

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Sturgis on the HSE
Date: 08 March 2024 11:38:00

Thanks [REDACTED] – likewise good to see you both – [REDACTED]
[REDACTED]

[REDACTED] I'll have a look at this next week and get back to you

Regards

[REDACTED]

From: [REDACTED] <[REDACTED]>
Sent: Thursday, March 7, 2024 3:05 AM
To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Cc: [REDACTED] <[REDACTED]>
Subject: Sturgis on the HSE

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

Hi [REDACTED]

It was good to see you yesterday. Congratulations on putting together such an interesting and engaging conference. The three of us discussed the question of whether Patrick Sturgis considered the Health Surveys to have under-reported PG and so I thought I would jot down my thoughts on this.

My reading of Professor Sturgis's works on the subject is that, while he accepts that under-reporting in the HSE is a possibility, he is more inclined to trust the Health Surveys than either the GambleAware/YouGov survey or the GSGB. This is what I base this interpretation on.

In his original paper for GambleAware (Sturgis, 2020), Professor Sturgis does in fact state that: *"the 2016 combined health surveys may somewhat under-estimate the true prevalence of problem gambling as a result of under-coverage and nonresponse amongst groups with higher rates of problem gambling compared to the general population. Additionally, it seems likely that there may be some degree of downward bias in the combined health survey estimates due to measurement error, with socially desirable responding and the content of the questions preceding the PGSI having a downward effect on the prevalence reports amongst some respondents."*

Although he mentions socially desirable response bias in this summation, he is

generally dismissive of it as a significant factor explaining the differences between GambleAware/YouGov and the Health Surveys, writing: *"There are no strong reasons to expect that the combined health surveys are substantially more subject to socially desirable responding compared to the YouGov survey"; and "while we might expect the YouGov survey to have lower levels of socially desirable responding due to the absence of an interviewer, any difference from the combined health surveys is likely to be largely or wholly removed by the use of self-completion procedures in the combined health surveys."*

He concludes that: *"it seems credible that the true level of gambling harm prevalence lies somewhere in between their two bounds. However, my assessment is that the true value probably lies closer to the combined health surveys than to the YouGov survey."* He clarifies what he means by this in stating: *"This is not to contend that we should simply 'split the difference' and take the mid-point as the most reasonable estimate. Rather, I would hazard that, for the reasons set out in this report, the true value lies rather closer to the combined health surveys than it does to the YouGov survey."*

The peer-reviewed journal paper (Sturgis & Kuha, 2022) takes a closer look at reasons for differences between the Health Surveys and a variety of online surveys (including GambleAware/YouGov) and here Sturgis is a bit more forthright (supported by analyses). Where socially desirable response bias is concerned, they find a small difference in the prevalence of PGSI 1+ scores between people who are interviewed in the presence of another household member and those who were interviewed alone. He notes, however, that the difference is not statistically significant and concludes that *"socially desirable responding in the health surveys is unlikely to be a significant contributory factor to the lower estimates of gambling harm."*

Sturgis & Kuha (2022) attributes the bulk of the difference in PG estimates between the Health Surveys and GambleAware/YouGov to selection bias, concluding that: *"These comparisons have enabled us to identify selection bias as the primary source of the differences in estimates of gambling harm. Comparisons across a range of estimates revealed a systematic pattern: the online surveys contained gamblers who were more likely to gamble online and to gamble frequently. Other potential causes of the differences, including true change in harmful gambling, sampling variability, coverage error, and differential measurement error, seem unlikely to exert a notable influence."*

They conclude that: *"These differences in sample composition are likely to be driving the discrepancies in rates of problem gambling between surveys, with online surveys whether based on probability or nonprobability samples tending to overestimate gambling harm relative to interviewer-administered in-person surveys."*

In his review of the GSGB, Professor Sturgis softens his view slightly - and this seems to be largely based on two claims in Ashford et al. (2022):

1) the GSGB Pilot found that *"at the same level of gambling, respondents are less likely to report high PGSI scores in the HSE compared to the pilot"*

2) the GSGB Pilot found that *"HSE respondents reported lower PGSI scores when another household member was present during the interview."*

Professor Sturgis is required to accept these statements on trust and does not really interrogate them.

The first of these should be disregarded in my view. This is because (as we have discussed) Ashford et al. forgot to factor in the effect of lockdown policies in 2021 on the frequency and breadth of gambling participation. In other words, a person who gambled once a month during a lockdown year was likely to be displaying qualitatively different behaviours than someone who did so in 2018 - and this undermines the test. There is no evidence to believe that (as some have argued in defence of Ashford) National Lottery participation drives the headline rate of gambling frequency - when around one-third of past-year gamblers do not play the Lottery at all - and it cannot plausibly be said to drive breadth of participation.

The second of these is interesting as it seems to be inconsistent with Sturgis & Kuha. Ashford et al found that people completing the PGSI with another householder present were 1.5 times more likely to be PGSI 1+ than when no-one else is present. Ashford et al. does not show the workings for this (or provide any references) and Sturgis did not review Ashford's approach. It is difficult to know therefore, which is the better assessment. In any case (and without knowing the effect sizes on PG, MR and LR) it would only explain a part of the differences between the estimates. In the GSGB review, Sturgis writes that *"these observational analyses rely on assumptions that are difficult to verify and are sensitive to which control variables are included in the models."*

Looking across the three reports prepared by Patrick Sturgis, the strong impression is that the Health Surveys are more likely (in his opinion) to produce reliable estimates of both gambling participation and problem gambling prevalence than either the GambleAware/YouGov survey or the GSGB. While Sturgis (2020) suggests that the Health Surveys may under-report PG, this is a relatively speculative comment and appears to be based more on concerns about non-response bias from vulnerable groups (which we address in our report) than socially desirable response bias. It is of course possible that the Health Surveys under-reported PG. It seems far more likely from reading the works of Sturgis (as well as our own analysis) that the GSGB

substantially over-reports PG. It is important not to give the impression (as GambleAware tried to do) that Sturgis claimed that under-reporting (in the HSE) and over-reporting (GambleAware/YouGov and GSGB) are equally likely.

It would be great to discuss this with you when you have the time as email is not the best medium for exchanging views.

[REDACTED]

[REDACTED]

[REDACTED]

M: [REDACTED]
E: [REDACTED]
W: [REDACTED]

[REDACTED]

This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. The sender therefore does not accept liability for any errors or omissions in the contents of this message, which arise as a result of e-mail transmission.

Alpha Leonis Group Ltd, 50 Grosvenor Hill, London, W1K 3QL

From: [REDACTED]
To: [REDACTED]
Subject: FW: Review of Gambling Survey for Great Britain
Date: 27 September 2023 21:54:00
Attachments: [PastedGraphic-1.png](#)

FYI....

Probably a little more than I thought, I will need to check if it includes VAT or not as if it doesn't that will take us over £[REDACTED]. However I'm happy with the report outline below if you are?

From: Sturgis, P <[REDACTED]@lse.ac.uk>
Sent: Wednesday, September 27, 2023 11:32 AM
To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Subject: Re: Review of Gambling Survey for Great Britain

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Hello [REDACTED]

Yes, it was good to catch up on these developments and I was very pleased to hear that our work has played a part in shaping them. I would be happy to take this work on. In terms of report structure I would suggest something like:

1. Introduction and context, setting out the recent and current landscape for general population survey designs
2. A brief history of how surveys of gambling behaviours in the UK, focusing on the key estimation challenges
3. A description and critical assessment of the proposed design of the Gambling Survey of Great Britain
4. Recommendations for design improvements and future development options
5. Summary and Conclusion

I would be happy to present the findings of my report to the Gambling Commission in person or online.

[REDACTED] As things stand I can undertake the work during November and December with a draft report submitted in early January.

I hope this meets your requirements, let me know if you have any suggestions for amendments or additions.

Best wishes,

Patrick

Media Enquiry:

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Gambling survey - [REDACTED]
Date: 23 November 2023 15:08:02
Attachments: [image002.png](#)

Thanks [REDACTED]

Reads well to me.

I'll send at 3.45pm unless I hear otherwise.

Best regards,

[REDACTED]

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From: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Sent: Thursday, November 23, 2023 3:03 PM
To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Cc: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Subject: FW: Gambling survey - [REDACTED]

Hi [REDACTED]

I've added a response to the one question you hadn't answered and we have reworked the answer to the first question.

Thanks

[REDACTED]

From: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Sent: Thursday, November 23, 2023 1:36 PM
To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Cc: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Subject: FW: Gambling survey - [REDACTED]

Hi [REDACTED]

[REDACTED]

I've taken three of the answers from the detailed QA (in green) but there is one question I can't answer.

Obviously feel free to change any of the below.

Said I'd get back to the journo by 4pm.

Best regards,

[REDACTED]

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From: [REDACTED] <[REDACTED]>
Sent: Thursday, November 23, 2023 12:04 PM
To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Subject: Re: Gambling survey

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Have read the blog, which is helpful.

I think the key thing for us is that we need a paragraph or two outlining the differences between this methodology and previous methodology (i.e. the telephone survey?) that might account for the difference in outcomes. The blog hints at some of this but I could really do with a concise outline of what the methodological differences are that create the difference.

Reworked to say:

Previously the Commission had used multiple ways to collect data on the topic of gambling. To measure problem gambling, we used the health surveys, conducted in each of the home nations. In England and Scotland, these surveys use a face-to-face approach, and a self-completion approach for questions relating to gambling. In Wales, a telephone survey and follow up online survey is employed. The Commission also ran a quarterly telephone survey to measure gambling participation on a more regular basis.

The new Gambling Survey for Great Britain consolidates all our survey requirements into one single study. A key difference between the previous methods and the new approach is that the new Gambling Survey for Great Britain, uses a push-to-web approach which is conducted online, and is supplemented with a paper questionnaire for anyone not online or who prefers an offline approach. As discussed, the previous methods (Health Survey and Telephone Survey) use a face-

to-face or telephone approach.

This new push-to-web approach also eliminates the need for an interviewer to be present during surveying, which allows participants a higher degree of privacy when filling in their survey. In addition, the Gambling Survey for Great Britain is a gambling focused survey, rather than a health-related survey containing a handful of gambling questions (like the Health Survey for England).

For more information on the strengths and limitations of our approach, please see the following page [Gambling participation and the prevalence of problem gambling survey: Final experimental statistics stage \(Step 3\) \(gamblingcommission.gov.uk\)](#)

Second, could the final methodology change depending on Sturgis' recommendations? The blog sort of suggests that Sturgis will report his views and the methodology will then be adopted. But presumably if Sturgis has major objections, you'd have to revisit the way the methodology question?

??? (Can you help [REDACTED])

We are very confident in the approach we have developed for the Gambling Survey for Great Britain, which follows the recommendations set out by Patrick Sturgis in his [2021 work for GambleAware](#). However, any recommendations following the review of the GSGB by Patrick Sturgis will be taken into consideration in any future refinements to the methodology.

Third, I presume you only surveyed adults? Thus, if one was going to apply the estimated % figure to population, you'd need to do so using a figure for the number of adults in GB?

Yes, we only surveyed adults aged 18+ but you shouldn't gross up the percentage of problem gamblers into a population level estimate. The data we have released is experimental data and based on a smaller sample of respondents than we will use for our Official Statistics going forward. In addition, this data has also been collected over a shorter time frame (2 months) so doesn't have full coverage like our official statistics will. .

Last, you stress the importance of not comparing this figure with previous PGSI estimates. I presume by this you mean that one can't say, for instance, PG rates have risen from 0.3% to an estimated 2.5%. That much is very clear to me. However, I assume you're not asking us to avoid reporting how this methodology produces outcomes that are significantly different to previous outcomes? That, with all the appropriate caveats attached, is a statement of fact, isn't it?

That's right. 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.

Grateful for any reponse, happy to take off-record guidance.

Best,

[Redacted]

[Redacted]

[Redacted]

[PGP public key](#)

[twitter:](#) [Redacted]

Awards

[Redacted]

[Redacted]

[Redacted]

On Thu, 23 Nov 2023 at 11:54, [Redacted] <[Redacted]@gamblingcommission.gov.uk> wrote:

Hi [Redacted]

I can ring you about 1.15.

You have seen the blog right?

[Blog - Gambling Survey for Great Britain Experimental data release – better data will lead to better regulation \(gamblingcommission.gov.uk\)](#)

Best regards,

[Redacted]

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COMMISSION**

[Redacted]

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From: [Redacted] <[Redacted]>

Sent: Thursday, November 23, 2023 11:46 AM

To: [Redacted] <[Redacted]@gamblingcommission.gov.uk>

Subject: Gambling survey

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

Hi

Could you give me a ring about the new stats when you get the chance?

thanks

[Redacted]

[Redacted]

[PGP public key](#)

[twitter:](#) [Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

From: [REDACTED]
To: [REDACTED]
Subject: RE: Gambling survey
Date: 23 November 2023 15:47:00
Attachments: [image002.png](#)

Hi [REDACTED]

See below the answers to your questions (in bold).

Have you asked DCMS about this BTW?

Best regards,

[REDACTED]

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From: [REDACTED]
Sent: Thursday, November 23, 2023 12:04 PM
To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Subject: Re: Gambling survey

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Have read the blog, which is helpful.

I think the key thing for us is that we need a paragraph or two outlining the differences between this methodology and previous methodology (i.e. the telephone survey?) that might account for the difference in outcomes. The blog hints at some of this but I could really do with a concise outline of what the methodological differences are that create the difference.

Previously the Commission had used multiple ways to collect data on the topic of gambling. To measure problem gambling, we used the health surveys, conducted in each of the home nations. In England and Scotland, these surveys use a face-to-face approach, and a self-completion approach for questions relating to gambling. In Wales, a telephone survey and follow up online survey is employed. The Commission also ran a quarterly telephone survey to measure gambling participation on a more regular basis.

