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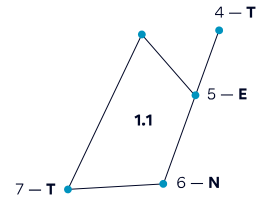
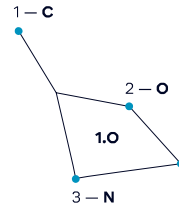
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Beyond the Jackpot: analysing the safety of charity lotteries

November 2024



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Foreword

Charity lotteries raise a huge amount of funds for good causes in countries across Europe, currently totalling around €1.5 billion each year. These funds are helping civil society to thrive and serve the people and communities of Europe.

The member organisations of the Association of Charity Lotteries in Europe (ACLEU) fund charities which tackle poverty, support our elderly, protect the natural environment, help those with health conditions, preserve our culture and heritage, and promote grassroots sports – plus many other good causes.

The charities supported range from very small community organisations to national and even international charities – all doing their bit to help people and the planet.

Whilst charity lotteries clearly do a lot of good, they are a gambling product and are regulated as such. However, there is a huge difference between charity lotteries and other types of gambling, such as betting and casinos.

In recent years, partly as a result of increases in online betting in many countries, there has been greater political focus on problem gambling. As befits organisations set up to benefit society, charity lottery operators take this issue very seriously, and have many safeguards in place to protect consumers.

Yet the debate on problem gambling can often treat the gambling sector as if every product is the same, with the same potential risks, where that is clearly not the case.

Charity lotteries already face considerable operating regulations in the countries we fundraise in. However, there is a danger that a “one size fits all” approach to gambling regulations could harm charity lottery fundraising, despite the widespread understanding from previous research that charity lotteries are a low risk product.

ACLEU wanted to verify if this low-risk description was backed up by the statistical evidence and we commissioned Regulus Partners to research the issue. Looking at the statistical evidence, and drawing from publications from across Europe, their analysis confirms once again the low risk nature of the product. Indeed one of their key findings is that ~”*Official statistics consistently show that charity lotteries exhibit very clear signs of being safe products.*”

Therefore, our message to law-makers and regulators across Europe is to ensure that charity lotteries can continue to raise funds for good causes and should not be subject to regulations and restrictions which are not relevant to the charity lottery sector.

Our record as a sector is that we are both a highly successful form of charity fundraising and we take our social responsibility duties seriously. We hope that this report illustrates the strong case that charity lottery fundraising is low risk and should be regulated appropriately on that basis.

Malcolm Fleming

President

Association of Charity Lotteries in Europe

November 2024.

Beyond the Jackpot: analysing the Safety of Charity lotteries

Executive Summary

Regulus Partners was commissioned by the Association of Charity Lotteries in Europe (ACLEU) to analyse what prevalence survey data can tell us about charity lotteries – in terms of who plays them and the extent to which participation may be associated with positive or negative outcomes. This is a European-wide study with European-wide application, but which uses a large dataset from Great Britain to provide a detailed case study using previously non-public official data from the UK Data Service Archive. The structural characteristics of charity lotteries compared with many other commercial gambling activities make these findings internationally relevant. This is demonstrated by wider findings from a range of other jurisdictions, within Europe and elsewhere which we refer to in this report. Our detailed case study shows that charity lotteries are consistently associated with very low rates of problem gambling, reflecting similar findings elsewhere in Europe and internationally.

Official statistics have consistently shown that playing a charity lottery is a low risk activity that involves benefits to both consumers and society more broadly:

- **rates of ‘problem gambling’¹ have been consistently low among players of charity lotteries - similar to rates for players of draw-based state lottery games;**
- **rates of chronic financial and health harms have been extremely low for participants in charity lotteries - similar to state lottery products**
- **the limited prevalence of ‘problem gambling’ among charity lottery players is almost certainly caused by multi-product usage, with no solus charity lottery players (in the datasets analysed) classified as ‘problem gamblers’.**

Britain’s gambling surveys show that Charity Lottery products are among the safest for customers to play and are linked to improved wellbeing rather than causing gambling harm; comparable data from other European jurisdictions demonstrates that these findings are broadly applicable across markets.

¹ We recognise that there is some dispute about the use of the term ‘problem gambling’ and that some stakeholders consider it to be stigmatising. We use it in this report in its technical sense (ie, as a recognised classification within screening instruments) and in the interests of coherence and simplicity.

Section I: Understanding participation in charity lotteries and the prevalence of problem gambling

Regulus Partners was commissioned by the Association of Charity Lotteries in Europe (ACLEU) to analyse prevalence survey data in order to divine insights into who plays charity lotteries and the extent to which participation is associated with beneficial or harmful outcomes. Between 1999 and 2021, eight different sets of official prevalence surveys were conducted in Great Britain; and these provide a rich source of data to answer these questions. While some of the survey results have been published by the Gambling Commission and the National Health Service, these large datasets offer a very wide range of opportunities for further secondary research. This has allowed us to reveal within this report, a number of previously unpublished findings about participation in charity lotteries. While our analysis is focussed on British data, the structural characteristics of charity lottery compared with other gambling products make the findings international in scope.

The nature of participation in gambling in Great Britain has been examined through the use of large-scale household prevalence surveys since 1999, providing a multi-generational database. These surveys have been carried out in eight years between 1999 and 2021. The British Gambling Prevalence Survey ('BGPS') was conducted in 1999, 2007 and 2010 and was a bespoke study of gambling behaviours, commissioned initially by GamCare and subsequently by the Gambling Commission (using Government funding). From 2012 onwards, data collection was conducted as part of the NHS Health Survey for England ('HSE'), the Scottish Health Survey ('SHeS') and the Wales Omnibus Survey^{2 3}. While the core gambling questions are very similar between the BGPS and the Health Surveys, there are some differences of survey description (ie, 'gambling' vs 'health') and data collection. For this reason, caution should be exercised when comparing results from the BGPS with the Health Surveys. In our analysis, we consider both the longer-term (BGPS and Health Surveys) and the medium-term time series (Health Surveys alone). Please see Appendix I for information relating to the Gambling Commission's recent change in approach to these surveys.

