

Thanks III raise this with our FOI team and see if that changes our intention to respond by the deadline.

Kind regards

Office for Statistics Regulation | UK Statistics Authority | @UKStatsAuth

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Help shape OSR's priorities for next year and beyond

Important - Privacy Policy

We take great care to protect your personal information. To reflect changes to data protection law (GDPR), we have updated our <u>Privacy</u> <u>Policy</u> and would encourage you to take a moment to read it. Our Privacy Policy explains how we handle and protect your personal information, your legal rights and who to contact if you have any questions about how your personal information is being used.



Caution: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hello
Thanks for sharing.
We have also received a similar FOI.
Given that there is ongoing case work with based on a referral we made to you, we have exempted these communications from the FOI until the case work is concluded.
Other than that we are content with the information being released from a GC perspective.
Kind Regards
From:
Sent: Tuesday, August 6, 2024 4:36 PM To: @gamblingcommission.gov.uk>:
< @gamblingcommission.gov.uk>
Cc: <u>@Statistics.gov.uk</u> > Subject: ACTION REQUIRED - FOI response for awareness
CAUTION: This email is from an external source - be careful of attachments and links
Hello
We have received an FOI request (below in bold) that is going through

final approval. We wanted to share with you for awareness and to give you the opportunity to highlight any concerns you may have. Please can you let us know if you have any concerns by cop tomorrow (7/8/24). Ideally if you can advise why you think the release of that information should be exempt from FOI that would be helpful so we can reflect your concerns to the FOI team. We plan to send this FOI to the requestor by the end of the week. Please be aware anything highlighted yellow (and potentially green) will be redacted.

Please document, via e mail, all correspondence between the statistics regulator and the gambling commission. To include specific correspondence on report to the statistics regulator by the gambling commission on the charity gambling with lives'

Kind Regards,

Office for Statistics Regulation | UK Statistics Authority

@StatsRegulation | osr.statisticsauthority.gov.uk | Privacy Policy

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From:	
To:	7.0
Subject:	RE: FOI release
Date:	20 August 2024 15:43:32

You don't often get email from

@statistics.gov.uk. Learn why this is important

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Thank you

Kind regards

Office for Statistics Regulation | UK Statistics Authority | @UKStatsAuth

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From:	@gamblingcommission.gov.uk>
Sent: Tuesday, Au	gust 20, 2024 3:15 PM
To:	@Statistics.gov.uk>
Cc:	@gamblingcommission.gov.uk>
Cultant DE EOL	Learning Data 200

Subject: RE: FOI release

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Hi

Thanks for getting in touch

No concerns from me and happy with the redactions.

Kind regards

To:

Cc:

@gamblingcommission.gov.uk> @gamblingcommission.gov.uk>

Subject: FOI release

CAUTION: This email is from an external source - be careful of attachments and links

Good morning

We wanted to make you aware of emails we will be releasing as part of an FOI request to the OSR. If you believe this email should be exempt from FOI release for any reason please let us know what exemption you think applies and why by close of play tomorrow (20/08/2024). I will share this with our FOI team who will make a final decision on release.

Please note anything highlighted in red will be redacted under the personal information exemption.

Kind regards

Office for Statistics Regulation | UK Statistics Authority | @UKStatsAuth

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From:	
To:	
Cc:	
Subject:	OSR response to the Gambling Commission: 'Gambling with Lives' casework
Date:	02 October 2024 09:57:07
Attachments:	OSR response to the Gambling Commission Gambling with Lives
	casework.pdt

Dear

Please see attached a letter from

this will be published on our website today at 11am.

Kind regards,

@statistics.gov.uk

Office for Statistics Regulation | UK Statistics Authority @StatsRegulation | osr.statisticsauthority.gov.uk | Privacy Policy We are reviewing the Code of Practice for Statistics; join the conversation at our <u>Futureproofing the Code events</u>

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From:	
To:	
Subject:	RE: Gambling with Lives casework update
Date:	03 October 2024 09:52:28

Hello

The letter went live on our website yesterday morning.

Please see the attached link: <u>Ed Humpherson to Tim Miller: OSR response to the</u> <u>Gambling Commission: 'Gambling with Lives' casework – Office for Statistics</u> <u>Regulation (statisticsauthority.gov.uk)</u>

Best wishes,

| Office for Statistics Regulation @ext.statistics.gov.uk Website: Office for Statistics Regulation Twitter: @StatsRegulation

From: @gamblingcommission.gov.uk> Sent: Thursday, October 3, 2024 9:34 AM

@ext.statistics.gov.uk>

Subject: RE: Gambling with Lives casework update

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Hi

To:

Do you know when the OSR letter to the GC will be published? I noticed it is not up on your website yet .

Thanks

 From:
 @ext.statistics.gov.uk>

 Sent: Wednesday, October 2, 2024 5:32 PM

 To:
 @gamblingcommission.gov.uk>

 Subject: RE: Gambling with Lives casework update

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Hi

I completely appreciate this. At this stage, I'm not sure a full engagement list is needed but thank you. Perhaps we could revisit this at a later date?

Best wishes,

| Office for Statistics Regulation

Website: Office for Statistics Regulation Twitter: @StatsRegulation

From: @gamblingcommission.gov.uk> Sent: Wednesday, October 2, 2024 10:19 AM To: @ext.statistics.gov.uk> Subject: RE: Gambling with Lives casework update

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Hi

Thanks for sharing a copy of the final letter which will be published.

On the stakeholder lists, I need to get permission from our stakeholders to share their contact details with you before I can send them over. I'm conscious this may delay your engagement for a week or two which I obtain the correct permissions. Would you still like me to go ahead?

Thanks

From: @ext.statistics.gov.uk>
Sent: Wednesday, October 2, 2024 9:09 AM
To: @gamblingcommission.gov.uk>
Subject: RE: Gambling with Lives casework update
CAUTION: This email is from an external source - be careful of attachments and links
That's great, thank you
Best wishes,
Office for Statistics Regulation
Website: Office for Statistics Regulation Twitter: @StatsRegulation
From: @gamblingcommission.gov.uk>

Sent: Tuesday, October 1, 2024 5:38 PM To: Subject: RE: Gambling with Lives casework update
Caution: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.
Hi
email address is @gamblingcommission.gov.uk
I'll share the stakeholder lists this week.
Thanks
From: <u>@ext.statistics.gov.uk</u> >
To: @gamblingcommission.gov.uk>
Subject: RE: Gambling with Lives casework update
CAUTION: This email is from an external source - be careful of attachments and links
Hello
Details of the webinar attendance and stakeholder engagement lists would be very useful, thank you.
Our initial round of user engagement is very light touch. We'll be speaking with a few interested parties with a range of different views/ experience of using the data. After this initial round, we were hoping to meet with you again to cover any queries we might have. We would then determine if additional user engagement is required.
In terms of the Gambling with Lives casework, I can confirm this public letter will be published on our website and on X tomorrow. If you could possibly forward me email address, I will send you both the final letter today.
Best wishes,
Office for Statistics Regulation
Website: Office for Statistics Regulation Twitter: @StatsRegulation
From: @gamblingcommission.gov.uk>

Sent: Monday, September 30, 2024 5:22 PM

@ext.statistics.gov.uk>

Subject: RE: Gambling with Lives casework update

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Hi

Just thinking about your stakeholder engagement phase for GSGB, if you need the details of people who joined the webinar or people who belong to our stakeholder engagement groups then please let me know.

Thanks



Thank you for your feedback. I appreciate the additional insights you've provided regarding the PGSI scale. I'll be sure to explore this area in more detail and will make the appropriate adjustments to the wording in the letter.

You mentioned that you have shared the letter with your Comms team, but can I confirm that this has also been shared with your DG and that he has no further concerns about the accuracy of the content?

To:

Once I can confirm this, I will check with our Comms team to see when they have a slot available. I will confirm these details with you once that's arranged.

In terms of the timings for the GSGB review, I can confirm that we have completed the desk research and are commencing user engagement next week. When this next phase of the review is completed, I will be in touch to discuss next steps.

I look forward to speaking with you in due course.

Kindest regards,

Best wishes,

| Office for Statistics Regulation @ext.statistics.gov.uk Website: Office for Statistics Regulation Twitter: @StatsRegulation

From:	@gamblingcommission.gov.uk>
Sent: Friday, S	September 27, 2024 1:44 PM
To:	@ext.statistics.gov.uk>
Cc:	@gamblingcommission.gov.uk>;
@gai	mblingcommission.gov.uk>

Subject: RE: Gambling with Lives casework update

Caution: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi

Thank you for sharing the draft letter and confirming this will be published on your website, this has been shared internally with our Comms team.

We are very happy that your review will consider the clarity around the composition and definitions of PGSI, as we would be on other terms we use. We think it will be helpful in terms of continuing to refine our approach. Are you able to share any information as to the timescales for completing your light touch review of the GSGB?

I would like to make clear though that in terms of our advice not to use PGSI 8+ as an indicator of addiction that this is a point we are following from the developers of the PGSI. It is not a view we have formulated. As a result, we think it would be best if your note could reflect that.

The language we use is an interesting area – we noted this week that the WHO when using a similar screen around adolescent social media use, also noted that the Social Media Disorder Scale could not be used as a measure of addiction but instead described it as an indicator of problematic behaviour or addictive like behaviours. If you could confirm when you intend to publish the letter that would be very helpful.

Kind Regards

 From:
 @ext.statistics.gov.uk>

 Sent: Wednesday, September 25, 2024 5:03 PM

 To:
 @gamblingcommission.gov.uk>

 Subject: RE: Gambling with Lives casework update

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Dear

Following yesterday's email, I would like to clarify that the previously sent document is a draft public letter, not a private letter as mentioned.

As such, we welcome any comments on its factual accuracy and invite you to raise any concerns you may have in this respect.

At this stage we would also invite you to share this draft with any relevant colleagues for their input and to also make aware of the letter and process going forward. Once we can consider your comments and can confirm the accuracy of the information, this final letter will be officially sent to and we will confirm with you at this time when it will be published on our website.

I have attached the document again for your convenience.

Kindest regards,

| Office for Statistics Regulation

@ext.statistics.gov.uk

Website: Office for Statistics Regulation Twitter: @StatsRegulation

From: Sent: Tuesday, September 24, 2024 5:28 PM

To: @gamblingcommission.gov.uk>; @gmablingcommission.gov.uk Subject: Gambling with Lives casework update

Dear and

Please find attached our private letter outlining the progress made with the 'Gambling with Lives' casework you previously raised with OSR. We appreciate your patience while we reviewed this matter.

I'll be in touch later this week to arrange a time for us to catch up regarding the GSGB compliance check. I look forward to speaking with you soon.



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From: To: Cc:	
Subject:	RE: GSGB Review Findings: Meeting Request
Date:	04 November 2024 10:20:55
Hi	
Thanks for the	email.
We could do th	ne 13 th Nov from 3-4pm. Please could you also invite and and
	(copied)?
Thanks	
From:	@ext.statistics.gov.uk>
Sent: Tuesday,	October 29, 2024 3:56 PM
To:	@gamblingcommission.gov.uk>
Cc:	@statistics.gov.uk>
Subject: GSGB	Review Findings: Meeting Request
CAUTION: This en	nail is from an external source - be careful of attachments and links
Dear	

I hope this email finds you well.

I am writing to let you know that we are in the final phase of compiling our findings from our desk research and user engagement for the purpose of our review of the GSGB. As such, we would like to arrange a date and time to touch base via Teams to discuss our key findings and next steps.

Would either of the dates below suit you?

- Wednesday, 13th November 3-4pm
- Thursday, 14th November 1.30-2.30pm

Please let me know which date works best for and if you would like me to invite any other colleagues. Once confirmed, I will send a Teams invite accordingly.

I look forward to speaking with you soon.

Kindest regards,

| Office for Statistics Regulation

Website: Office for Statistics Regulation Twitter: @StatsRegulation

@ext.statistics.gov.uk

From:	
To:	
Subject:	Casework update
Date:	15 November 2024 13:24:17

Hello

Thank you once again for your time and for sharing your insights with my colleagues and me last Wednesday.

As mentioned earlier this week, we have received two pieces of casework regarding the GSGB. Today, I am addressing the first instance which concerns communications between your organisation and the media regarding the GSGB guidance and data caveats.

In our response, we have acknowledged the significant changes that this survey has undergone and have supported your decision in communicating the limitations of the figures in line with the guidance you have set. However, we have also recognised that you have taken an overly cautious approach in challenging any reference to previous survey results.

While we agree that it is crucial not to make comparisons between previous data sets, some work is needed to help users understand how to discuss this data and refer to results from previous surveys. As suggested in our meeting, this could be achieved through notes for editors and lines for journalists. We believe that this proactive approach will enhance public trust and transparency.

Regarding the second piece of casework, I am scheduled to meet with my colleague next week, after which we will be in touch to discuss any questions we may have.

As previously mentioned, I am preparing a document summarising the key suggestions and user feedback we have discussed. I will provide this to you early next week.

I look forward to speaking with you then.

Best wishes,

| Office for Statistics Regulation

@ext.statistics.gov.uk

Website: Office for Statistics Regulation Twitter: @StatsRegulation

OSR is consulting on a new edition of the Code of Practice for Statistics. <u>Share</u> <u>your views</u> on our proposals

For information on the work of the UK Statistics Authority, visit: http://www.statisticsauthority.gov.uk We got there in the end!! It's in the diary, look forward to speaking to you then.

From:

@ext.statistics.gov.uk>

Sent: Tuesday, November 26, 2024 4:09 PM

To: @gamblingcommission.gov.uk>

Subject: RE: Gambling casework update

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We may have a winner!

Could we book in 3.30-4.30pm, Tuesday 3rd December in that case – I'll send an invite through now

Best wishes,

Office for Statistics Regulation

@ext.statistics.gov.uk

Website: Office for Statistics Regulation Twitter: @StatsRegulation

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From: @gamblingcommission.gov.uk> Sent: 26 November 2024 15:53 To: @ext.statistics.gov.uk>

Subject: RE: Gambling casework update

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Hi

We could do any time after 2pm on Tuesday 3rd but can't make 10-11am I'm afraid.

Thanks

From:

Sent: Tuesday, November 26, 2024 1:40 PM To: @gamblingcommission.gov.uk> Subject: RE: Gambling casework update

CAUTION: This email is from an external source - be careful of attachments and links

Hello

I totally understand – it's been tricky to find a slot that works for both me and too. I'm afraid tomorrow is already completely booked up, as are the times you've suggested on Thursday. Could you please let me know if you have any availability on the following Tuesday, 3rd December, from 10-11 a.m.?

Thanks and speak soon.

Best wishes,

Office for Statistics Regulation

Website: Office for Statistics Regulation Twitter: @StatsRegulation

OSR is consulting on a new edition of the Code of Practice for Statistics. <u>Share</u> <u>your views</u> on our proposals

From: @gamblingcommission.gov.uk>

Sent: 26 November 2024 08:56

To:

@ext.statistics.gov.uk>

Subject: RE: Gambling casework update

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Hi

Apologies as Thursday is our office today it tends to get quite busy.

We could do 12-12.30pm Thursday or after 3pm? We also have some availability tomorrow between 11 and 1pm?

Thanks

From:

@ext.statistics.gov.uk>

Sent: Monday, November 25, 2024 10:35 AM

@gamblingcommission.gov.uk> To: Subject: RE: Gambling casework update

CAUTION: This email is from an external source - be careful of attachments and links

Hello

We could meet at 11-12 on Thursday if this works for you?

Best wishes,

| Office for Statistics Regulation

@ext.statistics.gov.uk

Website: Office for Statistics Regulation Twitter: @StatsRegulation

OSR is consulting on a new edition of the Code of Practice for Statistics. Share vour views on our proposals

@gamblingcommission.gov.uk> From: Sent: 22 November 2024 17:22 To: @ext.statistics.gov.uk>

Subject: RE: Gambling casework update

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Hi

I also have some more information to send you relating to your light touch review which I'll send through on Monday, its just some more information on user engagement and our Comms plan which are internal documents that you won't have seen.

We have our team meeting next Thursday until 3pm but we are free after that to discuss if that works for you?

Have a nice weekend!

From: @ext.statistics.gov.uk> Sent: Friday, November 22, 2024 1:12 PM @gamblingcommission.gov.uk> To: Subject: Gambling casework update

Hello

I hope this email finds you well.

I apologise for the delay in getting back to you with the summary of last week's discussion and the headline findings from our user engagement.

On a related note, I have managed to meet up with **sectors** to discuss the new piece of casework that came in last week, as mentioned at the meeting. It is a slightly tricky one, so we would really appreciate an opportunity to discuss it over a Teams call. Do you have any availability next Thursday, 29th November, from 2-3pm?

Thank you and speak soon.

Best wishes,

Office for Statistics Regulation

@ext.statistics.gov.uk Website: Office for Statistics Regulation Twitter: @StatsRegulation

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From:	
To:	
Subject:	RE: GSGB light touch review - additional supporting documents
Date:	26 November 2024 17:39:17
Attachments:	image002.png

That's great, thank you

I'll look at these in some detail before we meet next week - we'll put aside some time in case we have any questions.

I look forward to speaking with you then.

All the best,

@ext.statistics.gov.uk

Website: Office for Statistics Regulation Twitter: @StatsRegulation

OSR is consulting on a new edition of the Code of Practice for Statistics. <u>Share</u> <u>your views</u> on our proposals

From:	@gamblingcommission.gov.uk>
Sent: 26 Novem	ber 2024 17:31
To:	@ext.statistics.gov.uk>
Cc:	@gamblingcommission.gov.uk>

Subject: GSGB light touch review - additional supporting documents

Caution: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi

Following our call to discuss the light touch review of the GSGB, I'm now attaching a number of additional documents to inform the review which are related to the planning that went into the communication of the launch of the GSGB in July this year and related Comms documents.

A summary of the documents attached:

Oasis Comms plan – produced by our Comms team to support the launch of the annual report

Timeline of milestones - a summary of engagements and communications about the GSGB annual report

25.07.24 Letter from Ebulletin - copy of the text included in the Commission's bulletin newsletter which has a distribution list of c.11.000 respondents Implementation plan - produced by Comms team to map out external and internal comms in lead up to publication of annual report Overview of annual report publication - produced by my team to inform Comms and Exec about the upcoming publication GSGB FAQs - produced for use by Comms in responding to stakeholder feedback or journalist enquiries

If you have any questions about these additional documents then please let me know.

Kind Regards

GAMBLING COMMISSION

www.gamblingcommission.gov.uk Making gambling safer, fairer and crime free



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GAMBLING COMMISSION

GSGB Annual Report Launch

Note - These project plans are iterative documents that should be maintained through the life of. They are not suitable for presenting to Boards/Executive Directors for signoff. For this please use a presentation summarising the key aspects of each stage of the OASIS model.

Last updated	01.06.2024
Department/project	Communications & Engagement Department
Communication project lead	
Communication sign-off	
Version	1
Objectives	
Business/project objectives What is the policy/business objective that communications will support?	The Commission seeks to be the authoritative, trusted and impartial voice on gambling behaviours, using an evidence based approach. The Commission's strategic focus for 2024 to 2027 includes using data and analytics to make gambling regulation more effective - that better evidence will lead to better regulation, which in turn will lead to better outcomes for consumers, the public and licensees. Our evidence gaps and priorities work enable the Commission to fulfil the commitment to better understand the gambling market, behaviour and gambling related harm. The Gambling Survey for Great Britain is one of the primary data sets to achieve this as it will be the official statistics providing high quality information on gambling habits, attitudes and harms experienced by the adult population
	 This communications plan seeks to: Raise awareness among key stakeholder groups about the release of the 1st GSGB Annual Report Enhance understanding among stakeholders about GSGB Build trust, address concerns and overcome misconceptions about GSGB

	 Maximize reach of the Commission's messaging around GSGB by using various communications channels (digital and traditional) and tailoring messages and strategies to resonate with different stakeholder groups and their specific interests and concerns.
SMART communication objectives Specific, Measurable, Achievable, Realistic, Time bound. Should be achievable, measurable focused on outcomes and related to changing attitudes and/or behaviour.	 Awareness Webinar attendance – at least 100 stakeholders will attend the GSGB Annual Report Launch Webinar on 25 July 2024 Media Briefing attendance Social media and website views Visits to GSGB Hub to view the GSGB Guidance when distributed the week before the webinar - Over 200 views of the Guidance notes within 1 week of publication Visits to <u>GSGB Hub</u> to view Annual Report following the webinar – Over 400 views of the GSGB annual report during the month after publication.
	 Media Coverage Media coverage for the consultation is earned in 6 news outlets (trade press & Nationals) Sentiment in news coverage = 60% have neutral/positive sentiment Internal Communications Open rate of 40% by EOD for the Chief Executive's GSGB email which will be distributed no later than 10:00am on Thursday 25 July At least 200 views of the GSGB blog on House within 1 month of publication
	 At least 200 views of the GSGB Viva Engage post within 1 week of the post publication date.
Summary of previous communication activity, if any What did this achieve? What should we learn from this?	 <u>Timeline of the development of GSGB</u> from consultation launched December 2020 Timeline of milestones and communications activities: Ref: pdf attached Stakeholder engagement around GSGB has included: Stakeholder engagement panels convened for Industry, Policy & Academics and Lived experience with regular sessions held to provide updates on the development of GSGB and gain feedback from stakeholders – sessions hosted July 2023, Speaking Engagements: Speeches delivered by executives at various conferences and events attended by
	 Speaking Engagements: Speeches delivered by executives at various conferences and events attended by industry, other regulators and government

	 The Gambling Commission's Spring Conference March 2023 and March 2024 has had focus on data and evidence gaps with dedicated sessions covering GSGB GSGB hub on Gambling Commission website Blog posts on GC website Misuse of statistics - where instances of misuse of statistics have been identified, the Commission has communicated directly with the party involved. 				
Horizon scanning	Throats/Picks	CC Position/Mitigation	Approach/Koy Lines		
Potential threats, risks, emerging issues and opportunities.	Criticism of the GSGB methodology	Previous methods are no longer adequate for our requirements; face to face response rates are declining;	Approach/Key Lines GSGB provides national coverage, regularity, and consistency of approach across England, Scotland, and Wales, allowing us to confidently report on trends in gambling behaviour, as well as a more detailed understanding of behaviours amongst sub-population groups.		
	Requests for data before Annual Report released		Official statistics cannot be shared prior to publication		
	Focus on the recommendations from Prof Sturgis, and use of this to discredit the methodology and findings	R&S will commission work in relation to Recommendations 1, 2 and 3	GC will provide an update on how we plan to implement recommendations later this year.		
	Dissent online about the GSGB stats and method	Set up social monitoring and reporting to track sentiment – flag to R&S	GC will not usually directly respond to criticisms online; standard lines for GSGB will be used for any direct or indirect response to address concerns about GSGB		
	Focus on PGSI rate by media – negative story – journalists will want to extrapolate it for the population	Guidance notes provide clear steer on this Provide other interesting angles from the report	It would be dangerous to extrapolate – overestimating; confidence interval around the figure that is released – if grossing up should be looking at a range		

	Misuse of statistics	Guidance notes will advise action to be taken in cases of misuse	Where there are instances of misuse of statistics: The Commission will respond to all instances of misuse of statistics that come to our attention.
	Comparison with previous stats	 strong caution against this due to the difference in methodology 	Where there are instances of misuse of statistics: The Commission will respond to all instances of misuse of statistics that come to our attention.
	 Risks Media will not pay any attention to the will focus on benefits of GSGB Media requests for information before advance in accordance with rules and the observation of the data Opportunities Highlight that the GSGB enables between richness of the data Greater awareness of GB from electron for interviews after the webinar – residence on the basis that R&S is the properties of the data 	ne guidance notes – focus on the PGSI ra re official statistics are published – advise ound official statistics tter tracking of trends and other advantag ion betting stories may generate increas sponse to be determined on a case-by-ca urview of	ate as the headline story – press release that the data cannot be shared in ges due to the robust methodology and ed number of media enquiries, requests ase basis by External Comms – can on call for the weekend of
Audience			
Target audience/s Who –specifically –is/are the target/s for the messages? Demographics?	Industry Researchers and Academics DCMS Parliamentarians Consumers Wider public Charities		

	Board/Staff/Advisory Groups				
Insight What do we know about the audience? What are their beliefs/attitudes/behaviours ? Source of information? Anticipate unintended consequences and ensure your campaign is inclusive	 Industry: Industry are focused on the PGSI and concerned about the potentially higher PG rate based on the results of the experimental research, rather than appreciating the rich data that GSGB provides Concern about how the higher PGSI rate might be used to define policy, will thresholds be reduced; use of the GSGB data to support the advocacy of interest groups who want to have public health approach to gambling Concerns about participation of perceived anti-gambling individuals in the development of GSGB Subject to the influence of consultants who have been critical about GSGB 				
	 Academics & Research: Welcome the updated gambling behaviour findings; have actively participated in the development of GSGB 				
	DCMS: Welcomes robust evidence to support policy making; has received regular updates on development of GSGB and participates in engagement sessions alongside other stakeholders				
	Parliamentarians:				
	New Government – unfamiliar with GSGB – may not have heard of it before May be on the receiving end of industry lobbying efforts House of Commons Library as source of info Some parliamentarians that could be seen as sympathetic to industry have lost their seats. Still some confusion on the different PG rates.				
	Consumers: Consumers have been participating in the GSGB surveys responding online and via post Other than communication to solicit survey responses (which go from researchers and not GC) and mentioned on GC social media channels, there has been no other specific consumer-oriented communications on GSGB – none planned.				

