




Examining Youth Protections against Gambling in Ireland: A Tiger Team (Red Team) Examination of the National Lottery

Mia Daly⁽¹⁾ , Anne Campbell⁽²⁾ , Frank Houghton⁽³⁾ 

(1) School of Applied Psychology, University College Cork, Cork, Ireland (ROR: <https://ror.org/03265fv13>)

(2) School of Social Sciences, Education & Social Work, Queen's University of Belfast, Belfast, Northern Ireland, UK (ROR: <https://ror.org/00hswnk62>)

(3) Department of Applied Social Sciences, Technological University of the Shannon, Limerick, Ireland (ROR: <https://ror.org/04efm0253>)

CORRESPONDING AUTHOR: Frank Houghton, Department of Applied Social Sciences, Technological University of the Shannon, Limerick, Ireland. E-mail: Frank.Houghton@TUS.ie

SUMMARY

Background: Youth gambling in Ireland is of growing concern.

Objectives: Thus, this study evaluated youth gambling protections in the Irish National Lottery's online age verification system.

Methods: A Tiger Team (Red Team) methodology was used. This involved using falsified National Lottery accounts ($n = 56$).

Results: Over half (55.4%) of attempts were successfully verified, with successful verification significantly varying by gender.

Conclusions: These findings highlight vulnerabilities in the National Lottery's online age-verification system and underscore the urgent need for more robust safeguards to prevent underage access.

Keywords: National Lottery; Youth gambling; Youth protections; Age verification; Ireland; Public health

INTRODUCTION

The gambling industry is currently undergoing rapid transformation. Due to increasing digitisation and technological advancements, gambling has become widely accessible 24 hours a day [1]. This ease of access has increased the industry's revenue exponentially, with consumer net losses predicted to reach almost US\$700 billion by 2028 [2]. Ireland poses as a major contributor to this expansion, with €9.8 billion staked by the population in 2019 [3], making the Irish the fourth-biggest gamblers in the European Union [4-5]. Ireland's National Drugs and Alcohol survey (NDAS) revealed that 49% of the adult population engaged in gambling activity in the year 2019-20, with this figure dropping to just 20% upon exclusion of the lottery [6]. The National Lottery has also expanded its digital reach within recent years – with online platforms amassing €132.2 million in game sales in 2023 [7].

This extended outreach of The National Lottery may seem benign, given that lottery purchases are often not considered gambling [8]. However, online gambling can pose additional negative consequences in comparison to offline counterparts; such as poorer physical and mental health, lower overall quality of life and greater financial insecurity [9]. Furthermore, possessing online gambling accounts and/or mobile gambling apps has been linked with higher reports of problematic gambling behaviours [10]. Recent estimates from the Economic and Social Research Institute (ESRI) suggest that 1 in 30 (or 130,000) adults in Ireland suffer from problem gambling [11], with a further 7.1% (or 279,000 adults) demonstrating 'moderate evidence' of problem gambling.

In addition to the elevated risks of addiction, online gambling also raises issues of underage access and harm [12]. Youth gambling is a major concern, with the European School Survey Project on Alcohol and Other Drugs (ESPAD) for Ireland 2024 reporting that

32.2% of 15-16 year-olds had gambled for money in the year 2024 [13] (up from 24% in 2019 [14]). Furthermore, 26.1% of adolescents reported utilising online gambling platforms [13], associated with a 4.2-fold higher odds of excessive gambling [14]. Lotteries remain among the most common gambling activities for adolescents, with 15.6% engaging in lotteries on-site, and a further 7.2% online [13].

Despite National Lottery gambling often being normalised among Irish households [8, 15], recent evidence has demonstrated that gambling before the age of 18 almost doubles the probability of developing problem gambling in adulthood [16]. Similarly, an examination of 3,000 individuals treated for problem gambling in Ireland, between 2008-2019, discovered that half of these adults had begun to gamble before age 17 [17]. Moreover, online gambling at age 17 was found to be a significant independent predictor of engagement in online gambling at age 20, alongside team sport participation [18]. Recent research has demonstrated that Irish online gambling sites perform poorly in terms of responsible gambling compared to other jurisdictions [12].

In response to the illegality of underage gambling, the Irish Office of the Regulator of the National Lottery (ORNL) commissioned two 'test purchasing' exercises on the under-age purchase of National Lottery products in retail premises by Ipsos MRBI, in 2018 and 2024 respectively. A test purchase exercise involves an agency hiring children to try and purchase items with a minimum age requirement. Such tests are used in many countries to assess compliance with legislation restricting the purchase of cigarettes, alcohol, or in this lottery tickets/ scratch cards.

In 2024, 562 retail premises were tested. The research found that 71% of test purchases by 15-17 year olds were challenged, an 8% increase on 2018 [19]. Nevertheless, despite 92% of outlets displaying the mandatory '18+' signage, almost 3 in 10 test purchases were not refused [20]. As can be seen in the extract of Ireland's National Lottery Act, 2013, detailed in Table 1, it is illegal to sell National Lottery tickets to children.

Table 1. Ireland's National Lottery Act, 2013 [21]

Sale of National Lottery tickets

42...

(6) A person, including the operator, shall not sell or offer for sale by any means a National Lottery ticket to a person under the age of 18 years or invite from such a person an offer to buy a National Lottery ticket.

Ireland has a poor record of enforcement of Public Health related legislation. This can be seen in relation to tobacco [22-23], alcohol [24-26], and gambling control [27], as well as in relation to road safety enforcement [28-33], and environmental protections [34].