The three British Gambling Prevalence Surveys were commissioned during a period of significant change for the country's gambling laws. The first survey (conducted in 1999) effectively provided baseline data; the second (in 2007) was timed to assess the effect of the first waves of legislative change (the Gambling Act was passed in 2005); the third was conducted in 2010, presumably to measure the effect of the implementation of the Act in full (in 2007). The National Centre for Social Research (NatCen) has published findings from each of the surveys. These public reports provide 'snapshots' of the state of gambling participation in Britain at irregular intervals during the first two decades of the 21st century. However, until now there has been no systematic review of the datasets from all eight of the survey sets. Our analysis includes previously unpublished data from the UK Data Service archive.

| Survey | Coverage | Sample size | Published |
|---------------------|-----------------------------|-------------|-----------|
| BGPS 1999 | England, Scotland and Wales | 7,860 | 2000 |
| BGPS 2007 | England, Scotland and Wales | 9,003 | 2007 |
| BGPS 2010 | England, Scotland and Wales | 7,756 | 2011 |
| HSE 2012; SHeS 2012 | England and Scotland | 13,106 | 2014 |
| HSE 2015; SHeS 2015 | England and Scotland | 20,166 | 2017 |
| HSE 2016; SHeS 2016 | England and Scotland | 12,334 | 2018 |
| HSE 2018 | England | 7,104 | 2019 |
| HSE 2021 | England | 3,773 | 2023 |

The BGPS and Health Surveys collected data in relation to what it termed 'other lotteries'. This was defined within the survey questionnaire as "*tickets for any lother lottery, including charity lotteries*" and was clearly distinguished from National Lottery draws. In the interests of simplicity, we use the term 'charity lottery' where the BGPS and Health Surveys used the term 'other lottery'.

² Where we refer to these surveys collectively, we do so as the 'Health Surveys'

³ The inclusion of gambling questions in these surveys has been funded by the Gambling Commission

Problem and at risk gambling

Problem gambling is defined as “gambling to a degree that compromises, disrupts or damages family, personal or recreational pursuits”⁴. Since 2007⁵, official prevalence surveys in Great Britain have made estimates the population prevalence of ‘problem gambling’ using the Problem Gambling Severity Index (‘PGSI’)⁶. Criteria from the American Psychiatric Association’s Diagnostic and Statistical Manual Fourth Edition (‘DSM-IV’) have been used alongside the PGSI. For the sake of simplicity, our analysis focuses on results obtained from the PGSI.

The PGSI consists of nine questions about gambling behaviours and is used internationally:

Thinking about the last 12 months...

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

Each item is assessed on a four-point scale:

- Never = 0
- Some of the time = 1
- Most of the time = 2
- Almost always = 3

This results in a scoring scale of 0 to 27, with respondents given the following classifications based on their score:

| Score | Classification | Summary description |
|-------|-----------------------|--|
| 0 | Non-gambler | Respondents in this group have not gambled at all in the past 12 months |
| 0 | Non-problem gambler | This group probably will not have experienced any adverse consequences of gambling |
| 1-2 | Low risk gambler | This group likely will not have experienced any adverse consequences from gambling. |
| 3-7 | Moderate risk gambler | This group may or may not have experienced adverse consequences from gambling. |
| 8+ | Problem gambler | Respondents in this group are those who have experienced adverse consequences from their gambling, and may have lost control of their behaviour. |

There has been some discussion about the most appropriate cut-off points for the ‘at risk’ classifications. In 2013, Currie et al. proposed a slightly altered scoring system for ‘low risk gambling’ (1 to 4) and ‘moderate risk gambling’ (5 to 7)⁷. In our analysis we adhere to the original cut-offs prescribed by Ferris & Wynne. While our report focuses on detailed findings from the administration of the PGSI in British surveys, we also refer to estimated rates of prevalence in a number of other jurisdictions to demonstrate the comparability and relevance of the findings (please see following sections).

⁴ Gambling Commission, 2021

⁵ The BGPS 1999 used the South Oaks Gambling Screen and the DSM-IV instruments

⁶ The PGSI was developed by Ferris & Wynne (2001) specifically for use in population surveys

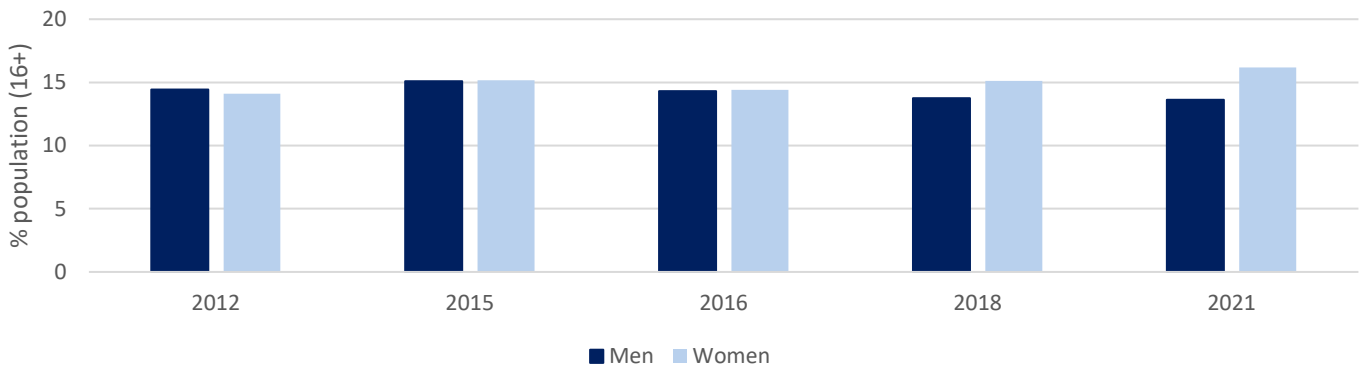
⁷ Currie et al., 2013

Section II: Who plays charity lotteries?

