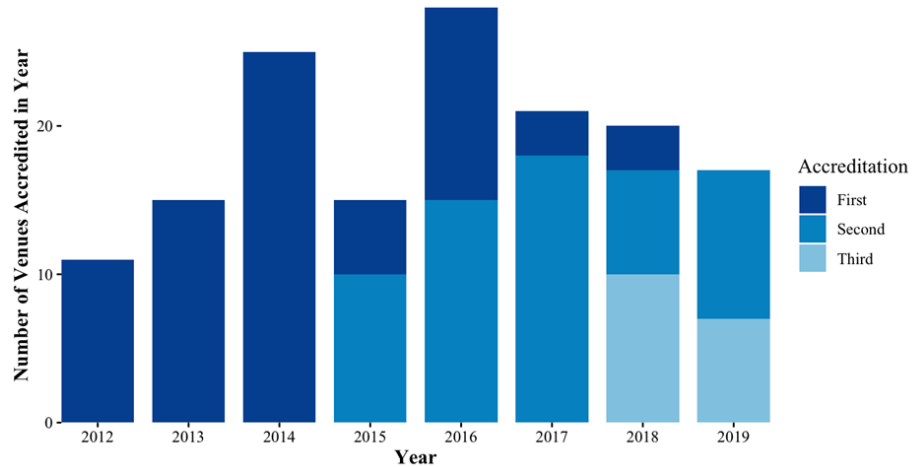


Figure 1  
Accreditations by year and count of occurrence for venue. Note: 2019 values are limited to Jan-April 2019.

Table 1  
Summary Statistics of Scores by Accreditation Number

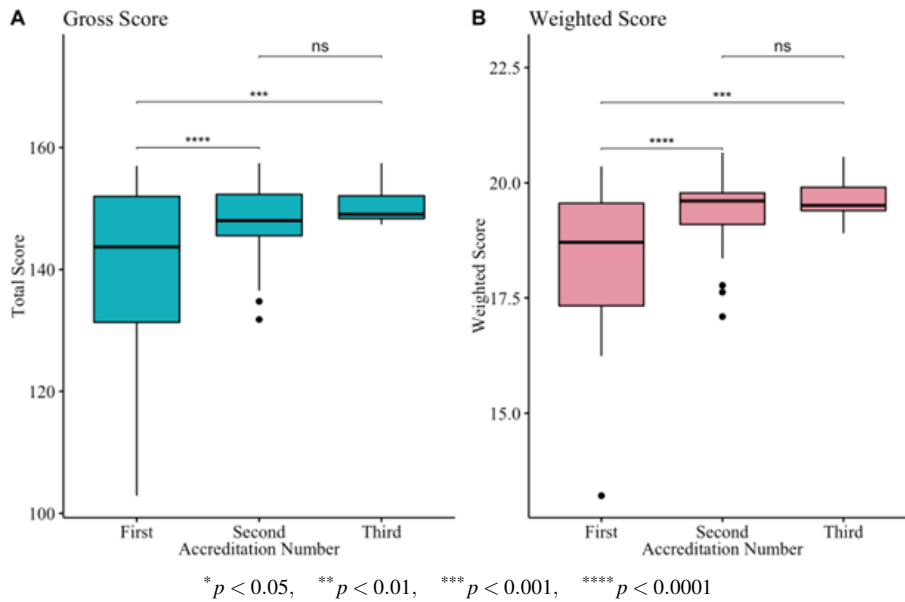
	Gross Score	Weighted Score	Policy (%)	Training (%)	Self-Exclusion (%)	Assisting Patrons (%)	IDM (%)	Ads (%)	Features (%)	Money (%)
<b>First accreditation (N = 75)</b>										
Mean	141.76	18.42	78.44	81.97	72.64	73.35	70.61	76.26	69.70	80.57
SD	11.26	1.38	6.58	8.24	7.73	7.00	3.65	7.15	12.28	12.57
Min	102.89	13.21	52	39	56	45	58	64	47	52
Max	157.02	20.36	91	93	90	90	80	95	89	97
<b>Second accreditation (N = 60)</b>										
Mean	148.15	19.42	86.07	90.35	74.83	75.30	69.10	73.53	73.23	84.72
SD	5.15	0.68	6.73	3.51	4.70	7.46	3.82	6.18	11.24	10.46
Min	131.80	17.10	69	82	60	57	60	61	54	59
Max	157.46	20.66	95	99	83	94	83	96	92	98
<b>Third accreditation (N = 17)</b>										
Mean	150.62	19.64	83.59	89.12	77.65	75.94	67.59	75.59	79.18	85.24
SD	3.32	0.49	5.79	3.06	4.89	7.66	3.04	7.56	8.39	11.86
Min	147.40	18.90	73	85	71	62	62	55	64	61
Max	157.46	20.57	96	94	87	88	72	90	92	100

Note: SD = Standard deviation; IDM = Informed decision making.

