

# Researching and developing a new framework of gambling related harm in GB

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Regulatory Settlement Funded  
Research Programme

## About GambleAware

GambleAware is the leading independent charity (Charity No. England & Wales 1093910, Scotland SC049433) and strategic commissioner of gambling harm education, prevention and treatment across Great Britain to keep people safe from gambling harms.

GambleAware commissions the National Gambling Support Network (NSGN) which provides, free confidential treatment for almost 7,000 people, as well as the National Gambling Helpline which takes around 44,000 calls a year. The charity is independent and evidence-based, with a robust governance process in place to ensure the industry has absolutely no input or influence on our work.

Gambling harms can affect anyone, and not just those who gamble, but also their families and communities. These harms particularly affect communities that already face inequality.

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## Introduction

### The Programme

GambleAware wishes to commission the establishment of a new, empirically robust **framework of gambling harms and recovery in GB suitable for holistic assessment of gambling harms and changes in harm over time, and which works effectively in a wide range of communities and contexts.**

This work would address identified issues with the Problem Gambling Severity Index (PGSI) in the screening and assessment of harm, and to build on and adapt other frameworks that have been established in other jurisdictions and adjacent policy areas (e.g. drug use and mental health).

Our intention is for the framework to be appropriate for assessment and outcome measurement in both clinical and non-clinical contexts, as well as for increasing understanding of gambling harms amongst wider stakeholders. The framework will also need to have quantitative elements in order to enable an assessment of the variation in total harms by population group, or by different economic contexts or policy regimes.

The work undertaken for this framework will need to be mindful of and complement the recently designed survey questions on gambling related harms and the negative impacts of gambling currently being collected via the new Gambling Survey for Great Britain (GSGB),<sup>1</sup> delivered by the Gambling Commission. We would expect that work to be an input into this programme, and there would therefore be regular engagement with the Commission during this programme.

We anticipate that the successful applicant/consortium will have a proven track record of **undertaking research developing empirical tools, along with an understanding of how gambling harms are experienced and measured,** with a specific focus on **meaningful involvement of diverse communities and applicability to frontline practice.** It is therefore desirable that applicants have knowledge of psychological or psychometric scale validation and development.

We expect that the successful applicants will:

- Have a mixed-methods, multidisciplinary and multi-sector approach to achieve the aims of the research programme.
- Be from consortium and multidisciplinary teams include research agencies and/or academics, along with community organisations or practice bodies.

The research will build on the scoping study commissioned by GambleAware, *'Frameworks and Measurement of Gambling Related Harm.'*<sup>2</sup> Many frameworks explored in this scoping study focussed on individual behaviour and overlooked a variety of socio-environmental factors which contribute to gambling related harms, with methodologies often lacking robustness and failing to engage with people with lived experience. The reliance on the PGSI and similar measures may leave some communities, particularly those who are minoritised and bear disproportionate burdens of

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<sup>1</sup> Wardle et al, 2022, *Developing survey questions capturing gambling-related harms.* Available [here](#)

<sup>2</sup> Close, J., Martin, I., White, G., Lau, R., & May, J. (2024). *Frameworks and Measurement of Gambling Related Harm: A Scoping Study.* Available [here](#).

gambling harm, underserved by having their harms less accurately established. This programme of work will address these shortcomings.<sup>3/4</sup>

**The budget envelope is £297,900** (all inclusive, and as a grant this is outside the scope of VAT), over 18 months.

## Funding Source

This project is funded by an independent funding source, in the form of the Regulatory Settlement allocated to GambleAware by [The Gambling Commission](#) in accordance with their [Statement of Principles](#) for determining financial penalties. In keeping with these principles, the funding allocated by the Commission to GambleAware will be used for specific, agreed purposes that accelerate GambleAware's commissioning plans, including research projects.

Regulatory settlement funding has previously been used by Gambling Commission to fund independent research on gambling harms. It is **not** voluntary industry funding, and the gambling industry has no influence over how it is allocated or used.