Unlike many gambling activities, charity lotteries have a broad appeal across gender, age, and socio-economic groups. Further, official prevalence data surveys the mental health of charity lottery players in Britain. Charity lottery players are not only less likely to have mental health issues than other gamblers and non-gamblers, they are found to be generally happier, with four-in-five players reporting ‘high’ or ‘very high’ life satisfaction.

Gender - Women are slightly more likely than men to play charity lotteries. The effect is far less pronounced than in other parts of the licensed gambling market but there is evidence of a widening of this gap in recent years. Results from the HSE 2021 indicate that women may now constitute around 57% of charity lottery players⁸.

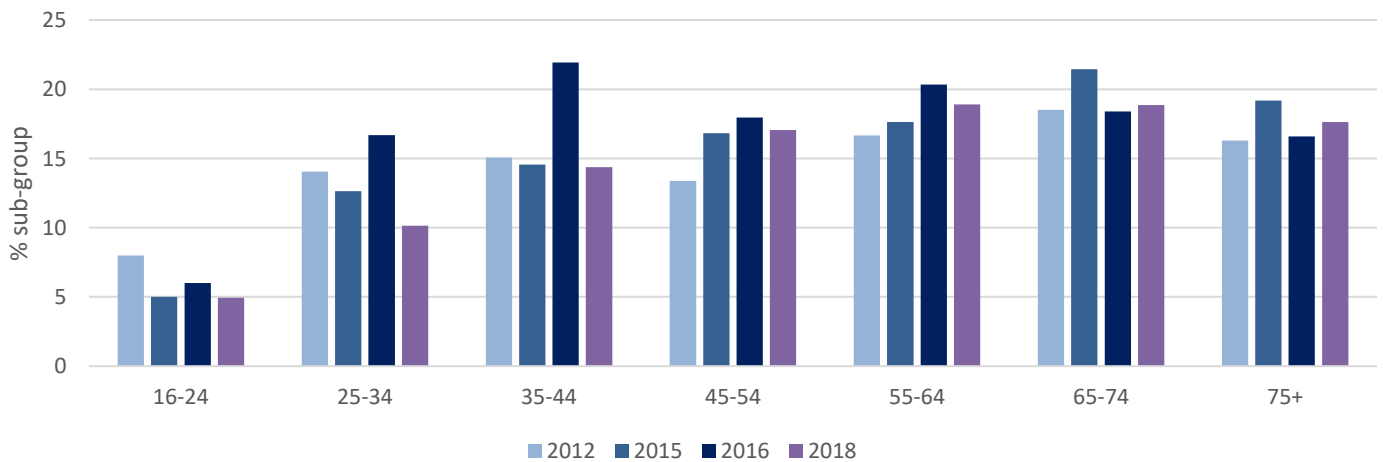
Chart 1: participation in charity lotteries by gender



Source: Regulus Partners analysis of Health Surveys (2012-2021)

Age – Participation in charity lotteries has been skewed towards older age cohorts. Participation rates for people aged 55 years or older have been around three times as high as for people in the 16-24 years cohort.⁹

Chart 2: participation in charity lotteries by age cohort and survey year



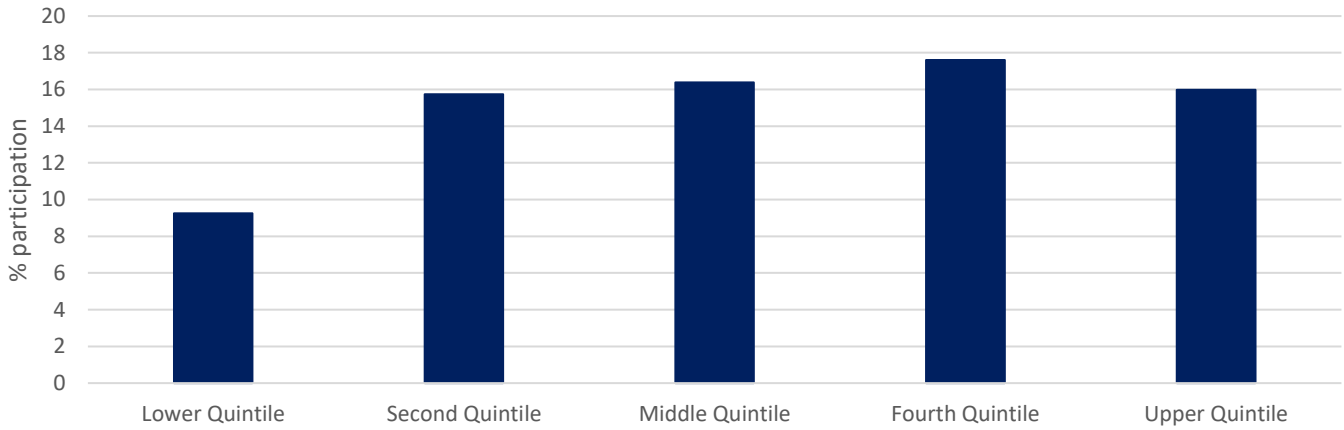
Source: Regulus Partners analysis of Health Surveys (2012-2018)

⁸ Results from the Gambling Survey for Great Britain 2023 indicate a fairly even split in participation between women and men. As we observe on page [..], concerns have been expressed about this survey’s reliability, which is why we have not included its results.

⁹ The Young People and Gambling Survey (Ipsos MORI/Gambling Commission) highlights the fact that underage gambling is relatively rare – and is often facilitated by adults (eg, parents and guardians) where it does occur.

Income - Charity lottery participation is skewed slightly towards people on higher incomes. In the HSE 2018, 9.3% of people in the lowest earnings quintile played a charity lottery compared with 17.6% in the second-highest quintile (and 16.0% in the highest quintile). This pattern has been consistent throughout the BGPS and Health Survey series.