The new Gambling Survey for Great Britain consolidates all our survey requirements into one single study. A key difference between the previous methods and the new approach is that the new Gambling Survey for Great Britain, uses a push-to-web approach which is conducted online, and is supplemented with a paper questionnaire for anyone not online or who prefers an offline approach. As discussed, the previous methods (Health Survey and Telephone Survey) use a face-to-face or telephone approach.

This new push-to-web approach also eliminates the need for an interviewer to be

present during surveying, which allows participants a higher degree of privacy when filling in their survey. In addition, the Gambling Survey for Great Britain is a gambling focused survey, rather than a health-related survey containing a handful of gambling questions (like the Health Survey for England).

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We are very confident in the approach we have developed for the Gambling Survey for Great Britain, which follows the recommendations set out by Patrick Sturgis in his [2021 work for GambleAware](#). However, any recommendations following the review of the GSGB by Patrick Sturgis will be taken into consideration in any future refinements to the methodology.

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That's right. 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.

Grateful for any response, happy to take off-record guidance.

Best,



GAMBLING COMMISSION

23 November 2023

By email: [REDACTED]

Dear [REDACTED]

Publication of Gambling Survey for Great Britain Experimental data

Today the Gambling Commission publishes the findings from the final step in the experimental stage of the project to develop a better methodology for the collection of data for participation in gambling and the prevalence of problem gambling. We have also [published an update](#) discussing the work up to now, why it's important and the next steps towards the roll out of what will become the new official statistics in this space: the Gambling Survey for Great Britain.

Over the last three years, we have invested significant resources - money, people and time – and worked alongside international experts in the field to develop the best consumer gambling survey that we can. Through our stakeholder engagement panels we've also made sure to keep industry, those with lived experience, academics and policy makers and others informed at every step of the journey. It is a significant milestone we have reached today in being able to publish the findings from the final step in the experimental stage of the project.

These findings, which are still classed as being experimental, or as the Office for Statistics Regulation (OSR) now calls them 'Official Statistics in Development', provide insight into gambling behaviours across Great Britain gathered using a [push to web survey methodology](#). They are based on responses from around 4,000 respondents with data collected in April and May 2023.

The significant work we have done to update the methodology, to refresh the questions asked and the change in focus of the survey to one being solely about gambling means the results are not comparable to previous ways we have collected this sort of data. This includes our quarterly telephone survey or using data from the NHS Health Surveys.

The purpose of publishing the data now is so users can become familiar with and understand the impact of new methods and approaches on the findings before they become official statistics. To help with this we have also commissioned Professor Patrick Sturgis, Professor of Quantitative Social Science at the London School of Economics, to undertake an independent review of the Gambling Survey for Great Britain methodology. We'll publish his findings and recommendations early next year, ahead of the new methodology becoming our official statistics later in 2024.

This project is just one of the ways the Commission is looking to improve our understanding and build a stronger evidence base for our regulation, as set out in our evidence gaps and priorities for 2023 to 2026. And when the Gambling Survey for Great Britain launches as official statistics, it will be with the insight of around 20,000 respondents a year – the largest survey of its kind in the world.

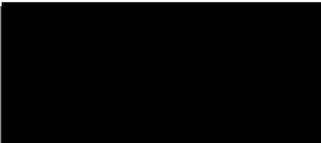



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T+44 121 230 6666
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We are firmly of the belief that better evidence, driven by better data, will lead to better regulation, which in turn will lead to better outcomes.

Yours sincerely

A solid black rectangular redaction box covering the signature area.Two solid black rectangular redaction boxes covering contact information. The top box is short and wide, and the bottom box is longer and narrower.




4 December 2023

Dear 

Publication of Gambling Survey for Great Britain Experimental data


Thank you for your letter received last week regarding the 'Publication of Gambling Survey for Great Britain Experimental data'.

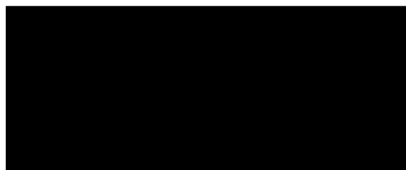
We at the  welcome improvements to our collective knowledge and understanding of Problem Gambling here in the UK. To this end we are keen supporters of better data, intelligence and evidence and concur with the final sentence in your letter.

From what we have read and learned, the robustness of this 'experimental' data being produced is still very much in question, including in the Commission's own webpage section on 'Limitations'. We are pleased to read in your letter that you have commissioned Professor Patrick Sturgis to undertake a review of the methodology but wonder why this is restricted to a review by just one single individual. If you are confident in the robustness of the methodology, then we believe it would be deemed more 'independent' and robust if unincumbered access was given to a wider 'peer review'?

Your fifth paragraph talks about the data becoming 'official statistics' as a foregone conclusion. This is worrying for us as we would have expected a pragmatic approach to such a critical piece of work to ensure quality over delivery. Taking the time to get this absolutely right has to be more important than hitting an arbitrary deadline.

Considering the above, observers could be forgiven for concluding that this new methodology is being shoe-horned into becoming 'official statistics', which runs the risk of not being in the best interests of genuine problem gamblers or for that matter the protection of the vulnerable. Who knows what unintended consequences might arise from rushed-through research –not something that the Commission, as a risk based, evidence-led, outcomes-focused regulator would want.

This new methodology for measuring Problem Gambling should be a key milestone in our collective pursuit of better data, intelligence and evidence.  therefore recommend a more rigorous independent and transparent evaluation of the methodology before it is formally implemented.



Extracts from GambleAware Annual Conference 2023, Andrew Rhodes speech Conference
Title: 'A new chapter: working together to deliver gambling reform'

We have continued to publish updates on the Gambling Survey for Great Britain, including the Experimental data last month.

Gambling Survey for Great Britain – better data for better outcomes

But back to our new Participation and Prevalence data, that we're calling the Gambling Survey for Great Britain. Many of you will be aware that this work – to improve the data we collect on people's gambling behaviours – has been running for about three years now. Whilst both the Health Surveys and our Quarterly Telephone Survey have their strengths, neither really satisfied our needs for current data, predictable in when it is available and that also had the level of detail and granularity required today. The Gambling Survey for Great Britain has been painstakingly developed to give us the level of detail we need with modernised questions, increased frequency and flexibility. It will also benefit from an increase in scale – with around 20,000 respondents each year when it's fully up and running. It will be the largest survey of its kind in the world.

So last month, the publication of the experimental data was a big step in what has been a key priority for several years. And yes, as part of that we published new data on gambling participation and on how many people score 8+ on the Problem Gambling Severity Index. This data is still experimental in nature and doesn't replace current official statistics. The new survey also uses a new and completely different methodology to what has gone before and therefore it should not be compared to data from previous surveys. The first official statistics we publish for the Gambling Survey for Great Britain next year will be a new baseline from which we will then be able to compare against in future years.

And between now and then we will continue to work on how we can make the methodology as good as it can be for full launch. We've commissioned Professor Patrick Sturgis, Professor of Quantitative Social Science at the London School of Economics, to undertake an independent review of our methodology and we'll publish his findings and recommendations early next year.

From our perspective at the Commission, the key thing to know is that we are on the cusp of having better data from our official statistics. We have invested significant resources - money, people and time – and worked alongside experts in the field to develop the best consumer gambling survey that we can. And that better data will lead to better regulation and better outcomes for gambling – including operators, consumers and those at risk of suffering harms.

Improving the evidence base is also a key part of how – working with DCMS and others - we will be able to deliver on the Government's White Paper.

GAMBLING COMMISSION

XXXXXXXXXX
ADDRESS LINE 1
ADDRESS LINE 2
POSTCODE

Dear XXXXXXXXX,

Clarification of the publication of Gambling Survey for Great Britain Experimental data.

Thank you for attending the Gambling Commissions Chairs Roundtable on Wednesday 6th December. I am writing to you to further clarify progress on the Gambling Survey of Great Britain results and outline the next steps.

On the 23rd of November, the Gambling Commission [published the findings from the final step in the experimental stage](#) of the project to develop a better methodology for the collection of data for participation in gambling and the prevalence of problem gambling. We have also [published a blog post](#) which highlights the work up to now, why it's important and the next steps towards the roll out of what will become the new official statistics in this space: the Gambling Survey for Great Britain.

Over the last three years, we have invested significant resources - money, people, and time – and worked alongside international experts in the field to develop the best consumer gambling survey that we can. Through our stakeholder engagement panels we've also made sure to keep industry, those with lived experience, academics and policy makers and others informed at every step of the journey. It is a significant milestone we have reached today in being able to publish the findings from the final step in the experimental stage of the project.

These findings, **which are still classed as being experimental**, or as the Office for Statistics Regulation (OSR) now calls them 'Official Statistics in Development', provide insight into gambling behaviours across Great Britain gathered using a push to web survey methodology. They are based on responses from around 4,000 respondents with data collected in April and May 2023.

The significant work we have done to update the methodology, to refresh the questions asked and the change in focus of the survey to one being solely about gambling means the results are not comparable to previous ways we have collected this sort of data. This includes our quarterly telephone survey or using data from the NHS Health Surveys.

The purpose of publishing the data now is so users can become familiar with and understand the impact of new methods and approaches on the findings before they become official statistics. To help with this we have also commissioned Professor Patrick Sturgis, Professor of Quantitative Social Science at the London School of Economics, to undertake an independent review of the Gambling Survey for Great Britain methodology. **We'll publish his findings and recommendations early next year, ahead of the new methodology becoming our official statistics later in 2024.**



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This project is just one of the ways the Commission is looking to improve our understanding and build a stronger evidence base for our regulation, as set out in our evidence gaps and priorities for 2023 to 2026. And when the Gambling Survey for Great Britain launches as official statistics, it will be with the insight of around 20,000 respondents a year – the largest survey of its kind in the world.

You can view a full breakdown of the timeline of the consultation and progress made to date [here](#).

Yours sincerely,

A large black rectangular redaction box covering the signature area.

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

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED] <[REDACTED]>
Sent: Monday, January 29, 2024 4:12 PM
To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Cc: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Subject: RE: Removal of In Development/Experimental Statistics Label

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[REDACTED]

From: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Sent: Wednesday, January 24, 2024 11:18 AM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Subject: RE: Removal of In Development/Experimental Statistics Label

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

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[Redacted]

[Redacted]

From: [REDACTED]
To: [REDACTED]
Subject: [REDACTED] replied to a comment in "GSGB Y1 static technical report_v3_IN PROGRESS HWGC"
Date: 05 February 2024 17:13:11
Attachments: [cf2ae650-4035-473c-b573-52315dbba59a](#)
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[a96618d4-3955-4dad-a844-d9b774d5b70c](#)
[3d249f34-a1b9-43ac-917f-f2cde41232d6](#)



GSGB Y1 static technical report_v3_IN PROGRESS HWGC.docx



[REDACTED] You left a comment

Might be more to add here from Patrick Sturgis report. Also the way this sentence is phrased seems to suggest the HSE is right, but we know HSE could be under estimating

[REDACTED] left a comment

I suggest we revisit when we get the report from Patrick Sturgess - but I would strongly recommend whatever that says, being totally transparent about it.

[REDACTED] You left a comment

Yes agree

[REDACTED] replied

Sturgis argues that people scoring higher on the PGSI may actually not want to take part in a gambling survey (LEAP shared same view) so this theory may not hold true for all. Would be good to reference Sturgis report here

...tudy is about which thus 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 thus that rates of past- year gambling participation and PGSI scores are overestimated-higher in the GSGB compared with the Health Survey seriesHSE.

In addition, analysis conducted by Sturgis and Kaha and also, Ashford et al (the latter for the

GSGB pilot: reported in Participation and Prevalence: Pilot methodology review re...

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From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: P Sturgis report - Assessment of GSGB
Date: 05 February 2024 13:45:00
Attachments: [image002.png](#)
[Report_final_3FEB24.docx](#)

Hi All

Hope you are well.

I have attached a final version of Patrick Sturgis's report on the GSGB for you to review and happy to discuss your thoughts/feedback in our catch up this week. Please don't share this any more widely at the moment.

Our plan is to get this published ahead of the Wave 1 data, either on the 15 or 19 Feb. It will be published within the LSE library and we will publish a news article on our website on the same day.

I have also just re-read the draft annual technical report and there are a couple of comments we said we'd come back to once we had Patrick's report which I think we will need to. I don't think there is much to add in, but a couple of sentences to acknowledge latest report by Patrick would be useful.

Thanks

[REDACTED]

**GAMBLING
COMMISSION**

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Making gambling safer, fairer and crime free



Assessment of the Gambling Survey for Great Britain (GSGB)

Professor Patrick Sturgis, London School of Economics and Political Science

Background

The core objective of the Gambling Commission is to safeguard consumers of gambling services and the wider public by monitoring and regulating gambling in a way that makes it both safe and fair. As part of this remit, under section 26 of the 2005 Gambling Act, the Commission has a duty to collect and disseminate evidence about the extent and nature of the gambling behaviour of the general public in Great Britain. It largely, though not entirely, fulfils this remit through the periodic collection of general population surveys which ask adult respondents to report on their frequency of gambling, the types of gambling they participate in, and the social and psychological effects they experience from it.

This is a challenging task. Gambling behaviour and its associated psychological impacts on individuals who gamble as well as their friends and families can only feasibly be collected through error-prone self-reports. Given the widespread negative social norms around gambling, particularly harmful gambling, obtaining representative samples and accurate response data is at the more difficult end of what survey researchers seek to measure in general populations.

Historically, the Gambling Commission has employed the methodology of random sampling and face-to-face interviewing (with respondent self-completion for sensitive questions) for collecting this data. The first such survey carried out in Britain was the 1999 British Gambling Prevalence Survey (BGPS), though this preceded the existence of the Commission and was funded by the gambling charity GamCare. The 1999 BGPS used a multi-stage, stratified sample design with postcode sectors randomly sampled from the Postcode Address File (PAF). Addresses, then households and individuals, were sampled randomly and sequentially within these primary sampling units (PSUs). This first sweep of the BGPS achieved a response rate of 65%, which was quite typical for this type of design at that time, yielding an achieved sample size of 7,680 individuals.

