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**Ed Humpherson, Director General for Office for Statistics Regulation**

Jonathan Marron, Director General, Primary Care and Prevention  
Jeanelle de Gruchy, Deputy Chief Medical Officer

11/09/2024

Dear Jonathan and Jeanelle,

**OSR response to the OHID report 'The economic and social cost of harms associated with gambling in England' (2023).**

I am writing to you following our recent engagement regarding a case raised with the Office for Statistics Regulation (OSR) about the 2023 report 'The economic and social cost of harms associated with gambling in England'<sup>1</sup> by the Office for Health Improvement and Disparities (OHID). This report updates an earlier version published by Public Health England (PHE) in 2021.

As the regulator for official statistics, our role is to ensure that official statistics are produced with trustworthiness, quality, and value, in accordance with the Code of Practice for Statistics<sup>2</sup>. While the report contains some official statistics, we recognise that the research and data it presents do not constitute official statistics. Therefore, our findings and recommendations are provided on an informal, advisory basis, focusing on the importance of the clarity and transparency of this information.

We are grateful for the time taken by your team to meet with us to discuss the concerns raised and opportunities to enhance clarity and understanding in future reports. In the interest of transparency, we have set out the recommendations we made to OHID in this letter and the actions your team have committed to take in response to our findings.

Given the importance and sensitivity of this subject, which has seen limited research, we commend the efforts made in producing this original report. It offers valuable

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<sup>1</sup> Office for Health Improvement and Disparities (2023) The economic cost of gambling-related harm in England: evidence update 2023. Available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1128002/The-economic-cost-of-gambling-related-harm-in-England\\_evidence-update-2023.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1128002/The-economic-cost-of-gambling-related-harm-in-England_evidence-update-2023.pdf)

<sup>2</sup> UK Statistics Authority. (2022) *Code of Practice for Statistics*. Available at:  
<https://code.statisticsauthority.gov.uk/wp-content/uploads/2022/05/Code-of-Practice-for-Statistics-REVISED.pdf>

insights into the economic and social costs of gambling-related harms, significantly contributes to addressing gaps in data and knowledge and reflects OHID's commitment to advancing understanding in this complex field. We also recognise the report's transparency in outlining methodological decisions and limitations. Given the lack of available data on gambling-related suicides at the time of publication, OHID's engagement with experts and inclusion of a range of estimates in the 2023 update demonstrates a thoughtful approach to handling uncertainty.

For the value of the data to be enhanced, we recommended additional clarity around the strength of the evidence used to estimate the costs. For example, including more detailed information in Table 1 (page 7) about the number of studies supporting each sub-domain's estimate, and indicating the level of confidence in these studies, would help users better assess and understand the data. We appreciate that OHID has been receptive to this feedback and has agreed to make these improvements in future updates.

We also recommended that OHID is more mindful of the language used in subsequent updates. Clear and careful phrasing will help ensure that the findings are communicated sensitively. With these adjustments, we believe the report will provide even greater value to its readers.

We appreciate that you have been open to challenge and have shown a commitment to assessing and updating this report; revisiting the data to ensure the robustness of the methodology and calculations, which reflects a commendable approach to enhancing public understanding and the value of this research.

In this spirit, we note that you were approached by a member of an interest group in September 2023 and committed to addressing their feedback. However, a response has not yet been provided. We would encourage you to maintain transparency and timeliness in your communications, as this is essential for building trust and demonstrating your commitment to ongoing dialogue and improvement. Promptly addressing this matter will further enhance the credibility of your work and will prevent any doubt being cast on the actions you are taking.

We recognise your efforts to use statistics with full context and clarity to bolster public trust, and we are eager to assist you in furthering this commitment through the implementation of our recommendations.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ed Humpherson', written in a cursive style.

Ed Humpherson  
Director General for OSR