What do we want our	Audience	Think	Feel	Do
audience to think/feel/do as				
	Industry	PG rate impacts operational procedures, compliance costs;	While concerned about regulatory and commercial implications of increase PGSI rate willing to put the necessary policies and processes in place to minimize gambling harm	Engage constructively with the Commission;
	Academics and	Welcome and supportive of	Willing to contribute to evidence-	Participate when invited to
	Researchers	methodologically sound research that aligns with best practice; new research that uses current relevant research methodologies;	based decision making; welcomes opportunity to be engaged in the development of GSGB	engage with the Commission on research work; Provide supporting statement for GSGB; Contribute to reviews and improvements;
	Consumers	Gambling Commission wants to inhibit freedom to participate in gambling via its regulations	Trust the Gambling Commission to work to make gambling safer fairer and crime free	Be willing to participate in GSGB research if invited - provide honest feedback about gambling experiences
	Wider public	Most are generally not aware	Trust the Gambling Commission to	Be willing to participate in GSGB
	(non- gamblers)	of the gambling commission but want to know that vulnerable persons are protected from gambling harm	work to make gambling safer fairer and crime free Value public protection	research if invited – provide honest feedback about gambling experiences
	DCMS	Welcome evidence that supports policymaking; cautious about negative feedback or criticisms of policy decisions	Confident in the integrity and relevance of the GC's research and the valuable contribution to policy decisions	Provide supporting statement for GSGB
	Parliamentarians	Impact of regulations on welfare of their constituents and economic impacts of regulations – must appear to be working in the interests of their constituents	Want to balance public protection and business interests	Open to understanding GSGB; Supportive of initiatives and regulations that balance the interests of all constituents

	Third Sector/Charities Board/GC Staff	GSGB results may justify enhanced safer gambling measures Proud of the GC's accomplishments, innovative work; that the GC is committed to evidence-based	Hope to get evidence for stronger gambling harm prevention Confidence in GC's work - authoritative voice, regulatory excellence and consumer protection	Have a balanced perspective; understand that the WP is informed by a range of evidence sources Support and champion the Commission's work
	Advisory Groups	The GC's work on GSGB is an opportunity to influence gambling policy to keep gambling safer, fairer and crime free	Valued for their expert input	Continue to provide insights to support the development of GSGB
Strategy				
Core messages	 GSGB helps to better understand people's attitudes and gambling behaviours in Great Britain; provides a consistent a frequent way of collecting data from adults in Great Britain and will provide regular data outputs to help us understand changes in gambling behaviour amongst the population and sub population groups. GSGB sets a new baseline and will help to better track trends The 1st GSGB Annual Report is based on data collected across two waves from July 2023 to February 2024 (10,000 responses); in future years the annual reports will be based on four waves of data collected across the calendar year (20,000 responses). 			
Channels Owned, earned and paid for, consider internal and external channels as appropriate. How will stakeholders be engaged?	Earned – via Pres Owned • Website no • Newsletter	s release distributed to nationa ews item; Blog post rs: Ebulletin; LA Bulletin; Parliar	l/regional media mentary newsletter	

	Speeches: Mentions as appropriate to audience and event
	 Social media channels – LinkedIn, X (Twitter) YouTube Webinar recording posted to YouTube (Public) (TBC); Posts on LinkedIn and Twitter: w/o 15/07 - Announce publication of Guidance to GSGB Hub 25/07 – 9:30am Announce publication of Annual Report on GSGB Hub/link to blog Post event – webinar recording available to view on YouTube Ongoing after Annual Report published – posts highlighting key data points from GSGB Annual Report Q2/Q3 – posts to announce themed reports; availability of GSGB data via UK Data Service
	 Internal: Email, Viva Engage Post; House Blog; Commission Stories newsletter; R&S Master Classes Updates provided through Bird table and <i>Connect with Exec</i> monthly session.
Budget and Resources <i>Budget required?</i> <i>Department resource?</i>	No budget allocated <u>Department resources:</u> Execs – <u>Manager as executive spokesperson for the annual report launch Comms – Public Affairs, External, Internal R&S IT – technical support as required for TEAMS Webinar</u>
Approach And assets required Creative feel and collateral should be discussed, and colleagues engaged to create specific channel strategies if required e.g., social media strategy.	Overview of annual report publication (prepared by R&S) : Ref: pdf attached <u>Media Engagement:</u> Press release : <u>First Gambling Survey for Great Britain Annual Report published</u> FAQ's – These are general FAQs on GSGB – Internal Use Only; not for publication Other External Communication
	GSGB Webinar banner Invitations and other Comms regarding the launch webinar Invitation to attend (expression of interest) Registration for Teams joining link (sent via MailChimp – 22.07.2024)

	Teams event registration page – description of event with speaker profiles
	Registration Confirmation (auto reply from Teams)
	Biog - 23.07.2024 to accompany Official Statistics release - <u>Biog - Gamping Survey for Great Britain - First Annual</u>
	Ebulletin : 20 July 2024 docy - sent to 11K recipients
	Parliamentary stakeholder letter: Attached Latter to Carolyn Harris MD
	Letter to Other Regulatory stakeholders _ CAR/ASA_Ofeem_ICO_ECA
	Letter to Other Regulatory stakeholders - CAP/ASA. Olcom, ICO, FCA
	Social media:
	Launch day post for Linkedin and X (Twitter):
	 Follow up posts starting the week after the event – will include supportive guotes/endorsements from
	and highlights of key data points with infographics created by R&S team
	Post event email with link to evaluation survey and the presentation
	Internal Communication
	Pre-event – House Blog to introduce the GSGB Team: Meet the team behind the Gambling Survey for Great Britain
	(GSGB)
	Letter from to all staff: GSGB email.docx - published morning of Official Statistics release
	House Blog post – On Viva Engage: Today is a big day! We mark a nuge milestone today in
	releasing the first annual publication of the Gambling Survey for Great Britain (GSGB), one of Posted in All GC
	colleagues on Jul 25, 2024
	CCCP Team video Connect Lite
	GSGB ream video – Connect Lite
Implementation n	nilestones
How we deliver the	View detailed Implementation Plan: Ref pdf attached
communications and tactics	
set out your timeline of	
activities.	
Scoring/Evaluation	on
Evaluate against SMART	
objectives.	

Inputs (The activity carried out)	Launch for the 1 st Annual Report for the Gambling Survey of Great Britain				
Communications objectives Pull from your SMART objectives above	Outputs (How many people had the opportunity to see or hear the activity and how frequently? channel metrics)	Out-takes (Impact on awareness, understanding and attitude)	Intermediate outcomes (Actions taken by target audience as a result of the activity)	Outcomes (The result of your activity on your target audience)	Organisational Impact (Quantifiable impact on organisation goals)
Webinar attendance – at least 100 stakeholders will attend the GSGB Annual Report Launch Webinar on 25 July 2024	Target audiences receive invitation to webinar via email – includes form to submit questions in advance # of attendees to webinar	Questions asked before or during webinar Responses to post- event survey	Adherence to guidance; Review the annual report and have some familiarity with the content; refer questions to GC;	Correct interpretation and use of statistics	Enhanced credibility as the authoritative source on gambling data
Visits to GSGB Hub to view the GSGB Guidance when distributed the week before the webinar - over 200 views Visits to GSGB Hub to view Annual Report following the webinar – over 400 views within the month after publication	# of unique visitors; Time spent on page;	Increased awareness and understanding of the correct use of the GSGB statistics	Adherence to guidance; Review the annual report and have some familiarity with the content; refer questions to GC;	Correct use and interpretation of the statistics	No or reduced instances of misinterpretation/ misuse of data
Media coverage for the consultation is earned in 6 news outlets (trade press & Nationals)	Number of articles/mentions; potential reach	Sentiment analysis: 60% neutral/positive	Review the annual report and have some familiarity with the content; Requests for interviews/comment	Balanced media coverage that does not focus on PG rate	Enhanced reputation; seen as that authority on participation and prevalence insights

Sentiment in news coverage: 60% have neutral/positive sentiment					
Open rate of 40% by EOD for the Deputy Chief Executive's GSGB email which will be distributed no later than 10:00am on Thursday 25 July At least 200 views of the GSGB blog on House within 1 month of publication X clicks on the link in the Commission Stories newsletter which will be distributed X date At least 200 views of the GSGB Viva Engage post within 1 week of the post publication date.	View counts and click through rates	Awareness and understanding of the GSGB, how this aligns to strategy and informs policy	Review the annual report and have some familiarity with the content; refer questions to R&S team; think about how the data informs our work Colleagues feel proud of the Commission's role in providing authoritative, trusted data	Participation at R&S Master Classes	Informed colleagues. Strengthened culture around data-driven decision making Staff members understand how their work contributes to "doing the right thing" for society

GSGB: Timeline of Milestones and Activities

Date	Milestone	Activity	Notes	Other Comms
November 2024	GSGB update shared with 90 industry CEOs at CEO Briefing	Presentation		
October 2024	Presentation at the European Conference on Gambling Studies and Policy Issues	Conference Presentation		<u>LinkedIn Post</u>
	Discussion with CEO's from top 10 gambling operators - GSGB on the agenda	CEO Roundtable		
	Collaboration meeting with Bingo Association	Meeting to develop new question for the survey		
Sept 2024	GSGB Y2 W1 Data Release	Report published to website		<u>Website</u> <u>Blog</u> <u>LinkedIn</u> or <u>see post</u> on timeline
	GSGB on Agenda at Chairs Roundtable meeting (Chairs from largest gambling operators)	Chairs Roundtable		
	GSGB on agenda at Bingo Roundtable meeting	Bingo Roundtable		
August 2024	Publish quote about GSGB Annual Report from Prof Sturgis	Social media		<u>LinkedIn</u> or <u>see post</u> on timeline
	Publish quote about GSGB from	Social media		<u>LinkedIn</u> or <u>see post</u> on timeline
July 2024	1 st Annual Report published	Report published to website Webinar	Webinar invitation Invitation Follow Up	<u>Blog</u> <u>LinkedIn</u> or <u>see post</u> on timeline

		Internal Comms - Recorded presentation, email to all staff Article in e- bulletin (11,000 recipients) Pre-release meeting and pre-release session with DCMS Letter to all	
		trade bodies Parliamentary stakeholder letter sent by	
	Guidance notes for Annual Report published	Document published to website	<u>Website</u> LinkedIn or <u>see post</u> on timeline
	Update about GSGB to casino operators	Casino Roundtable	
	Update about GSGB to amusement and land- based gaming operators	BACTA roundtable	
10 July	Year 1 Wave 2 data published	Report published to website	<u>Blog</u> LinkedIn or see post on timeline
June 2024	Stakeholder workshops – hosted by GSGB project team (R&S, NatCen and University of Glasgow)	Webinars for Industry, Policy & Academics, Lived Experience	

May 2024	Conference Presentation –	Conference		<u>LinkedIn</u> or <u>see post</u>
	Alberta Gambling	Presentation		on timeline
	Research Institute			
April 2024	Blog - Development of new			Blog
	harms questions as part of			l inkedIn or see post
	GSGB			on timeline
				<u>on amouno</u>
March	Spring Conference	Breakout	Update on GSGB and	<u>LinkedIn post –</u>
2024		session	initial findings on	conference recap
			participation from	
	Otolyala a lalay M(aylyala aya		Wave 1 data	
	Stakenolder Workshop -			
	LEAP			
February	Independent Assessment			Press Release
2024	of GSGB by Professor			
	Sturgis			Prof Sturgis' Review
				LinkedIn – see post
				on timeline
	Email update to			
	stakeholders to advise on			
	publication of Prof Sturgis			
	review of GSGB			
	CSCR Summary video	Video on		VouTube
		VouTube		Tourube
		TOUTUDE		
	Responses to letters from			
	trade bodies re GSGB –			
	Bingo Assoc; BACTA; GBG			
	Year 1 Wave 1 Data			<u>Blog</u>
	Release			
December	Stakeholder engagements		discussion following	
2023			publication of final	
2020			experimental stage	
			results and website	
			testing	
July 2023	Stakeholder Engagement			
	sessions – LEAP,			
	Policy/Academics/Industry			
	Diag Deat			
	Blog Post			
June 2023	Email update to			
	stakeholders			
March	Spring Conference	Breakout	All attendees at the	
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2023		session	conference (c.150)	
			attended GSGB	
			breakout session	
			including	
			representatives from	
			Industry Academics	
			Third Sector etc	
2 4 th	Entering the experimental	Undate on	Blog post published	Blog - Gambling
		u choite	on website	Commission
October		website	Email sent to all	Commission
2022	participation and		etakeholder groupe	
	prevalence project		stakenoluer groups	
1.8 th	Gambling Prevalence	l Indate on	Blog post published	Blog - Gambling
			on website	
October	Research: the view of Lived	website	Email cont to all	Commission
2022	Experience		etakoholdar groupo	
			stakenoluer groups	
July	Launch of experimental			
onwards –	statistics phase			
Tronsition				
Transition				
phase				
June 2022	Harms question reports /			
	Field work on the main			
	stage.			
		Wehinar	Engagement nanels	
			invited to a wohingr	
		nosted by	outlining the	
		NatCen	outcome of the pilot	
			report	
	Intornal	Connoct	Connact spesion to	
	internat	Connect	oll staff outlining the	
		Session		
		Briat DCMS	Rriof DCMS on the	and
			brief DCMS of the	
				briefed by
			project	and on
				03/05/22
		Storvin	The undate will be	
			included in the	
		regular	narliamentary	
		newsletters	noweletter Netional	
			Stratedy powelattor	
			and E bullation	
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May 2022	Stakeholder engagement		Academics, Industry	
-	workshops		and lived experience	
			- to share the findings	
			from the pilot survey.	
February	Draft report from the	Update on	Full report to be	Participation and
2022	stakeholder engagement	the website	published on the	Prevalence:
	phase to be published		website detailing the	<u>Stakeholder</u>
			outcome from the	engagement report -
			stakeholder	Gambling
			engagement phase.	Commission
		DCMS	DCMS briefed on	
			how the project is	
			progressing before	
			the release of the	
		D ¹ · · · · · ·	pilot in April.	
		Direct email	Email to members of	
			the engagement	
			pariets Email to go to all on	
			the consultation	
			list	
		Social media	Update pushed on	
			LinkedIn	
			NatCen and Uni of	
			Glasgow will also	
			promote on Twitter	
		E-Bulletin	Update published on	
			E-bulletin	
November	Stakeholder workshops	Workshops	Stakeholders who	
2021			expressed an interest	10/11/2021 -
			In being a part of the	11/11/2021
			slakenolder	11/11/2021
			will be invited to	
			workshons taking	
			place in November	<u>Stakeholder panels</u>
			2021	
			Workshops will be	
			1.5 hours long and be	Follow-up from
			groups from the	panels
			Industry, Policy &	
			Academic and LEAP.	
October	Research partner	Update on	An update will be	
2021	appointed and pilot	Citizen	published on Citizen	20/10/2021
	methodology starts	space	Space announcing	20/10/2021
	including stakeholder		the new research	
	engagement phase		partier	
				<u>Website update</u>

		Update on	Informative piece on	
		the website	the website will be	
			published	<u>LinkedIn post</u>
			Pieces will be shared	
			on LinkedIn only	
			Piece to be included	
			in the E-bulletin	
July 2021	Invitation to tender for pilot	Email to all	All stakeholders who	
	methodology issued via	consultation	responded to the	/ /
	Research Framework	respondents	consultation will be	09/09/2021
			emailed with an	Email
			update on how the	
			project has	
			progressed	
			Email will explain	
			further updates will	
			be published on	
			Citizen Space	
			Email will invite	
			stakeholder to be	
			involved in the	
			"stakeholder	
			engagement phase	
			"of the project	
		Update on	An update will be	27/07/2021
		Citizen	published on Citizen	
		Space	Space outlining the	
			next steps for the	Citizen Snace
			project and invite	<u>undete</u>
			stakeholders to be	<u>update</u>
			involved in the	
			"stakeholder	
			engagement phase"	
			of the project	

GSGB Annual Report Publication - Comms Implementation Timeline

Date:	w/o 25/06	July 1 - 12	w/o 15/07	w/o 22/07	Thu 25/07	w/o 29/07	August	September
Campaign Activity	Webinar Invitations distributed		18/07 - Guidance document published	24/07 R&S - GSGB pre- release briefings for Execs and	9:30 - GSGB Annual Report published		Share webinar recording with invitees – link to YouTube vid	
Digital			18/07 Guidance document published to GSGB Hub		Annual Report published to GSGB Hub Blog post			
Social Media			LinkedIn/X posts to point to Guidance doc on GSGB Hub		Post to announce publication and point to GSGB Annual Report published to GSGB hub/Blog	Series of posts highlighting key data points from GSGB each day	Link to webinar recording on YouTube	
External Comms	Photo – R&S/GSGB Team photo				Press release distributed and published on website	Video of webinar posted to YouTube		

Date:	w/o 25/06	July 1 - 12	w/o 15/07	w/o 22/07	Thu 25/07	w/o 29/07	August	September
Internal Comms		Blog: Setting the scene: Meet the team GSGB	Blog: Now you know the team> How did we get here?		 All Staff email from Viva Engage post House Blog R&S GSGB Team video 		R&S - GSGB Masterclasses	R&S - GSGB Masterclasses
Email	Invitations sent via email	Share draft GSGB Guidance notes with	Reminder to register for webinar with link to Guidance doc	22/07 - TEAMS Email link to join Webinar	Email webinar slides to participants with post event survey		Email webinar recording to all invitees?	
Other			Mon 15/07 – 4:00pm: Webinar Rehearsal Draft internal email to		Parliamentary Stakeholder letters go out			

Date:	w/o 25/06	July 1 - 12	w/o 15/07	w/o 22/07	Thu 25/07	w/o 29/07	August	September
					Email to attendees with post event survey and presentation			

Gambling Survey for Great Britain Annual Report 2023

This document provides an overview of the publication plan for the first GSGB annual report which will be published in July 2024.

The data being published is based on 10,000 responses collected from July 2023 to Feb 2024 and will contain information about the impact of gambling for the first time, including new official statistics on PGSI and new data on gambling related harms.

By the time the annual report is published we will have released 2 wave specific publications from the GSGB based on data collected between July-November (Wave 1) and November to February (Wave 2). These wave specific publications focus on gambling participation during the wave.

Timings for annual report publication

Pre-release: 24 July 2024 9.30am

Publication date: 25 July 2024 9.30am

Objectives for publication

- Build awareness of the GSGB as new source of official statistics
- The new methodology is understood and accepted
- Establish new trend data on gambling behaviours including our first set of data around gambling related harms
- · Board are confident, colleagues are confidently using the data
- We establish how people should and shouldn't use the data and we challenge where data is used incorrectly
- We are open and transparent with the data, publishing to the GSGB hub on our website and the UK Data Service
- We talk about the statistics in a non-stigmatising way, improving the language that we use to describe the statistics

What will be published on the 25 July?

Information will be published on the GSGB area of our website <u>Gambling Survey for Great</u> <u>Britain (GSGB) (gamblingcommission.gov.uk)</u>

Official statistics	Data tables Annual report Power Bi dashboard - for interactive analysis
Accompanying documents	Blog Guidance on how to use the statistics Technical report – GSGB Technical report - harms Misuse policy Updated information on PGSI and harms measurement on website

We will also investigate whether Rachel Volberg and Patrick Sturgis would be willing to provide supporting statements that could be published alongside the report. (They have verbally agreed to this)

Annual report content

The report is being written by NatCen and the University of Glasgow and will be reviewed and signed off by the R&S Team at the GC. Patrick Sturgis has also agreed to review the chapter on the impact of gambling.

1) Gambling participation

o Gambling participation in the past 4 weeks by sex and age

 \circ Gambling participation in the past 4 weeks excl. lottery draw only players by sex and age

• Online and in person gambling participation in past 4 weeks by sex and age

• Past 4 week participation by activity by sex and age (including breakdown by lottery draw type and betting activity)

• Number of gambling activities participated in, in the last 4 weeks by sex and age

- Gambling participation in the past 12 months by sex and age
- $_{\odot}$ $\,$ Types of leisure activities by gambling participation in the past 12 months
- Type of internet use by gambling participation in the past 12 months
- 0

2) Impact of gambling

This chapter will start by introducing the reasons why people gamble and how people feel about gambling amongst those respondents who have gambled in the last 12 months.

It will then introduce the findings from the PGSI. It will initially start by presenting these at a population level, and then explain why it is more sensible to look at these statistics amongst people who gamble. We will then go on to present the findings based on past 12 month gamblers this will include:

- Endorsement of each PGSI statement
- PGSI distribution of scores from 0 to 27
- PGSI categories
- PGSI by those who gambled in past 12 months by age and sex
- PGSI by those who gambled in past 12 months by activity

To ensure due caution with the new estimates, confidence intervals will be presented alongside reported PGSI scores.

Within the report when we are discussing the findings, we will refer to how the PGSI score differs from the average. For example, when referring to PGSI by activity we would describe the findings in the following way 'amongst those playing online slots, the number of people scoring 8 or more on the PGSI is x times higher than it is amongst people who have gambled in the last 12 months'.

