

From: [REDACTED]
To: [REDACTED]
Subject: RE: Official statistics in development
Date: 17 October 2023 09:56:58
Attachments: [image002.png](#)

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Hi [REDACTED]

Great, I'll send an invite over now.

Thanks,
[REDACTED]

From: [REDACTED]@gamblingcommission.gov.uk>
Sent: 16 October 2023 13:23
To: [REDACTED]@Statistics.gov.uk>
Subject: RE: Official statistics in development

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Hi [REDACTED]

[REDACTED], do you have any availability on Thursday this week? Anytime between 12.30-3pm or 4-5pm?

Thanks

[REDACTED]

From: [REDACTED]@Statistics.gov.uk>
Sent: Wednesday, October 11, 2023 9:15 AM
To: [REDACTED]@gamblingcommission.gov.uk>; [REDACTED]
[REDACTED]@Statistics.gov.uk>
Subject: RE: Official statistics in development

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Hi [REDACTED]

Sorry for the late reply. Would you be available for a meeting either tomorrow or next week?

Best wishes,
[REDACTED]

From: [REDACTED]@gamblingcommission.gov.uk>

Sent: 05 October 2023 09:59

To: [REDACTED] <[\[REDACTED\]@Statistics.gov.uk](mailto:[REDACTED]@Statistics.gov.uk)>

Cc: [REDACTED] <[\[REDACTED\]@Statistics.gov.uk](mailto:[REDACTED]@Statistics.gov.uk)>

Subject: RE: Official statistics in development

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Hi [REDACTED]

Thanks for the message, it certainly is a popular topic! Apologies I hadn't realised you were in the Health and Social Care domain but makes sense now as I was in touch with you regarding the Health Survey.

Nice to meet you [REDACTED] - hopefully we can catch up at some point soon? Would be good to chat through our project at the GC

Thanks

[REDACTED]

From: [REDACTED] <[\[REDACTED\]@Statistics.gov.uk](mailto:[REDACTED]@Statistics.gov.uk)>

Sent: Wednesday, October 4, 2023 4:57 PM

To: [REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Cc: [REDACTED] <[\[REDACTED\]@Statistics.gov.uk](mailto:[REDACTED]@Statistics.gov.uk)>

Subject: RE: Official statistics in development

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Hi [REDACTED]

Thanks for getting in touch. I'm glad that the help on the gambling casework was useful. Gambling statistics seems to be a popular topic at the moment!

Not sure if you know but I'm actually in the Health & Social Care domain at OSR. I am copying in [REDACTED] who is our contact for DCMS. She should be able to help you with the process of moving to OS.

Regards

[REDACTED]

From: [REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Sent: 04 October 2023 16:03

To: [REDACTED] <[\[REDACTED\]@Statistics.gov.uk](mailto:[REDACTED]@Statistics.gov.uk)>

Subject: Official statistics in development

[REDACTED]

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Hi [REDACTED]

Hope you are well. A while ago you helped me with a case around misuse of official statistics and I'm getting in touch to see if you can help me with something else this time, apologies if you are not the right person to contact.

We are working on some 'official statistics in development' and I would be interested in speaking to you about our approach and the process of moving from 'in development' to 'official statistics' as we hope to do that next year.

Would you be available for a call either later this week or next week sometime?

Kind Regards

[REDACTED]

**GAMBLING
COMMISSION**



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Making gambling safer, fairer and crime free



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From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED] @Statistics.gov.uk; [REDACTED]
Subject: RE: Questions for Gambling Commission Casework
Date: 20 November 2023 12:32:00

Hi [REDACTED]

Thank you for your query, happy to help, and apologies for the slight delay in replying, [REDACTED]

The two paragraphs you have quoted below are consistent with each other. I will set out some information below about each of the paragraphs to set this out.

As you have highlighted, our previous response to you stated that “[Previous research has shown that many online gamblers have multiple accounts, and it is likely that the proportion of individuals subject to the checks will be lower than the proportion of accounts subject to the checks. However, we do not know how many individuals will be subject to checks or assessments on multiple accounts; this is why we have reported on accounts.](#)”

This is correct - We do not know exactly how many individuals who hold multiple accounts would be subject to checks, so we referred to the number of accounts in our response.

In our [Open Letter to Racing Post](#) readers, an estimate on the number of account holders likely to be affected, is made:

"It's estimated that just 3 percent of accounts would undergo financial risk assessments. And by our estimates at most just a tenth of that 3 percent would not have a frictionless check via credit reference agency or open banking data. **So our estimate is that at most just 0.3 percent of account holders** would ever be asked to directly provide the additional financial information that operators are already requiring of some customers. This means **99.7 percent of customers** would not be asked to directly provide any information."

In this paragraph, the “*at most... 0.3% of account holders*” estimate is a product of the estimated proportion of accounts that will be subject to a financial risk assessment (3% as discussed in our response to your previous queries) and the estimated proportion of account holders that would have to provide information for the risk assessment (10%). The rationale for the 10% estimate is detailed in the [White Paper \(from page 223\)](#).

As the 10% estimate in the open letter to The Racing Post relates to the provision of information by customers, it is appropriate to refer to the proportion of account holders, rather than accounts. As you have highlighted from our previous response, we do not know exactly how many individuals will gamble with sufficient expenditure across multiple accounts to be subject to checks with multiple operators. We do however know that many online customers hold multiple accounts and it is more likely that higher spend customers will hold multiple accounts - the number of account holders that are checked will therefore be less than the number of accounts. This is also why the phrase “*at most*” was used in the open letter. The 99.7% estimate follows directly from the 0.3% estimate and is clearly linked to it.

I hope that's helpful and answers your question.

Kind Regards,

[REDACTED]

From: [REDACTED]@Statistics.gov.uk>
Sent: Monday, November 13, 2023 1:01 PM
To: [REDACTED]@gamblingcommission.gov.uk>
Cc: [REDACTED]@Statistics.gov.uk>; [REDACTED] >
Subject: RE: Questions for Gambling Commission Casework

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Hi [REDACTED]

I understand, and I also appreciate your patience.

I have one further question. In your response, you stated that

“Previous research has shown that many online gamblers have multiple accounts, and it is likely that the proportion of individuals subject to the checks will be lower than the proportion of accounts subject to the checks. **However, we do not know how many individuals will be subject to checks or assessments on multiple accounts; this is why we have reported on accounts.**”

However, in the [Open Letter to Racing Post](#) readers, an estimate on the number of accountholders likely to be affected, is made:

"It's estimated that just 3 percent of accounts would undergo financial risk assessments. And by our estimates at most just a tenth of that 3 percent would not have a frictionless check via credit reference agency or open banking data. **So our estimate is that at most just 0.3 percent of account holders** would ever be asked to directly provide the additional financial information that operators are already requiring of some customers.

This **means 99.7 percent of customers** would not be asked to directly provide any information."

Are you able to provide some clarity of this 0.3 percent estimate? I am happy to have a chat if it is easier.

Also, please be reassured that the issues being investigated do not concern official statistics, therefore our conclusions will be guidance for improvements.

Many thanks,

[REDACTED]

From: [REDACTED]@gamblingcommission.gov.uk>
Sent: 10 November 2023 17:11

To: [REDACTED]@Statistics.gov.uk>
Cc: [REDACTED]@Statistics.gov.uk>; [REDACTED]>
Subject: RE: Questions for Gambling Commission Casework

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Hi [REDACTED]
No problem about the delay.
Our main reason for asking for the details was to enable me to inform colleagues in our communications team in case there's a risk of the quote(s) being taken out of context.
I'll wait to hear further in due course when the response is in a position to be shared; thanks for confirming the intention to do so.