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<sup>3</sup> Levy, J., O'Driscoll, C., & Sweet, A. (2021). *Disproportionate Burdens of Gambling Harms Amongst Minority Communities* (London: GambleAware). Available [here](#).

<sup>4</sup> Conolly, A, Davies, B., Fuller, E., Heinze, N., Wardle, H. (2018). *Gambling behaviour in Great Britain in 2016: Evidence from England, Scotland and Wales* (London: NatCen Social Research). Available [here](#).

## Background and Context

Whilst the PGSI is very commonly used, it has also been argued to be stigmatising, to lack nuance and specificity, to be a measure of proxy harm as opposed to of direct harm, and not allow for some harms to be weighted as more harmful than others. A scoping study previously carried out by the University of Plymouth and the National Centre for Social Research investigated and summarised widely used and influential frameworks and measurement of gambling related harms in GB and comparative contexts internationally, and to establish what is needed for future research,<sup>5</sup> and intervention strategies. This report identified gaps in the current knowledge base and made recommendations for future research and for the development of a gambling harms scale. The report stresses that there are **significant gaps in evidence** around existing frameworks of harm, as well as the measurement of gambling-related harms.

The scoping review found that traditional survey and questionnaire measurement tools for gambling harms are not always applicable to the GB context, have little to no input from people with lived experience of gambling harm, and often ignore existing policy and legislation. The lack of a clear underlying framework of harms for these instruments is clearly seen in the 'items' of the questionnaires, which do not recognise that harms can be experienced on a sliding scale, rather than binary outcomes.

## The Measurement of Gambling Harms

### Identified issues with the PGSI

The scoping study highlights key issues with the PGSI, where financial loss and risk of harm has been used as a proxy measure of actual harm. The PGSI draws from historically clinical notions of 'pathological' versus 'non pathological' gambling and uses reductive and problematic language which (however unwittingly) places blame on the individual through using terms such as "problem gambler", which compound and perpetuate stigma. Not only does this result in an unnuanced and inaccurate understanding of how and why harms manifest, and how this may change across time, but it may also reduce help seeking behaviours<sup>6</sup>. Further, the PGSI only assesses the previous 12-months, making it ineffective as a holistic or longitudinal tool and limiting its effectiveness within treatment programmes and services. Whilst there exists a rational, weighted scale to assess the relative harms of drugs over time,<sup>7</sup> no such scale exists to assess the relative harm of gambling harms. This points to a clear gap in the measurement and understanding of gambling harms within GB.

### Other Scales

That is not to say that frameworks are limited by the shortcomings of the PGSI. The 'Conceptual Framework of Gambling Related Harms' developed by Langham et al.<sup>8</sup> is an extremely robust and comprehensively developed framework. As emphasised in the abovementioned scoping study, the "Langham framework has enabled the development of an 'item bank' of questions, mapping right across the domains of harm. From this, a new suite of

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<sup>5</sup> Close, J., Martin, I., White, G., Lau, R., & May, J. (2024). *Frameworks and Measurement of Gambling Related Harm: A Scoping Study*. Available [here](#).

<sup>6</sup> Pliakas, T., Stangl, A., & Siapka, M. (2022). *Building Knowledge of Stigma Related to Gambling and Gambling Harms in Great Britain: A Scoping Review of the Literature*. Available [here](#).

<sup>7</sup> Nutt et al, 2010, Drug harms in the UK: a multicriteria decision analysis. *The Lancet* 376. Available [here](#).

<sup>8</sup> Langham, E. et al. (2015), Understanding gambling related harm: a proposed definition, conceptual framework, and taxonomy of harms. *BMC Public Health* 16, 80

'Short Gambling Harms Screens' (SGHS) tools have been developed,<sup>9</sup> aimed at people who gamble or affected others. It has also underpinned the recent addition of specific harms items into the upcoming Gambling Survey for Great Britain, delivered by the Gambling Commission." The Gambling Commission's survey questions capture direct and indirect harms and negative impacts associated with gambling, and has produced two questionnaire sub-sets (14 questions each), one measuring harms to the individual self, and the other measuring indirect harms, that is harms from others.<sup>10</sup>

