

# GAMBLING COMMISSION

29 August 2023

Dame Caroline Dinéage  
Chair, Culture, Media and Sport Select Committee  
House of Commons  
London  
SW1A 0AA

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Dear Dame Caroline,

## Misuse of gambling statistics

In order to aid the inquiry regarding gambling regulation and in response to the significant increase in the misuse of statistics around gambling at present, I am writing to you to highlight several areas where Official Statistics about gambling have been misused or misquoted during recent oral evidence sessions held for that inquiry. Whilst we understand that sometimes this is a matter of misspeaking, misunderstanding, or is otherwise unintended, as the body that produces the Official Statistics on behalf of government, it is important that we ensure Parliament is properly advised on what those statistics say.

Unfortunately, the misuse of statistics is something that is widespread and is not confined to any one side of the debate either. [As I wrote in the open letter published on the Commission website on 14 August](#), as much as everyone is entitled to present their arguments, it is wholly unacceptable to misuse statistics to support that argument. The Commission is very concerned at the significant increase in the misuse of statistics around gambling as different parties seek to make persuasive arguments for or against different proposals. And we would not want your Committee's important work to be undermined in anyway as a result of this.

I therefore have attached an annex to this letter that details instances where Official Statistics have been misused or misquoted - whether deliberately or otherwise. It is important to note this is limited to Official Statistics and does not cover areas where other statistics may have been misused.

Further to this, I also wanted to highlight the connected issue of how the terminology around gambling related harms is used and how statistics that seek to measure harms and the risk of harms are then conflated or disregarded. Problem gambling and gambling-related harm are two separate, but linked, experiences. Again this can be a complicated area and mistakes can and do naturally occur but unfortunately some choose to deliberately misrepresent or misuse the terminology.

The term '[Problem gambling](#)' means gambling to a degree that compromises, disrupts or damages family, personal or recreational pursuits. It can be measured by a number of screening tools; the Commission predominantly uses the [PGSI \(Problem Gambling Severity Index\)](#).

When we talk about [gambling-related harms](#), we are talking about the adverse impacts from gambling on the health and wellbeing of individuals, families, communities and society. These harms impact on



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people's resources, relationships and health. Harms can be experienced not just by gamblers themselves. There is currently no single, recognised measure of gambling-related harms, or robust figures on the prevalence of severe harms in Great Britain such as gambling-related suicide. However, the Commission has been developing new survey questions that will give us a far better understanding of this issue across the whole spectrum of gambling involvement, including questions on suicidality (ideation and attempts). These will be included in the forthcoming [Gambling Survey for Great Britain](#), alongside the PGSI.

Another example of the incorrect use of statistics is how the problem gambling rate is discussed, where we have seen examples where it has been discussed in isolation, arguably implying this is the extent of those suffering harms. We've also heard instances where a problem gambling rate is added together with the percentage of people who gambled in the last 12 months and who are at moderate risk of their gambling leading to some negative consequences along with the percentage of people classed as being low risk as well (gambling with few or no identified negative consequences), thereby potentially mischaracterising the extent or risk of harms suffered by some people. Neither use of statistics is acceptable, nor does it help the debate.

We have also seen problem gambling and addiction used interchangeably during committee hearings. The Official Statistics that we produce on levels of problem gambling do not report the rate of gambling addiction across the population or in relation to individual products. Data on rates of problem gambling can not automatically be equated to rates of addiction.

Finally, as I've already mentioned, there are currently no robust figures on the prevalence of severe harms in Great Britain such as gambling-related suicide. This is, in part, because this is an extremely difficult area to develop an accurate picture of, as the reasons people take their own lives can be exceptionally complicated, with multiple factors being potentially important. So whilst it is not an Official Statistic produced by the Commission, we have also been troubled to note that figures around the level of gambling-related suicide are being used more frequently without context or explanation. The OHID gambling related harms evidence review, published in January, is a clear example. The report gave a range of 117 and 496 deaths by suicides associated with problem gambling or gambling disorder, yet we have seen this used to state that there are 496 gambling-related suicides, or a suicide every day. We have even seen this figure then extrapolated to say 10% of suicides in the UK are due to gambling. This is not a reliable or accurate way to use the range published by OHID, and the estimated range of 117 – 496 represents a very large confidence interval, further demonstrating how difficult it is to be definitive on such an emotive and complex topic. As much as everyone is entitled to present their arguments, it remains wholly unacceptable to misuse statistics to support that argument.