Have a good weekend,
[REDACTED]

From: [REDACTED]@Statistics.gov.uk>
Sent: Friday, November 10, 2023 1:50 PM
To: [REDACTED]@gamblingcommission.gov.uk>; [REDACTED]>
Cc: [REDACTED]@Statistics.gov.uk>
Subject: RE: Questions for Gambling Commission Casework

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Hi both,

I apologise for the delay in responding to you.

I am still investigating this issue and am drafting the responses. As these are still being worked on, I cannot confirm today, which specific sections of your response I would like to quote.

However, please be reassured that I will share the responses with you before they are finalised, to make sure you feel it accurately reflects the discussion we have had.

Best wishes,
[REDACTED]

From: [REDACTED]@gamblingcommission.gov.uk>
Sent: 10 November 2023 09:03
To: [REDACTED]@Statistics.gov.uk>
Cc: [REDACTED]>
Subject: RE: Questions for Gambling Commission Casework

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attachments unless you recognise the sender and know the content is safe.

Hi [REDACTED]

I know [REDACTED] got in touch last week with the query about your intention to quote our response to the complainants – are you able to share the section(s) with us in advance?

Thanks,

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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[REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

[REDACTED] <[REDACTED]@gamblingcommission.gov.uk>

Sent: 02 November 2023 15:02

To: [REDACTED] <[REDACTED]@Statistics.gov.uk>

Cc: [REDACTED] <[REDACTED]@Statistics.gov.uk>; [REDACTED]

<[REDACTED]@gamblingcommission.gov.uk>; [REDACTED]>

Subject: RE: Questions for Gambling Commission Casework

Some people who received this message don't often get email from [REDACTED]@gamblingcommission.gov.uk. [Learn why this is important](#)

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Hi [REDACTED]

Please see attached for a joint response to your questions from both the Gambling Commission and DCMS. This has been prepared with the input of [REDACTED] [REDACTED] (copied into this email) and I would be grateful if you could address any subsequent queries to us both.

As you will see from the attachment, we felt that it was necessary to provide a joint response in the interests of transparency and completeness. The "around 3% of accounts" estimate that is the subject of the questions was an estimate that was generated by DCMS colleagues and first made public in the DCMS-produced White Paper. It was therefore appropriate to seek additional information from DCMS to answer your questions as fully as possible.

I hope the information provided is sufficient but if you require anything more from us, please let us know.

Kind Regards,

[REDACTED]

From: [REDACTED]@gamblingcommission.gov.uk>

Sent: Friday, October 27, 2023 3:53 PM

To: [REDACTED]@Statistics.gov.uk>

Cc: [REDACTED]@Statistics.gov.uk>; [REDACTED]

[REDACTED]@gamblingcommission.gov.uk>

Subject: RE: Questions for Gambling Commission Casework

Hi [REDACTED]

Thanks for sending across the clarification questions.

We are gathering the relevant information to answer your questions, and my colleague, [REDACTED] [REDACTED] will be in touch next week with our [REDACTED]

Thanks

[REDACTED]

From: [REDACTED]@Statistics.gov.uk>
Sent: Monday, October 23, 2023 4:06 PM
To: [REDACTED]@gamblingcommission.gov.uk>
Cc: [REDACTED]@Statistics.gov.uk>
Subject: Questions for Gambling Commission Casework

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Hi [REDACTED],

I hope you are well.

Following on from our meeting last Thursday, here are the questions concerning the casework. Within this, I have provided some context and shared the relevant publications. Any clarification you can provide us will help us inform our response to those who raised concerns with us.

I apologise for not getting these over to you sooner. I'm happy to answer any questions you may have.

Best wishes,

[REDACTED]

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Response 1:

Thank you for contacting the [Office for Statistics Regulation](#). We are the regulatory arm of the [UK Statistics Authority](#).

As the regulator for [official statistics](#), our role is to support confidence in statistics published by government bodies. Although the Gambling Commission and Department of Culture, Media, and Sport (DCMS) are producers of official statistics, the data related to your concerns are not labelled as official statistics. Our findings and judgement are therefore made on an informal and advisory basis.

It is our view that data published routinely by government bodies should be classified as official statistics unless there are very good reasons not to do so. As part of taking forward our findings, we will work with the Gambling Commission and DCMS to understand their approach to labelling data.

General visibility and transparency:

While the Gambling Commission quotes the “around 3% of accounts” estimate, it was first generated by the Department of Culture, Media and Sport (DCMS) and made public in the DCMS-produced [White Paper](#).

The estimate was generated from an industry data request, **involving four operator groups**, which covered an estimated 19% of all active remote gambling accounts, as stated in the [Advice document](#). The data are then made available through a [downloadable excel file](#) published on the Gambling Commission’s website. DCMS informed us that the 3% estimate was reached by applying reasonable assumptions to industry data request.

We consider that the [downloadable excel file](#) lacks detail and further information around the methodology and assumptions made in reaching this 3% estimate is needed to support understanding.

Timeframe:

The Commission and DCMS decided a twelve-month period provided the most sufficient snapshot. During our investigation, they explained the timeframe of data collection (May 2020-April 2021) was selected, as this was the most recent twelve-month period. When asked, the DCMS and Commission responded that collecting data for a less recent timeframe may have been **“burdensome for some operators”**.

However, as noted by yourself, this period was subject to lockdown measures. It would be beneficial for the Commission and DCMS to be transparent about the impacts of the timeframe selection on the statistics produced.

Multiple accounts:

DCMS and the Commission acknowledge that online gamblers may have multiple accounts. However, they informed us that **“we do not know how many individuals will be subject to checks or assessments on multiple accounts”**. Given this, it is appropriate for the

Commission and DCMS to report on the number of accounts as this measure can be drawn from the statistical evidence.

Assumptions regarding financial risks:

Table A provided by the Full Advice [Report](#) presents ‘Binge gambling’ and ‘Significant losses over time’ as two mutually exclusive events. We are not an auditor of statistics and therefore have no remit to access the data to confirm whether over 1 million accounts will be subjected to enhanced checks.

DCMS informed us that it considered adjustments for several factors, including the potential overlap between the two risk classifications (‘Binge Gambling’ and ‘Significant losses over time’). However, **no specific proportion of overlap** was assumed. To accommodate this, a lower estimate (the 3% estimate) was decided upon with the most confidence.

As highlighted above, we consider further information around the methodology and assumptions underpinning these statements is needed to support understanding. We will encourage the Commission and DCMS to enhance the transparency of this information.

Once again, thank you for contacting OSR.

Response 2:

Thank you for contacting the [Office for Statistics Regulation](#). We are the regulatory arm of the [UK Statistics Authority](#).

As the regulator for [official statistics](#), our role is to support confidence in statistics published by government bodies. Although the Gambling Commission and Department of Culture, Media, and Sport (DCMS) are producers of official statistics, the data related to your concerns are not labelled as official statistics. Our findings and judgement are therefore made on an informal and advisory basis.

It is our view that data published routinely by government bodies should be classified as official statistics unless there are very good reasons not to do so. As part of taking forward our findings, we will work with the Gambling Commission and DCMS to understand their approach to labelling data.

General visibility and transparency:

While the Gambling Commission quotes the “around 3% of accounts” estimate, it was first generated by the Department of Culture, Media and Sport (DCMS) and made public in the DCMS-produced [White Paper](#).