These new tools are better able to identify reductions in quality of life and provide more specific and precise measures of harm."<sup>11</sup> However, further to well-understood issues with the PGSI and its shortcomings, many of the frameworks analysed in the scoping study<sup>12</sup> focussed on individual behaviour and overlooked a variety of socio-environmental factors which contribute to gambling related harms<sup>1314</sup>. Moreover, there is a tendency to focus across populations as opposed to developing scales that engage with individuals' nuanced and variable realities and lived experiences, allowing for screening of individuals who are currently experiencing gambling harms, or who may experience legacy harms of gambling. Of the frameworks that did consider both personal and sociological perspectives, the methodology was often lacking robustness and instead relied on theoretical knowledge, or required more diverse input from people with lived experience. As most drew from North American research it remains unclear whether they are culturally appropriate for use within GB.

The scoping study demonstrated that **even amongst the frameworks which were deemed most comprehensive** and representative of lived experience, there were nevertheless **gaps around:**

- **The gendered impacts of gambling related harm;**
- **Stigmatisation;**
- **Discrimination;**
- **And ostracisation (friends or family) as a form of gambling harm.**

This reliance on frameworks and measurements of harm that are arguably best suited to establishing harm across populations and are not fit for purpose for individual screening and understanding of lived experience of gambling harm leave many communities (and many types of harms and legacy harms), particularly those who are minoritised and bear disproportionate burdens of gambling harm, in a context where burdens of gambling harm cannot be accurately established.

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<sup>9</sup> For example see Browne, M., Goodwin, B. C. & Rockloff, M. J. (2018). Validation of the Short Gambling Harm Screen (SGHS): A Tool for Assessment of Harms from Gambling. *J. Gambl. Stud.* 34, 499–512

<sup>10</sup> For questions used in the pilot survey, see [Appendix A - Harms questions used in the pilot survey](#)

<sup>11</sup> p3 Close, J., Martin, I., White, G., Lau, R., & May, J. (2024). *Frameworks and Measurement of Gambling Related Harm: A Scoping Study*. Available [here](#).

<sup>12</sup> Close, J., Martin, I., White, G., Lau, R., & May, J. (2024). *Frameworks and Measurement of Gambling Related Harm: A Scoping Study*. Available [here](#).

<sup>13</sup> Marionneau, V., Egerer, M., & Raisamo, S. (2023) Frameworks of gambling harms: a comparative review and synthesis. *Addiction Research & Theory*, 31 (1), 69-76. Available [here](#).

<sup>14</sup> Close, J., Martin, I., White, G., Lau, R., & May, J. (2024). *Frameworks and Measurement of Gambling Related Harm: A Scoping Study*. Available [here](#).

## Purpose, Aims and Focus

The following research aims are driven by the recommendations of the scoping study, which is informed by subject matter experts and those with lived experience of gambling harms. The study recommends notably that “new modes of gambling related harms measurement” that go beyond the PGSI are needed to avoid conflating harms and behaviours. The development of a new, nuanced and weighted “harms measurement” index that has utility for individuals and not just across the population is therefore recommended to fully account for the diversity of sociocultural, economic, and personal factors and determinants within GB:

1. Develop a new gambling harms framework that can be used for individuals and lay (non clinical) screening, assessment and outcome measurement that builds on existing frameworks. This framework should ideally:
  - Fully represent the harms experienced by specific cohorts and sub-groups
  - Be able to define and quantify harms and changes in harm for a wide range of individuals, in a treatment and support context
  - Be adaptable in varying sociopolitical and policy contexts<sup>15</sup>, for example, if gambling product regulation or transparency increased or decreased, what would this mean for the relative harms to different populations, communities, and in different contexts?
  - Be developed to align with a recovery framework for gambling related harms, analogous to those used in mental health services
2. Primary research will underpin and operationalise the new framework of measuring gambling harms, ensuring it is empirically and methodologically robust, accurate, nuanced and weighted, inclusive, and non-stigmatising. Therefore, research will underpin the abovementioned framework with stakeholder mapping and engagement. Respondents and participants will include:
  - Those who have led on the development of successful frameworks in other contexts, as summarised in GambleAware’s scoping study.
  - Those active and invested in the sector in GB. This will include:
    - The Gambling Commission's work on establishment of nationally representative data concerning gambling harm across the GB population, alongside alignment with the harms questions used in the Gambling Survey for Great Britain.<sup>16</sup>
      - The Gambling Commission have confirmed their willingness to provide an overview of the variables - and other data points - that will be collected in the GSGB.
      - This will allow prospective grantees to allow their proposals to be informed by a full knowledge of the data that will be available to them in this programme. The Gambling Commission will be publishing datasets from the GSGB on the UK Data Archive, from late 2024 onwards. Headline findings will be released earlier in the year.
      - This is with a view to serving as a foundational basis from which the abovementioned framework of individual assessment could be developed.
      - Over time both of these pieces of work would then inform and support each other.

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<sup>15</sup> Nutt, D. J., King, L. A., & Phillips, L. D. (2010). Drug harms in the UK: a multicriteria decision analysis. *The Lancet*, 376(9752), 1558-1565. Available [here](#)

<sup>16</sup> Wardle et al, 2022, *Developing survey questions capturing gambling-related harms*. Available [here](#)

- Providers of gambling treatment and support services, such as the [National Gambling Support Network](#).
- Diverse communities of those with lived experience of gambling harm, as well as their representative networks. Research into and with groups who disproportionately bear a burden of gambling related harms is key here, offering evidence and insight into why such groups are impacted, how harms may be prevented, what barriers to harm reduction are experienced. These groups include but are not limited to: children and young people; the nuanced perspectives of various affected others; the impacts of stigma; and the specifics of the GB context including ethnical, cultural and religious groups.

Research will need to include focus on the lived experience of people impacted by gambling harms or at risk of harms, and demonstrate how lived experience will be involved throughout the project:

- Proposals should centre the meaningful involvement of community in the design, response to (as respondents, participants, and interviewees), and monitoring of research foci and fieldwork.
- People with lived experience of gambling harm must be meaningfully involved per the above, and must meaningfully participate in, and be consulted with, as part of each research programme. Proposals will need outline the resource committed to the involvement and contribution of the lived experience community.
- This must be set out in grant proposals and will be evaluated by proposal reviewers.

## Research Methodological Approach

This programme will develop a new gambling harms framework underpinned by primary research (qualitative and quantitative with relevant key informants, community members, and stakeholders in the sector and adjacent sectors) alongside literature reviews and systematic reviews where appropriate. It will focus on research into, and the development of, an empirical framework of gambling harms which is conceptually robust, and which is informed by the experience of minority communities and public health initiatives. This will iteratively inform the **testing, piloting, implementation, and the development and roll-out** of the abovementioned measurement tool which has “the explicit goal of identifying, monitoring and evaluating gambling related harms”.

In fulfilling the above aims, and based on existing research, we envisage that this research programme (and proposal) will take a mixed-methods, multidisciplinary approach, incorporating qualitative, quantitative, and theoretical research, and bidders should bid as teams who can deliver the work across these areas.

## Involvement of Community and Lived Experience

Further to the above, research will need to include some focus on the lived experience of people impacted by gambling harms or at risk of harms, and demonstrate how lived experience will be involved throughout the project.

- Proposals should centre the meaningful involvement of community in the design, response to (as respondents, participants, and interviewees), and monitoring of research foci and fieldwork.



- People with lived experience of gambling harm must be meaningfully involved per the above, and must meaningfully participate in, and be consulted with, as part of each research programme. Proposals will need to outline the resource committed to the involvement and contribution of the lived experience community.
- This must be set out in grant proposals and will be evaluated by proposal reviewers.