3) Negative consequences due to gambling

The report will then introduce the new findings around experience of gambling related harms amongst people who have gambled in the last 12 months, which will include

 $\circ~$ Experience of severe harms (bankruptcy, crime, relationship breakdown, violence or abuse) by sex and age

- Overall % experiencing 1 or more severe harm
- % breakdown of each type of severe harm
- % reporting suicide ideation or attempts due to gambling
- Harms Experience of other harms (other negative impacts)
 - % breakdown by each type of harm
 - Average number of harms experienced.
- Problem gambling & harms

• Relationships between PGSI scores and harms experienced – this is important as we haven't been able to do this before.

We will then repeat the harms section for those people who are close to someone who gambles to understand the extent to which 'affected others' are experiencing harm.

Language

We are engaging with our stakeholder engagement groups to discuss the language we use in the report to ensure statistics are reported in a way which is non-stigmatising.

Engagement Plan

We have developed an engagement plan leading up to the publication (see Annex) to set out who and when we need to engage with different stakeholders.

Webinar

On the 25 July we will also host an external webinar (attendance list similar to spring conference, plus GSGB stakeholder engagement groups) which will provide an overview of the main findings released, provide an overview of the information available on our website and provide an opportunity for stakeholders to ask questions.

The webinar will be hosted by the GC with members of the NatCen and University of Glasgow project team also presenting.

Following publication

2 more in-depth topical reports will follow the main publication and will be published by the end of 2024 (to be written by NatCen)

Secondary analysis to inform evidence gaps and priorities. (R&S)

Sector specific profiles produced by R&S team. Discussions with Comms team to outline materials that will be produced.

Annex - Engagement Plan

GSGB engagement plan								
April 2024 to Sept 2024								
	April	May	June	July	August	Sept		
	11th Harms blog		17th - receive v1 annual report draft	2nd - receive v2 annual draft report		11th -EASG conference		
Milestones	12th - AGRI conference		27th - wave 2 release	12th - receive final data				
				25th - ANNUAL REPORT RELEASE				
	Presentation of PGSI data (from all gamblers)	Write misuse protocol	Internal comms - Connect Lite	Webinar	Guidance / decision on use of data in policy i.e. GAR implementation and evaluation LCCP	Comms to explain decision on use of data in policy		
How to interpret the statistics	Final analysis decisions (e.g. odds ratios, suicide, position on grossing up to population level etc)	Web content - user guide, animation, review and update existing PG / harm content	Pre-publication blog (around release of wave 2 and providing notification of what is to come)	Media briefing pack (published by end June)	Misuse monitoring			
	Start writing media briefing pack and local authority briefing pack	Develop dashboard and accompanying how to use guidance (mirror main user guide)	Comms m eet ing across NatCen, Glasgow and GC (w/c 20th May)	Local authority briefing pack	Internal masterclasses			
	Sign off from + possibly Exec), and then from DCMS	Go back to stakeholder groups (early lune - TBC)	Pre-meet/s (10th June) - DCMS - OHID	Pre-release meeting with DCMS	Debrief meet/s - DCMS - OHID	Webinar/s on how to use the data (engage other		
		(early June - 100)	- GambleAware (to follow after		- GambleAware	stakeholders to present)		
Introducing the harms data	Writing technical report on development of harms questions	Work with LEAP on impact section language and terminology - 9th May		Publish technical report on development of harms	Scoping secondary impacts and	alysis and deep dive content		
		Finalising technical report on de	evelopment of harms questions	t of harms questions questions				
			OSR review user guide?		Develop re contact protocol and	d guidelines		
Building confidence and transparency in the approach		Peer review of technical report	Meet with industry forum?	Scotland and Wales engagement (pre release)	Scotland and Wales engagement (post release)	Publish data on UKDS		
				Supporting lines from Rachel Volberg, Patrick Sturgis?		OSR audit?		
Work to be done								
Internal sign off								
Stakeholder engagement								
Comms (internal)								
Comms (external)								
External review								
Publication								

GAMBLING COMMISSION

25 July 2024



First Gambling Survey for Great Britain annual report published

The Gambling Commission has today launched the <u>first annual report of the first Gambling</u> <u>Survey for Great Britain</u>. This first edition, features responses from 9,804 people but will increase to around 20,000 by next year, meaning it is set to become the largest survey of its kind in the world.

The publication provides insight into attitudes and gambling behaviours – illuminating participation rates, the type of gambling activities participated in, experiences and reasons for gambling, and the consequences that gambling can have on individuals and others close to them.

As the statutory advisor on gambling, one of our aims as the regulator is to ensure we gather the best possible evidence on gambling – and today's publication is the next significant step forward in our journey on creating a robust source of evidence for gambling in Great Britain.

The new push-to-web methodology means estimates presented in this report are not directly comparable with results from prior gambling or health surveys and such comparisons should not be used to assess trends over time. However, data in this report represents the first year of a new baseline, against which future changes can be compared.

Professor Patrick Sturgis, Professor of Quantitative Social Science at the London School of Economics, who reviewed the new methodology earlier this year added: "The new design of the Gambling Survey for Great Britain will significantly enhance the evidence base on patterns and trends in gambling behaviour. With an annual sample size of 20,000 individual interviews across the nations and regions of Great Britain, the survey will provide researchers and policy makers with fine-grained and timely data across a broad range of key indicators. Using a push-to-web mixed mode design and random probability sampling from the Postcode Address File, the survey implements state-of-the-art methodology to a very high standard"





Victoria Square House Victoria Square Birmingham B2 4BP T+44 121 230 6666 www.gamblingcommission.gov.uk As part of a drive to ensure the new statistics are used correctly the Commission has <u>published</u> <u>a guide to how this data can be interpreted</u>. This page also sets out how the Commission will robustly tackle any misuse of official statistics.

It is essential the debate around gambling is informed by the appropriate and accurate use of statistics, including in Parliament. Should you have any doubts about how particular data should be used please do not hesitate to seek advice from us beforehand.

If you would like any further information on the Gambling Survey for Great Britain, or indeed any area of the Commission's work, please feel free get in contact.

Yours sincerely,



GAMBLING COMMISSION

e-bulletin

Monday 29 July 2024

Welcome to the Gambling Commission's fortnightly newsletter.

First Gambling Survey for Great Britain Annual Report published

The Commission has launched a new gambling survey which is set to become one of the largest in the world and establish a new baseline for understanding gambling behaviour in Britain.

The first annual report of the <u>Gambling Survey for Great Britain</u> (GSGB), produced by National Centre for Social Research and the University of Glasgow, features responses from 9,804 people but will increase to around 20,000 by next year.

Read more about the <u>GSGB annual report</u> and the Commission's <u>guidance on using</u> the <u>GSGB statistics</u>.

Light touch financial vulnerability checks – stage 1

From 30 August 2024 the Commission is implementing light touch financial vulnerability checks for those customers with a net deposit of more than £500 a month on gambling.

These checks will focus solely on publicly available data and, following feedback through consultation, will not require gambling businesses to consider an individual's personal details such as postcode or job title.

To ease the introduction of these checks, these will initially come into force at £500 a month from 30 August 2024, before reducing to £150 a month from 28 February 2025.

Read more about light touch financial vulnerability checks

Age Verification – tightening verification in premises

From 30 August 2024 the Commission will introduce new rules which mean all gambling land-based licensees, including smaller licensees, must carry out age verification test purchasing.

It will also change the good practice code to say that licensees should have procedures that require their staff to check the age of any customer who appears to be under 25 years of age, rather than under 21 years of age.

Read more about strengthening age verification in premises

GAMBLING COMMISSION

e-bulletin

Key issues and our expectations concerning account withdrawals

Commission Chief Executive, Andrew Rhodes, discusses key issues and our expectations on the topic of withdrawal of funds.

Read the full account withdrawal blog post

Making improvements to regulatory returns

, talks through changes to regulatory returns submissions required by licensees.

Read the full <u>regulatory returns blog post</u>

Money laundering and terrorist financing risk assessment survey

Operators are invited to have their say on the Commission's <u>Money laundering and</u> terrorist financing risk assessment.

Responses to the <u>short survey</u> will help ensure that the document continues to be an effective resource for operators carrying out their own money laundering and terrorist financing risk assessments.

The survey closes on 2 August 2024.

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From:	
То:	
Cc:	
Subject:	Tomorrow"s meeting
Date:	02 December 2024 15:58:02
Attachments:	20241203 GC OSR Meeting GSGB Casework.docx

CAUTION: This email is from an external source - be careful of attachments and links



I hope you're both well. As you are aware, during tomorrow's meeting we will be discussing the recent GSGB casework we have received. The issues raised have been situated by the complainant within the 'Code of Practice for Statistics'. Due to the range of issues raised and to help you prepare for our discussion tomorrow, I've attached a document, which outlines these concerns.

We have also added an extra column to further contextualise each section of the code in question, which should help our discussion.

We look forward to speaking with you tomorrow.

Statistics Authority

| Office for Statistics Regulation | UK

@ext.statistics.gov.uk Website: Office for Statistics Regulation Twitter: @StatsRegulation

OSR is consulting on a new edition of the Code of Practice for Statistics. We would encourage you to <u>share your views</u> on our proposals

Please note, sometimes I use AI to help with my work - I may have used AI to help draft this email or the attachments.

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GSGB Casework: Complainant Analysis

The Gambling Survey for Great Britain and its compliance with the UK Statistics Authority's Code of Practice for Statistics – possible breaches.

The table below sets out a number of areas where we believe that the Gambling Commission may have breached the UK Statistics Authority's Code of Practice on Statistics in relation to the production and publication of the Gambling Survey for Great Britain. This analysis is based upon publicly available information. There may be legitimate reasons why the examples we highlight do not constitute breach of the Code provisions. The purpose of this analysis is to draw out explanatory information so that stakeholders may better understand the actions of the Commission, including the question of whether the Code has been breached at all.

Complainant Code Provision	Code practice context (OSR addition)	Complainant Assessment
T4.6 Statistics producers should be open about identified areas for improvement.	Trustworthiness: Transparent Processes and Management Organisations should have effective business processes and appropriate resources to support their statistical functions and be open about their plans, priorities and progress. Independent measures, such as internal and external audit, peer review and National Statistics Quality Reviews, should be used to evaluate the effectiveness of statistical processes. Statistics producers should be open about identified areas for improvement.	In January 2024, the Gambling Commission received analysis from Professor Sturgis as part of his independent review, which was critical of evidence subsequently relied upon by the Commission in the Technical Report for the GSGB. Professor Sturgis's analysis cast doubt on claims made by Ashford et al. (in their 2022 report on the GSGB Pilot Survey) that socially desirable response bias resulted in under-reporting of 'problem gambling' in the Health Survey for England. The Gambling Commission failed to mention this analysis (even though it was provided within the independent review) in its Technical Report or to disclose (although it was eventually made public under FOIA).
Q3.1 Statistics should be produced to a level of quality that meets users' needs. The strengths and limitations of the statistics and data should be	Quality: Assured quality Producers of statistics and data should explain clearly how they assure themselves that statistics and data are accurate, reliable, coherent and timely.	The Gambling Commission has not consistently explained the weaknesses of the GSGB statistics. For example, when it published the Sturgis Review, the Commission failed to mention in its announcement Professor Sturgis's opinion that

considered in relation to different uses, and clearly explained alongside the statistics.	Statistics should be produced to a level of quality that meets users' needs. The strengths and limitations of the statistics and data should be considered in relation to different uses and clearly explained alongside the statistics.	the GSGB may "substantially overstate the true level of gambling and gambling harm in the population". It has also withheld a critique of Ashford et al. (2022) by Professor Sturgis (see above); and failed to address other issues in Ashford et al. (notably the failure to consider the impact of Covid lockdown measures on the comparability of gambling behaviours in 2021 compared with 2018 – even after this issue was brought to the Commission's attention in August 2022). Sources: Regulus Partners (2022) Understanding the differences between prevalence survey estimates – insights
		Sturgis Assessment of the GSGB
Q3.2 Quality assurance arrangements should be proportionate to the nature of the quality issues and the importance of the statistics in serving the public good. Statistics producers should be transparent about the quality assurance approach taken throughout the preparation of the statistics. The risk and impact of quality issues on statistics and data should be minimised to an acceptable level for the intended uses.	Quality: Assured quality Producers of statistics and data should explain clearly how they assure themselves that statistics and data are accurate, reliable, coherent and timely. Quality assurance arrangements should be proportionate to the nature of the quality issues and the importance of the statistics in serving the public good. Statistics producers should be transparent about the quality assurance approach taken throughout the preparation of the statistics. The risk and impact of quality issues on statistics and data should be minimised to an acceptable level for the intended uses.	The Gambling Commission elected to publish the GSGB 2023 Annual Report in the face of significant concerns about its reliability. At present, the GSGB cannot be used for estimating population prevalence of harmful gambling due to these issues. This does not appear to represent "an acceptable standard" of minimisation of quality issues, given the significance of the matters involved (including violence and abuse; and suicidality) and the use to which these statistics are put in terms of both policymaking and activism.
Q3.3 The quality of the statistics and data, including their accuracy and reliability, coherence and comparability, and timeliness and punctuality, should be monitored and reported regularly. Statistics should be validated through	Quality: Assured quality Producers of statistics and data should explain clearly how they assure themselves that statistics and data are accurate, reliable, coherent and timely. The quality of the statistics and data, including their accuracy and reliability, coherence and comparability,	The Gambling Commission does not appear to have validated the GSGB by reference to other relevant statistics; but has instead sought to marginalise other relevant statistics. This has involved attempts to undermine confidence in the Health Survey for England by disputing its reliability (having previously described it as the 'gold standard').

comparison with other relevant statistics and data sources. The extent and nature of any uncertainty in the estimates should be clearly explained.	and timeliness and punctuality, should be monitored and reported regularly. Statistics should be validated through comparison with other relevant statistics and data sources. The extent and nature of any uncertainty in the estimates should be clearly explained.	
V1.1 Statistics producers should maintain and refresh their understanding of the use and potential use of the statistics and data. They should consider the ways in which the statistics might be used and the nature of the decisions that are or could be informed by them.	Value: Relevance to users Users of statistics and data should be at the centre of statistical production; their needs should be understood, their views sought and acted on, and their use of statistics supported. Statistics producers should maintain and refresh their understanding of the use and potential use of the statistics and data. They should consider the ways in which the statistics might be used and the nature of the decisions that are or could be informed by them.	The Gambling Commission appears to have given little thought to the impact on licensees and consumers that publication of unreliable statistics on harmful gambling might have. We are not aware of any publicly available document that considers these impacts.
V1.3 User satisfaction with the relevance and usefulness of the statistics and data should be reviewed routinely. This should consider the timeliness, accessibility, clarity and accuracy of the statistics and data. V1.5 The views received from users, potential users and other stakeholders should be addressed, where practicable. Statistics producers should consider whether to produce new statistics to meet identified information gaps. Feedback should be provided to them about how their needs can and cannot be met, being	 Value: Relevance to users Users of statistics and data should be at the centre of statistical production; their needs should be understood, their views sought and acted on, and their use of statistics supported. User satisfaction with the relevance and usefulness of the statistics and data should be reviewed routinely. This should consider the timeliness, accessibility, clarity and accuracy of the statistics and data. The views received from users, potential users and other stakeholders should be addressed, where practicable. Statistics producers should consider whether to produce new statistics to meet identified information gaps. Feedback should be provided to them about how their needs can and cannot be met, being transparent about reasons for the decisions made and any constraints. 	The Gambling Commission has ignored concerns raised by users of official statistics about the reliability of the GSGB. In October 2023, the CEO of the Gambling Commission dismissed concerns by describing them as the views of "those who have staked so much on a previous number who simply don't want to see that number change"; and in 2024 criticised the continued use of "previous official statistics" (despite using "previous official statistics" within the very same speech). It should be recalled that concerns about the reliability of the GSGB (which underpin criticism of the survey) have also been expressed by Professor Sturgis in his independent review (as well as in earlier studies, such as Sturgis& Kuha, 2022). This suggests that they have some validity and that those who have criticised the GSGB or indicated greater confidence in NHS Health Surveys are expressing valid concerns; and that attempts to marginalise those concerns are inconsistent with the Code. <u>IAGR 2024 Conference keynote – Andrew Rhodes speech</u>

transparent about reasons for the decisions made and any constraints.		The Commission has failed to acknowledge evidence of methodological problems and errors within the GSGB development work (particularly in relation to the Pilot Study report by Ashford et al. in 2022). See above.
V3.3 Comparisons that support the appropriate interpretation of the statistics, including within the UK and internationally, should be provided where useful. Users should be signposted to other related statistics and data sources and the extent of consistency and comparability with these sources should be explained to users.	Value: Clarity and insight Statistics and data should be presented clearly, explained meaningfully and provide authoritative insights that serve the public good. Comparisons that support the appropriate interpretation of the statistics, including within the UK and internationally, should be provided where useful. Users should be signposted to other related statistics and data sources and the extent of consistency and comparability with these sources should be explained to users.	The GSGB report contains links to the Health Survey for England and the Scottish Health Survey - but it does not refer directly to the relevant statistics (which, as a consequence are not easy for the user to find). It does note that these statistics are not consistent with the GSGB. The Gambling Commission has publicly criticised the use of other relevant statistics (see IAGR speeches above) – despite the fact that these remain the only permissible source of estimates on the population prevalence of 'problem gambling' (Commission guidance states that the GSGB cannot be grossed up to provide population-level figures). Criticising the use of NHS statistics appears incompatible with this provision of the Code.
V3.5 Statistics producers should collaborate with experts and producers of related statistics and data to provide a comprehensive and coherent narrative for the statistical topic.	 Value: Clarity and insight Statistics and data should be presented clearly, explained meaningfully and provide authoritative insights that serve the public good. Statistics producers should collaborate with experts and producers of related statistics and data to provide a comprehensive and coherent narrative for the statistical topic. 	It is not evident that the Gambling Commission has collaborated with NHS Digital to provide a comprehensive and coherent narrative for gambling and harmful gambling. The Commission has instead sought to undermine confidence in NHS statistics on gambling, harmful gambling and mental health by suggesting that both the Health Survey for England and the Adult Psychiatric Morbidity Survey are unreliable.



Hi

Following on from our meeting yesterday, I have attached a copy of the report that we received from at Regulus about the GSGB and our response to the report. We were responding to this report when we received the follow up email about the Code of Practice that you have also received.

Thanks



Gambling Commission response to Regulus Report 'Exercising Due Caution?'

In September 2024, the Gambling Commission received a report from Regulus Partners titled 'Exercising Due Caution? Analysis of problems with the Gambling Survey for Great Britain and the Gambling Commission's approach to compiling official statistics'.

This document sets out the Gambling Commission's response to four main themes within that report.

Methodology/Survey design

The Regulus report refers to three key differences between the GSGB and the Health Surveys which may introduce potential sources of bias. These are selection bias due to nonresponse, selection bias due to an online collection methodology, and selection bias due to labelling (topic salience).

These potential biases are all been listed in the <u>strengths and limitations</u> of the GSGB methodology which sit alongside the survey findings. These were also well documented within Professor Sturgis's <u>independent assessment of the GSGB</u>, in which he concluded that the move to the push-to-web methodology was the right decision for the Commission to take despite the potential limitations above.

Following on from the recommendations Professor Sturgis made in his report, the Commission is now in the process of commissioning additional research to undertake the experiments required in recommendations 1-3. These experiments are designed to help understand the impact of the potential sources of bias in more detail, particularly as a result of the online methodology and topic salience, and will contribute towards our continued refinement of the GSGB methodology.

With regards to potential bias as a result of the online methodology, it is worth reiterating that the push-to-web approach utilised by the GSGB uses the same sample design as NHS England's Health Survey for England (HSE). This is very different to an online panel where respondents opt to join a panel of respondents. It is for this reason we did not use our previous online tracker survey to collect official statistics; not because of the online nature of the survey but because of the potential bias amongst the people who opt to join a panel. The Commission has ensured a robust and random probability sampling frame for the GSGB, which was deemed important by our stakeholders. In addition, a postal survey option is available for those who do not wish to complete the survey online. 36% of respondents completed the survey on paper in Year 1. The sample design and alternative response options help to mitigate the risk of the online element of the methodological approach.

Whilst topic salience will be investigated as part of further ongoing work, there are a number of considerations to make here.

- It would be unethical to brand the GSGB as anything other than a gambling survey. Ethical approval would not be granted if the survey was referred to as a lifestyles or health related survey.
- Regulus partners have failed to consider the benefit of having a gambling focused survey which provides the opportunity to ask far more questions about gambling behaviours in one place, rather than being restricted to a few questions on an existing survey like the Health Survey for England.
- Following the pilot of the GSGB, wording was strengthened in the GSGB invitation letter to encourage response from non-gamblers, this resulted in an increase in the

percentage of non-gamblers responding to the survey from 37% in the pilot to 39% in Year 1.

Whilst Regulus Partners have raised the risk of non-response bias in their report, Professor Sturgis's report concludes that it was the right decision to switch to a push to web methodology due to the changing nature of social research and declining response rates amongst other more traditional survey methodologies. For example, the Health Survey for England saw response rates fall to 32% in the 2022 survey. NHS Digital have also consulted on changing the methodology for the HSE given the challenges faced with continuing with a face-to-face research.

With regards to the survey design, the report also raises a number of other points that we would like to respond to.

- **Response priming**. The Regulus report incorrectly states that respondents are required to answer a very large number of questions about gambling prior to being asked whether adverse life experiences were caused by gambling but this is not true. Following best practice, both the PGSI and follow up questions about the wider consequences of gambling are asked towards the beginning of the survey. The PGSI question actually follows a question about the reasons why people take part in gambling, which includes a balance of both positive and negative reasons for participating. The GSGB has been designed by experts in the field of questionnaire design and therefore we are confident that the design of the survey does not lead to response priming.
- Positioning of questions on suicide. The report implies that the questionnaire order, with questions on suicide following questions on work stress and drug and alcohol use, may have primed participants to response to suicidal ideation questions in a particular way. Due to the sensitive nature of these questions we carefully considered their placement, and followed best practice from other surveys including the Adult Psychiatric Morbidity Survey (APMS), where they are in a similar position towards the end of the questionnaire. It is common practice to build up trust during an interview and ask more sensitive questions towards the end when that trust is more likely to have been established. Using tried and tested questions from APMS allows us to benchmark to this data source, which to date has provided most of the empirical evidence on the association between gambling and suicidality. It allows us to be completely transparent about the differences between our sample and data collected from APMS, which we did in the annual report. This also allows us to continue to look at the extent to which certain groups who gamble are at risk for allcause suicidality - this is especially important information, especially for operators implementing customer interactions, as it is essential that they know about these risks so that this can be built into safeguarding plans. In addition, by asking about suicide ideation and attempts separately we can distinguish between the two, which is a standard way of exploring risk among scholars.
- Question wording. The Regulus report notes that the use of two-part questions, (where part a) asks whether the participant has experienced a harm and part b) asks if this was related to gambling) may result in participants responses to referring to only one part of the question. We do not believe this to be true. The questions in the GSGB were carefully developed with the involvement of both methodological and subject matter experts, and were thoroughly tested. By asking these questions in two parts we are able to ascertain whether a particular harm is experienced in relation to gambling, for example our figures on suicide ideation show that a small proportion of

those who experienced suicide ideation *in general* would attribute this to their gambling.