The estimate was generated from an industry data request, **involving four operator groups**, which covered an estimated 19% of all active remote gambling accounts, as stated in the [Advice document](#). The data are then made available through a [downloadable excel file](#) published on the Gambling Commission’s website. DCMS informed us that the 3% estimate was reached by applying reasonable assumptions to industry data request.

We consider that the [downloadable excel file](#) lacks detail and further information around the methodology and assumptions made in reaching this 3% estimate is needed to support understanding.

Timeframe:

The Commission and DCMS decided a twelve-month period provided the most sufficient snapshot. During our investigation, they explained the timeframe of data collection (May 2020-April 2021) was selected, as this was the most recent twelve-month period. When asked, the DCMS and Commission responded that collecting data for a less recent timeframe may have been **“burdensome for some operators”**.

However, as noted by yourself, this period was subject to lockdown measures. It would be beneficial for the Commission and DCMS to be transparent about the impacts of the timeframe selection on the statistics produced.

Multiple accounts:

You referred to an [Open Letter](#) that seemed to conflate the number of accounts with the number of customers. DCMS and the Commission acknowledge that online gamblers may have multiple accounts. However, they informed us that **“we do not know how many individuals will be subject to checks or assessments on multiple accounts”**. Given this, it is appropriate for the Commission and DCMS to report on the number of accounts as this measure can be drawn from the statistical evidence. However, we agree that these measures should not be conflated in communications and further clarity around the methods and definitions used alongside the data would support understanding.

Once again, thank you for contacting OSR.

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Query on gambling statistics
Date: 05 December 2023 18:13:00

Thanks [REDACTED]

From: [REDACTED]@Statistics.gov.uk>
Sent: Tuesday, December 5, 2023 12:32 PM
To: [REDACTED]@gamblingcommission.gov.uk>
Cc: [REDACTED]@Statistics.gov.uk>
Subject: RE: Query on gambling statistics

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Hi [REDACTED]

We've added in an extra line so they understand our remit (see draft below). They seemed to be unclear of it in their correspondence. Hope that is satisfactory.

Thanks for letting us know about the planned speech.

Regards

[REDACTED]

From: [REDACTED]@gamblingcommission.gov.uk>
Sent: 05 December 2023 12:21
To: [REDACTED]@Statistics.gov.uk>
Cc: [REDACTED]@Statistics.gov.uk>
Subject: RE: Query on gambling statistics

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Hi [REDACTED]

Thanks for sharing the draft response, it looks good to us.

With regards to this week's speech at GambleAware, we won't be including any statistics in the speech.

Thanks

[REDACTED]

From: [REDACTED]@Statistics.gov.uk>
Sent: Monday, December 4, 2023 3:36 PM

To: [REDACTED]@gamblingcommission.gov.uk>
Cc: [REDACTED]@Statistics.gov.uk>
Subject: RE: Query on gambling statistics

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Hi [REDACTED]

Thanks for the call earlier, it was really helpful to hear more about the whole gambling statistics discourse.

Below is the draft response that we are sending to the complainant – very similar to your email language.

Let me know if you have any queries,

[REDACTED]

Thank you for sharing your concerns regarding the statement that “Excluding the NL, 90% of profits come from 5% of customers” made by Andrew Rhodes at the 2021 conference.

We have spoken with the Gambling Commission (GC) statistics team who explained that Andrew Rhodes misquoted a ‘Patterns of Play’ statistic from a research funded by GambleAware and delivered by the National Centre for Social Research with academics from the University of Liverpool.

At the time of the speech, only the [interim report](#) had been published, and the relevant statistic is on slide 21. The statistic should be 86% gross gambling yield (GGY) from 5% of bettors for remote betting, rather than 90% GGY from 5% of gamblers for non-National Lottery products. We are pleased that the Gambling Commission has added this correction on the [record of the speech](#) with the date of the amendment clearly visible.

This research and its outputs do not constitute official statistics and therefore there were no data releases in need of amendment. We hope that this is helpful to you.

We will keep you updated of our planned regulatory work with the Gambling Commission including opportunities to feed in your views.

From: [REDACTED]@gamblingcommission.gov.uk>
Sent: 04 December 2023 12:37
To: [REDACTED]@Statistics.gov.uk>
Cc: [REDACTED]@Statistics.gov.uk>
Subject: RE: Query on gambling statistics

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Hi [REDACTED]

Nice to speak to you earlier in the meeting about this query.

If you need anymore information then just let me know. Will we see your draft response to the complainant as we did for the other query?

Thanks

[REDACTED]

From: [REDACTED] <[REDACTED]@Statistics.gov.uk>
Sent: Monday, December 4, 2023 9:08 AM
To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Cc: [REDACTED] <[REDACTED]@Statistics.gov.uk>
Subject: RE: Query on gambling statistics

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Hi [REDACTED]

Thanks for getting back to me. It is really helpful to know the accurate statistic and also all the links you have sent are useful too.

I'm joining the call so happy to discuss more.

Regards

[REDACTED]

From: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Sent: 30 November 2023 12:49
To: [REDACTED] <[REDACTED]@Statistics.gov.uk>
Cc: [REDACTED] <[REDACTED]@Statistics.gov.uk>
Subject: RE: Query on gambling statistics

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Hi [REDACTED]

Apologies for the delay in replying - as this speech occurred two years ago, it has taken a little time to review documents from the time as well as subsequent releases to find out whether the statement had been repeated.

Thank you for bringing our attention to the quote. As you have indicated, it appears that it is a misrepresentation of a 'Patterns of Play' statistic. At the time of the speech, only the [interim report](#) had been published, and the relevant statistic is on slide 21. We recognise that the

statistic has been misquoted and that the figure should be 86% GGY from 5% of bettors for remote betting, rather than 90% GGY from 5% of gamblers for non-National Lottery products.

As the Patterns of Play research study was funded by GambleAware and delivered by the National Centre for Social Research with academics from the University of Liverpool; its outputs do not constitute official statistics and were produced externally to the Commission therefore we do not have any data releases in need of amendment. Clearly, we do not wish to mislead any stakeholders revisiting the contents of past speeches and have therefore posted a correction on [our record of the speech](#) with the date of the amendment clearly visible.

We note your reference to multiple repetitions of this statistic since the speech so have been checking previous speeches; we have not located any occasions where the incorrect figure has been repeated. In our review, we have found many references of findings from the study being accurately presented: In an interview on Racing TV in February 2023, Andrew accurately used a racing-specific statistic from slide 20 of the same report. In the same month, [a speech at ICE](#) included a reference that “the rough proportions are that 85 percent of GGY comes from around 5 percent of accounts” and findings from the study were also used in the [CEO Briefing speech](#) on 9 November this year. We have also taken care when using other statistics from the research study in written communications, including our [Advice to Government – Review of the Gambling Act 2005](#) (References in paragraphs 1.30, 1.32, 1.40, 2.21, 8.15, 8.16, Annex B (para7), Annex G (para2)) and [Summer 2023 Consultation](#) (Pg11, 14, 33, 45, 48, 55, 67, 94-95). You may also be interested to know that the general point of the statistic (a large proportion of GGY coming from relatively few accounts) is not something that the Commission has been reiterating regularly and there were three instances referencing claims that the trend is reversing ([IAGR 2022](#), [CEO Briefing 2022](#), [DGA Event 2023](#)).

