





Youth Oriented Advertising in Ireland's National Lottery: A Quantitative Content Analysis of Advertisements

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SUMMARY

Background: Gambling on the National Lottery in Ireland peaked recently at an annual gross spend of over €1 billion. There is ample evidence of underage participation in the lotto. Youth participation in gambling is associated with problematic gambling in adulthood. A recent examination of the National Lottery's website identified child-friendly Halloween themed advertising.

Objectives: This research sought to investigate National Lottery advertisements to identify potentially child and youth-oriented marketing.

Methods: Quantitative content analysis of 127 video advertisements hosted on the National Lottery YouTube website were examined, using a pre-constructed six item framework.

Results: There was evidence relating to three of the six categories of content examined. In total 21.3% (n=27) of the videos examined made direct use of signs, symbols, themes, drawings, fictitious characters, or real people of primary or particular appeal to children. A total of 6.3% (n=8) of the videos examined included children, while 0.8% (n=1) featured adolescent, juvenile, or loutish behaviour.

Conclusions: Child-friendly marketing is present in National Lottery advertising. A more robust assessment of all National Lottery marketing materials is required. The Gambling Regulation Act, 2024, should be extended to oversee all gambling in Ireland, including the National Lottery. A public health approach to gambling is required across all state agencies and the Government.

Keywords: Gambling Lottery; children adolescents Ireland advertising

INTRODUCTION

The global gambling industry is rapidly developing. As a result of improvements in digitisation and information and communications technology, access to gambling has now become almost ubiquitous for much of the population [1]. The industry's global revenue has increased significantly, and it has been projected that by 2028, consumer net losses are expected to approach US\$700 billion [2]. Ireland is a significant contributor to this growth. In 2019, the Irish population were in the top-quartile of gamblers in the EU [3];

wagering an estimated €9.8 billion [4]. In 2024, Ireland's online gambling market was estimated to be €1.24 billion, with forecasts suggesting that it will increase to €1.40 billion by 2029 [5].

With ticket sales in excess €1 billion in 2021 [6], the National Lottery accounts for a substantial proportion of Irish gambling. According to the National Drugs and Alcohol Survey (NDAS), almost half (49%) of Irish adults gambled in the year 2019-20, with 29% accredited to the lottery alone [7]. The National Lottery has also strategically increased its online offerings in recent years, with their online gambling platforms delivering €155.1 million worth of sales in 2024 [8].

DOI: 10.54103/2282-0930/30498

Accepted: 10th January 2025

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The National Lottery's broadening online offerings may appear harmless to many, as lottery wagers are often not even considered gambling [9]. However, such an approach is naive. Online gambling can incur equally detrimental effects, including adverse mental and physical health outcomes, lower quality of life, and increasing financial precarity [10]. Mobile gambling applications and online gambling accounts have also been associated with reports of problematic gambling practices [11]. According to recent estimates from the Economic and Social Research Institute (ESRI), 1 in 30 adults in Ireland, or 130,000 people, suffer from 'problem gambling'. In addition, another 7.1% of adults, or 279,000 people, display 'moderate evidence' of problem gambling [12]. This figure is approximately ten times higher than previous estimates. Problematic gambling has been identified as a global issue [13].

The problems associated with gambling on national and state lotteries have been noted internationally [14-15]. An examination of a country's national lottery can be very revealing, as it exemplifies what Markham & Young term '*the global industry-state gambling complex*' [16]. Gambling is increasingly acknowledged as an important commercial determinant of health (CDoH) nationally and internationally [2]. In Ireland the College of Psychiatrists of Ireland have stated that gambling is a 'major Public Health concern' [17].

The damage caused by gambling must not be under-stated [18-21], despite the careful framing by the gambling industry [22-27]. Langham et al. have created a useful taxonomy of gambling harms that focusses on varying dimensions and timespans [28]. When evaluating the harms caused by the global gambling industry it is helpful to consider the impacts on individuals, as well as on partners and families. However, there is also substantial evidence that organised crime routinely utilises the gambling industry to both increase and launder profits from various criminal activities, including illicit drugs revenue, people trafficking and illegal sex work [29-39].