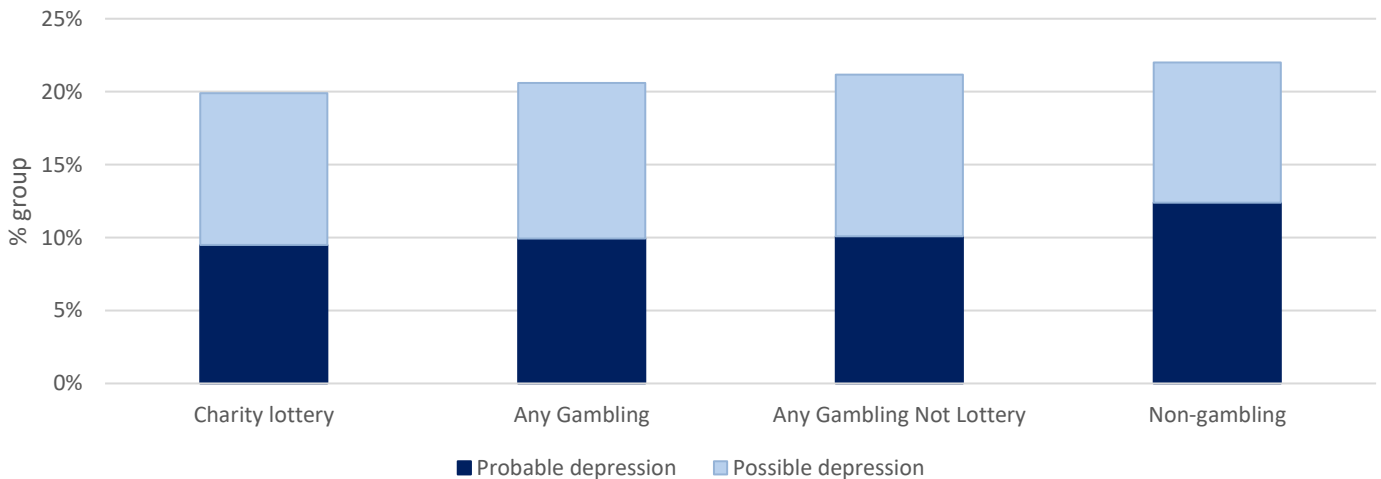
Chart 3: participation in charity lotteries by personal income quintile



Source: Regulus Partners analysis of Health Survey for England (2018)

Mental health and well-being - players of charity lotteries enjoy - on average - slightly better mental health and well-being than both gamblers in general and non-gamblers. Analysis of data from Health Surveys finds that 9.5% of players were classified with 'probable depression' (using the Warwick-Edinburgh Mental Wellbeing Screen). This compares with 9.9% of all gamblers and 12.4% of non-gamblers.

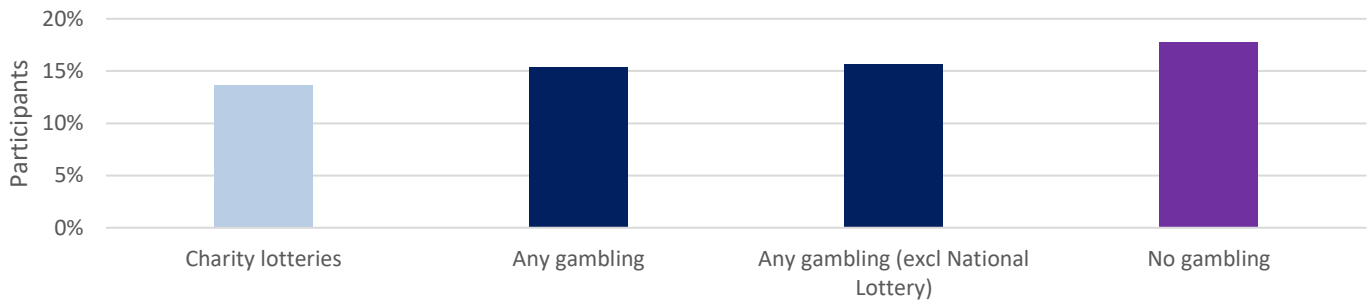
Chart 4: estimated rates of depression (WEMWBS) among gamblers and non-gamblers



Source: Regulus Partners analysis of Health Surveys (2012-2018)

Analysis of results from Health Surveys shows that players of charity lotteries are significantly less likely than both other gamblers and non-gamblers to score four or more on the 12-item General Health Questionnaire ('GHQ-12). This indicates significantly lower levels of psychological disturbance or mental ill-health compared to gamblers in general and non-gamblers.

Chart 5: Probable psychological disturbance or mental ill-health (GHQ-12)



Source: Regulus Partners analysis of Health Surveys (2012-2018)/ Public Health England

Life satisfaction – around four-in-five charity lottery players report either ‘high’ or ‘very high’ life satisfaction. This is similar to ratings for the National Lottery and gambling in general.

Demographic factors - findings in a broader European context

In order to understand the extent to which findings from Great Britain are likely to be representative of other European jurisdictions, we reviewed a number of prevalence surveys and market reports from wider jurisdictions.

Gender

Men are more likely than women to participate in most licensed gambling activities. Lotteries tend to be a rare exception to that rule with very similar rates of participation between men and women – including higher rates for women in certain jurisdictions (such as Great Britain).

- France (2019)**
 Data source: Costes et al. (2020) for Public Health France
 Findings: participation in draw-based lottery games was somewhat higher among men (33.7%) than women (27.9%); but women (27.6%) were more likely than men (26.1%) to play scratchcards.
- Ireland (2019/20)**
 Data source: Mongan et al. (2022) for the Health Research Board
 Findings: participation rates for lottery games (including scratchcards) were slightly higher among women than among men.
- Germany (2021)**
 Data source: Meyer et al. (2023) for Deutscher Lotto and Totoblock
 Findings: women were more likely than men to participate in certain draws (eg, Deutsche Postcode Lotterie) but not others (eg, Deutsche Fernsehlotterie). Overall – and in contrast to other jurisdictions reviewed), lottery participation in Germany appears to be weighted more towards men and women.
- Netherlands (2017)**
 Data source: KSA (2018) Netherlands Gaming Authority
 Findings: very similar rates of participation in lottery games between men and women (although marginally higher among men).