We would also like to reiterate that although the quote in the 2021 speech rounded-up the GGY proportion from 86% to 90%, it is in the context of making the point that a large proportion of GGY comes from relatively few accounts and there is a reliance from the gambling industry upon them; I hope you agree that this general point is true.

The speech for this years GambleAware conference is currently being written and I can share the source of any similar statistics that we are planning to use.

We are also arranging a meeting next week to discuss the 1st query that your colleague [REDACTED] is dealing with, and wondered if it would be helpful for you to join that call so we can discuss this 2nd query as well?

Kind Regards

[REDACTED]

From: [REDACTED] <[\[REDACTED\]@Statistics.gov.uk](mailto:[REDACTED]@Statistics.gov.uk)>

Sent: Tuesday, November 28, 2023 2:56 PM

To: [REDACTED] <[\[REDACTED\]@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)>

Cc: [REDACTED] <[\[REDACTED\]@Statistics.gov.uk](mailto:[REDACTED]@Statistics.gov.uk)>

Subject: RE: Query on gambling statistics

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Hi [REDACTED]

I just wanted to follow up to see if you were able to source the claim mentioned below. I understand that Mr Rhodes is due to address the conference again this week and it would be good to know the sources of any similar statistics that he might use.

Thanks

[REDACTED]

From: [REDACTED]
Sent: 22 November 2023 12:55
To: [REDACTED]@gamblingcommission.gov.uk>
Cc: [REDACTED]@statistics.gov.uk>
Subject: Query on gambling statistics

Hi [REDACTED]

Hope you are well. I just wanted to raise another query we have had about gambling statistics and [claims made by Andrew Rhodes back in 2021](#) at the GambleAware conference.

There is a line that was used "*Excluding the National Lottery, 90% profits come from 5% of customers*" and I understand this has been repeated on several occasions since 2021. When raised in this [Select Committee letter](#) about the misuse of gambling statistics (Q234 by Will Prochaska) it was stated that this was not from an official statistic but from the [Patterns of Play research](#) commissioned by GambleAware. We have, however, been unable to source this in the research mentioned.

I have been able to source similar statistics as quoted in parliament such as [this by Paul Blomfield](#) in 2022 : "*86% of gambling profits come from 5% of addicted or at-risk customers.*" A different figure was used in the House of Lords report to the Select Committee on the [Social and Economic Impact of the Gambling Industry Report of Session 2019–21](#) which states: "*The gambling industry spends £1.5 billion a year on advertising, and 60% of its profits come from the 5% who are already problem gamblers, or are at risk of becoming so.*"

Would you be able to help us with the original source of Andrew's 90% profits claim?

Thanks

[REDACTED]

[REDACTED]

[REDACTED]@statistics.gov.uk |

Website: [Office for Statistics Regulation](#)

From: [REDACTED]
To: [REDACTED]
Subject: Mentoring: [REDACTED] - 15 December
Date: 06 December 2023 14:05:00
Attachments: [image001.png](#)
[image002.png](#)

Hi [REDACTED]

I hope you are well.

I'm afraid that [REDACTED] can't make your next mentoring session on 15 December and she doesn't have any availability prior to Christmas for me to reschedule to, so I'm afraid I need to cancel.

Apologies for any inconvenience. [REDACTED] looks forward to speaking to you on Friday 12 January.

Have a lovely Christmas.

Kind regards,

[REDACTED]

**GAMBLING
COMMISSION**

[REDACTED]

[REDACTED]. For anything urgent please
contact communications@gamblingcommission.gov.uk

www.gamblingcommission.gov.uk

Making gambling safer, fairer and crime free



Response 1

Thank you for contacting the [Office for Statistics Regulation](#). We are the regulatory arm of the [UK Statistics Authority](#). Our remit concerns [official statistics](#) - statistics produced by government which must comply with the [Code of Practice for Statistics](#).

Although the Gambling Commission and Department of Culture, Media, and Sport (DCMS) are producers of official statistics, the data related to your concerns were produced for the purposes of an impact assessment and do not constitute official statistics. Our findings and judgement are therefore made on an informal and advisory basis.

Background to the data

The estimate of 3% of accounts that would be affected by proposed financial risk checks was first generated by the Department of Culture, Media and Sport (DCMS) and made public in the April 2023 [White Paper: High Stakes Gambling Reform for the Digital Age](#). The estimate was generated from an industry data request, which covered an estimated 19% of all active remote gambling accounts, as stated in the [Advice document](#).

The relevant data are published in a [data table](#) on the Gambling Commission's website. The timeframe of data collection (May 2020-April 2021) was selected due to being the most recent twelve-month period.

While we welcome the data table being published to support transparency, we consider that the data table could benefit from including some quality information to support understanding of the data. This includes making it clear that these data are not official statistics and being transparent about the potential impacts of the timeframe selection on the data.

Assumptions underpinning the 3% estimate

DCMS considered three relevant factors in its decision to adjust the 3-5.2% range from the Gambling Commission data request to reach a final estimate of approximately 3% of accounts. Considering the three factors together, it concluded that the true impact was likely to be at the lower end of the range, and therefore that 3% was a reasonable estimate for the purpose of impact modelling. These factors were as follows.

1. It considered there was likely to be a significant overlap between the two groups (the two risk classifications 'Binge Gambling' and 'Significant losses over time'), in the data request, but did not assume a specific proportion of overlap.
2. It considered that industry reporting of 'net loss' figures was unlikely to take account of customer winnings within the period or prior to it, which when accounted for would reduce the number of accounts which reach the threshold.
3. Finally, data from Patterns of Play was considered, which found that 3.1% of active online accounts had losses over £2,000 over an entire year. This suggests that the Gambling Commission's finding that 3.2% of accounts lost this much in just 90 days may have been anomalously high.

DCMS and the Commission acknowledge that online gamblers may have multiple accounts. Our view is it is appropriate for the Commission and DCMS to report on the number of accounts as this measure can be drawn from the statistical evidence.

You requested OSR to comment on the estimated number of accounts likely to be subject to enhanced checks. We are not an auditor of the management information held by either DCMS or the Gambling Commission and therefore have no remit to access the data to confirm whether over 1 million accounts will be subjected to enhanced checks.

Kind regards...

Response 2

Thank you for your query. Our remit concerns [official statistics](#) - statistics produced by government which must comply with the [Code of Practice for Statistics](#).

Although the Gambling Commission and Department of Culture, Media, and Sport (DCMS) are producers of official statistics, the data related to your concerns were produced for the purposes of an impact assessment and do not constitute official statistics. Our findings and judgement are therefore made on an informal and advisory basis.

Background to the data

The estimate of 3% of accounts that would be affected by proposed financial risk checks was first generated by the Department of Culture, Media and Sport (DCMS) and made public in the April 2023 [White Paper: High Stakes Gambling Reform for the Digital Age](#). The estimate was generated from an industry data request, which covered an estimated 19% of all active remote gambling accounts, as stated in the [Advice document](#).

The relevant data are published in a [data table](#) on the Gambling Commission's website. The timeframe of data collection (May 2020-April 2021) was selected due to being the most recent twelve-month period.

While we welcome the data table being published to support transparency, we consider that the data table could benefit from including some quality information to support understanding of the data. This includes making it clear that these data are not official statistics and being transparent about the potential impacts of the timeframe selection on the data.

Assumptions underpinning the 3% estimate

DCMS considered three relevant factors in its decision to adjust the 3-5.2% range from the Gambling Commission data request to reach a final estimate of approximately 3% of accounts. Considering the three factors together, it concluded that the true impact was likely to be at the lower end of the range, and therefore that 3% was a reasonable estimate for the purpose of impact modelling. These factors were as follows.