### Results

A repeated measures ANOVA was performed to compare the effect of reaccreditation on RG Check scores. There was a statistically significant difference of means in the gross scores,  $F(2, 72) = 30.24, p < .001$ ; and the scores weighted by the eight *Standards* weightings,  $F(2, 72) = 33.14, p < .001$ . A visual inspection of the Q-Q plot suggested deviation from a normal distribution, so a non-parametric test was estimated. The Friedman test produced similar results as ANOVA for gross scores:  $\chi^2(2, N = 17) = 20.6, p < .001$ ; and weighted scores:  $\chi^2(2, N = 17) = 19.9, p < .001$ . Figure 2 contains plots of the respective distribution of scores and post-hoc paired t-test results. A 'moderate' statistically significant difference was observed between the first and second accreditation gross scores, supporting  $H_1: t(59) = 6.71, p < .001, d = 0.73$ ; but no difference was observed between

the second and third accreditations:  $t(16) = 1.42, p < .174, d = 0.57$ . Similar results held in the weighted scores:  $t(59) = 7.09, p < .001, d = 0.92$  and  $t(16) = 0.28, p < .78, d = 0.38$ , respectively, except the effect size for the first and second score difference was ‘large’.



**Figure 2**  
*Distribution of total scores in unweighted gross scores (A) and scores weighted by ‘RG Check Standards’ weights. Holm–Bonferroni adjusted paired t-test scores showed statistically significant differences in mean scores between first and second accreditations and between first and third accreditations. No change in scores was estimated between the second and third accreditations.*

Tests of the individual *Standards* produced more nuanced results. The Friedman test produced statistically significant results for RG policies,  $\chi^2(2, N = 17) = 21.5, p < .001$ ; employee training,  $\chi^2(2, N = 17) = 20.3, p < .001$ ; informed decision making,  $\chi^2(2, N = 17) = 9.24, p = .010$ , venue/game features,  $\chi^2(2, N = 17) = 26.5, p < .001$ ; and access to money,  $\chi^2(2, N = 17) = 19.5, p < .001$ . No significant differences were observed for self-exclusion,  $\chi^2(2, N = 17) = 3.65, p = .161$ ; assisting patrons,  $\chi^2(2, N = 17) = 3.91, p = .142$ ; or advertising and promotion,  $\chi^2(2, N = 17) = 0.353, p = .838$ . Since the sample of venues with three accreditations was small, post-hoc t-tests with Holm-Bonferroni corrections were computed for all variables of interest and are reported in Figure 3. Full results are provided in the supplementary materials.<sup>2</sup>

### Discussion

The results from this study suggest that operators make improvements to their RG program after their first accreditation, but that there may be a ceiling to these improvements as there is no measured improvement from accreditation two to accreditation three. A visual examination of the score distributions suggests that much of the change in the performance is a function of lower performing venue improvement, as there appears to be little change in the top quartile of scores. RG Check is described as, “. . . an important tool for continuous improvement, providing operators with feedback and insights that help increase the effectiveness of their RG programming and manage risk” (White, 2022, as cited in the Score Bet,

<sup>2</sup>Supplementary materials for this study are available at: <https://osf.io/wu6ta/>

2022), however it appears that most of the performance improvement across the RG Check database is a result of one time changes among lower performing venues.