## Expected Outputs

The key output from this work will be a new gambling harms framework that allows us and the sector at large to accurately measure levels of gambling harm across various communities and individuals at any point in their experience gambling harm (including recovery journey), including their indirect experience of gambling harm. Such a framework may be adjusted to allow for establishment of levels of gambling harm not only across different communities, but in other sociopolitical contexts and populations further to GB. The new framework will be nuanced, empirical, and destigmatising, as recommended in the recommendations set forth in the '*Frameworks and Measurement of Gambling Related Harm: A Scoping Study*'.

The development of this framework will be underpinned by a research programme which will deliver separate reports for a) a lay audience, published by GambleAware, and b) papers submitted to peer reviewed journals for academic publication.

### Deliverable 1: A framework of harms

- The establishment of an **iterative, ongoing framework**, informed by new findings which are integrated with previous research findings and frameworks.<sup>11</sup>
  - a. Develop a 'harm index' .
  - b. This 'harm index' should be viewed as an individual replacement for PGSI scores, used for monitoring the level of harm encountered in everything from individuals right across heterogeneous populations and communities, scalable and mutable for different policy and sociopolitical contexts.
  - c. Stakeholder stewardship to ensure investment, ownership, cocreation, and uptake of the nascent network.

### Deliverable 2: Primary Research

- A separate empirical report for each research workstream in the programme, written for a lay audience, including a review of secondary literature.
- A synthesis report integrating findings from all research workstreams, written for a lay audience, including a review of secondary literature.
- A slide deck for presentation of key findings for GambleAware and / or an external audience for virtual or face-to-face delivery.
- Several peer reviewed publication submissions (at least three submissions in the course of the grant).

\*All reports will be in word and will be peer reviewed in line with GambleAware's [Research Publication Guidelines](#).

Further to the above, we encourage bidders to suggest innovative additional outputs; for example, videos, practitioner workshops or community events.

## Proposal and Submission Details

### Budget

The total budget for this work is up to £297,900 over 18 months. As a grant, this is outside the scope of VAT. On appointment, the successful bidder will be asked to submit a detailed budget.

### Guideline Timings

The research will be undertaken over a maximum of 18 months.

It will commence at a mutually agreed date/ time after the final decision and award (see below).

The guideline timings for this call for proposal are below:

Milestone	Planned start date	Planned end date
Call for Proposals launch (RFP)	08/02/24	08/02/24
Clarification of tender questions deadline	21/02/24	21/02/24
Clarification of tender answers circulated	26/02/24	26/02/24
Proposals submissions deadline	COP 08/03/24	COP 08/03/24
Outcomes communicated to bidders	18/03/24	22/03/24
Financial due diligence	18/03/24	22/03/24
Contract negotiation and signing	22/03/24	25/03/24

### Proposal requirements

Please include with your proposal the following:

- A proposal of no longer than 30,000 words in total (excluding publication and contact lists). Proposals must engage with the scoping study.
- A list of recent relevant publications by research team members and a short overview of each publication / piece of research.
- An overview of how team members have a proven track record of undertaking research to build knowledge and understanding of how gambling harms are conceptualised and measured, with a specific focus on meaningful involvement of communities who are excluded and poorly served by inadequate frameworks and measurements of harm.
- The names and contact details of two clients whom you would be content for us to contact if you are shortlisted.
- How impact and promotion of the findings and research will be maximised by your consortium further to GambleAware's own communications and promotion. This should include:

- Ensuring longevity of the research, and this work resulting in further research.
- How this research will strive to change the dominant and stigmatising discourses.
- GambleAware’s work centres around the principles of equality, inclusion, and diversity at all levels of governance, human resources, policy, and commissioning. As part of your proposal, please set out how equality, inclusion, and diversity play a part in your organisation. Please include any policies, procedures, and approaches to governance.

## Submission

Proposals and all associated documentation will need to be submitted by **5pm on 29th of February**, via email to [procurement@gambleaware.org](mailto:procurement@gambleaware.org) with the subject title ‘Gambling harms framework – call for proposal’ and we will acknowledge upon receipt. Any proposals submitted after this time will not be considered.