1. It considered there was likely to be a significant overlap between the two groups (the two risk classifications 'Binge Gambling' and 'Significant losses over time'), in the data request, but did not assume a specific proportion of overlap.
2. It considered that industry reporting of 'net loss' figures was unlikely to take account of customer winnings within the period or prior to it, which when accounted for would reduce the number of accounts which reach the threshold.

3. Finally, data from Patterns of Play was considered, which found that 3.1% of active online accounts had losses over £2,000 over an entire year. This suggests that the Gambling Commission's finding that 3.2% of accounts lost this much in just 90 days may have been anomalously high.

You referred to an [Open Letter](#) that seemed to conflate the number of accounts with the number of customers. DCMS and the Gambling Commission acknowledge that online gamblers may have multiple accounts. While we agree that these measures should not be conflated, our view is it is appropriate for the Commission and DCMS to report on the number of accounts as this measure can be drawn from the statistical evidence.

You requested OSR to comment on the estimated number of accounts likely to be subject to enhanced checks. We are not an auditor of the management information held by either DCMS or the Gambling Commission and therefore have no remit to access the data to confirm whether over 1 million accounts will be subjected to enhanced checks.

Kind regards...

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: OSR Drafted responses for fact checking
Date: 14 December 2023 12:46:25
Attachments: [Drafted responses to be shared with GC and DCMS.docx](#)

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

Hi [REDACTED],

Sorry for the delay. Here's the final copy.

Best wishes,
[REDACTED]

From: [REDACTED]@gamblingcommission.gov.uk>
Sent: 12 December 2023 15:16
To: [REDACTED]@Statistics.gov.uk>; [REDACTED] >
Cc: [REDACTED]@gamblingcommission.gov.uk>
Subject: RE: OSR Drafted responses for fact checking

You don't often get email from [REDACTED]@gamblingcommission.gov.uk. [Learn why this is important](#)

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.

Thanks [REDACTED] would it be possible to send us a final copy of the response?

From: [REDACTED]@Statistics.gov.uk>
Sent: Tuesday, December 12, 2023 2:37 PM
To: [REDACTED] >
Cc: [REDACTED]@gamblingcommission.gov.uk> [REDACTED]
[REDACTED]@gamblingcommission.gov.uk>
Subject: RE: OSR Drafted responses for fact checking

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

Hi [REDACTED],

Thanks for your comments and reflections! The response has been updated to reflect the webpage additions.

Best wishes,
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[Redacted]

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.

[Redacted]

[Redacted]

[Redacted]



[Redacted]

On Tue, 12 Dec 2023 at 12:16, [Redacted] <[\[Redacted\]@gamblingcommission.gov.uk](mailto:[Redacted]@gamblingcommission.gov.uk)> wrote:

Hi [Redacted]

It was good to have the opportunity to chat this through last Monday and thanks for sending the updated responses which reflect the discussion we had.

We have taken on board the recommendations with regards to the labelling of the data on our website and explaining the reason for the timeframe selected for the data request. We have updated both the web text and the downloadable excel file on our [website](#), these changes went live yesterday.

If it would be possible to amend the response to include the action taken above that would be great, other than that we are happy with the drafted responses.

Kind Regards

[Redacted]

From: [Redacted] <[\[Redacted\]@Statistics.gov.uk](mailto:[Redacted]@Statistics.gov.uk)>
Sent: Thursday, December 7, 2023 9:25 AM
To: [Redacted] <[\[Redacted\]@gamblingcommission.gov.uk](mailto:[Redacted]@gamblingcommission.gov.uk)>
Cc: [Redacted] <[\[Redacted\]@statistics.gov.uk](mailto:[Redacted]@statistics.gov.uk)>
Subject: RE: Drafted responses for fact checking

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

Hi [REDACTED]

Here are the updated responses following our meeting on Monday. Please let me know your thoughts.

Best wishes,

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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.

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]



[REDACTED]
[REDACTED]
[REDACTED]

On Thu, 30 Nov 2023 at 15:10, [REDACTED] <[\[REDACTED\]@statistics.gov.uk](mailto:[REDACTED]@statistics.gov.uk)> wrote:

Hi,

Thank you for letting me know!

Best,

[REDACTED]

From: [REDACTED]@gamblingcommission.gov.uk>

Sent: 30 November 2023 15:09

To: [REDACTED]@Statistics.gov.uk>

Cc: [REDACTED]@statistics.gov.uk>; [REDACTED]

Subject: RE: Drafted responses for fact checking

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Hi,

I've forwarded the invite to [REDACTED] thank you.

Just FYI, I'm not planning to attend the meeting on Monday – it'll be [REDACTED] and [REDACTED] attending from the GC.

Thanks,

[REDACTED]

From: [REDACTED]@Statistics.gov.uk>

Sent: Thursday, November 30, 2023 2:48 PM

To: [REDACTED]@gamblingcommission.gov.uk>

Cc: [REDACTED]@statistics.gov.uk>; [REDACTED]@dcms.gov.uk>

Subject: RE: Drafted responses for fact checking

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

Hi,

I have just updated the meeting to 9.30am-10am. I also added [REDACTED] to the invite but wasn't able to invite [REDACTED] as I do not have his email address. Are you able to forward the invite to [REDACTED] please?

Yes, it will be useful to cover the other query as part of this meeting.

Best wishes,

[REDACTED]

From: [REDACTED]@gamblingcommission.gov.uk>

Sent: 30 November 2023 09:54

To: [REDACTED]@Statistics.gov.uk>

Cc: [REDACTED]@statistics.gov.uk>; [REDACTED]>

Subject: RE: Drafted responses for fact checking

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 [REDACTED]

Sorry to be a pain but the Commission's [REDACTED] and [REDACTED] [REDACTED] would like to join this call, but [REDACTED] is unavailable at 11.30am. It looks like there's availability for [REDACTED] and DCMS colleagues on Monday at 9.30-10.00 or 3.30-4.00. Do either of those times suit you and [REDACTED]

Also, I'm not sure if you're aware but one of your colleagues [REDACTED] been in touch with [REDACTED] about a statement that was made by our Chief Exec in a speech in 2021; would it be possible to briefly discuss that query during this call too?

Many thanks,

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

On Wed, 29 Nov 2023 at 12:06, [REDACTED] [@gamblingcommission.gov.uk](mailto:[REDACTED]@gamblingcommission.gov.uk)> wrote:

Thanks [REDACTED]

I know that [REDACTED] is on an away-day today so may struggle to respond until tomorrow; I'm sure she will be able to advise regarding availability when she's back.

Kind Regards,

[REDACTED]

From: [REDACTED] [@Statistics.gov.uk](mailto:[REDACTED]@Statistics.gov.uk)>

Sent: Wednesday, November 29, 2023 11:07 AM

To: [REDACTED]@gamblingcommission.gov.uk>

Cc: [REDACTED]@dcms.gov.uk>; [REDACTED]@statistics.gov.uk>

Subject: RE: Drafted responses for fact checking

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

Hi,

Sure, I am available Monday morning and have sent a meeting request. If the suggested time does not work for you, please suggest an alternative. I have also cc'd and invited [REDACTED] to the meeting to help answer any questions you may have.