Returning to an individual perspective, online access not only increases the likelihood of addiction to gambling but also poses the additional hazards of underage access and harm [40-41]. The most recent report of the European School Survey Project on Alcohol and Other Drugs (ESPAD) for Ireland in 2024 noted that 32.2% of 15-16-year-olds had wagered in that year [40], which increased 24% in 2019 [42]. Such figures serve to highlight the serious issue of youth gambling. In addition, 26.1% of adolescent participants reported using online gambling platforms [42]. Young people using online platforms had a 4.2-fold increased risk of problem gambling [43]. Lotteries remain one of the most popular forms of teenage gambling, with a reported 15.6% playing in person and 7.2% playing online [40].

Gambling on the National Lottery is often considered acceptable within Irish households [9, 43]. However, recent research has shown that gambling prior to age

18 nearly doubles the likelihood of problem gambling in adulthood [44]. An examination of 3,000 adults in Ireland who received treatment for problem gambling between the years 2008 and 2019 noted that half of the cohort had started gambling prior to being 17 years of age [45]. Online gambling at 17 years of age has been identified as a significant independent predictor of online gambling activity at age 20 [44].

The National Lottery in Ireland is not unaware of the issue of youth gambling, including underage purchase of their tickets. For example, two underage purchasing exercises on National Lottery items in retail establishments by Ipsos MRBI, were commissioned by the Office of the Regulator of the National Lottery (ORNL), in 2018 and 2024 respectively [46-47]. A total of 562 retail locations were included in the 2024 repeat of the exercise. In this iteration of the study, 29% of test purchases made by 15-17-year-olds were successful [47]. In 2018 the figure for successful purchases was 37% [46].

Gambling in Ireland is notable in that its legislative regulation is divided between National Lottery gambling, and most other forms of gambling. The Irish National Lottery is therefore explicitly exempted from Ireland's Gambling Regulation Act, 2024 [48]. Ireland traditionally has operated a light-touch approach to Government regulation in many commercial spheres [49-50]. Instead, it has supported self-regulation by industry. Therefore, many of the advertising voluntary codes in Ireland explicitly exclude all [51], or the majority, elements of National Lottery advertising [52].

Although officially excluded from such codes, it must be acknowledged that the National Lottery's own codes of marketing and advertising practice are effectively identical to wider industry codes [51-52]. Details of the *National Lottery Advertising and Promotion Code of Practice* from Premier Lotteries Ireland [53], the Operator of the National Lottery in Ireland are detailed in Table 1.

Table 1. National Lottery Advertising and Promotion Code of Practice [53]

Under 18 (Children)

29. Advertising and Promotion activities shall not exploit the susceptibilities, aspirations, credulity, inexperience or lack of knowledge of children;
30. Advertising and Promotion activities shall not be likely to be of particular appeal to children, especially by being associated with youth culture;
31. Advertising and Promotion activities shall not make direct use of:
- a. signs, symbols, themes, drawings, fictitious characters or real people of primary or particular appeal to children;
 - b. depict adolescent, juvenile or loutish behaviour;
 - c. contain endorsements by recognisable figures who would be regarded as heroes or heroines of children; or
 - d. induce a child to regard National Lottery play as a natural element of his or her leisure time/activities;
32. Advertising and Promotion activities shall not be aimed at persons under 18 years of age;
33. Social media Advertising and Promotion will be designed by PLI to reach only those who are 21+;
34. No suggestion/inference shall be made (in any Advertising and Promotion activities) that anyone under the age of 18 years of age may participate in a National Lottery Game;

The Annual Report of the Regulator of the National Lottery for the year 2017 notes that a breach in advertising standards by the Operator of the National Lottery was observed [54]. Minimal details are given, although no fine appears to have been issued in relation to this breach.

It is clear from the Office of the Regulator of the National Lottery (ORNL) annual reports, that new games and marketing materials proposed by the lottery operator are assessed. The outcomes of such evaluations are annually detailed in the yearly reports of the Regulator. However, a review of these annual reports for the last three years (2022-2024) appears to detail just three instances of game related proposals having been refused approval [55-57]. No details are given in the reports of such rejections, merely the phrase 'Commercially Sensitive' [57].

Youth focussed marketing by the addiction industries has been explored by researchers from a range of countries in recent decades [58-62]. This research has included an examination of the tactics and strategies used by 'Big Gambling' to target young people [24, 63-66].