Comparison with relevant data sources

During the webinar for the launch of the first GSGB annual report (in July 2024), Commission representatives asked attendees to engage with us on their perspectives of GSGB – where they have their own data that is consistent and where it isn't, so we can explore these differences. Therefore, it is helpful to see some industry data shared within the Regulus report.

What is unclear from the data contained within the Regulus report is whether the data being compared is like for like. We note that no information is included within the report about how representative the data is of the market from a consumer perspective, and what the strengths and limitations are of the approach used with regards to modelling. However, it is also important to note that the purpose of collecting consumer data from surveys like the GSGB, is not to try and use it to size the GGY of a market as we have other data for that.

Within the Regulus report there is also reference to data collected via the APMS 2014. Whilst the report refers to rates of suicide ideation in the GSGB being twice the rates reported by the APMS, it fails to take into consideration the authors stated limitations of the APMS that it may under report due to the face-to-face methodology used. All surveys have limitations, and it is important they are all considered when making these sorts of comparisons.

In addition, the Regulus report suggests potential poorer-than-average wellbeing among GSGB participants, citing HSE 2021 findings. The HSE 2021 SWEMWBS (Short Warwick Edinburgh Mental Well Being Scale) findings used a raw score to calculate means, whereas GSGB 2023 used metric scores (which have been converted to allow for comparability with the longer form of the WEMWBS).

	SWEMWBS Mean score	SWEMWBS Mean score
HSE	(raw)	(metric/converted)
2016	25.1	22.8
2019	26.0	23.7
		Unavailable as dataset not yet
2021	26.0	released

The table below brings together both the raw and metric scores from the most recent years in which the well being scores were asked on the HSE.

When comparing like-for-like mean SWEMWBS, calculated using the raw score, the GSGB data points are only marginally different (up to one percentage point) to HSE 2021. This, alongside the points made above about face-to-face methodology, show there is no evidence to suggest that GSGB participants have poorer mental health and wellbeing than participants in other surveys.

	SWEMWBS Mean score	SWEMWBS Mean score
GSGB Stage	(raw)	(metric/converted)
Pilot	25.12	22.84
Step 3	25.08	22.91
Year 1 Wave 1	24.97	22.83
Year 1 Wave 2	25.07	22.93
Year 1	25.02	22.88
Year 2 Wave 1	24.87	22.72

Publication approach

In order to develop the GSGB, the Commission has worked alongside experts in the field, consulted with stakeholders and engaged with the Office for Statistics Regulation (OSR) for advice at a number of stages during development. As such we are confident that we have followed the right approach and adhered to the Code of Practice for Statistics. We welcome the OSR reviewing the GSGB in the future against the Code of Practice and we look forward to their findings.

When the GSGB made the move from 'Official statistics in development' to 'Official statistics', the decision was not taken lightly. Only when the statistics were of sufficient quality and value did we publish them as official statistics. This decision was taken following consultation with the OSR and incorporated user feedback. Further details relating to this decision are available at <u>GSGB – Removing the 'official statistics in development' label</u> (gamblingcommission.gov.uk).

However, removing the 'in development' label does not prevent us from continuing to refine and improve the methodology, building on best practice and the recommendations outlined in Professor Sturgis's report. <u>Assessment of the Gambling Survey for Great Britain (GSGB) - LSE Research Online</u>

Given the official statistics from the GSGB were new we published guidance alongside the publication of the GSGB annual report about how the statistics should be used. This was not because of a lack of confidence in the statistics, but rather to support users in how to use the statistics given they were different to statistics we have published previously.

The Regulus report references Q3.3 from the Code of Practice which states that "The quality of the statistics and data, including their accuracy and reliability, coherence and comparability, and timeliness and punctuality, should be monitored and reported regularly. Statistics should be validated through comparison with other relevant statistics and data sources. The extent and nature of any uncertainty in the estimates should be clearly explained". We believe we have clearly met this requirement through the following:

• Published information on the accuracy and reliability of the GSGB data in our strengths and limitations, flagging the risk that estimates may be overstated.

- Taken a cautionary approach and published guidance telling users not to gross population percentages to the number of people this equates to. We will review this guidance once further work has been completed.
- In terms of comparability, we have been very clear that estimates from the GSGB are not comparable to previous estimates due to the change in methodology.
- Improved the timeliness of the statistics, with results released within 6 months of data collection and on a quarterly basis.
- <u>Asked Industry to share data with us</u> so we can start to validate the findings against other data sources.
- Commissioned an independent assessment of the GSGB to help explain the extent and nature of uncertainty in the GSGB estimates.

Being open and transparent

Throughout the development of the GSGB we have been open and transparent about the work we have undertaken, the challenges faced and the strengths and limitations of the approach we have designed. The Regulus report appears to try and imply that there are some areas we have not been open about which is not the case:

- Proposal 2 within our 2020 consultation, to change the way we collect adult gambling participation and the prevalence of problem gambling statistics, proposed to reduce the number of surveys the Commission uses to produce official statistics to provide a single set of trusted metrics, because of the issue of different surveys not being comparable due to mode effects. This was an original objective of the GSGB, not disclosed through an FOI.
- The GSGB was designed from the outset with the intention of being able to track trends in behaviour over time, and given the large sample size to provide granular analysis for sub population groups. The GSGB can also be used to estimate the percentage of people in the population who gamble and who experience difficulties with their gambling. For the time being, while we carry out further work, we have issued guidance to ask people not to convert these population percentages into the number of people in the population, given the risk that our estimates may be overestimated. This information is set out in our guidance, it has not been revealed through an FOI.
- We have documented 'topic salience' as one of the limitations of our approach. We have committed to investigating the impact of topic salience as we commission <u>further work</u> following Professor Sturgis's independent review of the GSGB.
- Professor Sturgis did provide us with some additional analysis via email about the effect of having another person in the household during an interview for the HSE. This analysis has not been published by Professor Sturgis and he decided not to include it in his final report for the Commission.
- We have acknowledged that the results may over-estimate the consequences of gambling. This is documented in <u>the technical report</u> which accompanies the survey findings, within the <u>annual report</u> itself and was reiterated throughout the webinar. This has not been revealed though an FOI or through undisclosed information.
- Professor Sturgis's independent assessment of the GSGB said "However, neither study was able to come to a definitive conclusion about the relative magnitudes of these errors nor, as a consequence, which estimates are closer to the truth". This is not hidden information as described in the Regulus report.

- Guidance has not been published because of a lack of trust in the data from the GSGB. It has been published to help anyone who wishes to use data from the survey to report it correctly. As we state in the guidance "We have published this guidance because the official statistics from the GSGB are new and they are collected using a different methodology than previous official statistics. The guidance takes on board the recommendations from <u>Professor Sturgis's independent review of the GSGB</u> (opens in new tab) and his analysis of the impact of the change in methodology"
- We do not commission the Health Survey for England so it is not our decision whether gambling questions are included or not. It is not up to the Commission to disclose whether gambling questions are being included on future surveys or not.
- We have not said the GSGB is less reliable than the Health Survey for England, we have clearly stated that all surveys have strengths and limitations and due to the difference in methodology results from previous surveys are not directly comparable.

Gambling Commission. November 2024

RECULUS PARTNERS

Exercising Due Caution?

Analysis of problems with the Gambling Survey for Great Britain and the Gambling Commission's approach to compiling official statistics

Δ

Dan Waugh, Regulus Partners

&

Bill Robinson, Warwick Consultants

2.0







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Appendices

Appendix 1 – Analysis of the GSGB Technical Report

Appendix 2 - Health check: Analysing changes to the way that gambling participation and problem gambling prevalence are measured in Great Britain (2023)

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Foreword

As an economist with more than 50 years' experience working in both the public and private sectors, I am a long-standing user of official statistics. I understand that the apparent precision of published statistics often hides a degree of uncertainty; and I am used to the fact, that in economics especially, the statistics are constantly being revised.

From this perspective, I was not entirely surprised to learn that a new estimate of the number of problem gamblers, produced by a new methodology, was higher than any previous official estimate. But I was truly shocked to discover the scale of the difference. When I then examined the extent of the methodological flaws involved in the production of the new statistics and the inconsistency of the results with hard data on actual participation (as distinct from self-report survey data), I started to ask myself, as a former member of the RPI Advisory Committee, what the authorities should do about the problems uncovered.

The new survey clearly has many merits. It provides a degree of detail about gambling which will manifestly always be absent in any Health Survey. It will be carried out frequently and regularly, providing the authorities with a useful new time-series documenting changes in gambling behaviour over time. But do these merits justify in persisting with publication in the face of flaws in the survey which are known and admitted? Especially when the flaws have massively increased the prevalence estimate of 'problem gambling' – a statistic relied upon heavily by the Gambling Commission and the Government in setting regulatory policy.

I am reminded of the long-running issue of whether prices are best measured by the old Retail Price Index or the newer Consumer Price Index. Government statisticians started from the belief that the RPI, one of the earliest price indices on record, must be superior to the CPI, an upstart, imported somewhat unwillingly from Europe. Yet over time, as the statistical evidence mounted that the RPI persistently delivered higher estimates of prices than the CPI, it became imperative to investigate the reasons for the discrepancy. And the investigation revealed that the CPI used a methodology that was demonstrably superior. The technical experts concluded that the CPI was a better measure of inflation.

What happened next? The ONS continued to publish the RPI but removed its National Statistic status. They made it harder to find on their website and it was published with increasingly strident warnings that it was not a good measure of inflation. But, importantly, they continue to calculate and publish it. The RPI and CPI coexist to this day although every serious user knows that the CPI is the better measure of inflation.

When it comes to 'problem gambling', a key point is that 'problem gambling' denotes an extreme level of engagement in gambling (in terms of behaviours and consequences) and is a health problem. It is therefore of concern to the health authorities as well as the gambling authorities. So the most important outcome, given the flaws in the GSGB, is that it does NOT become the sole source of statistical information on problem gambling. I understand that the NHS Adult Psychiatric Morbidity Survey 2022 (scheduled for publication next summer) includes statistics on gambling and 'problem gambling' and that the same is true of the forthcoming NHS Health Survey for England 2025. It is important that the results of these surveys are given at least equal prominence in policy determinations as those provided by the GSGB – particularly given the fact that they enjoy the higher

status of Accredited Official Statistics. It is also critical (and consistent with formal advice from Professor Sturgis of the London School of Economics) that future editions of the Health Surveys include gambling questions on a periodic basis.

Secondly, it is essential that any differences between the GSGB and the Health Survey estimates of problem gambling are investigated with the same thoroughness that was brought to bear on the those between the CPI and the RPI. In this regard there are two obvious practical steps that should be taken without delay:

- 1. Given the potentially huge impact of survey labelling (or topic salience), the statistical authorities should send the same questionnaire out, randomly allocated to two groups, under two different headings as a Gambling Survey and as a Recreation Survey; and;
- 2. Given the possibility that the order in which survey questions are asked can make a difference to the answers, a similar approach should be adopted to question ordering, with identical questionnaires sent to two randomly chosen groups of respondents, differing only in whether questions about gambling harm come before or after the more general questions about frequency of gambling.

The Gambling Survey for Great Britain is a welcome new contribution to our understanding of gambling prevalence; but it is flawed, as the Commission has acknowledged. It must not therefore become the sole source of information on harmful gambling and those flaws must be addressed and rectified as soon as possible.

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September 2024

Executive summary

Background

The Gambling Commission has published a new gambling survey, the Gambling Survey for Great Britain (the 'GSGB'), which uses a new approach to data collection to estimate both the extent to which the adult population participates in gambling and the prevalence of harms caused by gambling.

The GSGB 2023 has estimated a 2.5% population prevalence rate of PGSI 'problem gambling'. This is substantially higher than all previous estimates from official statistics collected between 2007 and 2022. In particular, it is markedly different from rates reported by the NHS Health Surveys – the principal source of official statistics on 'problem gambling' between 2012 and 2021 - which have fallen within a range of 0.3% to 0.6%.

The new estimate, which classifies 'problem gambling' according to precisely the same criteria used in previous official surveys, is thus very much larger than any previous estimate and lies way outside the usual 95% error margins.

There is therefore a strong *a priori* probability that the new methodology is flawed.

Potential sources of bias

The balance of evidence indicates, in our view, that selection bias is the principal reason why the GSGB reports much higher levels of 'problem gambling' compared with the Health Surveys. This is likely to arise from three key differences between the GSGB and the Health Surveys:

- 1. Selection bias due to non-response. The GSGB 2023 achieved a response rate of 19% (i.e. 19% of households contacted completed the survey). This is markedly lower than the 54% achieved in the HSE 2018 and all preceding editions of the Health Surveys. In other words, a majority of those contacted to take part in Health Surveys agreed to do so; but fewer than one-in-five of those contacted to take part in the GSGB did. The GSGB sample is therefore less likely to be nationally representative than the HSE sample.
- 2. Selection bias due to data collection methodology. The use of an online survey is likely to result in over-recruitment of people who are more highly engaged online. Such people are more likely to gamble, and gamble frequently, than the national average. They may also have poorer than average mental health.
- **3.** Selection bias due to labelling (topic salience). The fact that the GSGB is advertised as a gambling survey means that it is more likely to attract people who gamble (and who do so with some degree of regularity) than people who do not. This is because, as Professor Patrick Sturgis of the London School of Economics has observed *"people are more likely to take part in a survey if the topic is personally salient to them"*. In one study in Canada, two identical surveys, half labelled 'gambling', half labelled 'health and recreation', were randomly assigned between two groups of respondents. The prevalence of 'problem gambling' in the survey labelled 'gambling' was 4.0% compared with 0.8% in the other, otherwise identical, survey. Labelling appeared to increase the measured prevalence of 'problem gambling' by a factor of five.

The Gambling Commission has accepted that these factors may result in over-statement of harmful gambling in the GSGB. At the same time, however, it has asserted that the Health Surveys may under-

report 'problem gambling' due to the effects of **socially desirable response bias** – with people interviewed in-person less likely to provide candid responses than people interviewed remotely. We agree that socially desirable response bias may affect survey responses for some people (one of a number of factors that might affect accuracy of responses); but the Commission has presented no credible evidence that this has materially affected prevalence rates in the past. In a separate review of differences in prevalence rates, Sturgis & Kuha (2022) stated.

"socially desirable responding in the health surveys is unlikely to be a significant contributory factor to the lower estimates of gambling."

In addition to these sources of selection bias, we are also concerned about the possibility that answers to questions about harmful consequences from gambling (including violence and abuse, mental health problems and suicidality) may be affected by **response priming.** Respondents to the GSGB were asked a very large number of questions about gambling (by themselves and others) before being asked whether gambling had been the cause of a wide range of negative life events (with no other possible causes explored). It seems likely that this may increase the extent to which harms suffered by respondents are attributed to gambling.

Empirical evidence of bias: comparison with industry data

Powerful evidence of the existence of selection bias is found when GSGB prevalence figures are compared with data on actual participation, provided by licensed operators. In this report, we provide direct comparisons between GSGB self-report estimates and hard data from three segments of the gambling market: bingo, in-person casino visits and the football pools. Data on customer numbers for four-week periods surveyed in Wave 1 of the GSGB have been obtained from the suppliers of these services, grossed up where necessary, to represent the entire industry, and compared directly with GSGB data for these three industries. The table below shows the results:

Table 1: Comparisons of participation estimates based on industry data and GSGB survey					
Market sector	Participation estimates	Difference			
	Industry data	GSGB Wave 1			
Bingo (non-remote)	567,073	1,678,049	+196%		
Casino games (played in casinos)	209,057	636,399	+204%		
Football pools	108,669	846,835	+679%		

The GSGB participation estimates for bingo and casino games are around three times as high as the actual numbers revealed by industry data. For football pools they are nearly eight times as high.

Advice to the Gambling Commission about possible bias.

Concerns about the reliability of GSGB results have been imparted to the Gambling Commission by its own expert advisers:

1. Professor Patrick Sturgis of the London School of Economics (in a review funded by the Gambling Commission), emphasised the *"non-negligible risk that [the GSGB results]* **substantially over-state** the true level of gambling and gambling harm in the population" (bold added).

2. Professor Heather Wardle of the University of Glasgow, a key adviser to the Gambling Commission on the development of the GSGB, commented in an email to the Gambling Commission in July 2023 that the principal source of bias affecting comparisons between the GSGB and the HSE was likely to be topic salience (i.e. the fact that highly engaged gamblers are likely to be over-represented in surveys about gambling).

In addition, an early version of the evidence from industry data presented in this report was shared with the Gambling Commission in August 2022. This also revealed clear evidence of selection bias in the GSGB Pilot Survey.

Response of the Gambling Commission

The Gambling Commission's initial public consultation made it clear that the development of the GSGB would be conditional on the mitigation of sources of selection bias. This has not been achieved. The response of the Gambling Commission has been to go ahead with publication of the GSGB with some remarkable caveats. The Commission has:

- 1. explicitly stated "we don't actually know which survey [the GSGB or Health Survey for England) is producing the most robust estimates" and "we think GSGB might be on the high side".
- 2. admitted that results from the GSGB should be used for relative analysis rather than to estimate population prevalence: *"really the focus should be less on the number itself but more on the patterns within the data and the trends going forward".*
- 3. issued the following guidance concerning how the GSGB results may and may not be used:

"The GSGB should not be used:

- to provide direct comparisons with results from prior gambling or health surveys
- as a measure of addiction to gambling
- to calculate an overall rate of gambling-related harm in Great Britain
- to gross up the prevalence of problem gambling or the consequences of gambling to whole population (until further work is completed)."

In the light of the above it is concerning that the Gambling Commission has proposed to discontinue the inclusion of gambling questions in Health Surveys, with the new Gambling Survey for Great Britain (GSGB) becoming the sole source of information on gambling behaviours and harms.

While our report focuses on problems with the GSGB, we recognise that it does have the potential to make a valuable contribution to research. It is also clear however, that it cannot at present be relied upon for estimating population prevalence of gambling or harmful gambling. Given our findings, the advice of other experts and the Gambling Commission's own admissions of uncertainty, we recommend that other sources of prevalence data (including the NHS Health Surveys and potentially a reinstated quarterly telephone survey) should be used alongside the GSGB until such time as the questions of representativeness, bias and reliability have been satisfactorily resolved. This would be consistent with the Gambling Commission's intention of using the GSGB as part of a much a broader tapestry of research and evidence.

Introduction

In December 2020, Britain's Gambling Commission opened a public consultation on *"gambling participation and problem gambling prevalence research"*¹. The consultation proposed the replacement of NHS Health Surveys² and the Gambling Commission's quarterly telephone survey with a new survey (now known as the Gambling Survey for Great Britain or 'GSGB') as the source of official statistics on participation in gambling and the population prevalence of 'problem gambling'.

The Health Surveys³ have consistently reported low population prevalence rates of PGSI 'problem gambling' – between 0.3% (2021) and 0.7% (2015) of adults⁴ in Great Britain. These results have had a high level of consistency with other state-commissioned surveys. The British Gambling Prevalence Survey reported rates of 0.6% (2007) and 0.7% (2010); and the Adult Psychiatric Morbidity Survey 2007 reported a DSM-IV 'problem gambling' rate of 0.7%. Between 2013 and 2022, the Gambling Commission's Quarterly Telephone Survey, which used the three-item short-form PGSI produced prevalence estimates of between 0.2% and 0.7%.

The GSGB 2023 estimate is that 2.5% of survey respondents are likely to be classified as PGSI 'problem gamblers'⁵ and that a further 12.0% are likely to be PGSI 'low risk gamblers' or 'moderate risk gamblers' – although the Commission has stipulated that the GSGB 2023 cannot be used to estimate population prevalence until further work has been undertaken to explore the risk of bias⁶. The implication therefore is that there is no current official statistic on the population prevalence of 'problem gambling'⁷ other than the estimate from the Health Survey for England 2021.

¹ Gambling Commission, 2020

² Comprising the Health Survey for England and the Scottish Health Survey

³ It should be noted that the NHS Health Survey for England and the NHS Scottish Health Survey periodically provide estimates of the same – and that these enjoy the higher status of Accredited Official Statistics. Accredited Official Statistics have been "independently reviewed by OSR and confirmed to comply with the standards of trustworthiness, quality and value in the Code of Practice for Statistics".

⁴ The Health Surveys, BGPS, APMS and Quarterly Telephone Survey all surveyed people aged 16 years and older; the GSGB by contrast surveys people aged 18 years and older.

⁵ The cut-off point for inclusion in the NHS Health Surveys is 16 years, whereas the GSGB uses a cut-off point of 18 years.

⁶ The Commission's Guidance on using statistics from the Gambling Survey for Great Britain states that "The GSGB should not be used: ... to gross up the prevalence of problem gambling or the consequences of gambling to whole population (until further work is completed)".

⁷ i.e. the estimated number of people in the population likely to meet the criteria for 'problem gambling'





Figure 2: Estimated combined rates of PGSI 'at risk' and 'problem' gambling in Great Britain (2007-2023)



The fact that the GSGB produces substantially higher rates of 'at risk' and 'problem' gambling than in previous official surveys warrants curiosity and caution from researchers and policymakers. The Code of Practice for Statistics requires the Gambling Commission, as a producer of official statistics, to examine this issue openly and transparently.⁸ It is instructive to consider at the outset potential reasons for the differences.

First, there is the possibility that the GSGB reflects an increase in both gambling and 'problem gambling' in the period since the last Health Survey for England (fieldwork for which ended in June 2022 – a year before fieldwork commenced on the GSGB). We can be reasonably confident however that the GSGB findings do not represent a real increase in the population prevalence of potentially

⁸ The Code of Practice for Statistics emphasises that coherence between different statistical outputs is crucial. Para. Q3.3 states that "The quality of the statistics and data, including their accuracy and reliability, coherence and comparability, and timeliness and punctuality, should be monitored and reported regularly. Statistics should be validated through comparison with other relevant statistics and data sources. The extent and nature of any uncertainty in the estimates should be clearly explained."
harmful gambling⁹ – given the consistency of previous surveys (including the quarterly telephone survey which provides estimates up to the end of 2022) and the absence of any plausible explanation for such a change.

The second theoretical possibility is that the new numbers lie within the normal margin of error for a survey-based estimate. All estimates of the numbers of 'problem gamblers' in the population are derived from surveys and the statistical probability of obtaining a freak result depends in part on the numbers of people surveyed. The 95% confidence intervals for the rate of PGSI 'problem gambling' in the HSE 2021 were 0.1% and 0.6%, meaning that there was a 95% probability that the true figure was between these two bounds. The 95% confidence intervals in the GSGB are 2% and 3%, which do not overlap with those from the HSE in 2021, 2018 or indeed any other years¹⁰. The estimated rate of 'problem gambling' has been reasonably consistent through the Health Survey time series; and the GSGB 2023 prevalence rate of 2.5% is identical with the figure produced during the survey's experimental stages. We can therefore be reasonably confident that the difference in estimates is not simply an aberration. The Gambling Commission has itself acknowledged that results obtained from its new survey may be less reliable than those obtained from the 'gold standard' NHS Health Surveys; with two factors in particular giving rise to concern of selection bias:

- i. **Online data collection:** conducting the survey online ('push to web') rather than through inperson interviewing – creates a risk of sample skew towards people with higher-than-average online engagement^{11 12};
- ii. Non-response bias and topic salience: advertising the survey as a gambling survey rather than a health survey may result in over-recruitment of gamblers - and more highly engaged gamblers. The GSGB 2023 achieved a response rate of 19%. This is below its target of 22% and substantially lower than rates achieved in Health Surveys (HSE 2018: 54%; HSE 2021: 32%¹³).