Subsequent BGP surveys, now funded by the Gambling Commission and using the same sample design, followed in 2007 and 2010. While the sample sizes of these later surveys remained at the same approximate level (9,000 and 7,756, respectively), the response rates were considerably lower, at 47%. This is still high by contemporary standards but the decline compared to earlier years would naturally raise concerns about the accuracy of the survey's population estimates.

Although the cost of these surveys is not publicly available information, it is safe to assume that, like other face-to-face interview surveys during this period, they were rising by considerably more than inflation from one year to the next. And this was at a time of increasing pressure on survey research budgets, falling as it did at the outset of the coalition government's programme of budgetary austerity.

Following the 2010 BGPS, the costs of delivering a sample of this design had become prohibitively expensive in this context and the Commission looked for other ways of fulfilling its evidential remit in a more cost-effective manner. It ultimately settled on an approach which involved running question modules within the Health Surveys for England and Scotland on a periodic basis (in England, gambling surveys were conducted in 2012, 2015, 2016, 2018, and 2021), while data in Wales was collected via a face-to-face omnibus survey. Great Britain estimates were produced by combining the data across these national surveys, though this was a somewhat complicated process given differences in methodology and timing of the surveys across nations.

The national health surveys in England and Scotland use the same basic methodology as the BGPS, so the time-series estimates were, in this respect, comparable, though less so for Wales. In order to obtain more frequent estimates for key variables of interest, the Health surveys were supplemented with a Computer Assisted Telephone Interview (CATI) survey, with results published on a quarterly and annual basis. However, given the differences in sample design, mode of administration, and question content, making direct comparisons between the CATI and health survey estimates required strong assumptions. Additionally, the Gambling Commission did not have a satisfactory level of control over the timing of the inclusion of gambling modules within the health surveys, nor of the volume and content of the questions that could be included.

For these reasons, in 2020, the Commission initiated a consultation on gambling survey research, with the intention of using the findings to transition to a bespoke survey design that would deliver timely and high-quality estimates of gambling participation, prevalence, and harm. Before turning to an assessment of the outcome of that consultation, I first consider how the development of the new survey design sits within the broader landscape of survey research over the past fifteen years or so.

The Changing Survey Landscape

The development of the methodological infrastructure for measuring gambling behaviour in Great Britain would, in many respects, serve as a useful case study of the changing pattern

of survey research more generally over the past fifteen to twenty years. As response rates continued to decline and survey costs increased, survey commissioners sought new approaches to obtaining cost-effective, representative, high-quality survey data for general populations. While this led to a multiplicity of new methodological approaches, the single biggest and most important development in the 21st Century survey landscape was the widespread transition from interviewer administration to online self-completion (Callegaro et al. 2014).

Online self-completion provides substantial cost savings compared to interviewer administered modes. For example, the American Community Survey estimated a cost of \$10 per online completion compared to \$192 for a face-to-face interview (Griffin, 2011). While the unit cost of an online self-completion is lower than interviewer administration, the marginal cost of each additional interview is even lower, meaning that sample sizes can be increased by large amounts for a comparatively modest additional outlay. This means it is possible to conduct more granular analyses for a fixed cost, producing robust estimates for small population sub-groups.

As well as the key benefit of cost efficiency, online self-completion offers other attractive features, such as greater flexibility over when respondents complete the questionnaire and the ability to use audio and visual capabilities or 'passive' data collection using online digital devices (Lessof and Sturgis 2018). For example, researchers are now starting to capture geographical mobility and online digital behaviour passively using apps and 'data donation', opening up exciting new possibilities for the types and volume of data that can be collected in surveys (Bosch and Revilla 2022).

Online self-completion, like all self-completion methods, also has desirable properties when measuring socially undesirable attitudes and behaviours because respondents are less willing to provide accurate responses to questions on such topics in the presence of an interviewer (Tourangeau and Smith 1996). This is clearly of high relevance to a survey of gambling behaviour, where there are good grounds to believe that the presence of an interviewer induces a downward bias on estimates of the prevalence of gambling harm (Sturgis and Kuha 2022).

The main barrier to the uptake of online self-completion designs has been the lower response rates they have tended to achieve compared to face-to-face interview designs. Low response rates increase the risk of biased estimates where the propensity to respond to the survey is correlated with the variable(s) of interest. However, this concern has diminished somewhat in recent years for two main reasons. First, push-to-web designs have started to achieve higher response rates while the reverse has been the case for in-person

interview surveys, as technological and societal change has tended to favour the former type of design over the latter. Second, in recent years survey methodologists have consistently found that the correlation between response rate and nonresponse bias is considerably weaker than has conventionally been assumed (Groves and Peytcheva 2008; Sturgis et al. 2017).

Most of the early online surveys carried out during the 2000s used opt-in (non-probability) sampling, which served as a barrier to the use of the online mode for official statistics and other high quality survey vehicles. A corresponding growth in online probability surveys was hindered by high rates of 'off-liners' in the general population, slow internet connections, and a lack of suitable sampling frames of the online population. However, as the size of the offline population has continued to decline, advances in address-based sampling, improved connection speeds and device sophistication have facilitated the growth of online probability surveys (Cornesse et al. 2020) and these are now increasingly common, both in the UK and overseas.

Survey commissioners who would previously not have considered a web survey due to concerns over sample and data quality are, therefore, now increasingly making the transition to the online self-completion mode of administration. Many UK surveys have already made, or will soon be making, this change including but not limited to the British Social Attitudes survey, the Labour Force survey, the European Social Survey, the National Survey of Sexual Attitudes and Lifestyles, the Participation Survey (formerly Taking Part), the British Election Survey, and Understanding Society.

This shift from in-person to online self-completion was already well underway in the early 2010s but was accelerated significantly during the Covid-19 pandemic, when in-home interviewing was brought to a sudden halt in March 2020. The pandemic not only forced the pace of technological change, it also increased the facility of the general population with online digital devices and accelerated the expectation that transactions and interactions be accomplished online rather than through in-person interaction.

Anecdotally at least, the pandemic also seems to have had a negative impact on people's willingness to invite survey interviewers into their homes, with post-pandemic response rates notably lower in the small number of surveys that have reverted to in-person interviews. The difficulty of maintaining interviewer field forces during the pandemic and the subsequent shortages experienced in the UK labour market have also been factors militating against a post-pandemic return to face-to-face interviewing.

Online probability survey designs currently fall under two broad methodological approaches in the UK. The first is a stand-alone 'push-to-web' method in which respondents are

randomly sampled from an address-based frame (PAF) and invited through the mail to complete a single survey online for a small monetary incentive. The second is an online probability panel, where respondents are recruited to become members of a 'standing panel' who receive regular invitations to complete surveys, again for small monetary incentives. The mode of recruitment for probability panels has been through both face-to-face interview, or mail push-to-web, though the latter is increasingly becoming the norm for the reasons noted above regarding the cost and limitations of in-person interviewing.

In choosing between a standalone push-to-web and an online probability panel, the main considerations will be response rate, sample size, data quality, and cost. While costs will, all things equal, generally be lower when using a panel, standalone surveys will achieve a somewhat higher response rate than can be obtained from a panel due to the attrition that occurs after the recruitment survey in the latter design. The sample size available through a panel will also have a lower maximum, so if a large sample is required a standalone survey is likely to be the best option. There are also potential data quality issues that arise through panel membership, notably the possibility of 'practice effects' or 'panel conditioning', where respondents' answers are affected by their participation in previous surveys (Sturgis, Allum, and Brunton-Smith 2009).

Both push-to-web and panel designs must deal with the issue of the minority of the population who are not able (or choose not) to have access to the internet. Studies have shown that, although this group is small, it is demographically, behaviourally, and attitudinally distinct, such that their exclusion can result in biased estimates (Cornesse et al. 2022). One approach here is to provide internet access and a mobile device to enable 'offliners' to complete surveys, though this is only practical for probability panels and has two problematic limitations. First, a large minority of the offliner group have *chosen* not to be online and so offering them online access is not a solution. Second, offering online access is likely to change the characteristics of an individual who would otherwise be offline and so will potentially produce biased estimates, for this sub-group at least.

Offliners can also be included in online probability surveys via telephone interview, or a paper questionnaire and both approaches are currently used in the UK context. Telephone interviewing has the benefit of enabling complex routing and integration of information from previous answers, although there is a substantial risk of measurement mode differences negatively affecting comparability with online response data. Paper questionnaires have the inverse properties of greater comparability in terms of measurement but not allowing routing and previous answer integration. Paper questionnaires generally need to be shorter than online and telephone interviews in order to achieve comparable unit and item response

rates. This means surveys sometimes include some questions that are asked in the online part of the survey only.

Another difficult issue that push-to-web sampling must grapple with is the selection of respondents within households where the design seeks to select a single individual, as is common for in-person interview surveys. This is done by the interviewer in face-to-face surveys. Existing research has shown that it is difficult to get respondents to implement random selection procedures successfully (Williams, 2016). An alternative approach to within household selection of a single adult is to request interviews with all eligible household members, thereby removing (or reducing) the potential for selection bias at this stage, albeit at the expense of introducing the additional potential for nonresponse amongst other household members. Some push-to-web surveys ask for interviews with all adults in a household, up to a maximum of four as this covers the vast majority of households in the UK. Although taking multiple adults at each address can increase sampling variance due to within household dependencies, this is usually compensated for by the gain in efficiency from reduced variance in design weights compared to a single adult design.

A disadvantage of allowing up to four interviews per household is that it creates an incentive for smaller households to fabricate interviews when there is a monetary incentive for each completion. A compromise design is to allow up to two interviews per household. Because approximately 85% of UK households contain fewer than three adults, in only a minority of households do the residents have any discretion over who completes the survey in this design. There is also less incentive for households to fabricate interviews when the maximum number of fake interviews per household is one. A study by Kantar Public (now Verian) found there was little difference on survey outcomes between these different approaches to respondent selection (Williams 2019).

The growing difficulty of implementing conventional survey modes has also served to sharpen the imperative to transition surveys online. Telephone interviewing – the main historical alternative to face-to-face interviews - is no longer able to provide sufficient cost savings or sample quality to make it a viable option. Although never as widely used in the UK as in other parts of the world, the trend toward a much-reduced volume of telephone interviewing that has been documented in the US (Olson et al. 2021) is also evident in the UK, and for broadly similar reasons.

The willingness of the general population to provide interviews over the telephone has fallen sharply since the early 2000s, with single digit response rates to Random Digit Dialling (RDD) surveys now the norm (Lavrakas et al 2017). This has mostly been driven by the steep decline in the number of fixed landline telephones and the commensurate rise in

'mobile-only' households over the past twenty years but it also seems to derive from a heightened general unwillingness amongst members of the public to complete interviews over the telephone.

Not only has the shift from fixed landline to mobile phones in the general population contributed to the decline in telephone response rates, as mobile users are less willing to respond to surveys, it has also posed new challenges for sampling and weighting. This is because dual frame (a mix of landline and mobile phone numbers) samples are more difficult to design and implement and require complex weighting adjustments for valid population inference. While the shift from landline to mobile phones has mostly been seen as representing a higher risk of biased estimates, it has also increased the cost of telephone surveys. This is because of the low and declining 'strike rate' (the number of calls made per achieved interview) for dual frame RDD samples.

In short, while telephone interviewing continues to play an integral role in survey research as an alternative mode of completion for existing respondents, it is not a viable alternative to face-to-face interviewing for sample recruitment. When a random probability survey needs to move away from in-person interviewing, online self-completion is increasingly the only viable choice.

A final factor currently pulling surveys to online self-completion is that this transition seems inevitable for most surveys at some point in the coming years anyway. Given the likely continuation and exacerbation of the problems hampering conventional modes of surveying, there is a strong case that transitioning from conventional to online modes should be implemented sooner rather than later. Another way of considering this is that, while moving surveys online will reduce *backward* comparability, it has the offsetting benefit of improving comparability with surveys that will be carried out in the *future*.

The design of the new survey – the Gambling Survey for Great Britain (GSGB)

The process for the redesign of the Commission's gambling survey commenced with a consultation with key stakeholder groups in December 2020. The key outcome of the consultation was the decision to assess the suitability of a standalone push-to-web design and to commission a pilot survey as the first step in this process. The contract for the pilot was awarded to NatCen Social Research in collaboration with the University of Glasgow and Bryson Purdon Social Research.

The design of the pilot followed a standard approach for the implementation of push-to-web surveys in the UK. A stratified random sample of 3,775 addresses was drawn from the PAF,

with sampled addresses sent an invitation letter asking up to 2 adults aged 16¹ or above to take part by completing the online survey with the link and unique identifiers in the letter. A £10 voucher was offered for completing the questionnaire. Three reminders were sent to nonresponding households, with the second reminder containing a paper version of the questionnaire. Fieldwork for the pilot was conducted in January and February 2022.

The pilot survey achieved 1,078 responses, representing a response rate of 21%, of which 57% were online completions and 43% paper. This response rate is comparable to other push-to-web surveys conducted in the UK at this time. Analyses carried out by NatCen and partners found that inclusion of paper questionnaires not only increased the response rate, but adjusted estimates of gambling behaviour downward, as would be expected (Ashford et al. 2022). The option of an offline completion mode therefore seems essential as a means of including parts of the population with quite different patterns and experiences of gambling, whose exclusion would likely bias key survey estimates.