Similar research has been carried out in Ireland. A recent study by Daly et al. noted child-friendly Halloween themed images for gambling games on Ireland's National Lottery website [67]. Kerr et al. recently explored gambling advertising to young people aged 14-14 in Ireland and stated it had reached saturation level [68]. These authors were so concerned by their findings that they stated that the situation 'warrants calling a 'Code-Red' emergency' [68]. This is a particular concern in terms of underage gambling, as other research by Daly et al has also noted inadequate age verification checks in Ireland's National Lottery [69]. This finding reinforces earlier research that noted inadequate protections for patrons of Irish online gambling platforms [70].

METHOD

This research sought to investigate other National Lottery advertising materials to determine how child friendly they are. This project utilised quantitative content analysis of visual imagery displayed on Ireland's National Lottery YouTube Channel. This approach is routinely used in media analysis [71]. In Rose's ground-breaking text on visual methodologies she outlines four steps to quantitative content analysis [72]: Finding your images; Devising your categories; Coding the images; Analysing the results. Content analysis of the YouTube videos was based on a priori codes that were developed largely based on child protection marketing guidelines in place in Ireland [51-53]. One additional category examined was that of the inclusion of children in adverts, as this is an acknowledged marketing strategy for appealing to children [73-74]. Table 2 details the categories examined. Content of the videos was screened by one of the authors (FH) and then discussed and agreed with another author (DH).

Table 2. Coding Framework for Content Analysis

Category
Contains advertising and promotion activities that...
1) ...exploit the susceptibilities, aspirations, credulity, inexperience, or lack of knowledge of children
2) ...make direct use of signs, symbols, themes, drawings, fictitious characters, or real people of primary or particular appeal to children
3) ...depict adolescent, juvenile, or loutish behaviour
4) ...contain endorsements by recognisable figures who would be regarded as heroes or heroines of children
5) ...induce a child to regard National Lottery play as a natural element of his or her leisure time/activities
6) ...include children

This project focussed on the Irish National Lottery YouTube Channel website (<http://www.youtube.com/IrishNationalLottery>). This site in turn links to the National Lottery website (lottery.ie), as well as to Twitter (twitter.com/NationalLottery), Facebook (facebook.com/nationallotteryireland) and Instagram (instagram.com/nationallottery). At the time of the analysis (October 2025) the National Lottery YouTube site contained 18 categories of playlist (<https://www.youtube.com/@IrishNationalLottery/playlists>). Six of these categories were not adverts but video clips showing the weekly results of draws, awards ceremonies, or outlines of how the money raised via the lottery was spent rather than adverts. These were excluded from the analysis, which left 133 videos for analysis. However, 6 videos were unavailable on YouTube, leaving 127 videos for analysis.

As this analysis was based on publicly accessible webpages, this research did not require ethical approval. This analysis was based on video clips contained on the Irish National Lottery YouTube channel.









RESULTS

The results of the quantitative content analysis of the 127 videos are detailed in Table 3 [72]. There were no examples of content relating to three of the six categories of material examined. However, there was evidence relating to categories two, three and six. Of most concern is the finding that 21.3% (n=27) of the videos examined made direct use of signs, symbols, themes, drawings, fictitious characters, or real people of primary or particular appeal to children. In total, 6.3% (n=8) of the videos examined included children, while 0.8% (n=1) featured adolescent, juvenile, or loutish behaviour.

Table 3. Coding Framework for Content Analysis

Category	Number of Videos Exhibiting Codes	Number of Videos Examined
Contains advertising and promotion activities that...		
1) ...exploit the susceptibilities, aspirations, credulity, inexperience, or lack of knowledge of children	0% (n=0)	127
2) ...make direct use of signs, symbols, themes, drawings, fictitious characters, or real people of primary or particular appeal to children	21.3% (n=27)	127
3) ...depict adolescent, juvenile, or loutish behaviour	0.8% (n=1)	127
4) ...contain endorsements by recognisable figures who would be regarded as heroes or heroines of children	0% (n=0)	127
5) ...induce a child to regard National Lottery play as a natural element of his or her leisure time/activities	0% (n=0)	127
6) ...include children	6.3% (n=8)	127

Figure 1. Exemplars of Child-Friendly Content from Videos Included on the Official National Lottery YouTube Channel