Age

Our analysis of Health Survey data from Great Britain showed that participation in charity lotteries tended to be highest for people in middle age and retirement age compared with young adults. We observed a similar pattern across other European jurisdictions that we reviewed.

- **France (2019)**
Data source: Costes et al. (2020) for Public Health France
Findings: participation in draw-based lottery games was higher between the ages of 35 years and 64 years (and highest within the 45-54 year age cohort).
- **Ireland (2019/20)**
Data source: Mongan et al. (2022) for the Health Research Board
Findings: participation rates for lottery games (including scratchcards) were higher between the ages of 35 years and 64 years (with around half of the population in these cohorts participating).
- **Germany (2021)**
Data source: Meyer et al. (2023) for Deutscher Lotto and Totoblock
Findings: while some variations were found in relation to specific lottery games, overall participation in lottery games was highest for people aged 56 to 70 years-old.
- **Netherlands (2017)**
Data source: KSA (2018) Netherlands Gaming Authority
Findings: Participation rate in lottery games was highest in the 40 to 54 year age cohort. Other age cohorts had relatively similar levels of participation with the exception of those aged 24-years or younger who were much less likely to play lottery games.

Income

Our analysis of Health Survey data from Great Britain showed that participation in charity lotteries tended to be more prevalent among people in higher income brackets (peaking at the fourth income quintile). We were able to locate only limited information from other jurisdictions on the association between income and lottery play; and this appeared inconclusive.

- **Netherlands (2017)**
Data source: KSA (2018) Netherlands Gaming Authority
Findings: Participation rate in lottery games was materially higher within the top 40% highest earners compared with the rest of the population.

Long-term prevalence data shows that charity lotteries have broad appeal, which explains the sustained popularity of the product:

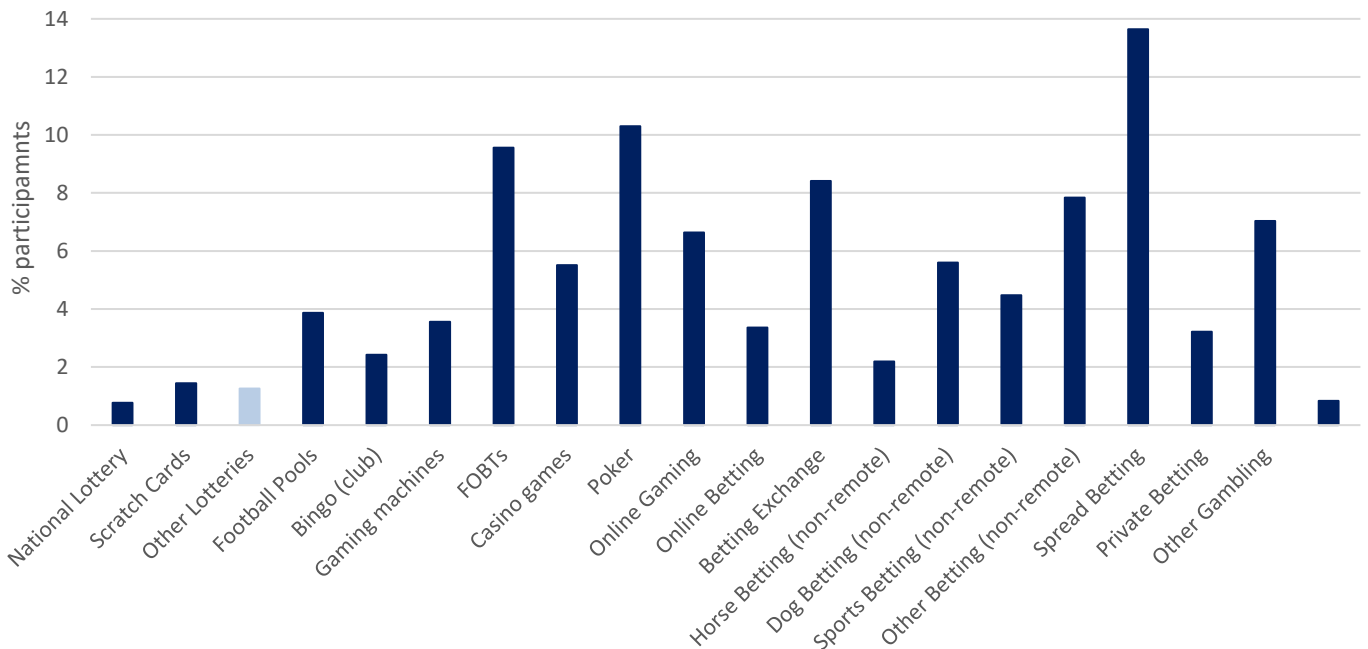
- **while many gambling products are aimed at men (eg, sports betting) or women (eg, bingo), charity lottery is popular with both men and women**
- **charity lotteries appeal to an older demographic but this demographic has consistently engaged with the product over time: an older demographic is not the same as an aging demographic**
- **charity lottery participation is well distributed across income groups rather than being skewed to certain socio-economic segments of the population**

Section III: Problem gambling and charity lotteries

Charity lotteries consistently have one of the lowest rates of problem gambling for all products and sectors, To analyse and contextualise the reported rate of problem gambling within a gambling product or industry segment, it is important to understand how problem gambling is measured. Problem gamblers that play several products are reported as problem gamblers in every product they play. The widespread popularity of charity lotteries therefore creates a level of engagement by problem gamblers regardless of the structural characteristics of the product. Crucially, no players that play only charity lotteries exhibit problem gambling.