Best wishes,

[REDACTED]

From: [REDACTED]@gamblingcommission.gov.uk>

Sent: 29 November 2023 09:03

To: [REDACTED]@Statistics.gov.uk>

Cc: [REDACTED]@dcms.gov.uk>

Subject: RE: Drafted responses for fact checking

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 [REDACTED]

As [REDACTED] said, thanks for sharing the draft with us and highlighting those relevant sections.

Rather than collating and sending comments, I think it would be easier to have a conversation. Would it be possible to have a call to discuss this? If so, do you have any availability on Friday or Monday?

Many thanks,

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]

On Mon, 27 Nov 2023 at 10:26, Dady, [REDACTED] <[\[REDACTED\]@statistics.gov.uk](mailto:[REDACTED]@statistics.gov.uk)> wrote:

Hi,

I hope you both are well.

Here is a copy of the drafted responses we intend to share with the complainants. The direct quotes from our communications have been highlighted in yellow.

I am happy to discuss any comments you may have.

Best wishes,

[REDACTED]

For information on the work of the UK Statistics Authority, visit:

<http://www.statisticsauthority.gov.uk>

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From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Removal of In Development/Experimental Statistics Label
Date: 29 January 2024 16:17:00

Hi [REDACTED]

Could we go for 2.30pm on the 1st? I'll send over an invite now.

Thanks

[REDACTED]

[REDACTED]@Statistics.gov.uk>

Sent: Monday, January 29, 2024 4:12 PM

To: [REDACTED]@gamblingcommission.gov.uk>

Cc: [REDACTED]@gamblingcommission.gov.uk>

Subject: RE: Removal of In Development/Experimental Statistics Label

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

Hi [REDACTED]

Sorry for the late reply. It's great to hear about your progress in removing the 'in development' label. We have availability on the following dates if any of these suit?

- Thursday the 1st: 9h00 - 10h30, 14h30 – 15h00
- Friday the 2nd: 9h00 - 11h30, 13h00 - 15h30

Best wishes,

[REDACTED]

From: [REDACTED]@gamblingcommission.gov.uk>

Sent: Wednesday, January 24, 2024 11:18 AM

To: [REDACTED]@Statistics.gov.uk>

Cc: [REDACTED]@gamblingcommission.gov.uk>

Subject: RE: Removal of In Development/Experimental Statistics Label

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 [REDACTED]

Hope you are well.

We are continuing with our development of the Gambling Survey for Great Britain which will collect our official statistics on gambling participation and the prevalence of problem gambling. We have reached the end of our defined period of development for the new survey

methodology and plan to remove the 'official statistics in development' label.

We have also commissioned an independent review of the methodology by Patrick Sturgis at the London School of Economics and have received his draft report which we plan to publish in the next month. His report contains a number of recommendations of potential further experiments we could do and recommendations around keeping up with best practice when it comes to things like household selection.

Would you have time for a call next week to discuss these recommendations? I'd like some advice on whether these recommendations become part of our continuous improvement cycle for the official stats, or whether it impacts the decision to remove the 'in development' label.

Kind Regards

[Redacted]

From: [Redacted] <[Redacted]@Statistics.gov.uk>
Sent: Friday, October 20, 2023 3:17 PM
To: [Redacted] <[Redacted]@gamblingcommission.gov.uk>
Subject: Removal of In Development/Experimental Statistics Label

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

Hi [Redacted],

It was great to meet you yesterday and I was pleased to hear about the developments you've made around measuring problem gambling. I've spoken with my team about the Compliance Check and we will be in touch as we plan our activities for the next business year.

I've had a look at our guidance on changing from OS in development to OS. Although we've change the terminology since we issued this [guidance](#), I think it gives you some of the questions you can ask yourselves about the stats. The Analysis Function have also released [guidance](#), with a list of factors to consider when removing the experimental/in development label.

If you need any further guidance, please don't hesitate to send me an email.

Best wishes,

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted] <[Redacted]@Statistics.gov.uk> Website: [Office for Statistics Regulation](#) | Twitter: [@StatsRegulation](#)

DRAFT

Gambling Survey for Great Britain – Removing the ‘official statistics in development’ label

Introduction

In 2020/21, the Gambling Commission consulted on proposals to improve the way we collect data on adult gambling participation and the impact of gambling. Since then, the Commission have been working on the development of a new survey called the Gambling Survey for Great Britain (GSGB) to collect official statistics on gambling behaviours in Great Britain.

The development has included a pilot study; to test the suitability of a push to web approach and to understand the impact of a methodology change on findings. This was followed by a further experimental phase; to refine the methodology, testing several conditions to ensure that we had the right approach going forward. In November 2023, we published the [final step in the experimental phase of the survey](#).

During development, publications have been labelled as ‘Experimental Statistics’ or ‘Official Statistics in Development’ as they are now referred to. This was to reflect the fact that these were new statistics which were being developed, but which were published to allow users and stakeholders to be involved in their development.

[Guidance](#) published by the Office for Statistics Regulation (OSR) states that the Commission, as the producer of the statistics, should determine when it is appropriate to remove the ‘official statistics in development’ label. This document sets out the reasons why we have taken the decision to remove the ‘in development’ label from the official statistics.

Approach

The label ‘official statistics in development’ is used to alert users to statistics that may be affected by a development, for example in our case the design of a new survey and new methodology to administer the survey. However the label should only be a temporary measure and it was always our intention to remove the label following the experimental/development stage of the project providing it was deemed appropriate.

Advice from the [Government Statistical Service \(opens in new tab\)](#) outlines the factors that should be considered when removing an ‘official statistics in development’ label:

- whether user feedback indicates that statistics are trustworthy, of high quality, and valuable
- whether the methods employed have proved sufficiently robust to suit the variety of circumstances material to the use of the statistics
- whether coverage has reached a sufficient level
- whether the defined development phase has ended
- whether it is judged that the statistics fully comply with the standards of the Code of Practice

Alongside this, [guidance](#) from the OSR states that the decision to remove the label should be based on one of three outcomes:

1. The statistics are of sufficient quality and value to be used in a meaningful way and so be published as official statistics.

[REDACTED]: I think we need to make it clear that according to guidance around official stats in development, we are allowed to determine when we remove the ‘experimental badge’. This paper then sets out the reasons why we as the Commission have taken the decision to remove the experimental badge

[REDACTED] Is it worth mentioning somewhere that ‘experimental stats’ are also known as ‘official statistics in development’ as I think we mention both terms

[REDACTED]: Done

2. The statistics are of insufficient quality or do not meet the required need and so production will be stopped.
3. There is insufficient evidence to reach a conclusion, or further refinement is required – producers would continue the development and be clear about extent of further testing.

We believe that the GSGB is collecting statistics which meet Outcome 1 and have set out the evidence of how we meet each of the factors outlined by the GSS below.

Evidence of meeting these factors:

Whether user feedback indicates that statistics are trustworthy, of high quality, and valuable.

User feedback has been an important aspect in the development of the GSGB. Over 60 respondents completed the 2020 consultation, a further 70 completed a stakeholder engagement survey at the end of 2021. We have held nine stakeholder engagement panel sessions where we have updated on project progress and we hosted a workshop session about the new survey at our Evidence Conference in March 2023 which over 60 people attended. This level of engagement demonstrates how valuable stakeholders consider the statistics to be, the [Government's white paper on High Stakes: gambling reform for the digital age](#), published in April 2023, also highlighted the value of regular and reliable statistics to inform policy making.