Whilst we have reviewed the oral evidence sessions, we have not reviewed all the submissions provided to the Committee in writing. If the committee would like to discuss the use of any statistics provided to them in written submissions we would be happy to assist.

If you have any questions about anything to do with this important issue, or any other areas of our work, please do feel free to get in touch. I look forward to seeing you and the Committee on the 5<sup>th</sup> September.

Yours sincerely,



Andrew Rhodes  
**Chief Executive**

<i>Transcript Quote</i>	<i>GC response</i>
<b>11<sup>th</sup> July 2023</b>	
<p><i>Q10 – Clive Efford:</i> There has been a massive explosion, particularly of online gambling. In 2011, I think it was £1.2 billion. By 2016, that had gone to £6.6 billion. Those are the figures that I can recall. But now, excluding lotteries, it is at £9.9 billion a year.</p>	<p>Whilst GGY from online gambling has increased over time, it is inaccurate to compare 2011 and 2016 timeframes without taking into consideration the legislation change that occurred in 2014. Since 2014, operators who provide facilities for remote gambling (online or through other means), and advertise to consumers in Britain, have been required to have a license from the Gambling Commission regardless of where they are based which is different to the pre 2014 legislation for remote licenses. Therefore some GGY pre 2014 would not have been included in our data as it was outside of regulation, whereas after 2014 it was included.</p> <p>In addition to the inaccurate comparison over time, the GGY referred to is also wrong. The correct figures taken from the Commission’s Industry Statistics (2021/22) are;</p> <ul style="list-style-type: none"> <li>• Remote GGY for 2011/12 was £710m (excluding lotteries)</li> <li>• Remote GGY for 2014/15 was £2.2bn (excluding lotteries) (included for context as first full year with new legislation)</li> <li>• Remote GGY for 2016/17 was £4.8bn (excluding lotteries)</li> <li>• Remote GGY in 2021/22 was £6.4bn (excluding lotteries)</li> </ul>
<p><i>Q68 – Michael Dugher:</i> We often talk about the 0.3% of problem gamblers—those are the independent Gambling Commission’s figures.</p>	<p>The figure of 0.3% comes from the Commission’s quarterly telephone survey (Year to March 2023), which uses the short form Problem Gambling Severity Index (PGSI) screen. This is not the correct source of official statistics on the prevalence of problem gambling.</p> <p>Official statistics on the prevalence of problem gambling are currently taken from the Health Surveys. The latest Health Survey data (2021) provides a problem gambling rate amongst the whole population aged 16+ of 0.4%, according to either the PGSI or DSM-IV<sup>1</sup>.</p>
<p><i>Q71 – Michael Dugher:</i> ...racing as a product to bet on has been in decline in recent years. It used to be the main thing, with football second. That has flipped in the last 10 years or so.</p>	<p>In Year to March 2015, past four week participation in horseracing was 3.4% compared to 3.5% in Year to March 2023 (Gambling Commission Quarterly Telephone Survey). GGY from horse racing has also remained relatively stable from £1.1bn in 2015/16 to £1.2bn in 2021/22.</p> <p>Whilst the data does not indicate a decline in the last 8 years, prior to this the 2007 British Gambling Prevalence Survey showed that past 12 month participation in horse racing was 17%, falling to 10% in the 2018 Health Survey for England.</p> <p>The Commission’s Industry statistics indicate that GGY generated from football betting overtook the GGY from horse racing in 2017/18.</p>
<p><i>Q73 – John Nicolson:</i></p>	<p>Whilst GGY has increased over time, it is inaccurate to compare 2011 and 2022 timeframes without taking into consideration the legislation change</p>