The Gambling Commission's 2020 consultation indicated that the proposed new survey methodology would only be adopted if the Commission was able to *"ensure that the survey does not encourage an over-representation of gamblers"*¹⁴.

The Gambling Commission has however provided no assurance that the risk of selection bias has been addressed. An expert opinion obtained from Professor Patrick Sturgis of the London School of Economics (the 'Sturgis Review'¹⁵) emphasised the *"non-negligible risk that [the GSGB results]*

⁹ This is not to say that the population prevalence rate of 'problem gambling' might not have increased since the NHS Health Survey 2021 (fieldwork for which completed in June 2022). Given the lack of like-for-like data, it is impossible to say. Analysis of whether rates have increased or decreased since 2022 have not been helped by the Gambling Commission's decision to discontinue its Quarterly Telephone Survey at the start of 2023.

¹⁰ This holds true if results from the Gambling Commission's Quarterly Telephone Survey are used instead.

¹¹ Sturgis & Kuha, 2022, p.68

¹² The consultation document stated that "the online methodology means that the sample responding to the survey are more likely to be engaged online, thus skewing the data. This is likely to be especially true for older age groups where high online engagement is less ubiquitous than amongst younger people." It noted that "We therefore do not use the online survey to report overall rates of engagement in online gambling or to report rates of problem gambling." (Gambling Commission, 2020, p.10)

¹³ Fieldwork for the HSE 2021 took place between January 2021 and June 2022 and was therefore affected by the Covid-19 pandemic.

¹⁴ Gambling Commission, 2020, p.25

¹⁵ Funded by the Gambling Commission

substantially over-state the true level of gambling and gambling harm in the population"¹⁶ ¹⁷. Documents disclosed by the Commission under the Freedom of Information Act ('FOIA') reveal that the Commission possesses little confidence in the accuracy of the GSGB; and that it also believes that the GSGB may produce results "on the high side"¹⁸.

The Gambling Commission has failed to address concerns that questionnaire design may skew results through a process of response priming¹⁹; with respondents required to answer a very large number of questions about gambling prior to being asked whether any adverse life experiences were caused by gambling (with no other factors considered). The Gambling Commission has published statistics on the extent to which adults in Britain participate in betting and games of chance; and the proportion of adults who may suffer harm from gambling in the knowledge that they may be substantially overstated. This raises important questions concerning the potential for market distortion (because the Commission has stated that the statistics will be used to guide regulatory policy) and damage to public trust in statistics.

¹⁶ Sturgis, 2024, p.10

¹⁷ We also observe that the Sturgis Review was not commissioned until five months after the fieldwork for the GSGB 2023 had commenced.

 $^{^{18}}$ GSGB Freedom of Information Act disclosure – 19^{th} March 2024 – Binder 1 – p.197

¹⁹ i.e. where answers provided by respondents to certain questions are influenced by questions asked previously.

Chapter 1 - The basis for introducing the GSGB

Official statistics on gambling participation and the population prevalence of 'problem gambling' have been produced in the past by the use of large-scale, random probability household surveys; and with data collected through in-person interviewing (with paper-based self-completion of 'problem gambling' screening questions). Between 2012 and 2021, this data collection was undertaken as part of the NHS Health Survey for England (the 'HSE') and the NHS Scottish Health Survey (the 'SHeS')^{20 21}.

The Commission's proposal to replace the NHS Health Surveys with the GSGB as the source of official statistics on gambling participation and the population prevalence of 'problem gambling' was justified by reference to a number of perceived limitations with the NHS Health Surveys, set out in the Commission's 2020 consultation document:

- *"Lack of control over our access to Health Surveys limits our ability to report representative data for the whole of Great Britain.*
- Different participation and prevalence questions on different surveys generate multiple figures.
- Data from the different surveys is not directly comparable due to different methodologies being used.
- The infrequency and long turnaround time of the Health Surveys from inception to reporting.
- Traditional research methods (on which we rely) are in decline and under greater threat due to Covid-19 impacts."²²

While these are legitimate reasons to explore the use of new data collection methods, it is questionable whether these benefits are suitable trade-offs against survey reliability – particularly given the role official statistics are meant to play in guiding legislative and regulatory policy. In its public consultation on proposals to change the way that these statistics are collected, the Gambling Commission acknowledged that the replacement of an in-person health survey with a remote (online or postal) gambling survey might result in selection bias – a concern which has since been repeated by Professor Patrick Sturgis of the London School of Economics. The 2020 consultation document indicated that the adoption of the new survey (the GSGB) would be conditional on ensuring that *"it does not attract an over-representation of gamblers or problem gamblers."*²³

As we discuss in this report, the Gambling Commission has not demonstrated that it has addressed the risk of selection bias. Analysis of hard data obtained from licensed gambling operators strongly indicates over-reporting of gambling participation.

As we describe in chapter 4, the Gambling Commission appears to be fully aware that results obtained from the new survey may be unreliable. By electing to publish results from the GSGB in the knowledge that they may be incorrect, the Gambling Commission appears to be in breach of both the Code of Practice for Statistics and the basis upon which it consulted about the change to the collection of official statistics.

²⁰ In some years, these surveys were supplemented by results from the Wales Omnibus Survey.

²¹ Supplemented by the Gambling Commission's quarterly telephone survey

²² Gambling Commission, 2020, p.2

²³ Ibid., p.25

Chapter 2 - Methodological concerns about the reliability of the GSGB

From the start, the Gambling Commission has acknowledged that the GSGB may result in skewed reporting. This is principally the result of two sources of selection bias:

- 1. The GSGB is conducted remotely (online and postal self-completion);
- 2. The GSGB is advertised as a gambling survey²⁴.

In addition, we highlight a significant issue of response priming via survey design, which the Gambling Commission has not taken steps to address.

2.1 On-line data collection

As the Gambling Commission acknowledges, the use of a primarily online survey²⁵ to collect data creates the risk of selection bias. This is because, as Sturgis & Kuha (2022) observed:

"Surveys conducted online produce substantially higher estimates of problem gambling compared with in-person interview surveys. This is because online surveys, whether using probability or non-probability sampling, over-represent people who are more likely to gamble online and to gamble frequently, relative to the proportions of these groups in the general population."²⁶

The Gambling Commission acknowledged this in its public consultation, where it stated that:

"the online methodology means that the sample responding to the survey are more likely to be engaged online, thus skewing the data.²⁷"

The Commission went on to suggest that its existing online survey (conducted by Yonder) was inappropriate for making population prevalence estimates:

*"We therefore do not use the online survey to report overall levels of engagement in online gambling or to report rates of problem gambling."*²⁸

The GSGB suffers from a much lower response rate compared with the Health Surveys – indicating greater risk of skew from non-response bias. While the Gambling Commission has criticised the HSE

²⁴ These matters are explored in more detail in our December 2023 report, which was shared with the Gambling Commission at the time and is included as appendix 2 to this review.

²⁵ A postal response option is made available to respondents who do not wish to complete the GSGB questionnaire online.

²⁶ Sturgis & Kuha, 2022, p.1

²⁷ Gambling Commission, 2020, p.10. This observation was made in relation to a non-probability online panel, administered by Yonder on behalf of the Gambling Commission. The assessment however seems to apply to all online surveys.

Table 2: Response rates to Health Surveys and the GSGB				
Survey	Response rate			
HSE 2018	54%			
HSE 2021	32%			
GSGB Target	22%			
GSGB Actual	19%			

for achieving a lower response rate in the Covid-affected HSE 2021 (down from 54% in 2018 to 32% in 2021^{29 30}), the rate for the GSGB 2023 is substantially lower at 19% - below its target rate of 22%³¹.

Our report submitted to the Gambling Commission in December 2023³², contains a more detailed examination of factors likely to affect results obtained in the GSGB by comparison with the Health Surveys.

2.1.1 Mental health and wellbeing

Respondents to the GSGB experienced poorer-than-average mental health and wellbeing and reported markedly higher levels of suicidal behaviour (ideation and attempts) than the general population (NHS statistics). The GSGB questionnaire includes the Short Warwick Edinburgh Mental Wellbeing Scale ('SWEMWBS'), which measures subjective wellbeing. The mean SWEMWBS score for the GSGB sample was 22.9 – around 20%³³ lower than the mean score reported of 26.0³⁴ in the Health Survey for England 2021³⁵.

Table 3: Comparison of mental wellbeing scores			
Survey SWEMWBS score			
HSE 2021	26.0		
GSGB 2023	22.9		
Difference	-11.9%		

²⁹ NHS Digital, 2022, p.24

³⁰ The response rate in the HSE 2022 was 35%, suggesting that there may be some recovery in public willingness to take part in face-to-face surveys.

³¹ While the Gambling Commission has commented on declining response rates for in-person surveys, there is a risk that public willingness to take part in all surveys may diminish. If response rates were to decline in general, there may be a benefit in choosing a survey with a higher starting point. ³² See appendix 2

³³ The SWEMWBS scales from a minimum score of 7 to a maximum score of 35.

³⁴ Higher scores indicate better subjective well-being

³⁵ NHS Digital, 2023 (Loneliness and wellbeing)

The GSGB reported rates of suicide ideation (including attempt) around twice the rates reported by the NHS Adult Psychiatric Morbidity Survey 2014³⁶.

Table 4: comparison of suicidal behaviour			
Survey	Suicide ideation (prevalence)		
APMS 2014 ³⁷	5.7%		
GSGB 2023	11.4%		
Difference	+100%		

2.2 Topic salience: gambling surveys vs health surveys

As the Gambling Commission acknowledged in 2020, the fact that GSGB is advertised as a gambling survey may also be a source of selection bias. This is because, as Sturgis (2024) comments: *"we know that people are more likely to take part in a survey if the topic is personally salient to them.*³⁸"

In 2009, Professor Robert Williams (University of Lethbridge) and Dr Rachel Volberg (University of Massachusetts) conducted a study of responses to gambling questions in a household survey in Canada. The survey was described to one half of respondents as a 'gambling' survey and to the other half as a 'health and recreation' survey. The study found markedly higher rates of PGSI 'problem gambling' for those who responded to the 'gambling survey'.

Table 5: comparison of Canadian Problem Gambling Index prevalence rates obtained fromidentical surveys advertised as 'gambling survey' and 'health and recreation survey'(Williams & Volberg, 2009)39							
	Non-gambler	Low risk gambler	Moderate risk gambler	Problem gambler	At risk/ problem gambler		
Gambling Survey	25.3%	8.5%	3.5%	4.0%	16.0%		
Health & recreation survey	30.0-%	5.8%	1.5%	0.8%	8.1%		
Difference	-15.7%	+46.6%	+133.3%	+400.0%	+97.5%		

The results from this study are summarised in table 5 below.

The Gambling Commission acknowledged this risk also within its 2020 public consultation, when it observed:

"it is important to ensure that, if moving to a gambling-specific survey, it does not attract an over-representation of gamblers or problem gamblers."

³⁶ The APMS 2022 is due to be published in June 2025. This will provide an opportunity for benchmarking survey results (as recommended by Sturgis, 2024).

³⁷ The APMS 2014 estimated that 5.0% of adults experienced suicidal thoughts (past-year) only and 0.7% had a past-year suicide attempt.

³⁸ Sturgis, 2024, p.10

³⁹ Williams & Volberg, 2009, p.19

⁴⁰ Gambling Commission, 2020, p.25

2.3 "Non-negligible risk" of "substantial" over-reporting

Taken together, these factors⁴¹ create what Sturgis (2024) has described as:

"a non-negligible risk that [results from the GSGB] substantially over-state the true level of gambling and gambling harm in the population.⁴²"

The Gambling Commission's consultation made it clear that the development of the GSGB would be conditional on the mitigation of these sources of selection bias. As we observe in chapter 3, this has not been achieved – and the guidance on use and misuse of the GSGB shows that the Commission is not confident itself that it has addressed these risks. As we note in chapter 4, the Gambling Commission has stated "we don't actually know which survey [the GSGB or Health Survey for England) is producing the most robust estimates" and "we think GSGB might be on the high side"⁴³.

In a document released under the Freedom of Information Act, the Commission admitted that results from the GSGB should be used for relative analysis rather than to estimate population prevalence. It stated that the results would be useful *"in terms of the granularity they provide"* (e.g. for sub-population analysis) or *"to track trends going forward"*⁴⁴. The memorandum concluded that *"really the focus should be less on the number itself but more on the patterns within the data and the trends going forward"*. This produces the perverse outcome that an official prevalence survey should not be relied upon to estimate population prevalence.

It seems doubtful whether GSGB prevalence estimates should have been published as official statistics given that such serious doubts attend their reliability. It is also questionable, in our view, how far the GSGB results may be used for trend analysis if the Gambling Commission intends to carry on testing and refining the survey. If – as seems almost certain – the GSGB is affected by selection bias, the Commission will need to make successive adjustments to data collection. If this process is carried out in earnest, it is certain to affect trend analysis⁴⁵.

2.4 Question order effects and two-part questions

In addition to indications of selection bias, it seems likely that the GSGB questionnaire design will also influence the survey results. The questionnaire contains more than 40 questions on gambling – whether the individual's own or someone else's. Many of these questions offer multiple response options. Requiring respondents to answer a large number of questions about gambling (in a survey advertised as a 'gambling survey') may affect how they answer subsequent questions on harms. By way of illustration, it is theoretically possible that a respondent might provide more than 200 responses about gambling before being asked whether he or she has thought about suicide and, if so, whether this was because of gambling. It is plausible that, had the questions on self-harm been preceded by 200 response options on work-related stress, alcohol consumption, drug use or

⁴¹ There are a range of other factors that may affect survey reliability. While the Gambling Commission has briefly addressed these within its Technical Report, we are concerned that this is based on slanted reading of the research literature. It is a matter of concern that the Commission appears to have deliberately omitted one key item of evidence from its analysis in this section. We address this point in chapter 4. ⁴² Sturgis, 2024, p.10

⁴³ GSGB Freedom of Information Act disclosure – 19th March 2024 – Binder 1 – p. 197

⁴⁴ Ibid., p.198

⁴⁵ The Gambling Commission has advised that it intends to make no changes to sampling methodology; so it is questionable how much it intends to do to address selection bias.

relationship difficulties, respondents may have been encouraged to attribute suicidal thoughts or acts to these factors.

The Gambling Commission might have tested for the presence of these effects by varying the questionnaire design in the experimental stage so that a control group was asked questions about harms at the outset (i.e. before being subjected to multiple questions about gambling); and by being asked to make attribution by reference to a list of possible causes. We have seen no evidence that such tests were carried out. We note that for those interested in self-harm prevention, a survey that explores a wide range of factors is likely to be more insightful than one that focuses solely on one possible cause.

Another concern relates to the use of two-part questions in relation to other harms and adverse consequences. This is because of the nature of these two-part questions, where the respondent is asked to consider whether two things might be true. In this example from the GSGB, the respondent is asked a) whether he or she has experienced violence or abuse; and b) if so, whether this was because of gambling: *"In the last 12 months, have you experienced violence or abuse because of your own gambling?"*

Where such questions are concerned, a respondent's answer may refer to only one part of the question (in this case, *"have you experienced violence or abuse"*). MacKenzie and Podsakoff (2012) state that:

*"because double-barreled questions decrease a respondent's ability to generate an accurate response, they may increase the likelihood that respondents will answer only one part of the question, or average their responses to both parts of the question."*⁴⁶

Samuelsson et al. (2019) has observed this effect in a follow-up study of participants in Sweden's Swelogs longitudinal gambling survey⁴⁷. They observed that the effects of two-part questions described by MacKenzie and Podsakoff *"emerged repeatedly"* in their study.

⁴⁶ MacKenzie & Podsakoff, 2012, p.547

⁴⁷ Samuelsson et al., 2019, p.155

Chapter 3 - Testing the reliability of the GSGB

Professor Sturgis made seven recommendations for the Gambling Commission to subject the GSGB to further testing (the 'Sturgis Tests'), being mindful that he considered there to be a *"non-negligible risk"* that the survey substantially over-reported gambling and harmful gambling. The Commission has only recently released cursory information about how this work will be carried out, following publication of the GSGB 2023⁴⁸.

Recognising the serious concerns about survey reliability, the Gambling Commission issued guidance in July 2024⁴⁹ for how the GSGB results may and may not be used. This guidance indicates that the GSGB must not be used to estimate the population prevalence of 'problem gambling' or gambling harms in Great Britain:

"The GSGB should **not be used:**

- to provide direct comparisons with results from prior gambling or health surveys
- as a measure of addiction to gambling
- to calculate an overall rate of gambling-related harm in Great Britain
- to gross up the prevalence of problem gambling or the consequences of gambling to whole population (until further work is completed)."

One way that the accuracy of survey estimates might be tested is by using information on actual customer numbers held by licensed operators – data that is provided to the Commission through regulatory returns. In 2022, industry data was used to assess the reliability of participation estimates from the Health Surveys and also from the GSGB Pilot Survey⁵⁰. This demonstrated that the Health Survey estimates had been reasonably accurate; and that the GSGB Pilot Survey estimates substantially over-estimated participation. Findings were shared with the Gambling Commission in August 2022 and it was suggested that similar analysis should be undertaken as part of its experimental work on the GSGB.

Following the publication of Wave 1 of the GSGB in February 2024, we obtained updated industry data for three sectors of the gambling industry:

- Non-remote bingo (The Bingo Association; The Rank Group Plc, Buzz Bingo)
- Non-remote casino games (Aspers Casinos; The Rank Group, Genting UK; Metropolitan Gaming; Global Gaming Ventures)
- The Football Pools (The Football Pools Company)

As a result, we were able to calculate population-level participation estimates for these market sectors based on customer numbers collected by the industry rather than relying on answers to survey questions on past four-week participation in gambling. Our analysis indicates that the GSGB has substantially over-reported participation in these activities (see table 6). In each case, we used industry data for four-week periods at the beginning, middle and end of the GSGB fieldwork period

⁴⁸ Indeed, it has indicated to us that it may not conduct all of the tests recommended by Professor Sturgis due to budgetary constraints.

⁴⁹ Gambling Commission, 2024a

⁵⁰ See appendix 3

and used the average (mean) of the three sets (which were relatively stable in any case). This exercise revealed substantial and systemic over-reporting of gambling participation in the GSGB.

Table 6: Comparisons of participation estimates based on industry data and GSGB survey							
Market sector	Participation estimation	Difference					
	Industry data	GSGB Wave 1					
Bingo (non-remote)	567,073	1,678,049	+196%				
Casino games (played	209,057	636,399	+204%				
in casinos)							
Football pools	108,669	846,835	+679%				

The following sections describe how these industry data estimates were produced⁵¹.

3.1 Non-remote bingo

Data sources: The Bingo Association supplied us with the total number of visits to bingo clubs in Britain for the Wave 1 period. The dataset was drawn from 61% of all licensed bingo clubs. The two largest operators (Buzz Bingo and The Rank Group/Mecca Bingo) – representing a majority of the market by value - supplied us with visit frequency figures for the Wave 1 period. These figures, which were provided independently, were consistent at around 2.5 visits per customer over a four-week period.

Calculation:

- A. We scaled-up the Bingo Association customer visits figure to adjust for missing operators.
- B. We divided the total estimated number of visits (from A) by the visit frequency ratio provided by the two largest operators to give us a market estimate of unique customers over a four-week period.

We made no adjustment for use of more than one club by the same customer; nor did we adjust for non-bingo playing visits (e.g. machine-only players or non-playing guests).

We were not able to make any assessment of participation in games of bingo in other venues (e.g. holiday parks, social clubs) or the extent to which people who play bingo in these settings are different from those who play in licensed clubs. Taken together, we consider it unlikely that these factors (which on their own may cause some over-reporting or under-reporting) will have a significant effect on participation estimates.

Result: the GSGB has overstated non-remote bingo play by around 196%.

3.2 Non-remote casino table games

Data source: We were supplied with unique customer data to match the Wave 1 period from five nonremote casino operators, representing 85% licensed casinos in Great Britain. We were also supplied with information from operators regarding the proportion of customers who played table games (ranging from 40% to 60% depending on operator).

⁵¹ We are happy to share our precise calculations with state bodies subject to licensee approval.

Method:

- A. We aggregated the customer numbers supplied by the operators to obtain a total;
- B. We scaled up the estimate from A to adjust for operators not represented in the dataset.
- C. We divided the total number of unique customers by industry estimates of participation in table games (as a meaningful proportion of customers either do not gamble or play electronic games instead).

We made no adjustment for visits by customers to more than one casino operator. This may result in a meaningful level of over-reporting given the fact that the 'permitted areas' licensing regime has resulted in the geographic concentration of casinos in certain locations (e.g. in the West End of London).

Result: the GSGB has overstated non-remote casino play by around 204%.

3.3 Football pools

Data source: The Football Pools Company, supplied us with its past four-week unique customer numbers for the fieldwork dates. As the business is the sole provider of football pools betting in Great Britain, its estimates must be considered more accurate than estimates obtained from self-report surveys.

Results: the GSGB has overstated participation in the football pools by xxx%.

3.4 Systemic over-reporting

This analysis is consistent with findings from an earlier assessment. In 2022, data on actual customer numbers was used to benchmark self-report estimates from the GSGB Pilot Survey and the Health Surveys in relation to online gambling, betting exchange, non-remote bingo, non-remote casino and the football pools. This revealed systemic and substantial over-reporting of gambling participation in the GSGB as well as generally accurate estimates from the Health Surveys. The analysis was shared with the Gambling Commission in August 2022 and its research team admitted at the time the likelihood that the Pilot Survey had overstated levels of gambling participation. The 2022 report is included within appendices.

3.5 Deferred testing – issues of policy, trust and trend analysis

The Gambling Commission's decision to defer the application of the Sturgis Tests until after publication presents a number of issues⁵². The first is, as previously discussed, the risk that inaccurate statistics are allowed to distort public policy discourse and thereby market regulation. The second is that – carried out in earnest – there is a strong probability that the Sturgis Tests will highlight problems with the accuracy of the GSGB estimates. If it is shown that the Gambling Commission has published misleading information about the prevalence of gambling harms, it is likely that public trust in both the Commission and official statistics will suffer. Third, if as a result of conducting the Sturgis Tests, the

⁵² On 25th July, the Gambling Commission announced details of the tests that it is prepared to undertake (which excludes one of the seven recommendations) – almost six months after receiving the Sturgis Review. Invitations to Tender will be published in September. It is reasonable to assume therefore that results from this testing phase will not be available much before the middle of 2025 (and possibly much later).

Commission makes refinements to the GSGB in order to improve accuracy, it is likely that any trend analysis (which, as the Commission has admitted, is a better use of the survey data than for estimating absolute prevalence) may be rendered meaningless.

Finally, we suggest that – having published the GSGB – there is a risk that the Gambling Commission may not be fully motivated to carry out tests given the possibility that such tests may show that it has published inaccurate statistics. This is not idle speculation. As we note in chapter 4, the Commission has at times appeared less concerned about substantive matters of survey reliability than it has been about shielding the GSGB from legitimate scrutiny.