In terms of substantive findings, the push-to-web pilot found considerably higher rates of gambling and gambling harm when compared to the most recent health survey data. For example, the pilot found 63% of the public had gambled in the previous 12 months, compared to 54% in the 2018 Health Survey for England (HSE). Estimates of the experience of problem gambling were even more discrepant, with the pilot finding prevalence of problem, moderate risk and low risk gambling three times higher than the 2018 HSE.

The differences were somewhat lower but still substantial using a trend adjusted estimate that accounted for an apparent small decline in gambling measured in the CATI survey over the intervening years. Because the estimates of problem gambling prevalence and in the BGPS and health surveys had been broadly stable since 2007, the substantial increase observed in the pilot would appear to have arisen primarily as a result of methodological differences between the surveys. This was in line with the conclusions of Sturgis and Kuha (2022) who found consistently higher gambling prevalence and harm estimates in both probability and non-probability online samples.

Based on the results of the pilot survey, the Commission embarked on a programme of additional research to determine the optimal approaches to within household selection and the measurement of gambling behaviour. For within household selection, this involved an experimental comparison between the 2-person approach used in the pilot and inviting up to a maximum of 4 adults. Measurement of gambling activities and harms involved comparison of binary and 4-point response scales and updating the list of activities to reflect recent

¹ The minimum age was subsequently raised to 18 for the experimental stages and the main-stage survey due to very low response rates amongst 16-17 year olds in the pilot.

changes in the types of gambling people do and experimental comparisons of how the list of activities is presented to respondents. This programme of work also involved testing (though not experimentally) the use of a QR code in the invitation letter to facilitate respondent access to the online questionnaire.

None of the experimental comparisons produced very strong or decisive differences but were sufficient to provide an evidential platform for determining the third and final design of the experimental stage. This would serve as a full test of the new push-to-web design before the main stage survey was launched in July 2023. Within household selection for the phase 3 design was up to 2 adults aged 18 or over, with the household members who have the most recent birthdays asked to complete the survey in households containing more than 2 adults. The updated list of gambling activities was presented to respondents in the form of a single long list and QR codes were included in the invitation letter. In all other respects the survey had the same design as the 2022 pilot described earlier, apart from the minimum age of respondents increasing from 16 to 18 and a somewhat longer questionnaire.

Fieldwork for this 'dress rehearsal' survey took place during April and May 2023, achieving a response rate of 17% and a sample size of 3,774. It found significantly higher rates of moderate risk and problem gambling on the PGSI compared to the 2022 pilot survey. This may be due to an increase in problem gambling in the population, but it might also have arisen as a result of the updated list of gambling activities used to filter respondents to the PGSI.

Conclusions and recommendations

My assessment of the development of the Gambling Survey of Great Britain (GSGB) is that it has been exemplary in all respects. Given the very high cost and declining response rates of in-person interview surveys, it was not feasible to continue with this sort of design into the future. This was true even before the Covid-19 pandemic hit but its effects on the general viability of in-home interviewing have made mode-choice even more stark. For different though equally compelling reasons, telephone interviewing is no longer a realistic alternative for obtaining cost-effective and accurate population estimates in Great Britain. The move to self-completion was therefore, in my judgement, the correct decision.

In making this transition the Gambling Commission has consulted widely with a broad range of stakeholders and followed industry standards of best practice in developing a mixed-mode push-to-web design that will yield high quality estimates of gambling prevalence in Great Britain on a quarterly and annual basis in the years ahead. The new design has been based

on a carefully planned programme of methodological research and development to ensure key design choices are evidence-based.

The shift to push-to-web will bring a number of important benefits. Prime amongst them will be the increased frequency of measurement afforded by the new design which will enable better detection and understanding of patterns and trends in gambling behaviour.

The push-to-web/paper design also yields a considerably larger sample size (approximately 20,000 interviews annually) compared to a face-to-face design. This will enable more precise estimates to be produced for population sub-groups and for detecting change within and between groups over time. This is a key evidence need for policy makers which has, up to now, not been satisfactorily met. It is important to note that this benefit of improved measurement of time-trends accrues even if estimates of the *level* of gambling and gambling harm are biased. That is to say, even if the estimates of gambling frequency and harm are too high due to nonresponse (as discussed below), the survey will still produce good estimates of change in these variables over time.

There are some issues that will require further consideration following the launch of the new design, to ensure public and stakeholder confidence in the quality and robustness of the statistics. Chief among them is the question of why the estimates of gambling prevalence and harm are so much higher in the push-to-web design than in the face-to-face interview surveys up to 2018. This has already been the subject of two investigations. Sturgis and Kuha (2022) placed most emphasis on the possibility of nonresponse bias in the push-to-web design inflating estimates of prevalence and harm, while Ashford et al (2022) came down more on the side of social desirability bias in the interviewer-administered surveys pushing the estimates downward from their true value. 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.

Until there is a better understanding of the errors affecting the new survey's estimates of the prevalence of gambling and gambling harm, policy-makers must treat them with due caution, being mindful to the fact there is a non-negligible risk that they substantially over-state the true level of gambling and gambling harm in the population.

One possibility, considered in the pilot report (Ashford, et al. 2022) is that response propensity will be higher amongst gamblers when gambling is mentioned as the focus of the survey in the invitation letter. This is because 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. Moreover, the 2010 BGPS was explicitly about gambling and also obtained similar estimates to the 2018 HSE. Understanding the direction of this relationship is crucial because this determines whether nonresponse is a compounding or an offsetting error with respect to social desirability.

I make seven recommendations for how the Gambling Commission should address the key remaining unresolved issues relating to how the shift to self-completion has affected estimates of gambling behaviour. Recommendations 1-4 should be considered of highest priority, while recommendations 5-7 are for longer term implementation and are, to some extent, dependent on circumstances beyond the Commission's control.

Recommendation 1: the Commission should conduct research to better understand the relationship between survey topic and the propensity of gamblers to respond to survey invitations.

The Ashord et al pilot survey report found that, at the same level of gambling, respondents are less likely to report high PGSI scores in the HSE compared to the pilot. It also found that HSE respondents reported lower PGSI scores when another household member was present during the interview. Both findings point to social desirability bias in the HSE as a reason for lower problem gambling estimates in this survey. However, these observational analyses rely on assumptions that are difficult to verify and are sensitive to which control variables are included in the models. A better approach to identifying the direction and size of a measurement bias would be to randomly assign respondents to online self-completion or an interview mode, as was recently done to evaluate mode effects on the Crime Survey for England and Wales.

Recommendation 2: the Gambling Commission should undertake additional research 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.

The stage 3 experimental survey found significantly higher PGSI scores than the 2022 pilot. This might have been a result of the use of an updated list of gambling activities on the 2023 survey but it might equally have been due to an increase in gambling harm in the population. In order to assess the impact of the updated gambling activity list, an experimental design is necessary.

Recommendation 3: the Gambling Commission should undertake a randomised experiment to evaluate the effect of the updated list of gambling activities on estimates of gambling prevalence and harm.

The addition of a paper option for questionnaire completion means that the survey does not exclude the offline population and those who find online survey completion challenging. As this sub-group has quite distinct demographic characteristics and patterns of gambling behaviour, their inclusion is essential. However, the inability to efficiently route respondents through a paper questionnaire means that it does not contain the full set of questions that are included on the online version. Some of the questions reported on in the GSGB will therefore exclude the offline population as well as those who choose not to complete the survey online which may lead to biases that are not currently well understood.

Recommendation 4: the Gambling Commission should take steps to assess the extent of potential bias in the subset of questions administered to online respondents only.

An on-going difficulty for push-to-web surveys is the implementation of within household respondent selection. The current approach of asking up to 2 respondents with the most recent birthdays to complete the survey is industry standard but nonetheless less than ideal. There is emerging evidence that appending PAF to external databases with information about the number of people in households can be effective in tailoring the number of invitations across households. This is just one example of how this issue might be mitigated and the Commission should keep abreast of developments in this area.

Recommendation 5: the Gambling Commission should continue to monitor best practice developments in the area of within household selection of adults in push-to-web surveys.

Any survey that uses PAF as its sampling frame will have under-coverage of groups that do not live in private residences. For most variables of interest, the small size of this group renders this generally unproblematic but for gambling it is possible that incidence is considerably higher in the excluded groups.

Recommendation 6: The Gambling Commission should carry out research on the prevalence of gambling and gambling harm in groups that are excluded from the GSGB because they are not included on the sampling frame.

A key piece of evidence regarding the effect of moving to self-completion is a comparison to a contemporaneous survey carried out using random sampling and face-to-face interviewing. This is unlikely to be affordable as a standalone data collection exercise but could be done as part of one of the national Health Surveys in the future.

Recommendation 7: the Gambling Commission should seek opportunities to benchmark the estimates from the GSGB against a contemporaneous face-to-face interview survey in the future.

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From: [REDACTED]
To: [REDACTED]
Subject: Sturgis news article
Date: 06 February 2024 09:51:00
Attachments: [Report_final_3FEB24.docx](#)
[image001.png](#)
[image003.png](#)

Hi [REDACTED]

Thanks for the catch up.

Here are my thoughts for potential content for the news article on the Sturgis report  [REDACTED]
[REDACTED]

If you need it I have also attached a copy of the Sturgis report.

Thanks

[REDACTED]
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News article:

Sturgis report published

-Patrick Sturgis, Professor of Quantitative Social Science at the London School of Economics was commissioned by the Gambling Commission to undertake an independent review of the GSGB methodology.

-The review was designed to assess the GSGB's methodological approach against our objectives which were consulted on back in 2020. Specifically the review was designed to:

1. Assess the GSGB methodological approach against best practice considering the context of current survey approaches
2. Analyse the likely impact of the methodological approach on estimates of gambling participation and prevalence of gambling harms
3. Make recommendations for improvement

-The review is an important part in the development of the GSGB, as we have reached the end of the defined experimental period and move towards the first publication of official statistics from the survey

-Delighted that Professor Sturgis's report concludes that the GC have followed best practice in developing a survey, using a future proofed mixed mode push to web survey methodology, which 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.

-However we take on board the recommendations in the report to continue to understand the impact of the changes made to both the survey design and the methodology in order to help us explain the findings from the survey to our users as we move forward with the launch of the survey.

-We'll be considering how we incorporate the recommendations into our business plan for 2024/25 and into a programme of continuous improvement for the GSGB survey in this year and years to come.

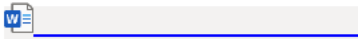
-We are clear that better evidence, driven by better data will lead to better regulation, which in turn will lead to better outcomes.

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: Independent review of GSGB by Professor Sturgis
Date: 08 February 2024 18:47:11
Attachments: [image002.png](#)
[image003.png](#)

This is a great read [REDACTED] and a testament to the years of hard slog and rigorous thinking and execution from the team to get us here.

Well done to everyone involved.

[REDACTED]



From: [Redacted]
To: [Redacted]
Subject: [Redacted] left a comment in "Sturgis report - news item"
Date: 08 February 2024 14:00:44
Attachments: [3b0798d7-ce72-4d7d-9438-384e105e6b1d](#)
[daea3b38-58b9-471d-9cb0-e6135b080fe2](#)
[00b79ecc-d45a-40e2-8c48-715b450ba665](#)
[10da2b0c-2870-418f-85d0-7fdb07ff3b36](#)
[38d17d7a-9a4b-492b-8ec5-b2f8e688a51d](#)
[89ed9fb7-6a49-42ec-a0f3-2daa7ca597aa](#)
[15860356-be1d-43b0-b5a9-fbbed42b8e1f](#)
[a7a22a89-66e3-4164-9ddb-f23e211c1109](#)
[0afe7553-b364-4407-bac7-4e9d979a154a](#)
[f61b84ea-d5f3-42cc-b924-c18634c8ce65](#)
[d9e7fce0-eeb6-4914-8e4b-ac3b6263a38a](#)
[f1526c9c-6a3a-4df8-b971-145828fc5e71](#)



Sturgis report - news item.docx



[Redacted] added a comment

I don't think this is totally accurate. I think he said "the development of the GSGB" had been exemplary in all respects

Independent review gives new gambling survey seal of approval

The Gambling Survey for Great Britain (GSGB) has been endorsed by Professor Patrick Sturgis, London School of Economics as being '*exemplary in all respects*'.

The independent review [\[Insert Link\]](#) published today, has assessed the GSGB's methodological approach against our [objectives](#) which were consulted on back...

[Go to comment](#)

[Why am I receiving this notification from Office?](#)

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: Letter from [REDACTED]
Date: 09 February 2024 14:26:32

Thanks [REDACTED] yes but I'd like to chat this through with you next week - we should be able to populate from lines to take - where there are new questions I'd like to populate that first and then work from there

[REDACTED]

From: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Sent: Friday, February 9, 2024 12:19:09 PM
To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Cc: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Subject: RE: Letter from [REDACTED]

Hi All

Can I confirm if I should be drafting a response to this letter ([REDACTED] [REDACTED]) or [REDACTED] – are your team picking these up? [REDACTED]
[REDACTED]

I have also had an email from [REDACTED] requesting the project brief we gave to Patrick Sturgis for the independent review of the GSGB. The full brief includes costs which I would suggest is commercially sensitive but I could share the following section as we'll be listing the items 1-3 in the news article that we'll be publishing on the 19th.

Specification

We would like to commission a review of the GSGB's methodological approach against our objectives. The review should build on the work undertaken for GambleAware in 2021 to understand best practice for estimating gambling participation and prevalence of gambling harms in Great Britain.

The review should:

1. Assess the GSGB methodological approach against best practice considering the context of current survey approaches
2. Analyse the likely impact of the methodological approach on estimates of gambling participation and prevalence of gambling harms
3. Make recommendations for improvement

Thanks

[REDACTED]

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Sturgis report: GSGB
Date: 12 February 2024 16:32:00
Attachments: [image002.png](#)
[Report_final_3FEB24.docx](#)

Hi [REDACTED]

Hope you are well.