<p>Anthropomorphic Washing Machine ('Hank')</p> 	<p>Waterslide</p> 
<p>Soft Toy Character</p> 	<p>Another Soft Toy Character</p> 
<p>Soft Toy Characters in Sunglasses</p> 	<p>Tyre Swing</p> 
<p>Tree House</p> 	<p>Wooden Toy Characters</p> 

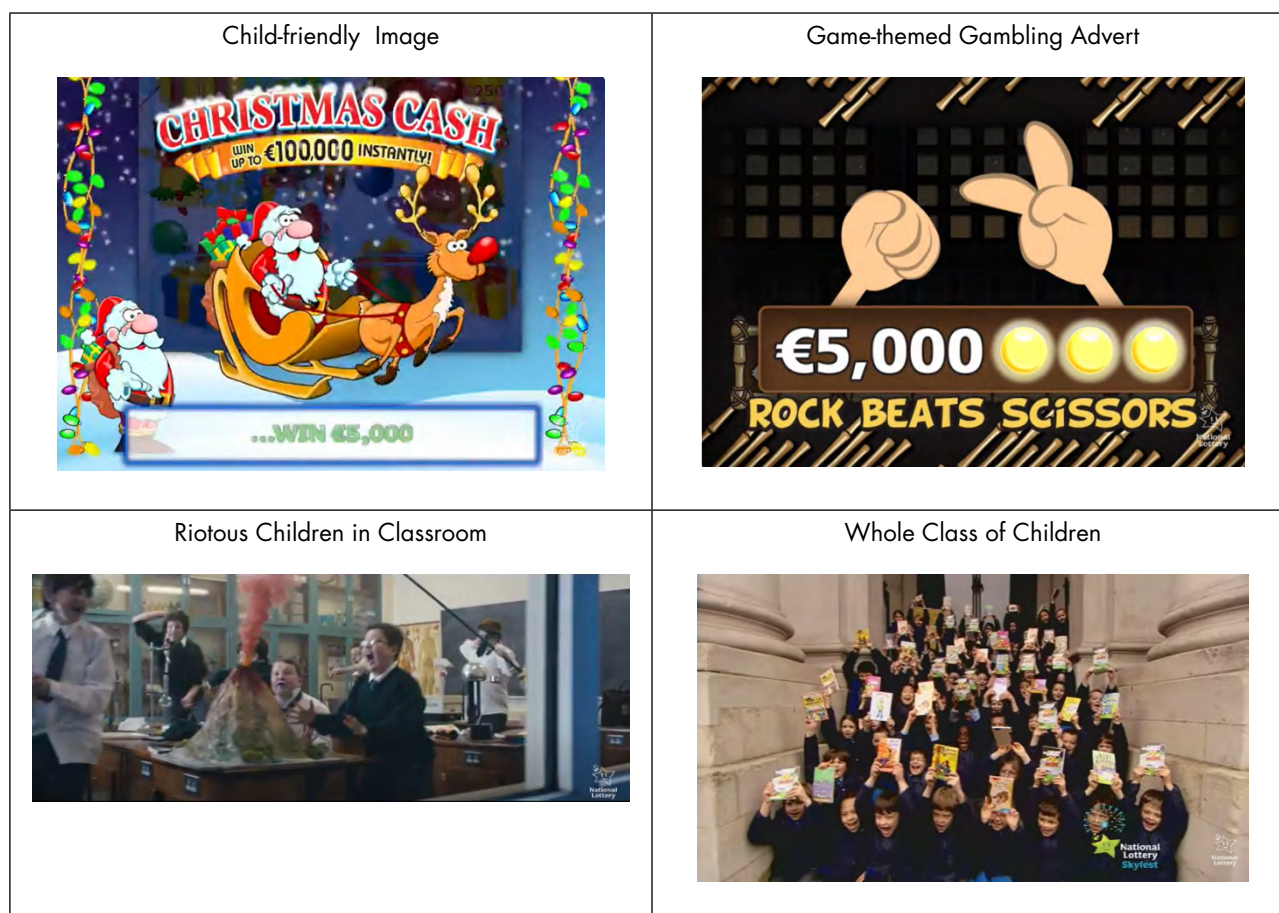


Figure 1 details exemplars of some of the imagery used in the advertisements. Please note that these images are stills taken from the videos. To see a selection of the videos themselves, please see Appendix 1. Imagery categorised as Category 2 include anthropomorphic machines (see Figure 2a), a colourful waterslide (see Figure 2b), and speaking soft toy style characters (see Figures 2c, 2d and 2e). Other images include a tyre-swing (see Figure 2f), and a tree house (see Figure 2g).

