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

Tim Miller  
Executive Director of Policy, Research & Statistics  
Gambling Commission

02/10/2024

Dear Tim,

**OSR response to the Gambling Commission: ‘Gambling with Lives’ casework**

Thank you for your letter of 14 May regarding the use of the term ‘addiction’ by Gambling with Lives when referring to official statistics from the Problem Gambling Severity Index (PGSI). We appreciate your patience while we investigated this matter.

We are pleased to see that since receiving your letter, following the publication of the Gambling Survey of Great Britain (GSGB), Gambling with Lives has updated the statistics on its website to refer to ‘problem gambling’, in line with the quality information published alongside the statistics. The website now includes the footnote:

“Gambling with Lives does not use stigmatising terminology such as “problem gambler”. However even though “addiction” and “addicted” have the widest public usage, we must refer to “problem gambling” when referring to scores of 8+ on the Problem Gambling Severity Index (PGSI) to comply with Gambling Commission guidelines. We are doing this to ensure the debate focuses on the high scale of harm revealed and not the terminology used.”

In our review of this case, we met with Gambling with Lives, who provided insights into the development of the PGSI by [Ferris and Wynne \(2001\)](#). While we acknowledge that the PGSI tool was not designed as a measure of addiction, we recognise the ongoing debate within the wider data landscape on gambling harms, particularly regarding the relevance of the nine statements used in the PGSI and their potential relevance to addiction.

As part of our light touch compliance review of the Gambling Survey for Great Britain against the Code of Practice for Statistics, we will explore whether there are any

opportunities to improve the clarity around the definitions of the PGSI or how these are communicated.

Yours sincerely,

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

Ed Humpherson  
Director General for OSR