We commissioned an independent review of the GSGB approach to demonstrate the quality and trustworthiness of the statistics which was undertaken by Professor Sturgis, Professor of Quantitative Social Science at the London School of Economics. Professor Sturgis concludes in his report that in his opinion it was the right decision to have moved to an online self completion methodology and that the GSGB will yield high quality estimates of gambling prevalence in Great Britain in the years ahead. Professor Sturgis also highlights the benefits that the survey will bring in terms of the better detection and understanding of patterns and trends in gambling behaviours, both within population sub groups and over time – emphasising the value that these statistics will bring.

[REDACTED] : Add link when available (19 Feb)

Despite the user engagement throughout the development of the GSGB, some stakeholders, mainly those within the gambling industry, do remain critical of the methodology we are using and are sceptical about the trustworthiness of the statistics as they believe previous methods of collecting the data (e.g. face to face Health Surveys) were more reliable. We will continue to engage with these stakeholders as we publish the findings from the GSGB to address their concerns.

Whether the methods employed have proved sufficiently robust to suit the variety of circumstances material to the use of the statistics.

A new push-to-web methodology has been used for the Gambling Survey for Great Britain as previously used methods to gather data on adult gambling participation and the prevalence of problem gambling are no longer adequate for our requirements. In 2022, we undertook a pilot to test the effectiveness of a push-to-web method to understand the impacts of a new methodology. In the experimental phase we worked on refining the methodology, which meant that there were several conditions that 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 including how best to present it to

participants. From the production of the experimental statistics, this methodology has proven to be robust and will allow us to bring consistency and regularity of our statistics across Great Britain.

The methodology also allows for more detailed analyses opportunities, that we previously have not been able to do, giving us more value from the data and updated methods. The statistics have been produced in line with the code of practice for statistics from Office of Statistical Regulation (OSR).

Whether coverage has reached a sufficient level.

We have developed an approach which will provide national coverage, regularity of data collection, and consistency across England, Scotland, and Wales. As we collect more data year on year, this will allow us to confidently report on trends in gambling behaviour, as well as a more detailed understanding of behaviours amongst sub-population groups.

Each wave we will collect 5,000 responses from adults across Great Britain, we will undertake four waves per year with a total of 20,000 responses being collected per annum from a nationally representative sample of adults aged 18+ in Great Britain.

We have maximised coverage of respondents by providing a paper response option alongside the web response option. This ensures responses can be captured by those who are less technologically literate, those without internet access and those who prefer an alternative approach to respond. These respondents may have otherwise been missed and not covered in the sample. We are however aware that some groups will be excluded from the survey because they are not included in the sampling frame (i.e. those who do not live in private residences) and we will continue to find ways to include these groups in other research to ensure their views are not missed.

Whether the defined development phase has ended.

Following the [pilot](#), we entered a 12 month experimental phase for the project. This phase allowed for continued development and refinement of the research methodology. In November 2023 we published the findings from the [final step in the experimental stage](#) of the project, signalling that our defined development phase had ended.

Whilst our defined development phase has ended and we will be removing the official statistics in development label, we will be continuing to innovate and improve our official statistics over time as per the [Code of Practice for Statistics](#). This includes taking forward the recommendations set out by Professor Sturgis in his [review of the GSGB](#) to continue to ensure stakeholder confidence in the statistics.

Whether it is judged that the statistics fully comply with the standards of the Code of Practice.

Working closely with our research supplier, NatCen and the University of Glasgow we are confident that the GSGB adheres to the three pillars of Trustworthiness, Value and Quality in the Code of Practice for Statistics. .

The trustworthiness pillar details the requirements which support independent statistics production. For GSGB data releases are pre-announced on a regular and consistent basis, staff are free from political influence - with the appropriate training and skills to work without bias, as well as the data being managed and dealt with in confidentiality with privacy of respondents remaining protected.

Do we want to say trends yet, I agree it will provide trends, just don't want anyone thinking they are getting any this year

Link - add when available (19 Feb)

The value pillar necessitates that the statistics meet user needs, add value, and provide insight. We have fully engaged with our users throughout the different stages of development, tracking our progress via a [timeline](#) on our website. Engagement sessions with stakeholders have been important in allowing us to go into detail on their expectations as users of the data and an opportunity to discuss concerns and updates. Advice and recommendations from experts in the field has been vital in the process in terms of making sure that these statistics represent good value. The data provides opportunities for granular analyses and will be publicly available on the UK data archive each year.

The quality pillar requires that “The statistics must be the best available estimate of what they aim to measure, and should not mislead... the data must be relevant, the methods must be sound and the assurance around the outputs must be clear”.

With respect to the Quality pillar, we follow an internal quality assurance process, which is detailed in this document (link to QA doc). As well as this, a peer review by Professor Sturgis has been conducted to reinforce that the Gambling Survey for Great Britain is robust and meets the quality and value for the modern needs of a gambling survey. Professor Sturgis also outlines that the change in methodology and approach was the correct thing to do. This survey will 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.

Conclusion

In conclusion, we have reached the decision to remove the official statistics in development label.

Whilst we will remove the ‘in development’ label we will continue to undertake a programme of continuous improvement for our official statistics building on best practice and the recommendations outlined in [Professor Sturgis’s report](#). We will also continue to be open and transparent about the strengths and limitations of our approach, describing them suitably in supporting technical documents.

[\[REDACTED\]](#) Add link when available

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Draft paper on removing "in development" label
Date: 12 February 2024 12:17:39
Attachments: [image002.png](#)

Hi [REDACTED]

Hope you had a nice weekend.

I just wondered if you had had chance to review our paper on lifting the experimental statistics label from our official statistics and whether you had any feedback?

Thanks

[REDACTED]

From: [REDACTED]
Sent: Tuesday, February 6, 2024 8:31 PM
To: [REDACTED]@Statistics.gov.uk>
Cc: [REDACTED]@gamblingcommission.gov.uk>; [REDACTED]
[REDACTED]@gamblingcommission.gov.uk>
Subject: Draft paper on removing 'in development' label

Hi [REDACTED]

As I mentioned when we spoke last week we have been working on a paper outlining why we are content to remove the 'in development' label from our official statistics. This is currently in draft but we would like to publish alongside our first release of official stats at the end of the month.

When we spoke you kindly agreed to review the draft paper and provide feedback, we are particularly interested in anything we may have missed or areas where you think we need to provide more evidence.

Are you still able to review the document for us?

Kind Regards

[REDACTED]

**GAMBLING
COMMISSION**

www.gamblingcommission.gov.uk

Making gambling safer, fairer and crime free



From: regulation@statistics.gov.uk
To: [REDACTED]
Subject: RE: Attendance
Date: 16 April 2024 17:28:23

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

Hi [REDACTED],

Thanks for getting in touch, you should be able to get more information and sign up at the [Eventbrite page](#).

Please do let us know if you have any questions or any issue with registering though of course.

Kind regards,

[REDACTED]

Regulation@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 [Futureproofing the Code events](#)

From: [REDACTED]<[REDACTED]@gamblingcommission.gov.uk>
Sent: Tuesday, April 16, 2024 3:35 PM
To: regulation@statistics.gov.uk
Subject: Attendance

You don't often get email from [REDACTED]<[REDACTED]@gamblingcommission.gov.uk>. [Learn why this is important](#)

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Hello

I'd be interested in attending the community of practice session on the 23rd April being held by OSR.

Is it possible to send me the details?