I know [REDACTED] gave the headlines of the review Professor Sturgis has now completed of the GSGB in the monthly catch up this morning, so just wanted to send you a full copy of the report ahead of publication next Monday.

The report will be published on the LSE website and we are planning to release a news article on the same day.

Feel free to share internally with colleagues but please don't share externally until the report is published.

Kind Regards

[REDACTED]

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From: [REDACTED]
To: [REDACTED]
Subject: Re: Independent review of GSGB by Professor Sturgis
Date: 14 February 2024 20:13:02
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

[REDACTED]. I read this through this afternoon through the lens our critics will likely read through. I think there are some handling issues to be worked out. When I spoke to [REDACTED] last week, it wasn't clear to me that the team has clocked these. I suspect the thinking is that the 'exemplary in all respects' line is strong enough to head off any criticism. It is certainly good to have that but I wouldn't want that to be our only response to the question about overstatement of participation and prevalence of harms. There are some really strong lines in here but we do need to put some work in to pull those out and, purely on the basis of my conversation with [REDACTED] I'm not very confident the team has done that work?

Definitely worth talking through.

[REDACTED]

From: Andrew Rhodes <[REDACTED]@gamblingcommission.gov.uk>
Sent: Wednesday, February 14, 2024 9:28 am
To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Subject: FW: Independent review of GSGB by Professor Sturgis

Hi,

I have read this in full and have spoken to [REDACTED] about it. It's a very positive read and whilst I did wonder why there was so much context at the start, it made sense when it came to his recommendations. [REDACTED] is right to pull out the commentary that the development has been 'exemplary' and the repeated reinforcement on how we have approached this well and have adopted best practice is reassuring. He does also 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. However, as it goes on it's more nuanced and much of his narrative explains why he thinks it might not be the case but it needs to be worked on and refined as we go. The explanation of this will be important as we already know sections of the industry want to undermine this. The same is going on in Ireland where they have a PG rate of 3.5%, rising to 10% when at risk is included. Sturgis does also explain at length why the current approach is no longer appropriate and sustainable, which I suspect critics will overlook.

Worth a chat when you're back, I think.

Andrew

| **Andrew Rhodes**



From: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Sent: Thursday, February 8, 2024 3:46 PM
To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; Andrew Rhodes
<[REDACTED]@gamblingcommission.gov.uk>; [REDACTED]
<[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>;
[REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED]
<[REDACTED]@gamblingcommission.gov.uk>; [REDACTED]
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<[REDACTED]@gamblingcommission.gov.uk>; [REDACTED]
<[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Cc: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Subject: Independent review of GSGB by Professor Sturgis

Hi All

Later this month we will be releasing the first wave of results from the new Gambling Survey for Great Britain (GSGB) which is a project that has been in development for the last few years. The new GSGB will provide us with a single, high quality methodology to help us understand gambling behaviours in Great Britain, and will be the largest consumer survey we have ever had.

On completion of the development of the GSGB we asked Professor Patrick Sturgis from the London School of Economics to review the approach we have taken and his final report can be found here [\[REDACTED\]](#) This is being shared with you for information only.

Professor Sturgis will be publishing his report on the 19 Feb on the LSE website and we will be releasing a news article on the same day to announce that the independent review has been published. The news article is currently being drafted by the Comms team.

On the 29 Feb we will then release the first wave of results from the new GSGB, followed in July by a larger publication based on data collected in 2023.

Kind Regards

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [REDACTED]
Subject: RE: REQUEST: Update GSGB Banner
Date: 14 February 2024 17:29:00
Attachments: [image001.png](#)
[image002.png](#)

Thanks [REDACTED]
Looks fine to me. Others may think differently. I will let you know
[REDACTED]

From: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Sent: Wednesday, February 14, 2024 5:26 PM
To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Subject: RE: REQUEST: Update GSGB Banner

Hi [REDACTED]

Hopefully this suffices but if not, let me know!

Cheers,

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From: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Sent: Wednesday, February 14, 2024 2:44 PM
To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Subject: REQUEST: Update GSGB Banner

Dear [REDACTED]

With apologies for the short notice, this is to request an updated banner for GSGB to use as a header for an email to stakeholders to announce the publication of Patrick Sturgis' independent review.

It really only needs to say: "Gambling Survey for Great Britain: Independent Assessment Published" – the body of the email will provide the details

Thank you
[REDACTED]

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Sturgis review of the GSGB
Date: 15 February 2024 14:33:00
Attachments: [image002.png](#)
[Assessment of the GSGB Professor Sturgis Feb 2024.pdf](#)

Hi Both

I wanted to share a copy of Professor Sturgis's review of the Gambling Survey for Great Britain methodology which will be published on the London School of Economics website on Monday (19th).

Please treat this as an embargoed copy of the report.

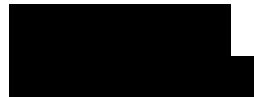
We will be publishing a news article on our website on Monday about the report and providing a link to access the full report via the LSE website.

We are currently assessing how we can incorporate the recommendations into our business plan for 2024/25 and would be happy to discuss this in a future meeting.

Kind Regards

[REDACTED]

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From: [REDACTED]
To: [REDACTED]
Subject: RE: Independent assessment of the GSGB
Date: 19 February 2024 16:17:35
Attachments: [image002.png](#)

Indeed – this is an important moment in terms of building towards the initial launch in Feb and full launch in July.

To have words like ‘exemplary’ used in terms of approach the team has made is a real feather in the cap given Sturgis is ‘the’ expert

Great to see the other research too – a good read - which I know is just the start of a busy period for releasing the smart work you’re doing

Thanks all

[REDACTED]

From: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Sent: Monday, February 19, 2024 10:51 AM
To: [REDACTED]@gamblingcommission.gov.uk>; [REDACTED]
[REDACTED]@gamblingcommission.gov.uk>; [REDACTED]
<[REDACTED]@gamblingcommission.gov.uk>
Subject: RE: Independent assessment of the GSGB

Thanks [REDACTED] – great to see this, well done to everyone involved!

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

Thanks,

[REDACTED]

[REDACTED]
[REDACTED]

From: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Sent: Monday, February 19, 2024 10:31 AM
To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Subject: Independent assessment of the GSGB

Morning All!

We have published Patrick Sturgis’s independent assessment of the Gambling Survey for Great

Britain this morning.

There is a news article on our website and a link to the full report on the LSE website.
[Independent assessment endorses Gambling Survey for Great Britain \(gamblingcommission.gov.uk\)](#)

Thanks



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From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Prof Sturgis report - LinkedIn
Date: 19 February 2024 14:02:49
Attachments: [image001.png](#)
[image002.png](#)

Yep, not a problem, thanks both! Will send this out shortly

Many thanks,

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[REDACTED]

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From: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Sent: Monday, February 19, 2024 1:23 PM
To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Cc: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Subject: FW: Prof Sturgis report - LinkedIn

Hi [REDACTED]

Thanks for pulling this together, [REDACTED] suggested some changes as per below. Are you OK incorporating these changes?

Thanks

[REDACTED]

From: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Sent: Monday, February 19, 2024 1:01 PM
To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Subject: RE: Prof Sturgis report - LinkedIn

Thanks I'd prob not lead with 'exemplary in all respects – it sounds a little triumphal to me. I've made some suggested changes.

I'd go more simply

We're really pleased to be able to report on the independent review of our development of the new Gambling Survey for Great Britain by Professor Patrick Sturgis of the London School of Economics

Professor Sturgis has praised our methodological approach against our consulted objectives as having “followed industry standards of best practice” which is expected to produce “high quality and timely estimates of gambling prevalence in Great Britain”.

Our Gambling Survey for Great Britain will be one of the largest survey samples on gambling prevalence globally, providing greater depth than ever before, and we’ll launch our first wave of official statistics at the end of this month.

We know that better evidence, driven by better data will lead to better outcomes for our ambitions of making gambling safer, fairer and crime free for all and we’ll continue to develop the survey as we work on recommendations for refining the approach made by Professor Sturgis.

A huge thank you to our research and statistics team, and everyone involved at the Commission, for the hard work to get to this important moment in the development of the Gambling Survey for Great Britain

To read more about Professor Sturgis’ independent review, visit our web page [LINK](#)

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

Sent: Monday, February 19, 2024 12:17 PM

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

Subject: FW: Prof Sturgis report - LinkedIn

FYI....

I need to review but caught up in meetings at the moment

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

Sent: Monday, February 19, 2024 11:22 AM

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

Subject: Prof Sturgis report - LinkedIn

Hi [REDACTED]

Hope you’re well,

Here’s the copy for LinkedIn to go out today in light of Prof Sturgis’ report on GSGB. Wanted to run it past you to make sure you were happy with it first. Any issues with it, let me know and I’ll amend accordingly.

Many thanks,

“Exemplary in all respects” was how Professor Patrick Sturgis of the London School of Economics described the development of our Gambling Survey for Great Britain after his

independent review was published today.

Professor Sturgis has praised our methodological approach against our consulted objectives as having “followed industry standards of best practice” which is expected to produce “high quality and timely estimates of gambling prevalence in Great Britain”.

Our Gambling Survey for Great Britain will be the largest survey on gambling prevalence in Great Britain, and we’ll launch our first wave of official statistics at the end of this month.

We know that better evidence, driven by better data will lead to better outcomes. As we work on our recommendations made by Professor Sturgis, we know that through decision-making led by clear, timely and robust research, we can continue to meet our ambitions of making gambling safer, fairer and crime free for all.

A huge thank you to our research and statistics team, and everyone involved at the Commission, for the wonderful work over the many months that has led to the Gambling Survey for Great Britain getting off to the best possible start.

To read more about Professor Sturgis’ independent review, visit our web page [LINK](#)

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From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Prof Sturgis report -social
Date: 19 February 2024 11:36:49
Attachments: [image001.png](#)
[image002.png](#)

It's a fair point, I asked myself. Fine to leave it out then.

From: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Sent: Monday, February 19, 2024 11:30 AM
To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED]
<[REDACTED]@gamblingcommission.gov.uk>
Cc: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Subject: RE: Prof Sturgis report -social

Cheers [REDACTED] I'm not averse to thanking Prof Sturgis, but is it the kind of thing we'd do when it concerns an independent reviewer? Doesn't seem a bit too 'matey'? Might be me overthinking it but it's not a hard no from me.

If so, something along the lines of "Thank you to Prof. Sturgis too, for his insight, expertise and honest feedback which we'll continue to work on in the coming weeks."

Cheers,

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[REDACTED]
[REDACTED]

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From: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Sent: Monday, February 19, 2024 11:27 AM
To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED]
<[REDACTED]@gamblingcommission.gov.uk>
Cc: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Subject: RE: Prof Sturgis report -social

Reads great!! Do we need to add a thank you to Prof Sturgis for his work at the end too?

From: [REDACTED]
To: [REDACTED]
Subject: RE: Prof Sturgis report -social
Date: 19 February 2024 11:25:25
Attachments: [image001.png](#)
[image002.png](#)

Need a space on 'canbe'. Looks good though!!

From: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Sent: Monday, February 19, 2024 11:20 AM
To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED]
<[REDACTED]@gamblingcommission.gov.uk>
Cc: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Subject: RE: Prof Sturgis report -social

Cheers [REDACTED] – will run past [REDACTED] for her approval too. Accompanying graphic attached.

Thanks,

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From: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Sent: Monday, February 19, 2024 11:00 AM
To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED]
<[REDACTED]@gamblingcommission.gov.uk>
Cc: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Subject: RE: Prof Sturgis report -social

Mugshot attached. Copy looks ok to me.

Are you going to pass by [REDACTED] too?

[REDACTED]

From: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Sent: Monday, February 19, 2024 10:55 AM
To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED]
<[REDACTED]@gamblingcommission.gov.uk>
Cc: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Subject: Prof Sturgis report -social

Hi both,

Copy for LinkedIn below – do we have a picture of Prof Sturgis to use for the graphic, perchance? Any glaring errors in this, do let me know and I’m happy to amend.

“Exemplary in all respects” was how Professor Patrick Sturgis of the London School of Economics described the development of our Gambling Survey for Great Britain after his independent review was published today.

Professor Sturgis has praised our methodological approach against our consulted objectives as having “followed industry standards of best practice” which is expected to produce “high quality and timely estimates of gambling prevalence in Great Britain”.

Our Gambling Survey for Great Britain will be the largest survey on gambling prevalence in Great Britain, and we’ll launch our first wave of official statistics at the end of this month.

We know that better evidence, driven by better data will lead to better outcomes. As we work on our recommendations made by Professor Sturgis, we know that through decision-making led by clear, timely and robust research, we can continue to meet our ambitions of making gambling safer, fairer and crime free for all.

A huge thank you to our research and statistics team, and everyone involved at the Commission, for the wonderful work over the many months that has led to the Gambling Survey for Great Britain getting off to the best possible start.

To read more about Professor Sturgis’ independent review, visit our web page [LINK](#)

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From: [REDACTED]
To: [REDACTED]
Subject: RE: Report request from Marcus
Date: 21 February 2024 09:45:00
Attachments: [image002.png](#)

Hi [REDACTED]
Great, thanks so much!

From: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Sent: Wednesday, February 21, 2024 9:45 AM
To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Subject: RE: Report request from Marcus

Hiya,

Yep of course, he's talking about the Patrick Sturgis review which was released on Monday:

[Sturgis Assessment of the gambling survey for great britain published.pdf \(lse.ac.uk\)](#)

If he has any questions then it's probably best to direct them to [REDACTED]

Thanks,

[REDACTED]

[REDACTED]

From: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Sent: Wednesday, February 21, 2024 9:30 AM
To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Subject: Report request from Marcus

Hi [REDACTED]

Marcus has asked me to get a copy of the following report ... : **Can you get me that professors report on the new gambling survey methodology please?**

Would you have an idea what that might be and if so could you send the report to me please?!