The BGPS and Health Surveys have consistently reported very low rates of ‘problem gambling’ for players of charity lotteries. Between the BGPS 2007 and the HSE 2018¹⁰, an average of 1.3% of people who had participated in charity lottery games were estimated to meet the criteria for PGSI ‘problem gambling’. As chart ten below illustrates, this was lower than for any other betting or gaming activity with the exception of National Lottery draws.

Chart 6: PGSI 'problem gambling' rates for participants in different gambling activities (2007-2018)



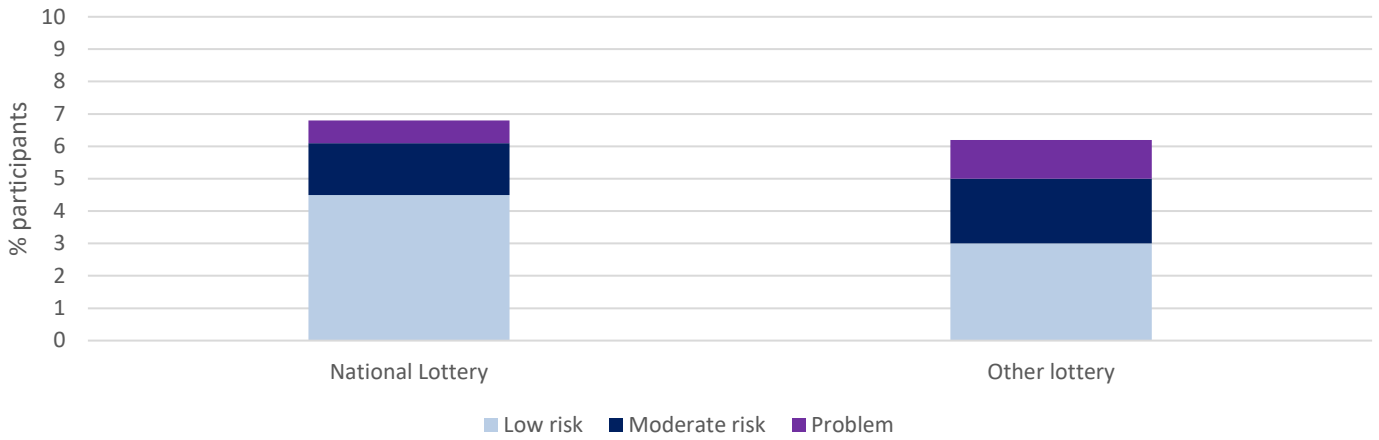
Source: Regulus Partners analysis of BGPS (2007-2010) and Health Surveys (2012-2018)

The HSE 2018 reported that charity lottery players were more likely than any other group of gamblers to be classified as non-problem gamblers – lower than for players of National Lottery draws.

As with most other gambling activities, a majority of lottery players with a problem gambling classification were men (70% in the HSE 2018).

¹⁰ The detailed results of the HSE 2021 have not yet been published.

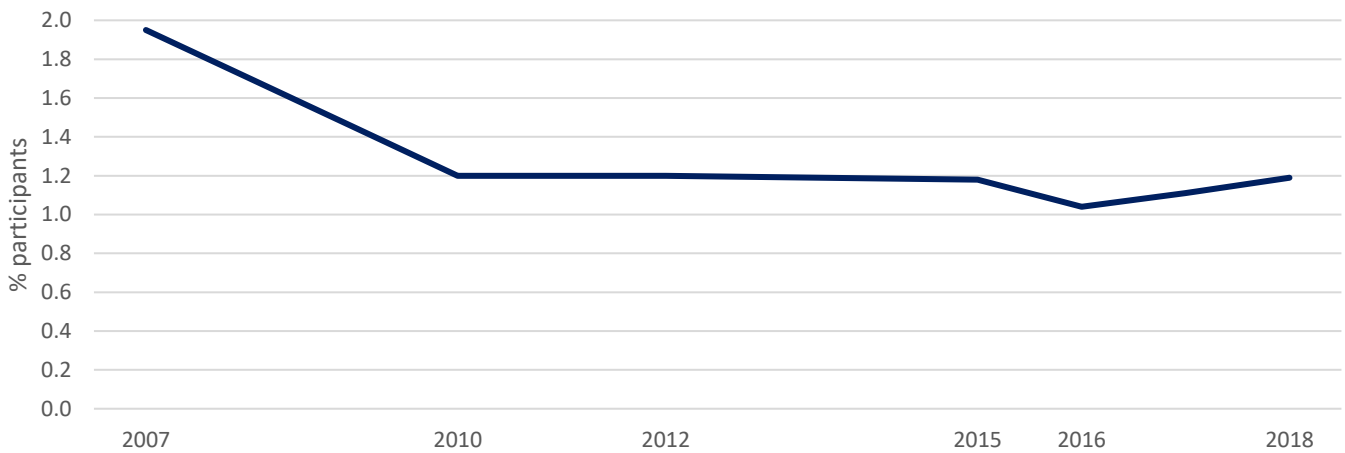
Chart 7: PGSI classifications for players of lottery draws



Source: Regulus Partners analysis of Health Survey for England (2018)

As chart twelve shows, the rate of PGSI ‘problem gambling’ among charity lottery players has been consistently low throughout the data series – between 1.0% (HSE 2016) and 2.0% (BGPS 2007).

Chart 8: PGSI 'problem gambling' for participants in charity lotteries (2007-2018)



Source: Regulus Partners analysis of BGPS (2007-2010) & Health Surveys (2012-2018)

It should also be noted that if a problem gambler plays several products including charity lotteries, then they will be recorded as a problem gambler under other lottery in the survey statistics (see below for analysis).

Problem gambling - findings in a broader European context

Health Surveys in Great Britain have consistently shown very low rates of ‘problem gambling’ and harm among lottery players (and even where this occurs, associations with lottery play appears weak). This observation is consistent with findings by Tran et al. (2024) in their meta-analysis of prevalence surveys, covering 68 international jurisdictions of 15 years (2010 to 2024). They found that lottery games had “the lowest prevalence of problematic gambling”¹¹. Saxton and Eberhardt (2021) have published similar findings¹². Griffiths (2021) meanwhile has observed that charity lottery games are characterised by low structural risk (eg, event frequency, speed and repetition of play, stake size) and situational risk (ie, the environment in which it is played) characteristics.