3.7 Conclusion

In order to test the reliability of GSGB participation statistics (which the Commission has admitted may be inaccurate), we were given access to industry datasets relating to the behaviour of hundreds of thousands of actual gambling consumers.

We found substantial over-reporting of gambling across these different activities. This indicates that the GSGB has over-recruited both gambling consumers and more highly engaged gambling consumers (in terms of breadth of participation). In other words, analysis of hard data vindicates the concerns expressed by Professor Sturgis that the GSGB may substantially over-report rates of gambling and harmful gambling in Great Britain.

Chapter 4 - How much confidence does the Gambling Commission really have in the reliability of the GSGB?

The Code of Practice for Statistics (the 'Code') states in its introduction that:

"Because statistics are a public asset, the public must have confidence in them. There is no point in publishing statistics that do not command confidence. So the Code is built around the commitments that support confidence."⁵³

Transparency is at the core of many of the Code's practices, requiring the producers of statistics to explain what judgements they have made about the data they produce, the methods used, and their strengths and limitations. The Code emphasises that "[t]hese explanations are as important as the numbers themselves".⁵⁴

Statistics, data and explanatory material must be presented impartially and objectively.55

Coherence is a key aspect of the Code: "[t]o comply with this Code, producers must demonstrate that they do not simply publish a set of numbers, but that they explain how they relate to other data on the topic, and how they combine with other statistics to better explain the part of the world they describe".⁵⁶

The importance of validating the reliability of statistics through comparison with other statistics and data sources is emphasised by the Code:

"The quality of the statistics and data, including their accuracy and reliability, coherence and comparability, and timeliness and punctuality, should be monitored and reported regularly. Statistics should be validated through comparison with other relevant statistics and data sources. The extent and nature of any uncertainty in the estimates should be clearly explained."⁵⁷

The need for the GSGB to be compared against the Health Surveys is critical, given the pronounced differences in prevalence estimates of PGSI 'at risk gambling' and 'problem gambling'.

While the Gambling Commission has provided limited commented on differences between the GSGB and the Health Surveys, it has not demonstrated that the GSGB is likely to be more reliable. It has not, in our view, examined the issue with sufficient impartiality and objectivity. The Commission has suggested instead that there is something close to an equal balance of probability that either the GSGB or the HSE is more accurate. This has been done this by reference to three studies:

 Ashford et al., 2022 - argued that socially desirable response bias in the HSE resulted in underreporting of 'problem gambling'. This assessment was based on analysis of findings from the HSE in 2016 that respondents who took part in the survey in the presence of another family member reported lower PGSI scores on average than others⁵⁸.

⁵³ Code of Practice for Statistics, p.7, para. iv.

⁵⁴ Code of Practice for Statistics, p.10, para. xxi(a).

⁵⁵ Code of Practice for Statistics, T1.4.

⁵⁶ Code of Practice for Statistics, p. 10, para. xxi(b)

⁵⁷ Office for Statistics Regulation, 2022, p.26

⁵⁸ Ashford et al., 2022, p.40

- Sturgis & Kuha, 2022 argued that online data collection resulted in over-recruitment of more highly engaged gamblers; and that the difference between prevalence estimates generated by Health Surveys on the one hand and online surveys on the other was principally the result of selection bias affecting online surveys.
- 3. Sturgis, 2024 effectively reiterated the opinion from Sturgis & Kuha (2022) while acknowledging the alternative opinion provided in Ashford et al. (2022).

At other times, the Commission has implied that because no surveys are perfect, the Health Surveys should not be considered more reliable than the GSGB. The GSGB Technical Report, for example provides a commentary on reasons for under-reporting and over-reporting PGSI scores suggesting a roughly equal balance between the two.

This seems questionable for a number of reasons: the NHS Health Surveys have the higher status of Accredited Official Statistics; they have had good internal consistency with a number of other surveys, including the Quarterly Telephone Survey, the NHS Adult Psychiatric Morbidity Survey and the DCMS Taking Part Survey (as well as analysis of industry data as discussed in chapter 3); and work by Sturgis & Kuha has indicated that the Health Surveys are likely to produce more reliable prevalence estimates than online surveys⁵⁹.

Significantly, documents disclosed by the Gambling Commission under the Freedom of Information Act indicate that the Commission is far less confident in the reliability of the GSGB than its public statements have indicated. We describe three of them here.

4.1 The Wardle opinion

Professor Heather Wardle of the University of Glasgow has been a key adviser to the Gambling Commission on the development of the GSGB. In an email to the Gambling Commission in July 2023, Professor Wardle commented on the biases that may affect differences in reporting between the GSGB and the HSE. She wrote that the principal source of bias affecting comparisons between the GSGB and the HSE was topic salience (i.e. the fact that highly engaged gamblers are likely to be over-represented in surveys about gambling). In her email, she wrote:

"This suggests that the issues with our study is less the push to web approach and more about topic salience. Which makes sense. Plus a bit of HSE potentially underestimating harms because of the way the self-comp is administered (though by comparison to the topic salience bias, I think that might more marginal explanation)."⁶⁰

This passage clearly shows that Professor Wardle considered topic salience bias to be the principal cause of differences in prevalence estimates for problem gambling between the GSGB and the HSE; and that socially desirable response bias was a relatively marginal factor by comparison. This is inconsistent with how the Gambling Commission has described in public the effect of potential biases.

4.2 – Sturgis on Ashford et al.

As we noted above, the Commission has effectively juxtaposed the findings of Ashford et al. (2022) with those of Sturgis & Kuha (2022) and Sturgis (2024) to suggest that the HSE is just as likely to have

⁵⁹ Sturgis & Kuha, 2022, p.68

⁶⁰ Freedom of Information Act disclosure – 8th February 2024 – 2023 Binder 1, p.90

under-reported the prevalence of 'problem gambling' as the GSGB is to have over-reported. Ashford et al. favoured socially desirable response bias as the principal explanation for differences between estimates, noting that in the HSE 2018 *"the odds of having a PGSI of 1+, after controlling for sex, age and gambling behaviour, were 1.5 times higher for those who were interviewed alone compared with those who were interviewed in the presence of another family member^{61 62}". The GSGB Technical Report cited this finding in support of the opinion that <i>"the online methods of GSGB may offer greater privacy to participants, and so reduce social desirability bias"*⁶³.

The Gambling Commission, however, had been provided with an alternative piece of analysis from Professor Sturgis, highlighting a problem with Ashford et al.'s analysis⁶⁴. On 8th January 2024, Sturgis wrote to the Commission to point out that the relationship between lower average PGSI scores and the presence of another member of the household may be better explained by whether the survey respondent lived alone or with other family members:

"there are substantive as well as methodological reasons to expect the presence of a household member to affect the PGSI responses. For example, we might expect that a spouse/partner provides a 'protective' effect against problem gambling, or that problem gamblers are more likely to select out of cohabitation partnerships. So, the spouse/partner coefficient may arise not because the spouse/partner is present during the interview but because there is a spouse/partner at all."⁶⁵

Professor Sturgis then tested *"the effect of a spouse/partner being present during the interview, conditional on there being a spouse/partner at all"*⁶⁶ and found that:

"the coefficient for spouse/partner is no longer significant but the coefficient for being married/cohabiting is significant and negative."⁶⁷

In other words, survey respondents who are married or cohabiting are significantly less likely to be classified as 'problem gamblers'; and it is this, rather than socially desirable response bias, that is the most plausible explanation for the recording of lower PGSI scores among those who respond to surveys in the presence of another household member.

This finding is significant in its own right; and because the Gambling Commission appears to have ignored it. The GSGB Technical Report refers to Ashford et al.'s findings but makes no mention of Professor Sturgis's critical analysis. It is unclear why this is the case. The Code of Practice for Statistics

⁶¹ Ashford et al., 2022, p.[.]

⁶² As analysis by Sturgis has shown, this effect was confined to the presence of spouses/partners, siblings and an unrelated child. It was not observed for parents or children; while those who completed the survey in the presence of another relative or an unrelated adult reported higher than average PGSI scores.

⁶³ Gambling Commission, 2024

⁶⁴ This was not the only problem with Ashford et al. As we note in our December 2023 report, the authors of that paper also managed to overlook the distortive effect of lockdown restrictions when making comparisons of gambling behaviour in 2018 and 2021.

⁶⁵ Freedom of Information Act disclosure – Sturgis – p.160

⁶⁶ Sturgis used combined results from the HSE 2016 and 2018 in order to obtain a larger sample.

⁶⁷ Ibid., p.163

requires producers of official statistics to openly and transparently address both the strengths and weaknesses of their data and methods.

4.3 – "We think GSGB might be on the high side"

On 29th January, an unnamed official from the Gambling Commission wrote to Professor Sturgis to seek *"advice about how we interpret the results we release in July"*. In the email, the official made the following statement:

"We don't actually know which survey is producing the most robust estimates and whilst we think GSGB might be on the high side, the results are still very useful in terms of the granularity they provide, the ability to track trends going forward and that really the focus should be less on the number itself but more on the patterns within the data and trends going forward."⁶⁸

This passage echoed the opinion provided by Sturgis in his review, which was published the following month. It is revealing for several reasons. First, it shows that the Gambling Commission has little confidence in the reliability of the GSGB⁶⁹; second it reveals a belief – not disclosed in public - that the GSGB is likely to produce over-estimates; and third it indicates that while the Commission's new survey might provide some useful insights, it is unsuitable for its principal purpose – estimating prevalence. We note that the Code of Practice for Statistics requires openness and transparency, and that statistics, data and explanatory material should be presented impartially and objectively.

4.4 – Misplaced priorities?

Professor Sturgis's concerns about the reliability of results obtained through the GSGB ("non-negligible risk that they substantially over-state the true level of gambling and gambling harm in the population"⁷⁰) elicited a curious response from the market regulator. Rather than reflecting on the key issue of substance (whether the GSGB might in fact be inaccurate and whether it was therefore appropriate to proceed with publication), officers at the Commission appeared to focus on the possibility that the Sturgis opinion might be used to cast doubt on the GSGB's reliability. One officer wrote of "handling issues to be worked out" in respect of Professor Sturgis's opinion on the risk of over-reporting. Then, on 14th February 2024, the chief executive of the Gambling Commission, Andrew Rhodes wrote:

"He (Professor Sturgis] does say there is a prospect the methodology overstates the levels of participation and harm, which I have little doubt those who are trying to undermine the approach will cite as a reason to reject it....The explanation of this will be important as we already know sections of the industry want to undermine this."⁷¹

⁶⁸ Ibid., p.197

⁶⁹ It may also indicate low confidence in the Health Surveys. However, the latter have been described by the Health and Social Care Information Centre as *"regarded internationally as a 'gold standard' for population health surveys"*; which perhaps provides greater assurance than the Commission's opinion.
⁷⁰ Sturgis, 2024, p.10

⁷¹ Freedom of Information Act disclosure – Sturgis Binder 2. In the full text of this email, Mr Rhodes writes "as it goes on it's more nuanced and much of his narrative explains why he thinks it might not be the case". This seems to be a particularly slanted interpretation of the Sturgis Review (which instead refers to the countervailing views of other researchers). It seems clear in fact that Sturgis considered over-reporting the more likely outcome from using the GSGB. As we show on page [.], Professor Sturgis had in fact been critical of the views of other researchers.

This email – the only recorded opinion from Mr Rhodes prior to publication of the Sturgis Review – creates the impression that the chief executive of the Gambling Commission was less concerned with the fact that the GSGB might be seriously flawed than with the fact that people might raise legitimate concerns in regard to its publication. There is no suggestion, for example, that the Commission considered deferring publication of the GSGB in response to the warning from Sturgis. It is unfortunate that this impression has been created. The Code of Practice for Statistics requires producers of statistics and data to explain clearly how they assure themselves that their statistics and data are accurate, reliable, coherent and timely. The Code states:

"Because statistics are a public asset, the public must have confidence in them. There is no point in publishing statistics that do not command confidence."

4.5 – The Technical Report

In the GSGB Technical Report (published in February 2024), the Commission addresses issues of how topic salience affects 'non-response bias/ selection bias'. It observes that:

"despite best efforts to reduce this possibility, it is likely that some selection bias remains and so that rates of past-year gambling participation and PGSI scores are higher in the GSGB compared with the health survey series."⁷²

The original draft (obtained under the Freedom of Information Act) however, presented the situation in different terms:

"despite best efforts to reduce this possibility, it is likely that some selection bias remains and so that rates of past-year gambling participation and PGSI scores are **over-estimated** in the GSGB compared with the HSE."⁷³

It is unclear why the Gambling Commission altered its original opinion that the GSGB over-estimated gambling participation and PGSI scores. The original draft appears to be more consistent with both the Wardle opinion (see page 18) and the Sturgis Review. The Code of Practice for Statistics states that statistics, data and explanatory material must be presented impartially and objectively⁷⁴.

In the appendix to this report, we highlight a number of other problems with the GSGB Technical Report, including the exclusion of research findings and misinterpretation of evidence.

4.6 - Managing and explaining alternative sources of data

From July 2024, it is the Gambling Commission's intention that NHS Health Surveys should no longer be the source for official statistics on harmful gambling. This does not mean that the NHS will no longer produce accredited official statistics on gambling participation and the prevalence of 'problem gambling'. In June 2025, the NHS will publish the results of the Adult Psychiatric Morbidity Survey 2022. This will include estimates of both 'problem gambling' and also suicidal behaviour (ideation and attempts). Meanwhile, the Health Survey for England 2025 (and possibly 2027) will feature questions on gambling and 'problem gambling'.

⁷² Gambling Commission, 2024

⁷³ Freedom of Information Act disclosure

⁷⁴ Office for Statistics Regulation, 2022, p.17 (T1.4)

The Gambling Commission failed to disclose the fact that future Health Surveys would continue to collect gambling data – despite its obvious relevance to the development of the GSGB; and the Experimental Stage of the GSGB did not include any testing against results from the HSE 2021.

A disclosure made (under FOIA) by the Department of Health and Social Care ('DHSC') reveals that the Gambling Commission expressed concerns about the continued inclusion of gambling questions in the NHS Health Survey for England. The DHSC noted the following:

"The GC have [sic.] different Qs so would like to stay close to the data and having too many number [sic.] may cause problems so would like to manage this."⁷⁵

The Commission's desire to 'manage' publication of future editions of the Health Survey may reflect a lack of enthusiasm for alternative statistics, regardless of which set of statistics is likely to be more accurate. However, benchmarking the GSGB against other sources of official statistics would be consistent with the Code of Practice for Statistics. The Code states:

"Systematic and periodic reviews on the strengths and limitations in the data and methods should be undertaken. Statistics producers should be open in addressing the issues identified and be transparent about their decisions on whether to act."⁷⁶

In any case, the DHSC passage cited above raises an important issue. If the NHS Health Survey for England ('HSE') and the NHS Adult Psychiatric Morbidity Survey ('APMS') produce markedly different results to the GSGB, does the Commission intend that the NHS surveys findings be considered unreliable? If that is the case, should all findings from the HSE and APMS (or at least all findings based on self-report) be considered unreliable as well (and if not, why not)? Should, for example, the GSGB be used to estimate rates of suicidal behaviour in England, in preference to the APMS? The Gambling Commission's attempts to undermine the HSE (by claiming that it no longer meets a 'gold standard') may have far-reaching consequences for public confidence in both gambling statistics and health statistics in general.

⁷⁵ Freedom of Information Act disclosure

⁷⁶ Office for Statistics Regulation, 2022, p.27 (Q3.5)

Conclusion

At the outset of the process, the Gambling Commission acknowledged that the introduction of the GSGB might result in over-reporting of gambling and gambling harms. Although the Commission initially indicated that the implementation of the survey (and its replacement of the Health Surveys as the course of Official Statistics) would be conditional on addressing risk of survey bias, this has not happened. The Commission now appears reluctant to acknowledge, in a suitably open and transparent manner, the limitations of the GSGB.

The assessment carried out by Professor Sturgis (as well as earlier work by Sturgis & Kuha) highlighted methodological reasons for the presence of *"substantial over-reporting"*. Our own analysis supports this, indicating systemic and significant overstatement of gambling participation. Results released from the GSGB also indicate that its sample was skewed towards people with poorer than average mental health and wellbeing.

The Gambling Commission has suggested that, as much as the GSGB may over-report the population prevalence of 'problem gambling', there is a possibility that the Health Surveys under-reported prevalence. While this is technically correct, it creates the impression that the GSGB is just as likely to be accurate as the Health Surveys. This is misleading in our view. NHS Health Surveys have in the past produced participation estimates that are reasonably consistent both with other official surveys and with industry data. The GSGB on the other hand produces estimates that are closer to other online surveys – surveys that both Sturgis & Kuha and the Gambling Commission itself have criticised. What is more, documents disclosed under the Freedom of Information Act, reveal the Gambling Commission's own lack of confidence in the GSGB relative to the Health Surveys. The Code of Practice for Statistics requires the Commission objectively and impartially to explain the limitations of its statistics and methods.

While the Gambling Commission has provided guidance on how results should be used, this seems likely to be ineffective – particularly given the often fractious and partisan nature of public discourse on gambling policy (itself fuelled by research that the Gambling Commission has described as unreliable). The guidance itself seems ambiguous – suggesting that the results may and may not be used for calculating population prevalence of 'problem gambling' and harms from gambling⁷⁷.

We consider the decision to publish the GSGB unfortunate given the fact that such doubts attend its reliability. We appreciate that the survey does possess a number of advantages. The GSGB may therefore provide valuable new insights, but we consider it an inappropriate source of population prevalence statistics. The Gambling Commission has stated that it will conduct further work to understand the risk of over-reporting before the survey can be used to provide population prevalence estimates. It is critical in our view that this work is conducted transparently and that it includes analysis of hard data from licensees. Until that work has been completed, we believe that the NHS Health Surveys (which enjoy the status of Accredited Official Statistics) should remain the source of official prevalence figures.

We look forward to discussing our analysis with interested parties.

⁷⁷ Although the Commission has indicated to us that results may not be used to make population prevalence estimates, this is precisely what many campaigners and media outlets have done.

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Bill Robinson is an economist with long and varied Whitehall experience, working in 10 Downing St, the Cabinet Office and HM Treasury, as well as in the Services of the European Commission, mainly as a macro-economic analyst and forecaster. He was the Director of the Institute for Fiscal Studies, the tax think-tank, and then Special Adviser to the Chancellor with a focus on tax policy. In that role he led the Treasury team charged with setting up the National Lottery and determining how the state would take a share of the revenues. He also helped design the system of competitive bids for the (initially seven-year) franchise to run the National Lottery.

Bill moved into consultancy as a Director of London Economics, which he helped to win a contract to help Camelot bid for the first lottery franchise. Their success led to a 25 year relationship with Camelot and many gambling-related projects. His relationship with Camelot and involvement with the wider gambling industry continued through successive moves to PwC (Head UK Economist) and KPMG (Chief Economist and Chairman of the Economics Practice, which he founded.) He continues to work for KPMG as a Senior Adviser.

Dan Waugh

Dan Waugh is a partner at Regulus Partners, a global research and advisory firm specialising in understanding gambling markets. He has worked in leisure and entertainment for almost 25 years – first as Director of Investor Relations at Whitbread PLC; and then as Group Strategy Director at The Rank Group plc. He was the founding Chair of the youth education charity, YGAM and has supported a number of other charities involved in the prevention of gambling harms.

Dan has written extensively about gambling market regulation and harm prevention, including a number of papers in academic journals; and he has appeared as a witness before parliamentary select committees on two occasions.

Appendix 1: Analysis of the GSGB Technical Report

In this report we examine the 'Limitations' section of the GSGB Technical Report. We find a number of problems with the Technical Report:

- Misrepresentation of research findings;
- Exclusion of relevant research findings supplied to the Gambling Commission by Professor Sturgis of the London School of Economics in January 2024.

The Limitations section is set out in full, alongside our own analysis. Text from the Technical report is in black italics, while our analysis is shown within shaded text boxes. Where we cite from sources other than the Technical Report itself, these passages are in blue text.

Limitations

With a push-to-web methodology, interviewers are not present to collect the data in person and accuracy of answers relies on participants understanding the questions asked and following the instructions.

Similarly, there is a risk that some participants (although a small proportion) will not follow the routing instructions correctly on the postal version of the questionnaire. To minimise the risk, the postal questionnaire was designed with simple routing instructions and further, routing errors were checked and corrected during the office-based data editing process.

Compared with face-to-face interviewing methods, remote data collection methods typically have lower response rates, meaning they are potentially more susceptible to non-response bias. However, response rates for face-to-face interviews are also declining meaning these studies are also subject to non-response bias.

Analysis

- 1. Prior to the Covid-19 pandemic, response rates to the HSE had been relatively stable (albeit lower than at the turn of the century). The HSE 2019, for example, achieved a household response rate of 60% up on the previous year. The HSE 2021 achieved a household response rate of 32%, which then increased to 35% in the HSE 2022.
- 2. It is valid to observe that response rates for face-to-face interviews have declined (it seems too soon to say whether they are still declining) but what the Technical Report fails to make clear is that response rates in the HSE 2018 and the HSE 2021 were respectively 2.8 times and 1.7 times greater than the GSGB 2023.
- 3. It may therefore be the case that the HSE 2021 is more sensitive to non-response bias than it was in the past (and this may be a valid reason for changing methods of data collection); but it is difficult to understand why this should be used to cast doubt on the reliability of results from the HSE 2018.

Furthermore, survey methodologists have found that the correlation between response rate and nonresponse bias is considerably weaker than conventionally assumed (Groves and Peytcheva 2008; Sturgis et al. 2017).

Analysis

- 1. This observation appears to be an over-simplification of a far more nuanced assessment. Sturgis et al. questions the effort it takes to recruit reluctant survey respondents given the relatively marginal effect that this appears to have on survey results *in general*.
- 2. The paper makes it clear however that this observation is not universal⁷⁸. For instance, it states that, "while it is not uncommon for estimates taken from high response rate surveys to be used as criteria for bias assessment (Yeager et al 2011; Erens et al 2014), this is a strong assumption, albeit one that will always be necessary for psychological and attitudinal variables."
- **3.** The suggestion here is that the effect of non-response bias will vary depending upon the nature of the matter being investigated by the survey.
- **4.** The findings in Sturgis et al. relate to face-to-face surveys only. It should not be assumed that the effects of non-response bias will be the same with online surveys.
- 5. Sturgis et al.'s analysis refers to absolute differences in survey responses rather than relative differences. It is therefore plausible that the effect could be considerable when examining low incidence behaviours or conditions (e.g. 'problem gambling').
- 6. We observe that there appears to be a contradiction within the Technical Report. If, as Sturgis et al. observe, the addition of reluctant respondents makes only a marginal difference to survey accuracy, why does the Gambling Commission believe that 'problem gambling' may be under-reported due to reluctance to respond?

As the GSGB is 'gambling focused', it is possible that the survey disproportionately attracts those who gamble, so that this group may be over-represented.

Analysis

- 1. This appears to be a significant understatement. The effect of topic salience is well understood. Professor Heather Wardle has described this as the predominant source of bias explaining the difference in estimates between the GSGB and the HSE.
- 2. It is unclear why the Technical Report makes no mention of the Wardle opinion provided to the Gambling Commission in May 2023.