<sup>1</sup> [Problem gambling screens \(gamblingcommission.gov.uk\)](https://www.gamblingcommission.gov.uk/problem-gambling-screens)

<p>In 2011, the gross gambling yield for the gambling industry was £8.4 billion. Last year it had rocketed to £14.1 billion...</p>	<p>that occurred in 2014. Since 2014, operators who provide facilities for remote gambling (online or through other means), and advertise to consumers in Britain, have been required to have a license from the Gambling Commission regardless of where they are based which is different to the pre 2014 legislation for remote licenses. Therefore some GGY from the remote sector pre 2014 would not have been included in our data as it was outside of regulation, whereas after 2014 it was included.</p> <p>Please note these GGY figures, whilst correct, include the National Lottery which isn't covered by the Gambling Act 2005.</p>
<p><i>Q73 – Wes Himes:</i> £14.1 billion includes the lottery, which is about £3.7 billion in GGY last year. <i>Q81 – Michael Dugher:</i> ...if the National Lottery is getting £3.7 billion in gambling revenue...</p>	<p>GGY in 2021/22 excluding the National Lottery was £10.6bn.</p> <p>The GGY equivalent for the National Lottery in 2021/22 according to the Industry Statistics was £3.5 billion, not £3.7 billion.</p>
<p><i>Q74 – Wes Himes:</i> The reduction in problem gaming rates that has occurred over the last seven years is also noticeable. They have nearly halved since 2017 to today: we have 0.3%, one of the lowest problem gambling rates internationally.</p>	<p>The 0.3% figure is from the Commission's Quarterly Telephone Survey (Year to March 2023), which uses the short form PGSI screen. The purpose of the telephone survey when it was introduced in 2015 was to report trends in between Health Survey years rather than to provide official statistics on the prevalence of problem gambling.</p> <p>Official statistics on the prevalence of problem gambling are currently taken from the Health Survey. The latest Health Survey data (2021) provides a problem gambling rate amongst the total population aged 16+ of 0.4%, according to PGSI or DSM-IV.</p> <p>The statement suggesting the problem gambling rates have nearly halved since 2017 is incorrect. The 2018 Health Survey for England reported a problem gambling rate of 0.5%.</p> <p>Problem gambling rates are also not comparable internationally due to different survey methodologies and different ways of measuring prevalence of problem gambling.</p>
<p><i>Q80 – Michael Dugher:</i> the "Young People and Gambling" report, which showed that there had been a significant reduction in children gambling, from 23% of children participating in some form of gambling in the past week in 2011 to 7% in 2022.</p> <p><i>Q128 – Wes Himes:</i> ...as mentioned before, participation in gambling has fallen from 23% in 2011 to only 7%.</p>	<p>Changes to the methodology limit comparability of findings between the 2011 and 2022 Young People and Gambling Survey as the survey has transitioned from being paper based to an online survey, and the scope of the survey has expanded to include Scotland since 2011. Also due to questionnaire changes in 2022, the Commission has advised against making comparisons to earlier findings.</p>