Further imagery categorised under Category 2 include the wooden toy characters ('Jaspar'; see Figure 2h), as well as the youth-oriented online gambling featured in images 2i (Santa Clause/ Father Christmas & Rudolf) and 2j (the rock, paper, scissors game). In relation to the other categories in the coding framework, figure 2k includes both a depiction of juvenile and loutish behaviour (Category 3) and children (Category 6), while image 2l features an entire class of children (Category 6).

DISCUSSION

It is an issue of concern that evidence relating to three of the six categories examined in the quantitative content analysis was observed. Of particular note was the finding that 21.3% of videos examined featured

material that made 'direct use of signs, symbols, themes, drawings, fictitious characters, or real people of primary or particular appeal to children' [53]. Given the ostensible prohibition on such imagery and themes this would finding appear to indicate a lack of robust appraisal of National Lottery advertising materials.

This finding is important given evidence relating to underage gambling. Evidence suggests that early initiation to gambling is a significant predictor of future gambling issues [65,70-78]. Youth gambling on the National Lottery in Ireland is an acknowledged problem dating back many years [46]. This is notable given both the identified poor performance of the Irish National Lottery age verification process [69], and the child-oriented nature of some National Lottery online game advertising [67]. It is therefore an issue of significant concern that over 20% of elements of National Lottery videos in this sample from the official National Lottery YouTube site featured child friendly imagery. It has been suggested that such marketing is 'priming young minds' for gambling [79].

The values of the Office of the Regulator of the National Lottery are listed as: Independence; Guardianship; Future Focused; Accountability; Professionalism; Valuing Our People; and Transparency [57]. The most important of these in the context of this examination is that of Guardianship. This is described

Table 4: Functions of the Office of the Regulator of the (Irish) National Lottery [81]

The Functions of the Regulator which support the vision above, are prescribed in the National Lottery Act 2013, and include the following:

1. To procure the holding of the National Lottery.
2. To oversee the operation of the National Lottery and to monitor and enforce compliance by the Operator with the Act and the Licence.
3. To consider for approval certain matters relating to the National Lottery (including schemes for National Lottery games).
4. To manage and control the National Lottery Fund.
5. To exercise the enforcement rights of any trademark of the National Lottery.

The Regulator is required to carry out these functions in a manner most likely to ensure –

- a) that the National Lottery is run with all due propriety,
- b) that the interests of participants in the National Lottery are protected,
- c) that the long-term sustainability of the National Lottery is safeguarded,

and, subject to above points a) to c), to ensure revenues allocated to the Central Fund for disbursement for the purposes permitted by the Act ("Good Causes") are as great as possible, subject to the terms of the Licence

by the Regulator as 'Acting in the public interest with integrity' [57]. The functions of the Regulator of the Irish Lottery are listed in Table 4. However, it is clear that the ORNL has competing and potentially opposing functions that may force it into a compromised position. This is particularly important for an addiction industry, such as gambling, as there is substantial evidence of the pareto (80/20) principal, in which 80% or more of total income is derived from 20% of participants [42, 80].

Thus, the Regulator of the National Lottery is placed in the invidious position of having to both safeguard the long-term viability of the National Lottery, while at the same time seeking to protect gamblers, and safeguard children. This delicate equilibrium is supposed to be achieved, while also maximising revenue. This may force the ORNL into moral jeopardy wherein

they compromise on player protections in order to safeguard the money being raised to support 'Good Causes' and the financial viability of the National Lottery itself [82-84].

Examination of the Annual Report of the Office of the Regulator of the National Lottery indicates a penalty was imposed in 2022. The Regulator withheld €150,000 in 2022 for breaches of the licence [55]. It is notable that, as the Regulator stated this 'was the first withholding of monies from payments due to the Operator under the Licence' [55]. Subsequently in 2024 the Regulator withheld €23,000 for another breach [57].