Caveats for interpreting estimates generated by the Problem Gambling Severity Index (PGSI)

The GSGB will produce new estimates of those scoring 1 to 2, 3 to 7 and 8 or higher on the Problem Gambling Severity Index (PGSI). No survey methodology is perfect; different surveys measuring the same phenomena will provide different estimates because variances in survey design and administration can affect both who takes part and how people answer these questions. Until 2010, data on gambling was captured through the bespoke British Gambling Prevalence Survey (BGPS) series (conducted in 1999, 2007 and 2010). Originally intended to be a tri-annual survey, funding for the BGPS

⁷⁸ The observation is made in relation to the accuracy of survey findings in relation to more than 500 variables from across seven surveys.

was cut in 2011. The Commission then sought different ways to capture information about gambling within available budgets.

Between 2012 and 2021, the primary method of measuring scores according to the PGSI (as well as a second measurement instrument, the DSM-IV) was through the Health Survey for England (HSE series) and the Scottish Health Survey. The GSGB picks up where the BGPS left off by being a bespoke gambling survey that captures a wide range of information about gambling across the whole of Great Britain. However, the methodology for the new GSGB differs from the BGPS and the health survey series in a number of ways. The remainder of this section considers a range of issues affecting all surveys, that may either serve to under-estimate or over-estimate the PGSI estimates.

Factors which may mean PGSI estimates are under-estimated in household-based surveys

Coverage error

Using the PAF as a sample frame is common on large-scale surveys, including the BGPS, the GSGB and the health survey series. This means that only those living in private households are eligible to be included in the survey. People living in student halls of residence, military barracks, hospitals, prisons and other institutions are excluded. Some of these populations may have higher rates of gambling and higher PGSI scores. All studies using the PAF as a sample frame inherit this source of bias.

Analysis

- It is far from clear that all population groups living at institutional addresses will have higher rates of problem gambling. Students, for example, appear to be at lower risk of 'problem gambling'. In the HSE 2018 the rate of PGSI 'problem gambling' for those in full-time education was 0.0%; and the rate for those aged 18 or 19-years-old (the modal age for someone living in a hall of residence) was 0.15%.
- 2. There is evidence that members of the armed forces and people in prison are at elevated risk of 'problem gambling' but these groups are relatively small in terms of the total population.
- **3.** NHS Digital advises that while the absence of institutional addresses should be "borne in mind, especially for older people", it also notes that "the proportion of those not living at private addresses is very small and so is **likely to have little impact on most prevalence estimates**".
- 4. In any case, as the Gambling Commission notes, the GSGB and the HSE will be affected identically by this factor.

Social desirability bias

This bias in founded on the idea that there are social norms that govern certain behaviours and attitudes, and that people may misrepresent themselves so as to appear to conform to these norms. In the survey context, this misrepresentation may involve participants explicitly deciding to give false information or modifying their in-mind answer. However, it can also involve participants giving information that they believe to be true but is in fact inaccurate. It is a potential risk for all surveys that collect information on sensitive topics, including the health survey series and the GSGB. Sensitive topics include those that:

- may be perceived as an invasion of privacy (for example, asking about frequency of gambling)
- involve a disclosure risk where there could be repercussions for the participant as a result of responding (for example, asking about criminal behaviour), or

• have to admit to breaking a perceived social norm (for example, asking about alcohol consumption).

One strategy to reduce the risk of social desirability bias is to use self-completion methods. These methods include online and postal questionnaires, which are completed by the participant. Self-completion methods are used on both the health survey series and the GSGB to collect information on gambling. However, the surveys differ in the way in which self-completion methods are used, which may affect resulting estimates. The health survey series is an interviewer-administered survey that includes a paper self-completion questionnaire to ask about gambling behaviour. This is typically completed by participants in the presence of the interviewer and potentially other household members, who also take part in the survey.

Sturgis and Kuha noted that it is possible that the presence of an interviewer or other household members might lead to underreporting of gambling in the self-completion questionnaire.

Analysis

- 1. This seems to misrepresent the opinion in Sturgis & Kuha. They observed that socially desirable response bias may affect responses but noted that "to minimize the risk of this kind of bias, the health surveys use a paper self completion questionnaire for the gambling questions" before acknowledging that "it is still possible that the presence of an interviewer or other household members might lead to underreporting of gambling in the self-completion questionnaire."
- 2. Critically, they concluded that: *"socially desirable responding in the health surveys is unlikely to be a significant contributory factor to the lower estimates of gambling harm."*
- 3. By omitting this assessment, the Technical Report misrepresents the balance of opinion expressed in Sturgis & Kuha.

Their analysis did not find a statistically significant difference in the proportion of people with a PGSI score of 1 or more within Health Survey for England (HSE) data, depending on whether other people were present at the time the gambling questions were being completed. However, subsequent analysis of HSE 2018 data conducted for the GSGB pilot, using multi-variate regression models, found that the odds of having an PGSI of 1 or more were 1.5 times higher among those who did not have other household members present at the point of interview. The authors concluded that the online methods of GSGB may offer greater privacy to participants, and so reduce social desirability bias.

Analysis

- 1. The "subsequent analysis referred to here is a paper by Ashford et al. in 2022, which was funded by the Gambling Commission as part of the GSGB development project.
- 2. Ashford et al. found (as stated in the Technical Report) that PGSI scores were lower on average when another member of the household was present.
- 3. The Technical Report fails to mention that Sturgis provided the Commission with analysis that casts considerable doubt on the opinion of Ashford et al.
- 4. Sturgis speculated that the lower PGSI scores might not show the effect of socially desirable response bias when another householder was present; but simply reflected that another householder existed.

"The problem here is that there are substantive as well as methodological reasons to expect the presence of a household member to affect the PGSI responses. For example, we might expect that a spouse/partner provides a 'protective' effect against problem gambling, or that problem gamblers are more likely to select out of cohabitation partnerships. So, the spouse/partner coefficient may arise not because the spouse/partner is present during the interview but because there is a spouse/partner at all."

5. He further observed that the correlation of lower PGSI scores with the presence of another person was restricted to a spouse or partner, a sibling or an unrelated child. The effect was not observed for the presence of a parent or the respondent's own children; while the presence of another relative or an unrelated adult predicted higher PGSI scores.



 Sturgis tested this by including marital status in his model. He found that the effect was attenuated and that the association between lower PGSI scores and the presence of a spouse or partner was no longer significant.

6.

"Now we find that **the coefficient for spouse/partner is no longer significant** but the coefficient for being married/cohabiting is significant and negative. In short, in order for the 'others present' variables to be interpreted as indicative of socially desirable responding, it is necessary to include appropriate controls in the model to account for these kinds of substantive effects."



A recent review of the GSGB development has suggested that additional research could be undertaken to better understand the role of socially desirable responding as the driver of the difference in gambling estimates between in-person and self-completion surveys.

Non-response and/or selection bias

During the stakeholder engagement sessions conducted for the GSGB, those with lived experience of gambling harms stated that they would have been unlikely to participate in a survey when they were experiencing gambling difficulties. This was also highlighted by Sturgis in his review of the GSGB methods.

Analysis

- 1. This seems to misrepresent the Sturgis opinion, by suggesting that Sturgis agreed with the stakeholder engagement panel.
- 2. What he actually wrote was this: "we know that people are more likely to take part in a survey if the topic is personally salient to them. This would help to explain why a survey which is explicitly about gambling obtains a higher response rate amongst gamblers than a survey that is generically about 'health'. However, we might question whether this would apply to problem gamblers, who may wish to avoid answering questions about their gambling as it may cause them emotional distress."
- 3. There is also evidence from other sources that appears to confound the opinion of the stakeholder panel. For instance, Forrest and McHale (2018) found in an English longitudinal survey that PGSI score predicted participation in subsequent waves of the survey.

Evidence supporting this is provided by analysis on non-response of the 2007 and 2010 BGPS series. In 2007, Scholes et al demonstrated a strong relationship between the factors predicting household

non-response and gambling frequency: area and household-level factors which predicted lower household response were associated with higher gambling frequency. This suggests that those households less likely to take part in surveys were more likely to contain frequent gamblers¹⁸. Similar analysis conducted for the BGPS 2010 (reported in Wardle et al, 2014)¹⁹ demonstrated that households which either:

- a) required multiple attempts to contact
- b) were reissued after multiple follow-up attempts, or

c) were followed-up by telephone interviewers after the face-to-face interviewer had been unable to make contact were more likely to contain people who gambled.

This supports the notion that very engaged gamblers may be less likely to take part in surveys overall. This is likely to apply to all surveys. (However, both the health survey series and the GSGB are likely subject to different selection biases.)

Analysis

- 1. This appears to be a mischaracterisation of the research findings in Wardle et al. The BGPS did find that some variables were correlated with both low response rates and high gambling frequency but the application of weights in the BGPS addressed this. The study states: *"For the majority of variables available for responders and non-responders (households and all adults within co-operating households) the evidence presented in this report suggests that the existing BGPS 2007 weight successfully dealt with non response biases present in the unweighted data. Adding information over and above age, sex and region made little difference to the gambling prevalence rates. The BGPS 2007 results therefore were robust against potential unit non-response biases."*
- 2. The suggestion therefore made in the Technical Report is that no action was taken by NatCen to ensure that weights addressed this issue. This may be true but, if it is, it is unclear why it was not raised as a concern previously (or why the approach in the BGPS was not carried over to the Health Surveys).
- 3. They also found that those survey respondents who did not complete the DSM-IV questionnaire were likely to be infrequent gamblers a finding that is germane to the question of the effect of non-response on estimated rates of 'problem gambling'. The study observes that: *"Examination of non-responders to the problem gambling screen showed that these people were most likely to: Be young men. Have gambled less than once a month within the past year. Be Asian or Asian British (as opposed to being White British). Have the lowest personal income."*

Question instruments to measure the negative impacts of gambling

The measurement of experience of so-called problem gambling is via a series of questions known as "screens". Multiple different screens to measure the experience of problem gambling exist. No screen is perfect. In the BGPS and health survey series, two different screening instruments have been used: the DSM-IV and the PGSI <u>Problem gambling screens</u>.

Analysis of these screens shows that they capture different groups of people with potentially different types of problems. Orford et al suggested that the PGSI, especially among women, may underestimate certain forms of gambling harms which the DSM-IV is better suited to measure²⁰. For this reason, the BGPS and health survey series always included both the DSM-IV and PGSI screens. The rates of problem

gambling reported by the PGSI are lower than those reported by the DSM-IV. Since the BGPS was developed, the PGSI has become one of the most widely used screens, particularly because it presents scores on a spectrum of severity. In addition, there is now greater focus on the wider range of negative consequences associated with gambling which are not captured by the PGSI or the DSM-IV. During consultation on the GSGB questionnaire content, stakeholders strongly suggested that it would be appropriate to include only one screen for problem gambling and to use additional questionnaire space to capture other important aspects of gambling experiences. As a result, the GSGB only includes the PGSI screen, which generates lower estimates of problem gambling than the DSM-IV.

Analysis

1. It should be recognised that screening instruments are designed to favour false positives over false negatives (on the grounds that, in a clinical setting, the former are preferable to the latter).

Factors which may mean PGSI estimates are over-estimated within bespoke gambling studies

Non-response bias/selection bias

Analysis

1. The Sturgis Review highlighted non-response bias/ selection bias as the principal factor necessitating caution when considering the GSGB results; yet the Technical Report does not mention this point within this section.

How surveys are presented to potential participants can influence who takes part. Williams and Volberg²¹ conducted an experiment presenting the same survey to potential participants but varying its description – introducing it either as a health and recreation survey or a gambling survey. The found that rates of problem gambling were higher in the latter. This is maybe because people who gamble may potentially be more likely to take part in a gambling survey because it is relevant to them. The GSGB likely suffers from this selection bias compared with the health survey series. Ethically, the GSGB invite letter has to inform people what the study is about which may make it more attractive to those who gamble. Despite best efforts to reduce this possibility, it is likely that some selection bias remains and so that rates of past-year gambling participation and PGSI scores are higher in the GSGB compared with the health survey series (when compared using the exact same questions, as was the case for the pilot and stage 1 of the experimental statistics phase).

Analysis

1. It is worth stating that in the Williams and Volberg study referred to, the level of overreporting of 'problem gambling' in the gambling survey by comparison with the health and recreation survey was substantial. The prevalence rate was 400% higher in the gambling survey compared to the health and recreation survey.

In addition, analysis conducted by Sturgis and Kaha²² and also, Ashford and others (the latter for the GSGB pilot) detailed in the <u>Participation and Prevalence: Pilot methodology review report</u> found that those who completed PGSI questions online had higher PGSI scores than those who completed the questions via an alternative mode. In short, online surveys may overestimate the proportion of online

gamblers, which may in turn overestimate gambling harm because online and frequent gambling are independently associated with a higher probability of gambling harm.

Analysis

- 1. This passage appears to dilute the opinion in Sturgis and Kuha, which stated: "Online surveys, whether using probability or non-probability sampling, overrepresent people who are more likely to gamble online and to gamble frequently, relative to the proportions of these groups in the general population".
- Ashford et al. was less firm on this point but its position relied upon analysis that has shown to be faulty or questionable (failing to consider the impact of lockdown restrictions on survey comparability and failing to control for marital status when considering the relationship between PGSI score and the presence of another householder).
- 3. The Technical Report therefore presents the evidence on this point as weaker than it is.

However, evidence suggests that those experiencing harms from gambling are less likely to take part in surveys overall and have poorer health outcomes. Given this, there is also the possibility that these people may be less likely to take part in a health-focused survey, which would also impact on the results obtained by health surveys. This is a theoretical possibility that needs further empirical examination, as recently recommended by Sturgis in his review of the GSGB development²³.

Analysis

- 1. The Technical Report does not specify the evidence in question here and we were not able to find any reference to this evidence in the Sturgis Review.
- 2. The suggestion is that all NHS Health Statistics are likely to be unreliable because people with poor health are less likely than people in good health to take part.
- 3. A suggestion of this moment should be properly substantiated.

FAQs – Gambling Survey for Great Britain July 2024

The new methodology – What's changed and why/ comparability with previous surveys

What are the benefits of the GSGB?

As the regulator of a complex sector and so we can also carry out our statutory duty to advise government effectively this new survey has the benefits of:

- Robust future proofed methodology which has been independently endorsed
- Bigger sample size equals more analytical power
- Frequency of data collection and timely reporting
- Updated questionnaire reflects today's gambling landscape
- Ability to make comparisons across England, Scotland and Wales (first time since 2010) and regional comparisons
- Strong foundation upon which to build (e.g. data linkage and longitudinal opportunities, changes to questionnaire to remain current)

What is the new survey methodology? What methods or approaches are being used for the Gambling Survey for Great Britain and why?

The Gambling Survey for Great Britain uses a push-to-web approach, whereby selected households receive a letter through the post asking up to two adults in the household to take part in the survey online. This is supplemented with a paper questionnaire for anyone not online or who prefers an offline approach.

To create a robust and nationally representative survey, we are selecting a best practice stratified random probability sample of addresses in Great Britain, from the Postcode Address File (PAF) to take part. Selected households receive a letter through the post asking up to two adults in the household to take part in the online survey. This is called a push-to-web survey. The Postcode Address File is owned by the Post Office, it is publicly available and contains all known postcodes in the UK.

To minimise non-coverage and selection bias, the online survey is supplemented by a postal questionnaire follow up to enable less technologically literate people, those without internet access and those who prefer an alternative approach to respond. This step is essential for the Gambling Survey for Great Britain as some gambling behaviours, notably the propensity to gamble online, is correlated to the probability to take part in an online survey and would therefore lead to biased results.

How is the new methodology different from the previous methodology?

Previously the Commission had used multiple ways to access and collect data on the topic of gambling, including health surveys, conducted by each of the home nations. The Health Survey for England currently uses a face-to-face approach, with a self-completion approach for questions relating to gambling. A face-to-face approach is also used in Scotland, whilst in Wales, a telephone and online survey approach is used. The Commission also ran a quarterly telephone survey, which was designed to track trends in gambling behaviours in between health survey years, and an online tracker survey, capturing more topical information. The new Gambling Survey for Great Britain consolidates all survey requirements into one single study.

The new methodology uses a push-to-web approach, whereby selected households receive a letter through the post, asking up to two adults in the household to take part in the survey online. This is supplemented with a paper questionnaire for anyone not online or who prefers an offline approach.

The GSGB has <u>been independently reviewed</u> by Professor Sturgis, Professor of Quantitative Social Science at the London School of Economics. Given the changing survey landscape and the need to be able to better detect and understand patterns and trends in gambling behaviour, he concludes that the move to the new methodology for the GSGB was the correct decision.

Why is the Gambling Commission moving from using the Telephone Survey and reliance on the goldstandard Health Survey to a new approach for compiling the official statistics for participation and prevalence?

The methods we previously used to gather data on adult gambling participation and the prevalence of problem gambling are no longer adequate for our requirements, and we no longer view them as gold standard for our needs. In recent years face-to-face response rates have been declining and many organisations have been shifting survey collection methods to online methodologies, particularly many public sector bodies.

We wanted to develop an approach which would provide national coverage, regularity, and consistency of approach across England, Scotland, and Wales, allowing us to confidently report on trends in gambling behaviour, as well as a more detailed understanding of behaviours amongst sub-population groups.

The GSGB has <u>been independently reviewed</u> by Professor Sturgis, Professor of Quantitative Social Science at the London School of Economics. Given the changing survey landscape and the need to be able to better detect and understand patterns and trends in gambling behaviour, he concludes that the move to the new methodology for the GSGB was the correct decision.

How does the new methodology improve data accuracy and reliability?

The Gambling Survey for Great Britain collects data from up to 20,000 respondents per annum and will greatly improve the level of analysis that can be undertaken on the results. (10,000 in Year 1)

The Gambling Survey for Great Britain will report participation data on a quarterly basis and data on the consequences of gambling (including PGSI, experience of severe harms and potential other negative consequences) on an annual basis, this will greatly improve the timeliness and frequency of data. Previously data from the Health Surveys was only available every few years, and there was a long period of time between fieldwork and publication of data.

The gambling activities we ask about in the survey have been tested and updated to reflect the current gambling landscape, including more detailed categories to capture online activities, meaning the data the survey collects is representative of gambling that is available today (We now ask about 16 online activities compared to 2 in the Health Survey). The last time the activity list was updated was in 2007, when online gambling was nowhere near as developed as it is today, and the list was more tailored towards land-based gambling. More granular information on each activity is included in the survey, including capturing participation on both the online and in-person element of each gambling activity. This will provide a more detailed breakdown of activities than what we have been able to do previously.

To measure the prevalence of those experiencing difficulties with their gambling, we will be using the full Problem Gambling Severity Index (PGSI) consisting of 9 statements. Our quarterly telephone survey previously used the PGSI mini screen, which was based on 3 statements, this was only ever intended to monitor trends in between health surveys years and was never designated as the official statistic for PGSI. In addition, we have developed a suite of new questions to understand other consequences of gambling because of someone's own gambling and as a result of someone else's gambling, these range from severe harms such as bankruptcy or relationship breakdown to other potentially negative consequences such as being absent from work or study.

What was the significance of the pilot and experimental phases of the project?

Following a consultation in 2020, we undertook a pilot to test the suitability of a push-to-web approach for our needs and to understand the impact of the methodology change. In the experimental phase we worked on refining the methodology to make sure it was the best it could be, there were several conditions which we wanted to test out to ensure that we had the right approach going forward. These experiments included reviewing household selection (who and how many adults should respond to the survey), testing different ways of capturing information relating to gambling related harm, and testing a new gambling participation list and how best to present it to participants. Finally, we took the learning from these stages, applied them, and re-ran the survey (in step 3) as the final stage of our testing process, ahead of launching the mainstage survey.

Our approach has followed the recommendations set out by Professor <u>Patrick Sturgis in 2021</u> which concluded that a move to online interviewing should be combined with a programme of methodological testing and development to mitigate selection bias. Professor Sturgis has since reviewed and <u>independently assessed</u> the work we have done to develop the GSGB and described our approach as exemplary.

What are the limitations and/or potential biases with the new methodology?

All survey methodologies have strengths and limitations associated with them. We have been open and transparent about the strengths and limitations of the GSGB methodology, which are published on our website here Gambling Survey for Great Britain - technical report - Data analysis and reporting (gamblingcommission.gov.uk).

When building an evidence base around policy, market or consumer questions it is important to remember that GSGB provides one important perspective but not the only one.

(The Commission collects operator data as well as consumer data and is constantly looking at fresh sources as part of its data strategy.)

The limitations are:

- With a push-to-web methodology, interviewers are not present to collect the data in person and accuracy of answers relies on participants understanding the questions asked and following the instructions. This is mitigated somewhat by keeping questioning and survey routing clear and simple and the significant advances made by the research industry on this approach.
- Compared with face-to-face interviewing methods, remote data collection methods typically have lower response rates, meaning they are potentially more susceptible to non-response bias. However, response rates for face-face interviews are also declining, meaning these studies are also subject to non-response bias. This is expected to continue. Furthermore, survey methodologists have found that the correlation between response rate and non-

response bias is considerably weaker than conventionally assumed (Groves and Peytcheva 2008; Sturgis et al. 2017)12.

- As highlighted in the report by Professor Patrick Sturgis (Methodological factors affecting estimates of the prevalence of gambling harm in the United Kingdom: A multi-survey study), surveys using predominantly or entirely online self-completion, produce consistently higher estimates of gambling harm, compared to surveys using a paper self-completion questionnaire as part of a face-to-face interview. As part of a balanced methodology. this is why it's important that respondents are given the opportunity to respond on paper if they prefer, currently around 40% of respondents are choosing to respond on paper. Professor Sturgis published an <u>independent assessment</u> of the GSGB in Feb 2024, he concluded that the move to a push to web approach was the correct one for the Commission to take.
- The new survey is a gambling focused survey, rather than a health-related survey containing gambling questions (like the Health Survey for England). Therefore, the survey may appeal more to gamblers more than non-gamblers. To mitigate against this, we have strengthened wording in the invitation letter to encourage all respondents including non-gamblers to take part in the research and where there are more than two adults living in the household, we have also included instructions for the two adults whose birthdays are next in the household to take part in the survey. Whilst we have done our best to mitigate against this, it's likely some non-response bias will remain.

How confident can we be that this new methodology provides an accurate estimate of PGSI?

In 2020, we consulted on improving the way we collect data on adult gambling participation and the prevalence of problem gambling, our consultation was well supported by stakeholders who agreed with our proposal to test a future proofed methodology for the collection of these official statistics in the future. This follows guidance from the Office for Statistical Regulation (OSR) which encourages innovation and continuous improvement.

Our approach also follows recommendations from Professor Sturgis report published in 2021 which said measurement of gambling prevalence and harm should move to online surveying (to allow more fine-grained sub analysis of behaviours and more regular data provision). He has since endorsed our approach as it will enable better detection and understanding of patterns and trends in gambling behaviour.

We have put significant investment into the project, with experts in questionnaire design, social research and gambling research leading the development.

That said, it is never easy to make this sort of change as it means restarting a trend. GSGB will provide a very robust new baseline but is not comparable with previous surveys.

We are confident that the new survey will allow us to collect in depth insight about gambling behaviours in one place, using a consistent methodology with results reported regularly so we can track changes in gambling behaviour over time for many years to come.