As established, the gambling industry is becoming increasingly digital in nature. Despite this shift,

experimental research surrounding the underage accessibility of online gambling platforms remains limited. Recent evidence on responsible gambling practices across 39 Irish websites found that 94.9% of operators did not require registrants to provide identity documents [13]. This raises concerns regarding the adequacy of age-verification measures in protecting young people. Accordingly, the present study sought to test whether underage individuals could successfully register for online gambling accounts in the Irish context. Given its ubiquity and cultural normalisation, the National Lottery was selected as the case platform.

METHOD

This research aimed to explore the effectiveness of underage youth player protections on Ireland's National Lottery. To do so this study adopted a Tiger Team approach to exploring underage player protections in the National Lottery [35]. A Tiger Team approach, sometimes referred to as a Red Team or Red Teaming, involves covert attempts to gain entry to specific sites [36]. Although the term was originally employed to describe elite special forces testing physical security systems it evolved to cover the testing of cyber-security systems [37-38]. As such this study employed deception, a strategy that can be employed deliberately and thoughtfully in psychological and social science research to good effect [39-41]. Although care is always needed when using deceptive methods in research this research was conducted on the basis of its aim to deliver a public good [42], it was reasonable in this specific context [40]. We conducted an experimental assessment of age-verification procedures on the official Irish National Lottery online platform (lottery.ie). 60 test accounts were created, evenly distributed by gender and assigned stereotypical Irish names (e.g., *Róisín Murphy*, *Tadhg Daly*).

Unique email accounts were generated for each fictitious identity using ten different providers (e.g., Outlook, Gmail & Yahoo). The emails were then employed to register for online lottery accounts. Creating lottery accounts further consisted of providing a fabricated home address, date of birth, phone number and answers to two security questions ('Your mother's maiden name' and 'Your place of birth').

In order to assess the age-verification processes of the National Lottery, counterfeit blank identity documents (IDs) were initially created within Adobe Photoshop to simulate required government-issued photographic ID. This blank was then imported into Microsoft PowerPoint and copied 60 times.

This research also sought to explore the potential impact of gender (male vs female) different forms of identity verification (passport vs driving licences) on the outcomes of attempts to establish fraudulent National Lottery accounts. Therefore, 30 Irish passport images

and 30 Irish driver licence images were generated, distributed evenly by gender. Publicly available headshots were used as photographs. These ID images were then printed and re-photographed to mimic a typical upload. Finally, each account submitted images of the assigned falsified IDs through the lottery.ie online verification system.

Four accounts were excluded due to technical issues with email providers, leaving 56 test accounts (male = 28, female = 28). Verification outcomes were collected using MS Excel. Lottery accounts were created between December 2023 and March 2024; counterfeit IDs were submitted between September and December 2024. No gambling activity or financial transactions were undertaken as part of this research project. It is worth noting that gambling activity is not permitted by the National Lottery prior to successful ID verification.

This research was approved by the Research Ethics Committee at the Technological University of the Shannon (TUS) Midwest.

RESULTS

All 56 test accounts (100%) successfully registered for lottery.ie. Upon submitting counterfeit IDs, 31 accounts received verification (55.4%). The remaining 25 accounts (44.6%) were blocked by the National Lottery. Blocking occurred at different stages; 9 accounts (16.1%) were blocked after submitting IDs for verification, 4 accounts (7.1%) during ID submission, and 12 accounts (21.4%) before ID submission.

Therefore, a total of 44 IDs were submitted to the National Lottery (25 passports and 19 driver's licences). Of these, 20 passports (45.5%) and 11 driver's licences (25%) were verified. Chi-square analysis did not identify this difference as significant.

Verification outcomes differed significantly by gender. 25 female IDs (89.3%) were verified, compared to 6 male IDs (21.4%). Chi-square analysis identified this difference as statistically significant ($\chi^2(1) = 26.09, p < .001$).

DISCUSSION

The results indicate that the Irish National Lottery's online age-verification system is vulnerable, with over half of the falsified accounts (55.4%) being successfully verified. Female accounts were verified significantly more often than male accounts; potentially reflecting order effects as female IDs were submitted first. This result could also imply that males are subject to more stringent verification, consistent with evidence that males are more likely to gamble underage [13] and develop problem gambling [11].

Furthermore, all accounts were created from the same IP address, which may have influenced

verification outcomes and does not fully reflect real-world conditions. These findings highlight a public health concern, as early exposure to gambling increases the risk of problem gambling later in life [16,17].

CONCLUSION

Problem gambling is a significant problem for a small but substantial group within society [1,2,43]. The long-term impact of youth initiation into gambling is a particular concern for their future trajectories into problematic gambling [16]. Evidence to date has demonstrated that test-purchasing of National Lottery products has identified significant weaknesses in face-to-face purchasing [19-20]. This research extends this finding into the online arena. The National Lottery's online age-verification system inadequately prevents underage access, with over half of test accounts approved (55.4%). As such it fails to protect young people. Verification success varied significantly by gender in this analysis, with 'male' accounts being more likely to be rejected. Our findings underscore the need to implement reliable, robust verification measures to reduce youth exposure to gambling and associated harms. The National Lottery Act should be amended to include a system of routine underage test-purchasing checks, with associated penalties and enforcement for breaches. This evaluation should be completed by the State's Environmental Health Service, who should receive appropriate extra funding, personnel and training to take on this additional role.

FUNDING

This research received no external funding.

DATA AVAILABILITY STATEMENT

Data available on request from the authors.

CONFLICTS OF INTEREST

The authors declare no conflicts of interest.

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