Many thanks,

[REDACTED]

From: [REDACTED]
To: [REDACTED]
Subject: RE: Submissions for this week's Commissioners update
Date: 21 February 2024 10:14:00
Attachments: [image001.png](#)
[image002.png](#)
[image004.png](#)

Thanks [REDACTED]

From: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Sent: Wednesday, February 21, 2024 10:14 AM
To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Subject: RE: Submissions for this week's Commissioners update

Hi [REDACTED]

Highlights:

- We issued news item for the release of Professor Patrick Sturgis report into the assessment for the Gambling Survey of Great Britain: [Independent assessment endorses Gambling Survey for Great Britain \(gamblingcommission.gov.uk\)](#)
- [REDACTED]
- [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]

Many Thanks

[REDACTED]

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From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: GSGB FAQs
Date: 27 February 2024 17:53:00
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

Hi All

My apologies I circulated the wrong link to the GSGB FAQs earlier.

The correct link is  [REDACTED]

These incorporate the latest questions, including some relating to the Wave 1 publication.


Once the GSGB area goes live on the website on Thursday I'll be able to add in links to the results, technical report and other supporting documentation which will be available to access on our website.

Thanks

[REDACTED]

From: [REDACTED]
Sent: Tuesday, February 27, 2024 12:30 PM
To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Cc: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Subject: RE: Winning Post Special - changing GB prevalence stats

Thanks [REDACTED] these look good to me.

I have incorporated the answers into our FAQ document for future reference  [REDACTED] am just reviewing and updating the document to include the latest Sturgis report.

Thanks

[REDACTED]

From: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Sent: Tuesday, February 27, 2024 12:27 PM
To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Subject: RE: Winning Post Special - changing GB prevalence stats

Thanks for being so speedy all.

I'll include the following unless I have any other feedback

General criticism that survey has limitations (including potentially overstating PG):


- Whilst we are obviously interested in the views of commentators and others, our develop process on GSGB has been built upon the assurance and input of recognised experts in this field
- Patrick made some important recommendations for us to follow but was clear that launching GSGB was not dependent on them being completed first.
- Don't overlook the fact the Patrick highlighted significant limitations with the Health Survey. If you were to apply the argument that GSGB shouldn't be launched until all issues were resolved then the Health Survey should not be used again either.
- We know no methodology is without its limitations but Patrick was clear that the continuing with in-person or telephone survey was no longer feasible and the decision to move to a self-completion survey was the right one

Specific criticism that survey contains estimates of gambling-related suicide attempts, violence and abuse, mental health breakdown, criminality and use of food banks 'in the full knowledge that these may be inaccurate':

- 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 and richer picture.
- inclusion of these questions follows stakeholder engagement (across industry, policy and academia, and lived experience) which told us there was widespread demand for the GSGB to include questions on wider harms, rather than just the PGSI.
- We don't simply rely on GSGB to develop our evidence part – it is simply one important aspect of it

Best regards,



GAMBLING COMMISSION	[Redacted] Phone: [Redacted] www.gamblingcommission.gov.uk Making gambling safer, fairer and crime free	
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From: [Redacted] <[Redacted]@gamblingcommission.gov.uk>
Sent: Tuesday, February 27, 2024 11:57 AM
To: [Redacted] <[Redacted]@gamblingcommission.gov.uk>; [Redacted] <[Redacted]@gamblingcommission.gov.uk>; [Redacted] <[Redacted]@gamblingcommission.gov.uk>; [Redacted] <[Redacted]@gamblingcommission.gov.uk>; [Redacted] <[Redacted]@gamblingcommission.gov.uk>; [Redacted] <[Redacted]@gamblingcommission.gov.uk>
Subject: RE: Winning Post Special - changing GB prevalence stats

I think those last two bullets are really important [Redacted] this comes back to a headline point

[which is also important] which is:

- We don't simply rely on GSGB to develop our evidence part – it is simply one important aspect of it

And so on this point:

- Likewise we do not simply want to rely on PGSI for understanding the impact of gambling
- This provides a far richer picture, including an element of scale to understand and explain harm better

Agree with everything else said.

Hope these point all reflect what we have in Q&A or are added to please

Thanks [REDACTED]

[REDACTED]

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

Sent: Tuesday, February 27, 2024 11:49 AM

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

Subject: RE: Winning Post Special - changing GB prevalence stats

Hi [REDACTED]

On that point I would say the points below from [REDACTED] still apply, because the sentence is implying that the data won't be reliable because of the methodology. In addition, we can point out that:

- The new data will be reported objectively and transparently in a chapter looking at both sides of the impacts of gambling, including how consumers enjoy gambling and their motivations for participating.
- We will be publishing the new data on impacts of gambling alongside a full technical report outlining the extensive development process that we have followed to ensure that the data is reliable and robust.
- The inclusion of these questions follows stakeholder engagement (across industry, policy and academia, and lived experience) which told us there was widespread demand for the GSGB to include questions on wider harms, rather than just the PGSI.
- 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.

Thanks,

[REDACTED]

[REDACTED]

From: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Sent: Tuesday, February 27, 2024 11:26 AM
To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Subject: RE: Winning Post Special - changing GB prevalence stats

Thanks [REDACTED] – really helpful

Is there anything Andrew can say if asked specifically about this criticism:

In July, the Gambling Commission will publish its first annual GSGB report, containing estimates of (among other things) gambling-related suicide attempts, violence and abuse, mental health breakdown, criminality and use of food banks – in the full knowledge that these may be inaccurate. It is questionable whether this is an ethical or responsible thing for a market regulator to do;

Best regards,

[REDACTED]

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From: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Sent: Tuesday, February 27, 2024 11:14 AM
To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Subject: RE: Winning Post Special - changing GB prevalence stats

For me key points are:

- Whilst we are obviously interested in the views of commentators and others, our develop process on GSGB has been built upon the assurance and input of recognised experts in this field
- Patrick made some important recommendations for us to follow but was clear that launching GSGB was not dependent on them being completed first.
- Don't overlook the fact the Patrick highlighted significant limitations with the Health Survey. If you were to apply the argument that GSGB shouldn't be launched until all issues were resolved then the Health Survey should not be used again either.
- We know no methodology is without its limitations but Patrick was clear that the

continuing with in-person or telephone survey was no longer feasible and the decision to move to a self-completion survey was the right one

From: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Sent: Tuesday, February 27, 2024 11:04 AM
To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Subject: RE: Winning Post Special - changing GB prevalence stats

Hi all,

Andrew may be quizzed about this on Thursday at the BGC AGM.

Do we have any key points we can supply him with?

Best regards,

[REDACTED]

	<p>[REDACTED] Phone: [REDACTED] www.gamblingcommission.gov.uk Making gambling safer, fairer and crime free</p>	
---	--	--

From: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Sent: Thursday, February 22, 2024 11:46 AM
To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Subject: RE: Winning Post Special - changing GB prevalence stats

Thanks [REDACTED]

[REDACTED]

From: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Sent: Thursday, February 22, 2024 11:42 AM
To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>; [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Subject: FW: Winning Post Special - changing GB prevalence stats

FYI

[REDACTED]

From: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Sent: Thursday, February 22, 2024 11:10 AM
To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Subject: FW: Winning Post Special - changing GB prevalence stats

FYI.....

From: [REDACTED] <[REDACTED]@reguluspartners.com>
Sent: Thursday, February 22, 2024 10:56 AM
To: [REDACTED] <[REDACTED]@gamblingcommission.gov.uk>
Subject: Winning Post Special - changing GB prevalence stats

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



GB: Prevalence Stats - Exemplary but wrong? What the independent review of the Commission's new survey really tells us

Britain's Gambling Commission has this week claimed vindication for its new Gambling Survey for Great Britain ('GSGB'), following publication of an independent review by Professor Patrick Sturgis of the London School of Economics ('LSE'). Professor Sturgis found much to admire in the market regulator's new approach to the collection of data on gambling participation and harmful gambling but cast doubt on the reliability of the statistics the GSGB will produce. His review thus raises a number of important ethical questions regarding the Commission's plans to ditch the 'gold standard' NHS Health Survey as the source of Official Statistics when it publishes its controversial new survey in full this summer.

In announcing the results of the review, the Gambling Commission understandably drew attention to Professor Sturgis's comment that work on developing the new online survey had been "*exemplary in all respects*". Critically however, it failed to mention that this opinion did not extend to the reliability of the statistics that the GSGB will produce, which was given an altogether more cautious assessment:

*"Until there is a better understanding of the errors affecting the new survey's estimates of the prevalence of gambling and gambling harm, **policy-makers must treat them with due caution**, being mindful to the fact **there is a non-negligible risk that they substantially over-state the true level of gambling and gambling harm in the population.**"*

This opinion is consistent with previous analysis by the LSE. In a peer-reviewed journal paper published in 2022, Sturgis and Kuha wrote:

"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"; and "online surveys whether based on probability or nonprobability samples [tend] to overestimate gambling harm relative to interviewer-administered in-person surveys".

"exemplary"

The extent to which the development of the GSGB is considered is largely restricted to the following: i) the Gambling Commission's decision to change data collection methods in a post-Covid world; ii) the advantages that the GSGB is likely to have (in terms of cost, flexibility and regularity and speed of reporting); iii) the Commission's efforts to consult and engage with stakeholders through the process; and iv) the fact that the transition to the GSGB has been preceded by a period of testing. While these are all valid observations, what really matters from a policy perspective is whether or not the survey will produce credible results. The Sturgis Review does little to dispel concerns that the GSGB – for all the hard work by the Commission's research team - will prove to be an unreliable source of Official Statistics. The regulator's decision to gloss over this inconvenient truth only adds to the disquiet.

In July, the Gambling Commission will publish its first annual GSGB report, containing estimates of (among other things) gambling-related suicide attempts, violence and abuse, mental health breakdown, criminality and use of food banks – in the full knowledge that these may be inaccurate. It is questionable whether this is an ethical or responsible thing for a market regulator to do; but it is also sadly consistent with its approach to research and evidence collation in recent years. There is now clear evidence that the Commission has misrepresented research findings within its public consultations; approved regulatory settlement funding for demonstrably flawed and activist-led studies; suppressed its opinion that Public Health England's 2021 report on social and economic costs was unreliable; withheld for more than three years research on consumer views on affordability checks; and admitted to automatic bias against research funded by its licensees. In 2022, the chair of its Advisory Board for Safer Gambling suggested that the accuracy of statistics on gambling harm was of little importance; and that attempts to apply scrutiny to the way that they are produced was "*a distraction from what matters to people and families harmed by gambling*". Meanwhile, its chief executive's vaunted crackdown on the misuse of statistics has been a notably flaccid and lopsided affair.

Professor Sturgis's review does not consider a number of points raised with the Gambling Commission in relation to the GSGB – presumably because he was not made aware of them. These include:

- the Commission's repeated refusals to disclose data from the Pilot and Experimental stages that could be used to test for sample bias
- its failure to recognise the effect that lockdown policies had on gambling participation in 2021 (and the impact this had on stress-testing 'problem gambling' estimates in the Pilot Survey)
- evidence of over-reporting of gambling participation in the Pilot and Experimental stages
- evidence that the Experimental stage sample was skewed towards people with poor mental health
- the Commission's marginalisation of legitimate concerns with the GSGB.

It is unlikely that Professor Sturgis would have been made aware of the salience of the GSGB in relation to public policy. Interaction quotas introduced by the Commission last year, are directly pegged to rates of 'problem gambling' and so may be expected to increase; while thresholds for affordability checks – calculated by reference to the population prevalence of 'problem gambling' – are likely to be lowered. The Office for Health Improvements and Disparities will magically increase its estimate of suicides associated with problem gambling from 496 a year (which the Commission has long known to be misleading) to around 3,300 - or about 60% of all such deaths in England. In short, the publication of misleading survey results has the potential to distort public policy and impair market functioning.

One curious side effect of the new survey will be to make it harder for the Commission to resist calls to bring the National Lottery into the mainstream system of market regulation. This is because the rate of problem gambling among participants in lottery games is likely to increase to levels currently considered problematic by the Commission (the fact that around 60% of 'problem gamblers' play the lottery main draw and around half play scratchcards suggests that this is close to a statistical inevitability regardless of typically ignored issues of causality).

In a week from now, the Commission will launch Wave 1 of the GSGB, comprising estimates of gambling participation as well as information on consumer motivations and public attitudes. A further wave will be

published in May before the Commission releases its full report – which one commentator has dubbed “the motherlode of anti-gambling statistics” – in July. The Sturgis review should have been an opportunity to address legitimate concerns about the GSGB in advance of publication; but this would have required a much bolder and more objective brief from the Commission. The publication of the new survey in full will lead to opportunities (previously resisted by the regulator) to test for sample bias. The Commission may therefore face some awkward questions if it can be shown that it wilfully published misleading statistics on harmful gambling. It has the option in the next few months of engaging meaningfully on legitimate concerns or continuing to ignore them. The choices it now makes may be expected to have a big influence on whether it achieves its aim of restoring trust.

Disclaimer; The analysis provided in this report represents the opinions of the authors. Any assessment of trends and change is necessarily subjective. The information and opinions provided herein are not intended to provide legal, accounting, investment or policy advice, nor should they be used as a forecast. Regulus Partners may act, or have acted, for any of the companies and other stakeholders mentioned in this report.

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FAQs – Gambling Survey for Great Britain

The new methodology – What’s changed and why.

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 will use 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 stratified random probability sample of addresses in Great Britain, from the Postcode Address File (PAF) to take part in the survey. 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 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.

Why is the Gambling Commission moving from using the Telephone Survey and reliance on the gold-standard 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. 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 [been independently reviewed](#) 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 will collect data from 20,000 respondents per annum and will greatly improve the level of analysis that can be undertaken on the results.