We will however continue to exercise caution when using the statistics, specifically those relating to the PGSI, as there is a risk that they could over estimate PGSI scores, in the same way that previous surveys could have under-estimated. We will continue to work through Professor Sturgis's recommendations to help us understand the impact of the change in methodology in more detail.

Our work to develop a suite of questions about the wider consequences of gambling will help us to move away from an over reliance on one figure from the PGSI as a measure of harm which is not

what the screen was intended for, and to better understand the relationship between PGSI and consequences of gambling.

How are you implementing the recommendations from Patrick Sturgis's assessment of the GSGB methodology?

There were seven recommendations made by Sturgis in his review. Recommendations 1-4 were considered by Professor Sturgis to be the highest priority, whilst recommendations 5-7 were for longer term implementation.

Our intention is to commission an external supplier to undertake recommendation 1 and 2 on behalf of the Commission during 2024/25. We have already commissioned some work to evaluate the effect of the updated list of gambling activities on PGSI estimates and will share the findings shortly (recommendation 3).

We are working through the other recommendations and will publish information on how we plan to address them on 25th July.

It is important to note that continuing to review and refine a survey methodology is best practice in terms of official statistics production.

Engagement in developing the new methodology.

Has there been any consultation with stakeholders including industry?

Yes, in December 2020, the Gambling Commission launched a <u>consultation on gambling participation</u> <u>and prevalence research (opens in new tab)</u> to gather views on proposals to develop a single, highquality methodology to measure gambling participation and prevalence of problem gambling. The <u>results of the gambling participation and prevalence research consultation</u> were published in June 2021. At the start of the project, the Commission set up three stakeholder engagement panels who were informed about the study and were provided with an opportunity to raise questions. These groups covered those with lived experience of gambling, academics/policy makers and industry. Groups have met four times to discuss the development of the project and for us to share information on current progress. In addition, the Commission held dedicated sessions relating to the Gambling Survey for Great Britain at our Evidence conference in March 2023 and March 2024. The Commission has also published outputs from the developmental stages of the project.

We have also spoken with lots of consumers through the development of the survey, we undertook cognitive testing of the questionnaire and undertook some qualitative research to help inform our analysis of responses to questions about the consequences of gambling. Our consumer voice programme is also engaging with people who gamble to undertake some research which will inform future questions on the survey, as well as providing an ongoing qualitative perspective to add further depth to the quantitative approach of GSGB.

Which organizations are involved with developing the methodology and implementing the Gambling Survey for Great Britain?

We commissioned the National Centre for Social Research (NatCen) in partnership with the University of Glasgow to develop the Gambling Survey for Great Britain on behalf of the Commission. In addition, two external experts, Professor Robert Williams and Dr Rachel Volberg, were commissioned to review the process undertaken to develop questions to measure gambling related harms and provide their expert advice on how the questions could be modified or the approach strengthened.

We have also engaged with stakeholders on a regular basis throughout the development of the survey. Following the initial consultation for this project, we ran a stakeholder engagement survey to inform development of the project to which over 70 stakeholders responded, we have held a number of stakeholder engagement panel sessions over the last three years, and we held a session at our Evidence Conference in March 2023 and March 2024 about the survey.

We also commissioned Professor Patrick Sturgis, Professor of Quantitative Social Science at the London School of Economics, to undertake an independent review of the methodology for the Gambling Survey for Great Britain. His results are published <u>here</u>. Professor Sturgis has also reviewed and provided comments on the GSGB annual report, specifically about how the chapter on consequences of gambling is written.

Have gambling industry and other stakeholders been consulted in the survey design?

At the beginning of the project, we established three stakeholder groups representing different audiences for the survey. One of these groups was aimed at representatives from the gambling industry, with whom as regulators we are required to interact. Groups have met at least four times in the last three years to discuss the project findings and for us to share information on current progress. In addition, the Commission held dedicated sessions relating to the Gambling Survey for Great Britain at our Evidence conference in March 2023 and March 2024. Summaries of our stakeholder engagement sessions can be found on the <u>Gambling Survey for Great Britain</u> <u>development timeline</u>

How has/will the Gambling Commission build stakeholder confidence in the new survey?

In the 2020 consultation, stakeholders supported the development of a high-quality single survey for whole of Great Britian using a future proofed methodology.

At the beginning of the project, we established three stakeholder groups representing key audiences for the final survey output. These groups covered industry, lived experience and academics/policy. Groups have met four times each in the past three years to discuss project findings and so that we could share information on current progress. In addition, the Commission held dedicated sessions relating to the Gambling Survey for Great Britain at our Evidence conference in March 2023 and March 2024.

We have been transparent about the development process, publishing a timeline of development on our website along with outputs from each of the developmental phases.

In the survey design process, we have built on advice given to us by experts in survey design from the National Centre for Social Research and the University of Glasgow. We have also engaged widely with stakeholders on a regular basis throughout the project.

Participation in the survey/representativeness

How have the survey respondents been selected to ensure a fair representation of the GB population/different demographics?

A best practice stratified random probability sample of addresses in Great Britain was used to ensure a nationally representative survey. We use the Postcode Address File (PAF), compiled by the Post
Office which is publicly available, as our sampling frame for the survey. This comprises a list of all known postal addresses or postcode delivery points in the UK. Prior to selection, the PAF sample frame was stratified (ordered) based on country and English region, population density at local authority level and overall Index of Multiple Deprivation (IMD) score. This helps to reduce sampling errors and ensure representativeness with respect to the measures. Whilst respondents are invited to take part in the survey online, they also have the option to complete a paper version of the survey if they prefer.

How are survey responses collected?

Questions are asked using a push-to web-survey, a methodology being increasingly used by many bodies who produce official statistics. In addition, we also offer a paper completion route to ensure we don't miss out on those respondents in our sample who are not able or willing to respond online.

How does the new methodology affect response rates? Are there measures in place to ensure adequate participation?

Remote data collection methods can have lower response rates, although our response rates are in line with other national push-to-web surveys, so this hasn't been an issue for us to date.

What will happen if the annual target of 20,000 responses is not achieved?

Progress towards the annual target is closely monitored throughout the year. At the start of a survey (data collection) year, a 20% reserve sample is drawn. The reserve sample(s) can be quickly brought into play if response is falling below expected levels.

What actions will be taken if survey participation falls below targets in future surveys?

Progress towards the annual target is closely monitored throughout the year. At the start of a survey (data collection) year, a 20% reserve sample is drawn. The reserve sample(s) can be quickly brought into play if response is falling below expected levels.

In addition, we would review any factors that may have adversely affected response rates to try and understand what might have caused this and how it can be combatted. For example, we would look at the invitation letters and reminders to see if the content and timing of mailings needs to be amended. We would also look at the pattern of response, overall and by demographic groups to see if targeted action is required.

In the unlikely event that participation falls below target, we will still be able to present the data based on what we have collected. This will likely still be a sizable sample and allow the same analyses to be conducted.

How is the privacy and security of survey respondents protected?

The information given by survey respondents is treated confidentially and used for statistical purposes only.

The National Centre for Social Research (NatCen), who collect the data, has regular internal and external audits of its information security, and is accredited to the ISO 27001:2013, the international standard for information security.

Survey respondents are directed to the survey Privacy Notice on NatCen's website which gives full detail of why the data is collected, what it is used for and by whom. The Notice also provides contact details should respondents have any questions about their data protection rights.

How can someone who is interested in participating in the survey submit a response?

Only those selected in the sampling process can submit a response to the survey to ensure representativeness. Selected households will receive a letter inviting them to take part in the survey, up to two adults per household can take part by either completing the survey online or via a postal questionnaire option.

Timescales/Reporting/Using the statistics.

What is the timeline for conducting the survey and presenting findings? / When will the first results of the Gambling Survey for Great Britain be published? / How often will the survey be conducted, and findings presented? / What information will the Gambling Commission publish as the official statistics?

Fieldwork for the GSGB takes place continuously throughout the year.

We will publish 4 wave specific publications per year, focused on participation in gambling in that wave.

Year 1 Wave 1 and Year 1 Wave 2 have bene published on our website <u>Gambling Survey for Great</u> <u>Britain (GSGB) (gamblingcommission.gov.uk)</u>

The first annual report from the Gambling Survey for Great Britain will be released on July 25 2024.

The annual report will report an annualised participation figure, reasons for gambling, and enjoyment of gambling, but will also incorporate additional measures such as PGSI, consequences of gambling and other topical information collected throughout the year.

More information about scheduled releases from the GSGB can be found on our website.

Why is the first annual report based on only 10,000 responses when you stated 20,000 is the target?

Data collected in a calendar year will be aggregated to form our annual report each year. The data collection for the Gambling Survey for Great Britain started mid-2023, so the first annual report will be based on data collected in the last 6 months of 2023 and will be made up of around 10,000 responses. We will collect a full years' worth of data from 2024 onwards.

Where can I find the official statistics?

Official statistics will/are available on the Gambling commissions website in its own unique <u>Gambling</u> <u>Survey for Great Britain hub</u>.

Where can people get a copy of the questionnaire?

The wave 1 questionnaire can be found here <u>Gambling Survey for Great Britain - Year 1 (2023), wave</u> <u>1 report: Official statistics (gamblingcommission.gov.uk)</u>

The wave 2 questionnaire can be found here Gambling Survey for Great Britain - Year 1 (2023), wave 2 report: Official statistics (gamblingcommission.gov.uk)

Using the data

Will the introduction of the GGSB mean that the customer interactions guidance will be updated.

We don't have plans to update the customer interaction guidance. If we did at a future point consider updating this guidance industry would be engaged as part of any discussion.

Will the full dataset be publicly available for third party analysis?/ How do you ensure transparency in your methodology and analysis of results?

Following the publication of the annual report each year the data will be available on the UK Data Service (UKDS) for all stakeholders to request the data, download it and conduct their own analyses.

What safeguards are in place to prevent the misuse or misinterpretation of the data from the Gambling Survey for Great Britain?

Our Communications teams work closely with media outlets, and will provide a full press release on the day of publication

Guidance on how to use the statistics is available on our website.

We have also published information on our website about what happens if we spot misuse of the official statistics.

Comparisons/ data challenges

Has PGSI been underestimated by the previous surveys?

The reason for developing the Gambling Survey for Great Britain is because previous data collection methods were no longer meeting our needs, we needed a methodology which allowed us to gather data from a larger sample of respondents, on a more frequent basis and used the same consistent approach across the whole of Great Britain.

Because of the change in methodological approach the findings are not directly comparable with previous estimates but there are a number of reasons why the estimates might be different (topic salience, social desirability, actual change). As outlined by Patrick Sturgis, further work is required to get a better understanding of the relative magnitude of potential errors affecting the survey estimates, and which estimates (the GSGB or previous surveys) are closer to the truth.

How do you respond to claims the survey over-represents people with gambling problems? Sample bias?

Professor Sturgis has independently reviewed the GSGB methodology and has said there is a risk that the methodology over estimates PGSI. He has provided a number of recommendations to help us further understand the impact of the new methodology which we will be implanting during 2024/25. Professor Sturgis also comments that previous surveys measuring PGSI may have under estimated and concludes that further work is required to understand which estimates are closer to the truth.

One of the limitations of the approach is that the survey might appeal to gamblers more than nongamblers. To mitigate against this, we have strengthened wording in the invitation letter to encourage all respondents including non-gamblers to take part in the research and where there are more than two adults living in the household, we have also included instructions for the two adults in the household whose birthdays are next, to take part in the survey. However, we have also had feedback from some stakeholders throughout the development of the survey that people who are experiencing difficulties with their gambling, would not be likely to fill in this type of survey which would suggest there is also a risk that some people experiencing harm may not be represented in the findings.

Professor Sturgis has independently reviewed the GSGB methodology and provided a number of recommendations to help us further understand the impact of the new methodology and the potential magnitude of bias. The Commission will be working through these recommendations.

How are breaks in trends between the old and new survey methodologies explained?

The Gambling Survey for Great Britain statistics use a new methodology, and therefore results are not directly comparable to data from previous surveys such as the Health Surveys. With time, the data collected from the new methodology will grow and enable us to look at trends and comparisons across this data source.

How does the new methodology affect comparability with previous data – the telephone survey, Health survey?

As a result of our comprehensive work to update our methodology, survey questions, and shifting the survey's focus towards gambling, the findings cannot be directly compared to data collected through our previous methods such as the quarterly telephone survey or NHS Health Surveys. We will be establishing a new baseline with this data, which is necessary to effectively track future shifts in gambling behaviour in Great Britain.

How do you respond to claims that the Gambling Commission pre-determined problem gambling rates would be higher?

This is not true. We consulted on changes to the methodology and proposed a push to web approach which we felt was the most viable option and the most logical approach to future proof the survey. Some consultation respondents were also in favour of a non-interviewer led approach as it removed the possibility of social desirability bias. We were however aware of evidence that "online surveys tend to systematically overestimate the prevalence of gambling harm compared to face-to-face interview surveys". However, the report by Patrick Sturgis also made recommendations for the measurement of gambling prevalence and harm to move to online surveying given the high and rising cost of in person surveys. It also stated that the move to online interviewing should be combined with a programme of methodological testing, to mitigate selection bias. Our experimental phase of the project stressed the importance of a postal survey completion option to ensure people aren't excluded from taking part in the survey because of the online methodology. We know 40% of respondents are opting to take part by post so it is vital we continue to offer this option for these respondents. An independent review of the GSGB methodology by Professor Sturgis has endorsed the methodology we are using.

Can I gross up GSGB statistics into a population level estimate?

Whilst the move to a push-to-web survey was endorsed by Professor Patrick Sturgis in his independent review of the GSGB methodological approach and will enable to better detection and understanding of patterns and trends in gambling behaviour, he also urges due caution with the new statistics, "being mindful of the fact that there is a non-negligible risk that they substantially over state the true level of gambling and gambling harm in the population".

There are many explanations as to why the GSGB appears to produce higher estimates of problem gambling than prior studies. As Sturgis (opens in new tab) notes, the two studies which investigate this so far were unable to come to a definitive estimate about the magnitude of the errors and thus uncertainty remains around which estimates (the GSGB or prior studies) are closer to the truth.

Our guidance states that you can gross up estimates of gambling participation to population level estimates as long as this is done with due caution, saying things like 'as many as X number of people in Great Britain' or 'Up to X number of people gamble' would be acceptable.

However given the greater margin of error with estimates relating to PGSI or broader consequences of gambling, these should not be grossed up to population estimates. If you were to scale these estimates up to population this would go against our advice of the use of the statistics.

What are you going to use these statistics for? Will you be changing the rules operators must follow as a result?

This methodology is new and it is too early to use it in isolation to make policy or regulatory changes. Our current focus is to continue to develop the methodology so in time we can expect it to become an important part of the evidence base.

What action will you take if some products are shown to have higher levels of risk associated with them?

This methodology is new and it is too early to use it in isolation to make policy or regulatory changes. Our current focus is to continue to develop the methodology so in time we can expect it to become an important part of the evidence base.

What action will you take if some demographic or community groups are shown to be at risk of harm than others?

This methodology is new and it is too early to use it in isolation to make policy or regulatory changes. Our current focus is to continue to develop the methodology so in time we can expect it to become an important part of the evidence base.

Understanding the consequences of gambling

How is the Gambling Commission addressing the concerns raised about the measurement of gambling harms?

We have produced a <u>technical report on the development of new questions on the GSGB to measure</u> <u>the consequences of gambling</u>. These questions will be asked every wave and findings will be reported annually.

How will the survey help to better understand the extent and nature of the consequences of gambling?

The survey contains new questions specifically developed by the Gambling Commission relating to consequences of gambling, both as a result of someone's own gambling and as a result of someone else's gambling. This data will be published annually.

We do not simply want to rely on PGSI for understanding the impact of gambling, asking about severe harms associated with gambling and other potentially negative consequences allows us to provide a far richer picture, including an element of scale to understand and explain consequences better.

How will the ongoing survey contribute to a more comprehensive understanding of gambling behaviours in Great Britain?

One of the strengths of the Gambling Survey for Great Britain is that we have a dedicated survey upon which we can ask questions about gambling behaviours, this will give us the ability to ask far

more questions about people's gambling behaviour than we have been able to do before. We are also introducing a new suite of questions related to the consequences of gambling which will give more in depth understanding of the peoples experiences. Coupled with this, the increased sample size (n=10000 Year 1 and n=20,000 from Year 2 onwards) will increase the level of detailed analysis we can undertake. Within the Gambling Survey for Great Britain we have the ability to recontact respondents for longitudinal analysis and for qualitative research, as well as add more questions on an individual wave basis. In addition to this we have a Consumer Voice programme which complements our quantitative research programme which further aids our understanding of gambling behaviours in Great Britain, as well as improvements we are making to our collection of operator data and looking at other sources such as open banking data.

As a regulator it is our job to ensure that gambling is not harmful to children or vulnerable groups – this new data will give us a far better evidence base on which to do this, with a better understanding of the nuances of people's experiences.

Are there more people at risk for gambling harm than previously thought?

We haven't measured the consequences of gambling on previous surveys, so this is new data that the commission will be collecting via the GSGB.

The PGSI scores are higher than estimates produced via previous surveys, the two studies which investigated this were unable to come to a definitive conclusion about the magnitude of the errors. Uncertainty around which estimates (the GSGB or prior studies) are closer to the truth therefore remain. Further investigation of the reasons for this difference is needed to better understand the scale and direction of impact upon the GSGB estimates. Until more and better evidence is available on this question, uncertainty will remain over which methodological approach produces estimates which are closest to the truth.

How will the Commission be acting upon the findings in relation to gambling related suicide?

In addition to the severe consequences asked about, all participants were asked if they had thought about taking their own life or made an attempt to take their own life in the past 12 months, using questions developed for the Adult Psychiatric Morbidity Survey. Those who experienced this were then asked whether this was related to their gambling. Response options were: a lot, a little and not at all.

It is the first time we have asked questions about whether people have thought about taking their own life or made an attempt to do this and we'll need to see how stable this figure is over time (although findings have been stable throughout the developmental stages of the GSGB and this first annual report). It would be too early to use the findings from this question in isolation to make policy or regulatory changes.

The wording of the question we have included in the survey, asks how attributable this was to someone's own gambling.

What is the Commission's position on gambling related suicide?

Any loss of life connected with gambling harm is one too many and we are absolutely committed to protecting the safety of the public and players.

But it should be remembered that we are a regulator and in Britain it is the role of Coroner's court to investigate deaths.

Nevertheless, when we become aware that a person has taken their own life and that gambling may have been a factor, we consider whether the operators the person gambled with were correctly following the social responsibility requirements we put in place. Where they have failed to act appropriately we will take regulatory actions against them.

If asked: All operators are required to inform us when they become aware that a person who has gambled with them has died by suicide.

X% problem gambling rate is still very high even if you halved it! What are you doing to make gambling safe!?

In recent years we have been focused on making gambling safer.

We have banned gambling on credit cards, increased online age and ID verification and strengthened customer interaction requirements, forced operators to take part in a national online self-exclusion scheme and brought in new rules to stamp out irresponsible 'VIP customer' practices.

In May we announced new rules which reduced the intensity of online games, improved consumer choice over receiving gambling marketing, tightened age verification checks, implemented light touch financial vulnerability checks and introduced a pilot to explore financial risk assessments.

In addition to rule changes we have taken an uncompromising approach to operators who failed to keep gambling safe - in the last three years we have taken enforcement action against 46 operators who have paid out £103.2m.

We look forward to working with the new Government to continue our shared focus on making gambling safer, fairer and crime-free.

Your job is to keep gambling safe - surely the PG rate should be a KPI for you as a regulator?

It's one of a range of data and evidence that we look at to inform our work and measure the impact of regulation.

What do you mean by an overall rate of gambling related harm, and why shouldn't the statistics on consequences of gambling be used to create a measure of overall gambling harm?

The GSGB includes questions from the PGSI which is a measure of behavioural symptoms and adverse consequences from gambling. In addition to this the Commission has developed a suite of questions to measure what we have often referred to as gambling related harms - these are things not covered by the PGSI. The suite of questions measure a number of severe consequences from gambling e.g. bankruptcy, relationship breakdown which if experienced are very likely to be harmful. We also measure other potential adverse consequences, which may or may not be harmful depending on an individual's situation and frequency at which the consequence is experienced. For this reason we have moved away from describing these as gambling related harm and changed our language to refer to the consequences of gambling. Given the degree of variability within responses we do not think it is appropriate to aggregate all of the responses to the questions on adverse consequences into one overall measure of 'harm' -e.g. 'number of people who have experienced harm' which is why we have reported the responses to each question separately in the annual report. Our guidance reiterates our advice that the results should not be aggregated in order to calculate an overall rate of gambled-related harm in Great Britain.

Other questions

Comms

How will you work with media to accurately report on new statistics?

We have <u>published guidance on our website</u> about how to use the statistics from the GSGB and a press release will be issued.

How will you communicate that the Health Survey is no longer the official data source?

We will communicate the new official statistics from the Gambling Survey for Great Britain on our <u>website</u>.

Use of findings

How will the Gambling Commission use the findings? Translate issues raised in the survey into policy or regulatory changes?

The Gambling Survey for Great Britain will be one very significant part of the overall evidence base which we use to inform policy decisions. Our <u>evidence gaps and priorities (2023-26)</u> sets out some of the ways in which the Gambling Survey for Great Britain will be used.

Will there be any qualitative research to add context to the quantitative data?

We have a comprehensive research programme at the Commission consisting of both quantitative and qualitative research. Our Consumer Voice programme runs alongside the Gambling Survey for Great Britain, providing the resource to undertake exploratory research – often qualitative – to explore topics in more detail. We have also added a recontact option to the Gambling Survey for Great Britain survey to allow us to recontact respondents either for follow up longitudinal research or for qualitative follow up.

Do the new findings from the GSGB mean that the White Paper needs rewriting based on new evidence?

No. The evidence we produced for the white paper was based on a robust evidence base containing multiple sources of evidence that were available at the time. The introduction of the GSGB does not change that, but it will enhance our evidence base going forward and allow us to fill gaps in our evidence base that we didn't have before. Direct comparisons to previous surveys can't be made, but we can look at patterns within the data and many of the patterns we see are similar (e.g. higher PGSI amongst younger people, higher PGSI for some products, patterns in gambling participation etc).

Adhoc

How will the new methodology and official statistics impact the gambling industry?

The purpose of the GSGB was to develop a survey which would provide consistent and timely insights into gambling behaviours across GB using a survey questions which represent the gambling landscape as it is now. The industry will be able to use this data alongside their own to understand the market and help keep players safe.

How does/will the new statistics from the GSGB compare internationally?

It is difficult to compare internationally due to differences in the way research is undertaken in different countries and in some cases, different problem gambling screens are used. A recent article in the Lancet (11/11/23) however suggested that past year problem gambling affects between 0.1%-5.8% of adults globally.

Why are you publishing game level information for the National Lottery but not for any other operator?

The purpose of the GSGB is to have a survey which provides consistent and timely insights into gambling behaviours across GB. With National Lottery being the most popular activity that people take part in and because the draw-based games offered by the NL are very different in their nature, often appealing to different demographics and / or players with different drivers it is important for us to understand the different patterns of play across the whole portfolio. Hence, we think it is relevant to publish slightly more granular information in this respect.

In addition, we get frequent public enquiries (i.e. through FOI requests) about levels of sales (and therefore, effectively participation) for particular games, so we are able to answer these through the GSGB data.