Thanks

[REDACTED]

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From: [REDACTED]
To: regulation@statistics.gov.uk
Subject: FW: Advice on gambling statistics
Date: 23 April 2024 13:32:00
Attachments: [image002.png](#)

Hello – forwarding to the generic email address as have just received [REDACTED] out of office

From: [REDACTED]
Sent: Tuesday, April 23, 2024 1:31 PM
To: [REDACTED]@Statistics.gov.uk>
Cc: [REDACTED]@gamblingcommission.gov.uk>
Subject: Advice on gambling statistics

Hi [REDACTED]

Hope you are well.

We wanted to ask your advice on how we should approach a 3rd sector charity who are using official statistics on problem gambling (measured through the Problem Gambling Severity Index) and equating these to be a measure of addiction to gambling. The PGSI is a validated tool for measuring people who may be experiencing difficulties with their gambling, but in no way was ever designed to be a measure of addiction.

We have spoken to the charity in question and asked them to change their terminology but to no avail.

Please could you advise on how you would approach this situation and what you think our next steps should be? This is going to be very important as we approach the launch of our new Gambling Survey for Great Britain, and we want to be clear to the charity on the action we would take if they continue to use this language in relation to the new survey.

Happy to set up a quick call to chat this through if it would help.

Thanks

[REDACTED]

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From: [REDACTED]
To: [REDACTED]
Subject: RE: Advice on gambling statistics
Date: 30 April 2024 13:01:09

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

Hi [REDACTED]

No problem, 11:30 on Friday works for me, I will send out an invite now.

Look forward to discussing how we can help.

From: [REDACTED]@gamblingcommission.gov.uk>
Sent: Tuesday, April 30, 2024 11:30 AM
To: [REDACTED]@Statistics.gov.uk>
Subject: RE: Advice on gambling statistics

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Hi [REDACTED]

Sorry I think I missed this email in my inbox.

What about this Friday instead? I could do between 11.30-12.30 or between 2-4pm?

Would be good to chat through the example I emailed [REDACTED] about in relation to how a charity is choosing to report our statistics, and also a wider policy around how we deal with misuse of our statistics.

Thanks

From: [REDACTED]@Statistics.gov.uk>
Sent: Thursday, April 25, 2024 8:42 AM
To: [REDACTED]@gamblingcommission.gov.uk>
Subject: RE: Advice on gambling statistics

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Hi [REDACTED]

Sorry I cannot do either of those times today. Monday works well for me, could you do 11am or 2pm?

From: [REDACTED]@gamblingcommission.gov.uk>
Sent: Wednesday, April 24, 2024 5:08 PM
To: [REDACTED]@Statistics.gov.uk>
Subject: RE: Advice on gambling statistics

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Hi [REDACTED]

Thanks for getting in touch.

I'm free between 1-1.30 tomorrow or after 4.15pm? I'm not working on Friday this week, so if tomorrow doesn't work could look to set something up on Monday?

Thanks

[REDACTED]

From: [REDACTED]@Statistics.gov.uk>
Sent: Wednesday, April 24, 2024 4:11 PM
To: [REDACTED]@gamblingcommission.gov.uk>
Subject: Advice on gambling statistics

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Hi [REDACTED]

Thanks for getting in touch with OSR regarding advice on supporting a charities use of official statistics. In [REDACTED] absence I am the link statistics regulator for the Gambling Commission/DCMS.

I would be very happy to meet with you and to see how I can help. I am free tomorrow afternoon at 1:30 or Friday afternoon anytime from 1pm if that is at all helpful?

Kind regards

[REDACTED]
[REDACTED] statistics.gov.uk | Website: [Office for Statistics Regulation](https://www.ofs.gov.uk) | Twitter: [@StatsRegulation](https://twitter.com/StatsRegulation)

OSR is currently carrying out a review of the [Code of Practice for Statistics](#) for information on how to join the conversation please visit our [webpage](#).

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Gambling Survey for Great Britain - guidance
Date: 10 July 2024 14:48:07

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

Hi [REDACTED],

Looking forward to catching up tomorrow and hearing about how the work has progressed. As [REDACTED] mentioned, we have a slightly different cast list on the OSR side tomorrow as [REDACTED] will be leaving us in August and we thought it would be useful to introduce you to the team who are hoping to carry out a light touch review of the new publication.

Thanks for sharing the guidance on use of the statistics. In short, we think it looks excellent and it's great how transparent you've been about some of the limitations and challenges with data in this space. Very easy to follow too. The only minor comments I had were:

- On the reference to further investigation being needed to understand potential overestimation – it's implied that you are planning to do some further work on this but it wasn't entirely clear. If you are planning to look into this, it might be worth saying that explicitly (and any timescales for that work if possible).
- The final section talks about consequences of misuse of these statistics. I wondered if it might be helpful to also put a positive spin on encouraging use of the stats by saying those who would like to use them but are unsure of how best to use/communicate them, can get in touch through the contact details provided for more support?

Hope this helps and happy to discuss further tomorrow.

Thanks,

[REDACTED]

From: [REDACTED]@gamblingcommission.gov.uk>

Sent: Monday, July 8, 2024 9:50 AM

To: [REDACTED]@Statistics.gov.uk>

Cc: [REDACTED]@gamblingcommission.gov.uk>; [REDACTED]

[REDACTED]@statistics.gov.uk>

Subject: Gambling Survey for Great Britain - guidance

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Hi [REDACTED]

Hope you are well!

Ahead of our catch up later this week, I wanted to share a copy of the guidance we have drafted in relation to how our official statistics from the new Gambling Survey for Great Britain should and shouldn't be used.

We are planning to publish this one week ahead of publishing the official statistics so people have time to digest the content ahead of publication.

We have a fairly tight timescale to get the guidance approved as we need to get it to our digital team by the end of the week to put on our website, hence my reason for sharing it now. If you do have time to review it ahead of our meeting on Thursday and can provide any feedback beforehand that would be really useful.

Thanks

██████████

From: ██████████@Statistics.gov.uk>

Sent: Tuesday, May 7, 2024 4:16 PM

To: ██████████@gamblingcommission.gov.uk>

Cc: ██████████@gamblingcommission.gov.uk>; ██████████

██████████@statistics.gov.uk>

Subject: RE: Office for Road and Rail example

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Hi ██████████

Sorry for not replying sooner. Yes w/c 8th July works for me, feel free to send a meeting invite!

██████████

From: ██████████@gamblingcommission.gov.uk>

Sent: Friday, May 3, 2024 4:53 PM

To: ██████████@Statistics.gov.uk>

Cc: ██████████@gamblingcommission.gov.uk>; ██████████

██████████@statistics.gov.uk>

Subject: RE: Office for Road and Rail example

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Hi ██████████

It was good to speak to you and ██████████ today, thanks for the useful guidance.

We are due to publish the full report from the GSGB on the 25th July, so it might be useful to put another catch up in our diaries at the beginning of July. We can update you on our plans for publication.

Should we look at dates w/c 8th July?

Thanks

[Redacted]

From: [Redacted] <[Redacted]@Statistics.gov.uk>
Sent: Friday, May 3, 2024 12:26 PM
To: [Redacted] <[Redacted]@gamblingcommission.gov.uk>
Cc: [Redacted] <[Redacted]@gamblingcommission.gov.uk>; [Redacted] <[Redacted]@statistics.gov.uk>
Subject: Office for Road and Rail example

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Hi both

Good to meet you. The Office for Road and Rail example I mentioned is on page 20 of this release, I think it is quite a nice simple way of displaying what the statistics can and cannot be used for.

[Passenger rail usage - October to December 2023 \(orr.gov.uk\)](https://www.orr.gov.uk)

[Redacted]

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