The Gambling Survey for Great Britain will report participation data on a quarterly basis and data on the prevalence of problem gambling and gambling related harms on an annual basis, this will greatly improve the timeliness and frequency of data.

The gambling activities we ask about in the survey has been 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 designed to be the official statistic for PGSI. In addition, we have developed a suite of new questions to understand experience of gambling related harms both because of someone's own gambling and as a result of someone else's gambling to help us understand more about the difficulties some gamblers experience with their gambling.

What is/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 [Patrick Sturgis in 2021](#) 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 [independently assessed](#) 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?

- 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.
- 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. Step 3 experimental data is based on a sample of approximately 4,000 respondents, one-fifth of the sample size expected annually when we move to the official statistics phase. Upon moving to this phase, data gathered from 20,000 respondents annually will make the survey one of the largest gambling surveys in the world.
- The experimental statistics use a new methodology, and therefore results are not comparable to data from previous alternative surveys such as the Health Surveys for England and Scotland or the National Survey for Wales. With time, the data collected from the new methodology will grow and enable us to look at trends and comparisons across this data source.
- 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. 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. We have recently commissioned Professor Patrick Sturgis, Professor of Quantitative Social Science at the London School of Economics, to undertake an independent review of the Gambling Survey for Great Britain methodology. We'll publish his findings and recommendations early next year, ahead of the new methodology becoming our official statistics later in 2024.
- 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 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 problem gambling rates?

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 input 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. 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-state the level of gambling harm in the population. We will continue to work through Professor Sturgis's recommendations to help us understand the impact of the change in methodology in more detail.

Engagement in developing the new methodology.

Has there been any consultation with stakeholders including industry?

Yes, in December 2020, the Gambling Commission launched a [consultation on gambling participation and prevalence research \(opens in new tab\)](#) to gather views on proposals to develop a single, high-quality methodology to measure gambling participation and prevalence of problem gambling. The [results of the gambling participation and prevalence research consultation](#) 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 three times to discuss the pilot and experimental data 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.

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 and Bryson Purdon Social Research to develop the Gambling Survey for Great Britain on behalf of the Commission. In addition, two external experts, Robert Williams and 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 nine stakeholder engagement panel sessions over the last two years, and we held a session at our Evidence Conference in March 2023 about the survey, in which over 60 stakeholders attended.

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 [here](#)

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 three times in the last two 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. Summaries of our stakeholder engagement sessions can be found on the Gambling Survey for Great Britain timeline [Participation and the prevalence of problem gambling \(gamblingcommission.gov.uk\)](#)

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

We have had support from stakeholders in the consultation to develop a high-quality single survey for whole of Great Britain 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 three times each in the past two 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.

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 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.

Experimental

Can the data from the pilot and experimental phases of the project be used as references and/or official statistics for gambling participation and prevalence?

Data from the pilot and experimental phases of the project are 'experimental statistics' or 'official statistics in development'. Whilst they are classed as experimental, they do not replace current official statistics. Due to the new methodology being implemented, data is not comparable with previous surveys.

How will you prevent experimental data being seen/used/quoted as official statistics?

We have clearly labelled the content on our website as 'experimental statistics' and reiterated the fact that these are not official statistics. The statistics are 'official statistics in development'.

What is the timeline for moving from experimental to official statistics?

The final outputs from the experimental statistics are being release on 23rd November 2023. Data from the first wave of the mainstage survey is due for first release on 29th February 2024.

We have published information relating to removing the experimental/in development label from our official statistics [here](#).

The Official 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?

The first set of official statistics from the Gambling Survey for Great Britain will be released in Spring 2024 and be based on the first wave of data collection. We will publish four waves of data each year, as well as a more substantial annual report which will look at gambling behaviours over the past 12 months.

The quarterly publications will focus mainly on participation, reasons for gambling and, enjoyment of gambling. The annual report will also report an annualised participation figure, reasons for gambling, and enjoyment of gambling, but will also incorporate additional measures such as gambling harms, PGSI, 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 Gambling Survey for Great Britain hub. (Inset link)

Using the data

How and when can operators use the data from the survey operators for their safer gambling customer interactions.

Upon launching the Gambling Survey for Great Britain, findings will be made available on the Gambling Commissions website four times per year. In addition, there will be a more detailed annual release, in which the dataset will be archived to the UKDA for all stakeholders to request the data, download it and conduct their own analyses. Further details on release dates will be shared in due course.

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

Upon launching the Gambling Survey for Great Britain, findings will be made available on the Gambling Commission's website four times per year. In addition, there will be a more detailed annual release, in which the dataset will be archived to the UK Data Service (UKDS) for all stakeholders to request the data, download it and conduct their own analyses. Further details on release dates will be shared in due course.

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

Still to do:

Something about Andrew R – challenge misuse of statistics.

Our Communications teams work closely with media outlets.

Clear reporting

Guidance on website about how to use the stats (to be published in July). This was also a select committee recommendation

Comparisons/ data challenges

Has the problem gambling rate been underestimated by the previous surveys? Is this why a new methodology is being used?

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.

However, all survey methodologies have strengths and limitations and a balanced view of those should be considered. In addition, because we are only dealing with a sample of the population rather than the whole population, the findings will only ever be estimates. The larger the sample size the more accurate these estimates are.

How do you respond to claims the survey over-represents people with gambling problems? Or biased towards problem gamblers? Sample bias?

The new survey is a gambling focused survey therefore one of the limitations of the approach is that it might appeal 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 in the household whose birthdays are next, to take part in the survey.

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. The Commission will be working through these recommendations in 2024/25.

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 comparable to data from previous alternative 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 – which is what we have been doing for the last 12 months, with the inclusion of a postal survey completion option being key in ensuring 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 the percentage of problem gamblers into a population level estimate?

Experimental data: No, we shouldn’t do this. The Step 3 data we have released is experimental data and based on a smaller sample of respondents than we will use for our Official Statistics going forward. In addition, this data has also been collected over a shorter time frame (2 months) so doesn’t have full coverage like our official statistics will.

Official Stats:

How do you work out whether a respondent is a problem gambler, moderate risk, non-problem gambler?

The details are available at: [Problem gambling screens \(gamblingcommission.gov.uk\)](https://www.gamblingcommission.gov.uk/problem-gambling-screens)

The PGSI was specifically developed for use among the general population rather than within a clinical context by [Ferris and Wynne \(2001\) \(opens in new tab\)](#).

The PGSI consists of nine items and each item is assessed on a four-point scale: never, sometimes, most of the time, almost always. Responses to each item are given the following scores:

- never = zero
- sometimes = one
- most of the time = two
- almost always = three

When scores to each item are summed, a total score ranging from 0 to 27 is possible.

A PGSI score of eight or more represents a problem gambler. This is the threshold recommended by the developers of the PGSI and the threshold used in our reporting. The PGSI was also developed to give further information on sub-threshold problem gamblers.

Scores between three and seven represent 'moderate risk' gambling (gamblers who experience a moderate level of problems leading to some negative consequences) and a score of one or two represents 'low risk' gambling (Gamblers who experience a low level of problems with few or no identified negative consequences).

Thinking about the last 12 months...

- Have you bet more than you could really afford to lose?
- Have you needed to gamble with larger amounts of money to get the same feeling of excitement?
- When you gambled, did you go back another day to try to win back the money you lost?
- Have you borrowed money or sold anything to get money to gamble?
- Have you felt that you might have a problem with gambling?
- Has gambling caused you any health problems, including stress or anxiety?
- Have people criticized your betting or told you that you had a gambling problem, regardless of whether or not you thought it was true?
- Has your gambling caused any financial problems for you or your household?
- Have you felt guilty about the way you gamble or what happens when you gamble?

Scoring instructions

0 - Gamblers who gamble with no negative consequences

1-2 - Gamblers who experience a low level of problems with few or no identified negative consequences.

3-7 - Gamblers who experience a moderate level of problems leading to some negative consequences.

8 or more - Gamblers who experience a moderate level of problems leading to some negative consequences.

How does this compare to other ways you've been measuring problem gambling?

Previously we have used the PGSI and the DSM-IV to measure problem gambling, and reported data based on whether someone scored the criteria on either screen. Going forward, it was decided that the Commission would focus solely on the PGSI measure. This was based on feedback from stakeholders, questionnaire space and comparability to other surveys. The data we collect on the PGSI will be supplemented by a new suite of questions designed to measure experience of gambling related harms both as a result of someone's own gambling and a result of someone else's gambling.

So, problem gambling has always been actually worse than we thought?

Firstly, this is a new methodology, and we shouldn't be making comparisons to data from previous surveys, since all methodologies are different and produce different estimates. **We have published the strengths and limitations of the Gambling Survey for Great Britain here.**

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. We have also commissioned Patrick Sturgis to review the Gambling Survey for Great Britain methodology and will publish his findings in 2024.

As part of this project, the gambling participation activity list has been updated to reflect the current gambling landscape, including more detailed categories to capture online activities. This means that the data the survey collects are representative of gambling that is available today. As a result of this change, it is likely that we are picking up more gamblers in the survey as the gambling list is clearer and more explicit. That results in more gamblers answering the PGSI questions.

In addition, the Gambling Survey for Great Britain is a survey about gambling behaviours (and not health, like the Health Surveys that we previously used), therefore, the survey may have more relevance to gamblers and attract a higher proportion of gamblers than other surveys which include gambling questions as part of a wider survey. This in turn feeds more respondents through to answer the PGSI questions.

Gambling harms

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

We have a programme of work looking at the measurement of gambling related harm. Further details can be found at [Developing survey questions to collect better data on gambling-related harms \(gamblingcommission.gov.uk\)](https://www.gamblingcommission.gov.uk/developing-survey-questions-to-collect-better-data-on-gambling-related-harms)

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

The survey contains questions relating to the impact of gambling, both as a result of someone's own gambling and as a result of someone else's gambling. We will publish this data in July 2024 in the Gambling Survey for Great Britain annual report publication.

We do not simply want to rely on PGSI for understanding the impact of gambling, asking about harms allows us to provide a far richer picture, including an element of scale to understand and explain harm better

How will the ongoing survey contribute to a more comprehensive understanding of gambling behaviours and harms 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 impact of gambling which will give more in depth understanding of the harms people experience. Coupled with this, the increased sample size (n=20,000 per annum) 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. 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.

- The new data will be reported objectively and transparently in a chapter looking at both sides of the impacts of gambling, including how consumers enjoy gambling and their motivations for participating.
- We will be publishing the new data on impacts of gambling alongside a full technical report outlining the extensive development process that we have followed to ensure that the data is reliable and robust.
- The inclusion of these questions follows stakeholder engagement (across industry, policy and academia, and lived experience) which told us there was widespread demand for the GSGB to include questions on wider harms, rather than just the PGSI.
- 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?

The harms development work is a new area of work and no data on this topic has been released yet.

Other questions

Comms

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

TBC

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 website.

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 significantly improve the evidence base which we use to inform policy decisions. Our [evidence gaps and priorities \(2023-26\)](#) 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.

Adhoc

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

TBC

How is the Gambling Survey for Great Britain funded? Are there any potential conflicts of interest?

The Gambling Survey for Great Britain is funded by the Gambling Commission.

How does the Gambling Survey for Great Britain contribute to making gambling safer, fairer and crime free?

TBC

How does/will the new problem gambling rate estimate 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.

Guardian Questions following Step 3 experimental release Nov 2023

The differences between this methodology and previous methodology (i.e., the telephone survey?) that might account for the difference in outcomes. A concise outline of what the methodological differences are that create the difference.

Previously the Commission had used multiple ways to collect data on the topic of gambling. To measure problem gambling, we used the health surveys, conducted in each of the home nations. In England and Scotland, these surveys use a face-to-face approach, and a self-completion approach for questions relating to gambling. In Wales, a telephone survey and follow up online survey is employed. The Commission also ran a quarterly telephone survey to measure gambling participation on a more regular basis, this had a telephone survey methodology.

The new Gambling Survey for Great Britain consolidates all our survey requirements into one single study. A key difference between the previous methods and the new approach is that the new Gambling Survey for Great Britain, uses a push-to-web approach which is conducted online, and is supplemented with a paper questionnaire for anyone not online or who prefers an offline approach, As discussed, the previous methods (Health Survey and Telephone Survey) use a face-to-face or telephone approach.

This new push-to-web approach also eliminates the need for an interviewer to be present during surveying, which allows participants a higher degree of privacy when filling in their survey. In addition, the Gambling Survey for Great Britain is a gambling focused survey, rather than a health-related survey containing a handful of gambling questions (like the Health Survey for England).

For more information on the strengths and limitations of our approach, please see the following page [Gambling participation and the prevalence of problem gambling survey: Final experimental statistics stage \(Step 3\) \(gamblingcommission.gov.uk\)](#)

Could the final methodology change depending on Sturgis' recommendations? The blog sort of suggests that Sturgis will report his views and the methodology will then be adopted. But presumably if Sturgis has major objections, you'd have to revisit the way the methodology question?

We are very confident in the approach we have developed for the Gambling Survey for Great Britain, which follows the recommendations set out by Patrick Sturgis in his [2021 work for GambleAware](#). However, any recommendations following the review of the GSGB by Patrick Sturgis will be taken into consideration in any future refinements to the methodology.

I presume you only surveyed adults. Thus, if one was going to apply the estimated % figure to population, you'd need to do so using a figure for the number of adults in GB?

Yes, we only surveyed adults aged 18+ but you shouldn't gross up the percentage of problem gamblers into a population level estimate. The data we have released is experimental data and based on a smaller sample of respondents than we will use for our Official Statistics going forward. In addition, this data has also been collected over a shorter time frame (2 months) so doesn't have full coverage like our official statistics will.

Last, you stress the importance of not comparing this figure with previous PGSI estimates. I presume by this you mean that one can't say, for instance, PG rates have risen from 0.3% to an estimated 2.5%. That much is very clear to me. However, I assume you're not asking us to avoid reporting how this methodology produces outcomes that are significantly different to previous outcomes? That, with all the appropriate caveats attached, is a statement of fact, isn't it?