## Eligibility criteria in relation to industry funding

In order to ensure and demonstrate the required levels of industry independence, applicants must ensure and demonstrate that they meet the criteria below.

**If applicants are eligible, then the proposal must include confirmation and assurance that all of the criteria below have been met or will be met. Proposals that do not demonstrate having met these criteria will not be considered.**

- a. Conditions for all organisations within the consortium:
  - i. Confirmation that no organisation within the consortium has any gambling industry representation on their board or senior management
  - ii. Confirmation that no organisation within the consortium has had any specific research funded or commissioned by the gambling industry in the last 12 months
  - iii. Confirmation that all organisations within the consortium will take all reasonable steps to ensure the independence, integrity and credibility of the research
- b. Conditions for the lead applicant and any other research organisation(s):
  - i. Confirmation that no research organisation in the consortium has received any direct industry funding within the last 12 months (e.g. RET donations); excluding regulatory settlement funding
- c. Where collaboration with a non-research, third-sector organisation (e.g. charity, service provider, lived experience organisation or peer support organisation) is proposed:
  - i. Justification of the choice of that partner organisation and the process through which that partner was identified
  - ii. Explanation of the relevant expertise of that partner
  - iii. Explanation of the third-sector partner's contribution to the project and how this will improve the quality, relevance and value of the research
  - iv. Itemised justification of any project funding to be allocated to the third-sector partner
  - v. Confirmation that any funding the third-sector partner may have received from industry will not influence or bias their role or contribution to the project, and how this will be ensured
  - vi. Confirmation that the lead applicant (research organisation) will have sole oversight of the production of all research findings and recommendations

## Evaluation Criteria

Framework Evaluation Criteria	Criteria	Criteria weighting <sup>17</sup>	Max Available Score
1.	Does the applicant meet the eligibility criteria in relation to industry funding, and have all the criteria for this been demonstrated or confirmed?	Pass/Fail	
2.	Proven demonstration of culturally competent research with clear examples of how the nuanced and complex needs of people in stigmatised communities have been considered in previous research.	Pass/Fail	
<b>Quality</b>	1. Innovation of proposed research, alongside understanding of the research aims, requirements and challenges.	20%	100(5 x 20)
	2. Demonstration of a rigorous and robust methodology, including an outline of analyses and outputs.	15%	75 (5 x 15)
	3. Overview of the proposed research team members, their relevant expertise and experience, and roles in delivering the programme.	15%	75 (5 x 15)
	4. Extent of meaningful involvement of lived experience communities throughout, with investment (financial or in-kind) allocated to this clearly set out	10%	50 (5 x 10)
	5. Potential societal impact of research, through regulation, policy, public debate, services or other mechanisms	15%	75 (5 x 15)
<b>Delivery</b>	6. Proven ability to meet the timetable and deliver the proposed outputs.	10%	50 (5 x 10)
<b>Cost</b>	7. Cost and value for money.	15%	75 (5 x 15)
<b>TOTAL</b>		<b>100%</b>	<b>500</b>

<sup>17</sup> Note that any organization that does not pass evaluation criteria (1) and (2) will not be eligible for funding through this grant.

## Process for appointment

The process for appointment will be:

1. Review and scoring of proposals against the above evaluation criteria by the Review Panel (made up of two internal reviewers from the GambleAware Research & Evaluation Team and one external independent Subject Matter Expert).
2. Final moderation with funding awarded to the highest scoring proposal.
3. All bidders will be notified of the outcome, and offered feedback on the scoring of their proposal by the Review Panel, and the successful bidder will be awarded the contract.

## Terms and conditions

To ensure expediency, we ask that any questions or clarifications regarding our Terms and Conditions are sent to [procurement@gambleaware.org](mailto:procurement@gambleaware.org) by 14<sup>th</sup> February 2024. Bidders are unable to make amendments to the Terms and Conditions post tender award. If there is no correspondence received by 14th February 2024 GambleAware will take this as acceptance to the Terms and Conditions.

[STANDARD Template Grant Agreement.pdf \(begambleaware.org\)](#)