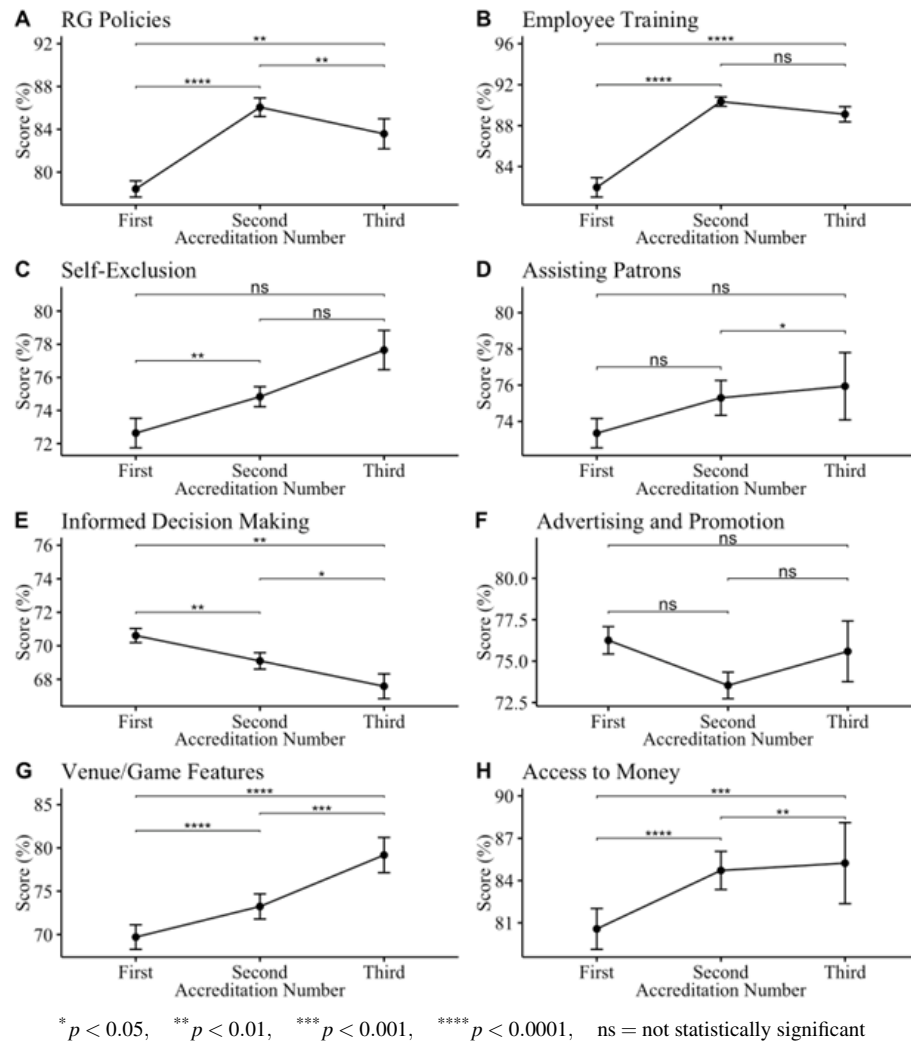


Figure 3

Mean and standard error plots of ‘RG Check Standards’ scores. Holm–Bonferroni adjusted paired t-test scores indicated that informed decision-making scores fell in both reaccreditations and there was no lasting change in self-exclusion, assisting patrons, and advertising and promotions scores.

A closer examination of the RG Check Standards suggests that the programmatic changes are uneven. Some categories showed improvements across all periods or from the first period to each of the last two accreditations: Venue/game features and access to money Standards both demonstrated statistically significant improvement in mean scores at both reaccreditation points; employee training improved in the second accreditation, which was maintained in the third accreditation; and RG policies showed improvement in the second accreditation but declined somewhat in the third accreditation.

Other Standards were unchanged or declined: self-exclusion, assisting patrons, and advertising and promotion each showed no evidence of sustained improvement in mean scores across the three periods. In addition, informed decision making showed evidence of decline in each reaccreditation. Based on these findings, it may be the case that firms are

reallocating resources towards *Standards* that are easier to achieve or are less disruptive to other business goals to maintain accreditation while minimizing costs. If firms intend to use accreditation as only a reputation signal rather than a performance management tool, there may be limited incentive to pursue score improvement beyond a passing level since numeric scores are not publicly reported (Responsible Gambling Council, 2022c).

Some aspects of RG Check scoring are unknown, including whether scores were a function of data collected from site visits, surveys of employees, and/or surveys of patrons. It therefore is unclear exactly why program elements may have scored better or worse. However, measures outlined in the data dictionary and accreditation variable list provides some information about elements that may have changed (Responsible Gambling Council, 2019b). Venue/game measures, which showed improvement in both periods, included items related to hours of operation, alcohol restrictions, game screening, on-device RG features, and staff behavior in response to player action. Access to money, which also showed improvement in both periods, included variables related credit provision; cash machine location; and RG information at cash machines. Informed decision making, which declined in both periods, included items related to the types of RG information provided, the distribution of information, languages of availability, the presence of onsite RG centers with knowledgeable staff, play feedback on-device, including session time and money spent, and the ability to set time and money limits. A full list of variables for all *Standards* is provided in the supplementary materials.

The evidence from this study suggests that RG assurance programs may not be a panacea without further refinement. Although third-party assurance programs may improve outcomes, evidence from the RG Check database suggests that the progress may be inconsistent and unevenly distributed. Program administrators should consider other mechanisms to ensure ongoing improvement, such as increasing accreditation difficulty or using a tiered program to provide incentives for higher scoring venues to continue to improve. Finally, it is worthwhile to consider whether RG programs are measuring policies and interventions that ultimately lead to positive outcomes for consumers (Hancock & Smith, 2017; Ladouceur et al., 2016). Although RG Check is based in-part on research-based insights, some scholars have criticized wider motivations around the development RG research and RG programs more generally (for a review of these criticisms, see Laplante et al., 2019).

### **Limitations/Future Research**

This study relied on data provided by Responsible Gambling Council and was unable to independently verify the source data. The results are correlational, and it is unclear whether RG program changes would have occurred in the absence of performance monitoring by RG Check. It is also unclear whether the first accreditation led to meaningful performance improvements compared to the period prior to accreditation. In addition, it remains an open question whether changes in RG Check scores are related to improvement in outcomes of interest. Further research is needed to tie assurance program accreditation or performance scores to reductions in gambling-related harms.

### **Conclusion**

Third-party RG assurance programs are becoming increasingly popular among firms and policymakers. The results of this study suggest that RG assurance program scores improve over a short time period, but these improvements are concentrated in initially lower performing venues. Additionally, firms appear to focus their efforts on certain programmatic areas, with half of the tactical areas showing no gains or even a decline across the reaccreditation periods. Therefore, it is important for assurance programs to consider measures of ongoing improvement and/or to use a tiered structure that creates an incentive for further progress. It is also necessary to understand how management behavior changes in response to the incentives created by RG assurance programs and whether these programs lead to more positive outcomes for gamblers and venue employees. Further research is



needed to address these issues and to determine whether assurance programs can effectively reduce gambling-related harms.

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