That's right. 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.

What were the step 1,2 and 3 Fieldwork dates and response rates?

Stage (Experimental)	Fieldwork dates	Response rate
Step 1	17 Aug 2022 – 6 Oct 2022	18%
Step 2	11 Oct 2022 – 22 Nov 2022	18%
Step 3	19 Apr 2023 – 12 June 2023	17%

The response rate shown is at the address-level (ie a questionnaire was completed by at least 1 adult in eligible addresses).

Professor Sturgis report/ ensuring we have a chosen a robust approach – Added 06/02/2024

As well as drawing upon previous advice from Professor Patrick Sturgis ([Methodology Report \(FINAL 14.05.21\).pdf \(begambleaware.org\)](#)) we also commissioned Professor 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.

Professor Sturgis is supportive of the approach taken in relation to the Gambling Survey for Great Britain and reinforces that the development and change in methodology was the correct decision. In addition, he added that the development has also been “exemplary in all respects”. [Independent assessment endorses Gambling Survey for Great Britain \(gamblingcommission.gov.uk\)](#)

GSGB Year 1 Wave 1 Data Release – 29 February 2024

Q: What is being released in the first wave of data from the Gambling Survey for Great Britain?

A: The first wave of data being released 29 February 2024 includes findings related to gambling participation rates in Great Britain. It covers information on who has gambled in the past 4 weeks, the types of gambling activities people engage in, how they feel about gambling and the reasons for gambling.

Q: What period does this data release cover? How many respondents?

A: The first wave of data released 29 February 2024 reports on Wave 1 data collected between 31 July and 16 November 2023. There were approximately 4,800 respondents to the first wave of the survey.

Q: What gambling activities are included in the participation data?

A: The data includes a wider range of gambling activities than previously covered in previous surveys. We have done a lot of qualitative work and cognitive testing to ensure the list of activities in GSGB represented activities available today and worded to ensure consumers would recognize the activities they take part in. Among the activities covered, the survey includes representation of the online gambling activities that are now available to consumers as well as types of lottery games and betting on particular sports. For example, there are now 16 examples included in the survey of online activities that people can take part in, compared to 2 online categories that were asked about in the Health Surveys.

Q: Will the first wave of data include any information on problem gambling rate?

A: No, the Year 1 Wave 1 GSGB data does not include any data from the PGSI. Our wave specific releases, published 4 times per year, will focus in on gambling participation and reasons for gambling. We will also publish annual data which will amalgamate all four waves of data together, the sample size for this publication will be around 20,000 per annum so we will include data on the impact of gambling (PGSI and harms included) within this annual publication.

Q: When will data on problem gambling rates be released?

A: We will be reporting data on the impact of gambling in July 2024. This new data will be reported objectively and transparently in a chapter looking at both sides of the impacts of gambling, including how consumers enjoy gambling and their motivations for participating alongside findings for the PGSI and negative consequences of gambling.

Q: Where can I find more information on the Gambling Survey for Great Britain methodology and contents?

A: Details for the Year 1 Wave 1 data release for the Gambling Survey for Great Britain as well as on the survey methodology, contents, and upcoming releases can be found on our website at [\[link to GSGB hub\]](#).

Extracts from Commissioner Update: w/c 26 February

Policy Function and Research and Stats ([REDACTED])

The Gambling Survey for Great Britain (GSGB) which has been developed by our Research and Statistics team in partnership with NatCen Social Research, has been independently assessed by Professor Sturgis from the London School of Economics and Political Science. Professor Sturgis describes the development of the survey as being exemplary in all respects. The report has been published on the LSE website with a news article featuring on the GC website on the day of publication.

External Comms ([REDACTED])

We issued news item for the release of Professor Patrick Sturgis report into the assessment for the Gambling Survey of Great Britain: Independent assessment endorses Gambling Survey for Great Britain <https://www.gamblingcommission.gov.uk/news/article/independent-assessment-endorses-gambling-survey-for-great-britain>

And as I've alluded to several times, we're now in the process of finalising our new participation and prevalence statistics that when they become Official Statistics will be known as the Gambling Survey of Great Britain.

50. The GSGB will be the most comprehensive data set of its kind in the world when it is introduced, with an annual response from around 20,000 people.

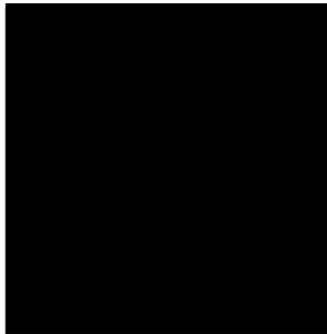
51. The work to design it started with a consultation back in 2020 and it is already delivering results with data from its experimental on phase having been published last November and the first actual Official Statistics to be published using the new methodology coming just last week with new participation data released.

52. It now continues to make progress towards its full introduction later this year but it's fair to say this work has started attracting some attention. At the Commission we understand this. Change is always difficult. In this instance both the pilot data and the Experimental phase data saw the estimate for those scoring 8+ on the Problem Gambling Severity Index (PGSI) – what we used to call Problem Gambling – at higher levels than our old telephone survey data.

53. None of that data of course replaces current official statistics at the moment and nor should it be compared to previous figures.

54. We won't have a new baseline for the prevalence of gambling harms until we publish Official Statistics later this year using the new methodology. But an independent review by Professor Patrick Sturgis of the London School of Economics of our work to develop and implement the GSGB, that was published last month, called the steps we've gone through 'exemplary'.

55. If anyone here would like to know more about this work please do get in touch and we'll be happy to discuss it with you but for now, we're building towards full official statistics this year and you can expect more on this in the Summer.



Professor Patrick Sturgis London School of Economics
Author of an independent assessment of GSGB which GC has quoted in
our new story regarding the Wave 1 Data Releases

Gambling Survey for Great Britain

- The Gambling Survey for Great Britain project involves a new approach to how we collect participation and prevalence data.
- It modernises our survey questions and improves the frequency and turnaround time of survey data, based on a single, high quality population survey methodology for the whole of GB.
- Final findings from the [experimental phase were published on 23 November](#) – there are experimental or as OSR calls, Official Statistics in Development. They are based on responses from around 4,000 respondents with data collected in April and May 2023. [Our blog post accompanying the release.](#)
- Significant work we have done to update the methodology, to refresh the questions asked and the change in focus of the survey to one being solely about gambling means the results are not comparable to previous ways we have collected this sort of data. This includes our quarterly telephone survey or using data from the NHS Health Surveys.
- This project is just one of the ways the Commission is looking to improve our understanding and build a stronger evidence base for our regulation, as set out in our [evidence gaps and priorities for 2023 to 2026](#). And when the Gambling Survey for Great Britain launches as official statistics, it will be with the insight of around 20,000 respondents a year – the largest survey of its kind in the world.
- We are firmly of the belief that better evidence, driven by better data, will lead to better regulation, which in turn will lead to better outcomes.

Independent Review of GSGB

The development of the Gambling Survey for Great Britain (GSGB) has been reviewed by and endorsed by Professor Patrick Sturgis, Professor of Quantitative Social Science, London School of Economics. [The review](#) will be published on the LSE website 19.02.2024
The review was designed to:

- Assess the GSGB methodological approach against best practice considering the context of current survey approaches
- Analyse the likely impact of the methodological approach on estimates of gambling participation and prevalence of gambling harms
- Make recommendations for improvement

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 and timely 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. However he recommends additional work to understand why estimates of gambling prevalence and harm are higher in the GSGB should be undertaken, suggesting the statistics are used with caution “being mindful to the fact there is a non-negligible risk that they substantially over-state the true level of gambling and gambling harm in the population”.

On 19 February, the GC issued a [press release](#) following the publication of the review. 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.

Key Milestones

On 29 February, we published the [1st wave of data](#) for the Gambling Survey of Great Britain. A [blog post](#) on this was also published to support this.

GSGB Morning

The Gambling Behavior Survey (GS GB) was created to provide regular insights into gambling behaviors in Great Britain. [REDACTED] explained the survey's development and [REDACTED] shared her experience working on the DSTV purchase team, highlighting the importance of combining quantitative and qualitative research. The group discussed the challenges of creating a new baseline and cautioned against interpreting results too quickly due to methodology changes. They also emphasized the need to understand the consequences of gambling on individuals and society, including reducing everyday spending, experiencing negative emotions, and seeking support services. Finally, the group discussed refining home measurement and reporting, with concerns about the reliability of published numbers and the need for more research.

Transcript

<https://otter.ai/u/j101ebdMPWmQ3DG8smPpVXVz6S0?view=transcript>

Action Items

- [] Develop media guide to proactively engage with media around release of statistics in July annual report.
- [] Implement recommendations from Patrick Sturgis' review report. Establish timeline for implementation, prioritizing ones with biggest impact pre-July.
- [] Take appropriate actions in response to concerning statistics or comparisons in July report. Avoid just "slap on the wrist".
- [] Continue international collaboration and communication around measuring gambling harms with other jurisdictions.
- [] Conduct focus research on pathways into illegal gambling market and develop well-tested survey questions to add to GSGB.
- [] Use survey questions to gather data on consumer encounters with illegal gambling sites. Cross-check names of sites reported.

Outline

Data and statistics in a political context.

The speaker thanks the team and colleagues for their contributions to the development of a new set of data on gambling, with a focus on the impacts of gambling.

Developing a new gambling survey in Great Britain.

explains why Gambling Commission surveys are crucial for understanding consumer behavior and addressing sensitive issues.

explains development of Gambling SafeGuard (GSG) alongside consumer research and data exploration.

Gambling survey methodology and results.

Speaker 3 conducted experiments to develop a survey for collecting accurate data on consumer preferences.

The survey included a long list of questions and participants were asked in different ways to capture their opinions.

discusses the Gambling Survey of Great Britain, which aims to provide a comprehensive understanding of gambling behaviors across the country.

The survey will have a large sample size of 20,000 respondents per year, allowing for detailed analysis by subgroups of the population.

Gambling participation and motivations in the UK.

discusses the Gambling Social and Economic Impact (GSG) study, which aims to broaden understanding of gambling's impacts, including positive and negative consequences, and the relationship between PDSI and potential harms.

The study found that the main reasons people gamble are for monetary reasons, chance, excitement, and socializing, with stakeholders expressing strong opinions on these topics.

highlights key findings on gambling participation, including that 48% of respondents gambled in the last 4 weeks, and that variation exists across regions.

The map shows percentage of respondents who gambled in the last 4 weeks by government office region, with the West Midlands having the highest participation rate (5%).

Gambling-related harms and their impact on individuals and society.

highlights the improved wording and categories in the survey, with flexibility to ask detailed questions about specific activities.

discusses the development of a broader understanding of gambling-related harms, including the creation of new survey questions based on existing frameworks.

The work aims to provide a more detailed and evidence-based understanding of people's experiences with gambling-related harms, rather than relying solely on the Problem Gambling Severity Index (PGSI).

Developing a gambling harm survey with stakeholder input.

and team iteratively tested response options on an online tracking survey until autumn 2021, then transferred data to GSDP development.

■■■■■ highlights the need for better data on gambling-related harms, including financial losses, relationship breakdown, and mental health issues.

The team developed a four-point scale to capture the nuance and variability of other negative consequences, such as reduced spending, isolation, and health problems.

Gambling's impact on daily life.

Speaker 4 explains that the survey aims to understand the range of adverse consequences associated with reducing everyday spending, such as potential negative impacts on health and well-being.

■■■■■ adds that the survey will also examine the relationship between different variables and player types to gain a better understanding of the whole picture.

■■■■■ discusses survey questions on use of services due to gambling, including wellness and mental health services, and the nuances of respondents' answers.

Qualitative interviews reveal range of thoughts and experiences, including occasional feelings of annoyance or frustration, and one respondent's struggle with daily essentials due to gambling.

Gambling survey methodology and data release.

■■■■■ discusses the findings from a report on the PHSI scale, including the need to consider responses at a lower frequency scale and the importance of transparency in communicating the data.

The team will release the findings in an annual report in July, accompanied by a full technical report outlining the development and validation of the questions.

■■■■■ provides an overview of the Gambling Survey Register, including its purpose, data releases, and future plans for development and improvement.

The GSG V will publish data on a broader impact of gambling, combining findings from wave one and wave two, and will be based on 10,000 responses in year one, with the goal of expanding to 20,000 responses in future years.

■■■■■ highlights the limitations of the new gambling statistics methodology, emphasizing the need for caution in interpreting the data (35:46-36:29).

Speakers discuss the importance of being open and honest about the limitations of the new baseline and the context in which the statistics can be used (37:40-38:47).

Improving reliability of media metrics.

Speaker 1 suggests creating a guide to proactively engage with likely talkers, and implementing recommendations from surgeries to improve reliability and media prep.

Speaker 6 questions the timeline for implementing recommendations and seeks clarity on what actions will be taken, with a focus on media prep and the importance of evolving and developing the service.

International collaboration and coordination are key to building a reliable evidence base for measuring home learning.

Illegal market research and survey development.

Colleagues at yonder are conducting focus research on pathways into the legal market, uncovering multiple ways people enter the illegal market.

Speaker 4 discusses developing questions for a survey on website engagement, using an understated approach to gather information on user experiences.

Extract from 'Doc 3'

The Gambling Commission has belatedly asked Professor Patrick Sturgis of the London School of Economics to review the GSGB by comparison with the NHS Health Surveys.

GAMBLING COMMISSION

The Gambling Commission has engaged with a broad range of stakeholders and followed industry standards of best practice in developing a survey design that can be expected to yield high quality and timely estimates of gambling prevalence in Great Britain.

Professor Patrick Sturgis, LSE

Speaking about our Gambling Survey for Great Britain