Table 5: Payments & Fines Levied by the Office of the Regulator of the (Irish) National Lottery (ORNL) to the Operator of the National Lottery [54-57, 85-90]

Year	Payments made to the Lottery Operator	Monies Withheld
2014	€61 million	€0 (0%)
2015	€74 million	€0 (0%)
2016	€69 million	€0 (0%)
2017	€74 million	€0 (0%)
2018	€73 million	€0 (0%)
2019	€83 million	€0 (0%)
2020	€89 million	€0 (0%)
2021	€103 million	€0 (0%)
2022	€90 million	€150,000 (0.0017%)
2023	€84 million	€0 (0%)
2024	€82 million	€23,000 (0.0003%)
TOTAL	€882 million	€173,000 (0.0002%)

The total fines or payments withheld of just 0.0002% of income to the operator (this figure relates purely to their return and excludes prizes, money paid to the Government for re-allocation to 'Good Causes', and a sizeable advertising budget) is miniscule in the context of income (See Table 5). Given inadequate youth protections observed in the operation of the lottery [46,47,69], and child & youth oriented National Lottery marketing observed in this study, and elsewhere [67], it is hard to understand why this figure is so low. In the UK in contrast, gambling operators have been forced to pay multimillion-pound fines for breaching consumer-protection and under-18 gambling regulations [91].

CONCLUSION

A proportion of the population either regularly or periodically engage in problematic gambling [2,7,12,92]. Many adult problem gamblers have a history of underage gambling [42]. Therefore, any child-friendly lotto advertising is a significant issue. It is strongly recommended that child friendly marketing videos on the official National Lottery YouTube website are deleted. Moving forward, it is crucial that a significantly more robust assessment of National Lottery marketing and promotion materials is enforced by the ORNL. As regards policy options, it is suggested that Ireland's new Gambling Regulation Act, 2024, is extended to cover the National Lottery [48]. This would eliminate the problematic and potentially compromised role of the ORNL in having to safeguard gamblers, ensure the viability of the National Lottery, and raise funds for 'Good Causes'. Such legislation would also force the operator of the National Lottery operator to be subject to more restricted marketing rules that will be introduced for other gambling companies under the Gambling Regulation Act, 2024 [48]. It is also imperative that the Government of Ireland and the ORNL adopt a public health approach to gambling [2,93].

Further research could usefully explore child and youth perceptions of National Lottery advertising. Additional research should also be conducted to explore other communications and marketing practices of the National Lottery to develop a more rounded appraisal of their marketing activities. Similar evaluations are additionally required to explore the marketing strategies of other gambling companies in Ireland.

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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Appendix 1

https://www.youtube.com/watch?v=wlx_M_YqIAk&list=PLf_rtlzFiefc0OvWhl4dfCkanV_eeHFC1&index=39
https://www.youtube.com/watch?v=Sv0chgbmPIA&list=PLf_rtlzFiefc0OvWhl4dfCkanV_eeHFC1&index=46
https://www.youtube.com/watch?v=d7JaRdkW4rE&list=PLf_rtlzFiefd6_FB0UF6kRP-Dfy7N3Ps&index=5
https://www.youtube.com/watch?v=upiWlNzB_k&list=PLf_rtlzFiefd6_FB0UF6kRP-Dfy7N3Ps&index=6
https://www.youtube.com/watch?v=Vr-dEdhWhjw&list=PLf_rtlzFiefd6_FB0UF6kRP-Dfy7N3Ps&index=2
https://www.youtube.com/watch?v=BqDalTYOpYE&list=PLf_rtlzFiefc0OvWhl4dfCkanV_eeHFC1&index=35
https://www.youtube.com/watch?v=pbL2lQyCQkA&list=PLf_rtlzFiefc0OvWhl4dfCkanV_eeHFC1&index=36
https://www.youtube.com/watch?v=ZVanc3AIS4g&list=PLf_rtlzFiefc0OvWhl4dfCkanV_eeHFC1&index=33
<https://www.youtube.com/watch?v=ljukoQQK1Bg&list=PL1812C775291CB82C&index=5>
https://www.youtube.com/watch?v=pyYbLNEglOs&list=PLf_rtlzFiefc0OvWhl4dfCkanV_eeHFC1&index=7