<p><i>Q108 – Paul Blomfield:</i> ...Betfair’s Betting Exchange product, which the coroner heard has an addiction rate of 18%.</p> <p><i>Q109 – Paul Blomfield:</i> ...is it right that products with an addiction rate of 18% are available?</p> <p><i>Q110 – Michael Dugher:</i> ...I don’t know the figures in terms of the 18%.</p> <p><i>Q111 – Paul Blomfield:</i> And the 18% is a Gambling Commission recognized figure, isn’t it?</p>	<p>There are no official statistics on the rate of gambling addiction across the population or in relation to individual products. Data on rates of problem gambling cannot automatically be equated to rates of addiction.</p> <p>The Health Survey for England (2018) and the Combined Health Survey for Great Britain (2016) report problem gambling rates (according to either the PGSI or DSM-IV) for betting exchange of 10.7% and 5.4%, respectively.</p> <p>An additional 8.6% of players using a betting exchange were identified as ‘moderate risk’ gamblers according to the PGSI in the Health Survey for England 2018. The equivalent figure from the Combined Health Survey for Great Britain 2016 was 12.7%.</p>
<p><i>Q124 – Dr Rupa Huq:</i> The figures we have seen show that 105,000 children are addicted to gambling...</p> <p><i>Q126 – Dr Rupa Huq:</i> The research from the academics shows that 11 to 14 year-olds are most susceptible, and there are tons of figures about under-18s: 55,000 people are addicted.</p>	<p>There are no official statistics on the rate of gambling addiction amongst children.</p> <p>We do collect statistics on the proportion of young people who experience problem gambling according to the youth adapted DSM-IV (DSM-IV-MR-J)..</p> <p>The Commission’s Young People and Gambling Survey (2022) found 0.9% of 11-16 year olds in England, Scotland, and Wales were experiencing problem gambling according to the DSM-IV-MR-J..</p>
<p><i>Q137 – Chair:</i> We have seen women’s gambling online growing at twice the rate of men’s.</p>	<p>The proportion of women gambling online over the last five years has increased steadily year on year, but still remains below the proportion of males who gamble online. The proportion of males who gamble online has remained stable over that time.</p> <p>The Commission’s Quarterly Telephone survey shows that from Year to March 2019 to Year to March 2023, online gambling participation for men increased by 2.5 percentage points (from 24.5% to 27.0%), whereas for women it increased by 9.7 percentage points (from 15.2% to 24.9%).</p> <p>However, much of this growth can be accounted for by a switch in playing the National Lottery in person to online. When excluding the National Lottery, past 4 week participation in online gambling has remained stable for men (19.3% in 2019 compared to 19.1% in 2023) and has increased from 12% in 2019 for women to 17.4% in 2023.</p>
<p><i>Q137 – Chair:</i> However, because women’s gambling is still at a much lower level than men’s, it is clearly not raising the flags that it otherwise would.</p>	<p>Past 4 week gambling participation rates for women are only slightly lower than those for men. When excluding those only playing National Lottery draw products, the past four-week participation rate for females is 28.1%, compared to 30.5% for males.</p> <p>The female participation rate for online gambling excluding the National Lottery now sits just 1.7 percentage points behind the male rate (17.4% and 19.1% respectively).</p>

<p>Q139 - Chair: Are you worried about the rise of problem gambling in women and whether there are any associations with the rise of online bingo gambling?</p>	<p>Official Statistics on the prevalence of problem gambling are currently taken from the Health Surveys, these statistics have not shown a rise in problem gambling amongst women.</p> <p>The Combined Health Surveys indicate that in England, Scotland, and Wales, problem gambling rates for women remained stable at 0.1% in 2015 and 0.2% in 2016. The Health Survey for England 2018 reports a problem gambling rate of 0.3% amongst women.</p> <p>The Health Survey for England (2021) reports a problem gambling rate of 0.1% for women. However, it is important to note that this figure is not comparable to previous Health Surveys due to changes in methodology.</p> <p>It is not possible to make associations between the rise of online bingo gambling and the notion that problem gambling rates for women are increasing.</p>
<p><b>18<sup>th</sup> July 2023</b></p>	
<p><i>Q186 – Dr Gaskell (referencing lockdown):</i> It is a bit of a mixed picture. If people’s gambling habits were more land based, then obviously a lot of those activities were shut down. There was an increase in online gambling. There was an increase in online slot play... There are also some contextual factors that lend themselves to increased risk, people having a lot of time on their hands, boredom, stress, financial concerns, employment concerns, and so on. There was a bit of a mix of factors there that lent itself to an increased risk.</p>	<p>During the Covid-19 pandemic overall participation in gambling reduced from 46.7% in Year to March 2020 to 40% in Year to March 2021 (32.1% and 26.5% respectively excluding the National Lottery).</p> <p>Whilst there was an increase in past 4 week participation in online gambling in March 2021 to 23.8% from 21.1% in Year to March 2020, when excluding those who only played National Lottery draws, the past 4 week online participation rate remained stable between 2020 and 2021 when most of the Covid- restrictions were in place (16.5% and 16.9% respectively). A lot of the increase in overall online gambling participation rates can be accounted for by people switching to play the National Lottery online rather than in person.</p> <p>However, from additional research conducted during the Covid-19 pandemic we know that some gamblers who were already gambling prior to the pandemic tried new gambling products. Research conducted by YouGov for the Commission<sup>2</sup> showed that around one third of past four week gamblers had tried one or more gambling activities for the first time during lockdown. Over half of engaged gamblers (those who had taken part in 3 or more activities) also increased the amount of time or money they had spent on at least one gambling activity, including the National Lottery.</p>
<p><i>Q234 – Will Prochaska:</i> Between 300,000 and 1.4 million people in the UK experience gambling disorders and each of them will impact six to 10 family members.</p>	<p>The 2016 Health Survey was the last Health Survey to give an estimate of the number of people experiencing problem gambling in Great Britain, it was estimated to be between 250,000 and 460,000. This is the number of people who experience negative consequences as a result of their gambling and possible loss of control.</p>