- **France (2019)**
Data source: Costes et al. (2020) for Public Health France
Findings: participation in draw-based lottery games was associated with the lowest rates of PGSI ‘at risk gambling’ and ‘problem gambling’ compared with all other commercial gambling activities (while prevalence rates for scratchcards were only slightly higher).
- **Germany (2021)**
Data source: Meyer et al. (2023) for Deutscher Lotto and Totoblock
Findings: Participation in lottery games was associated with the lowest prevalence of gambling disorder (measured using criteria from the American Psychiatric Association’s DSM-5) compared with all other commercial gambling activities included in the survey
- **Netherlands (2017)**
Data source: KSA (2018) Netherlands Gaming Authority
Findings: Participation rate in lottery games was associated with the lowest prevalence rates for ‘at risk gambling’ and ‘problem gambling’ (measured using the South Oaks Gambling Screen) compared with all other commercial gambling activities included in the survey.

Harms from gambling

Compared with other groups of gamblers, charity lottery players are extremely unlikely to experience harms from gambling. For example, 0.5% report financial problems (most of the time or almost always) in relation to gambling while 0.6% report health problems (most of the time or almost always). As we note in the section below, this does not mean that playing lottery games *causes* financial or health problems – and where these harms do occur it seems highly probable that they are unrelated to lottery play. The incidence of chronic harm are low by comparison with participants in other gambling activities for both financial and health problems.

¹¹ Tran et al., 2024, p.603

¹² Saxton and Eberhardt also reviewed results from NHS Health Surveys in Great Britain.

Chart 9: chronic harms: Gambling caused financial problems (most of the time/almost always)

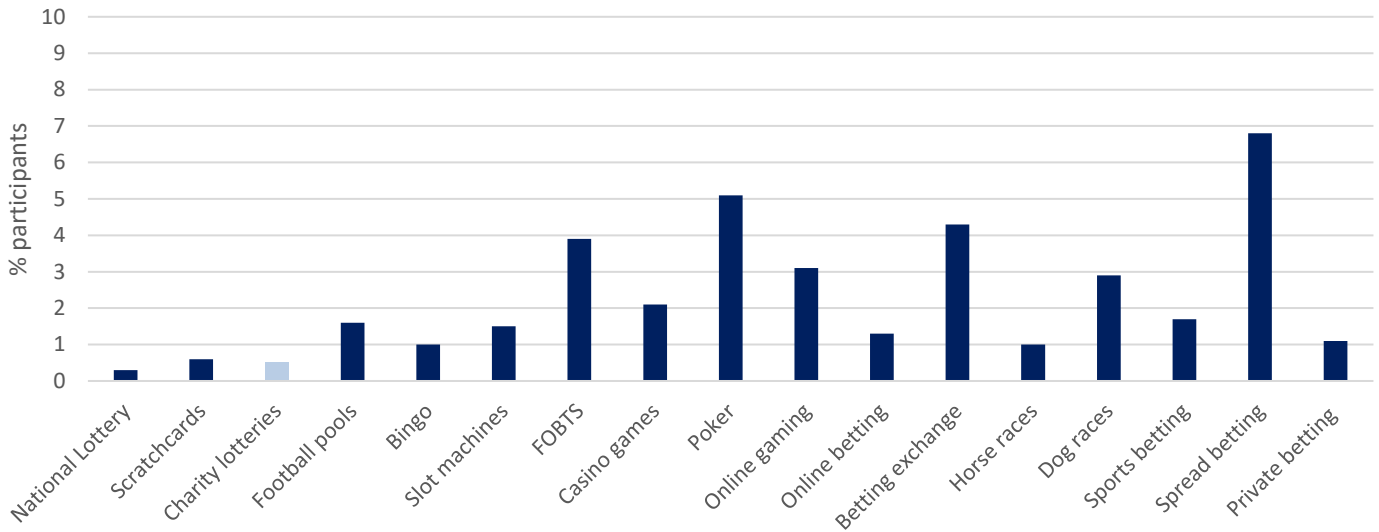
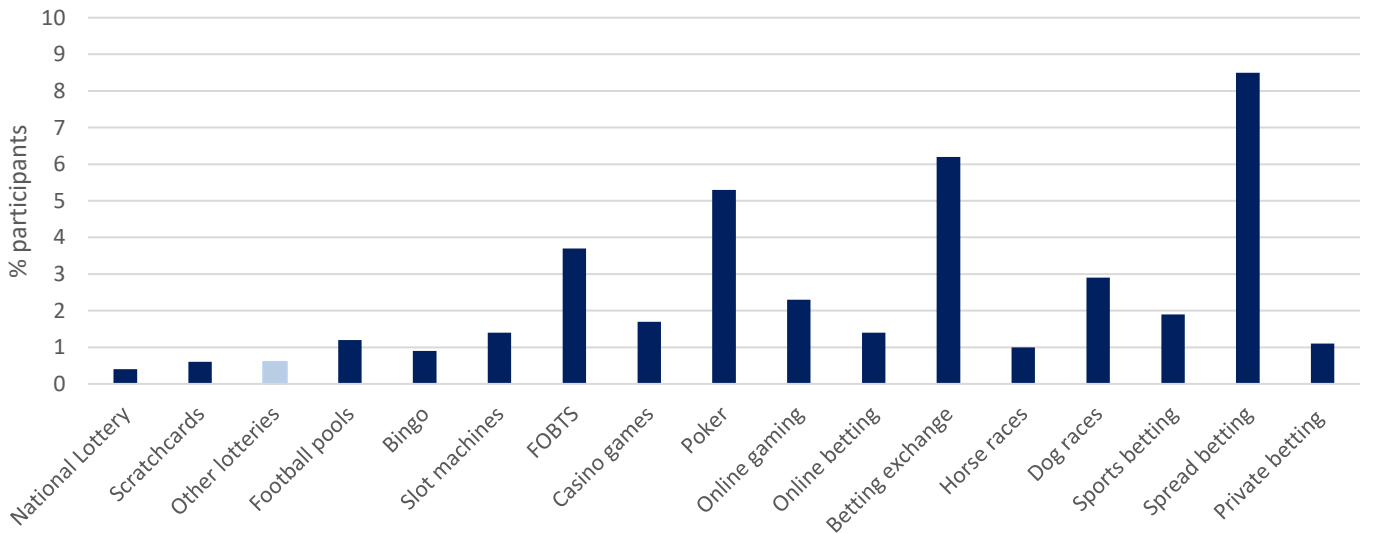