<sup>2</sup> [Covid 19 and its impact on gambling – June 2020 \(gamblingcommission.gov.uk\)](https://www.gamblingcommission.gov.uk/covid-19-and-its-impact-on-gambling-june-2020)

	<p>Official statistics use PGSI or DSM-IV to measure the number of people who may be experiencing negative consequences from their gambling, identified by those scoring 8+ on the PGSI or 3+ on the DSM-IV. Clinicians currently use an additional threshold of a DSM-IV score of 5 or more to represent pathological gambling, but the Commission do not.</p> <p>There has been research conducted into the impact of someone’s gambling on others undertaken by third parties but we do not have any official statistics on this topic.</p>
<p><i>Q234 – Will Prochaska:</i> ...some of these products have very high addiction and risk rates—online slots have a 45% addiction and at-risk rate—yet they are marketed and licensed by the UK Government as safe and with no health warnings.</p> <p><i>Q268 – Charles Ritchie:</i> Otherwise we are saying that it is fine to put something on the market that has a 25% addiction rate, and hang the consequences.</p>	<p>We don’t recognise the term ‘addiction rate’.</p> <p>The 2018 Health Survey for England suggests that the percentage of people aged 16+ who have gambled on online slots, bingo, or casino games (among others) in the past year and are experiencing problem gambling (according to the PGSI or DSM-IV) is 8.5%. The proportion of players who would be classed as ‘moderate risk’ according to the PGSI is 13.8%, and the proportion of players who would be classed as ‘low risk’ according to the PGSI is 26.6%. Data at activity level is not currently available from the 2021 Health Survey for England.</p> <p>For Q268, it is unclear which product the speaker is referencing but again, we do not recognise the terminology ‘addiction rate’ and do not have any official statistics on ‘addiction rates’.</p>
<p><i>Q234 – Will Prochaska:</i> If you accept the CEO of the Gambling Commission’s suggestion, 90% of the industry’s revenue comes from 5% of its customers, so you have an industry that is effectively dependent on harm.</p>	<p>This quote is a mischaracterisation of the following statistic: 5% of online betting accounts with the highest spending losses generated 86% of the money retained by operators. These figures do not come from any official statistics, but from the Patterns of Play research commissioned by GambleAware. This research consisted of a study of online accounts, meaning that its findings cannot be applied to the whole of the gambling industry. The Patterns of Play research does not show any evidence that the industry is ‘dependent on harm’.</p>
<p><i>Q252 – Will Prochaska:</i> There are 100,000 children in the UK who are either already addicted to gambling or at risk. That is one child in every secondary school classroom. It is a very serious issue for young people...</p>	<p>We do not measure the rate of gambling addiction amongst children in Great Britain. We use the DSM-IV-MR-J (a youth adapted version of the DSM-IV) to measure the proportion of children and young people classified as a ‘problem gambler’ or ‘at risk’ according to the screening instrument.</p> <p>The Commission’s Young People and Gambling Survey (2022) found that 0.9% of 11-16 year olds in state secondary schools in Great Britain were classified as problem gamblers and 2.4% were classified as being at risk. This does not amount to 100,000 children.</p>