Chart 10: chronic harms: Gambling caused health problems (most of the time/almost always)



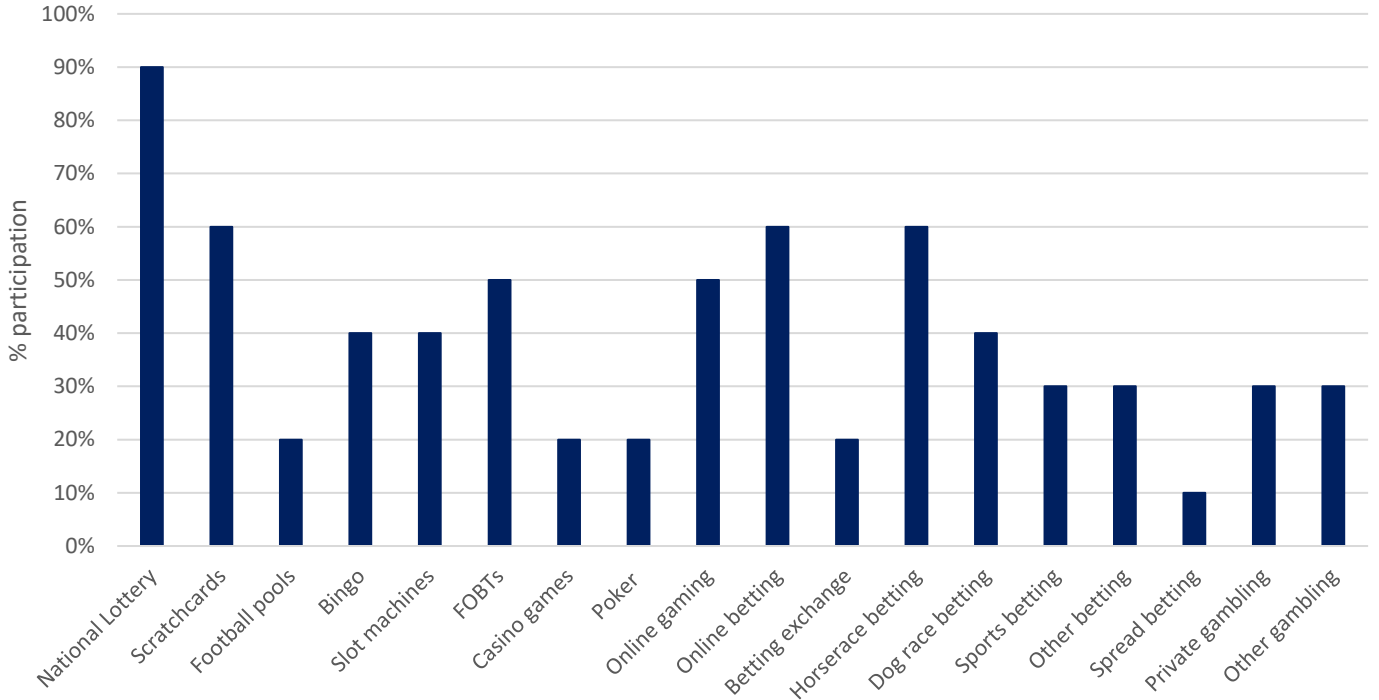
Source: Regulus Partners analysis of Health Surveys (2012-2018)

What do these statistics show? Addressing a common misconception

It is a common misconception that prevalence surveys report rates of 'problem gambling' by activity; but this is not the case. Problem gambling screening instruments (such as the PGSI) classify respondents in relation to their gambling in totality rather than specific activities or products. The HSE 2018 reported that 1.2% of participants in charity lotteries were likely to be PGSI 'problem gamblers'; but this does not mean that lottery play caused, or even contributed to problematic gambling. Analysis of the HSE dataset by Regulus Partners reveals that, on average, lottery players classified as problem gamblers participated in eight different forms of gambling over the course of a year. As chart fifteen illustrates, 90% of these 'problem gambler' charity lottery players also took part in the National Lottery main draw while 60% had bought scratchcards, bet on horseraces (non-remote) or bet on sports online. Half had played Fixed Odds Betting Terminals (banned from 2019) and the same proportion had played online casino, slots, or bingo.

Given the structural characteristics of lottery play, it seems plausible that the risky behaviours and harmful consequences of gambling reported by these 'problem gamblers' may have had little or nothing to do with participation in lottery games excluding scratchcards.

Chart 11: participation in gambling for charity lottery players classified as 'problem gamblers'



Source: Regulus Partners analysis of Health Survey for England (2018)

Crucially in demonstrating this point, Regulus Partners analysis of results from the Health Surveys stored in the UK Data Service archive reveal a nil rate of PGSI 'problem gambling' for people whose only form of gambling is lottery draws (charity lotteries and/or National Lottery).

Official statistics consistently show that charity lotteries exhibit very clear signs of being safe products for gamblers:

- **rates of problem gambling are consistently very low compared to other products, similar to draw-based National Lottery products**
- **rates of chronic financial and health harms are very low compared to other products, similar to National Lottery products**
- **the prevalence of problem gambling in charity lottery players is almost certainly caused by multi-product usage, with no solus charity lottery players exhibiting Problem Gambling**

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