





Child-Oriented Marketing Practices Associated with Ireland's Televised National Lottery Draws: A Secondary Analysis of Associated Programming and Screening Times

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SUMMARY

Background: There is sustained evidence of youth National Lottery participation in Ireland. Youth participation in gambling is associated with future problem gambling in adulthood. Recent evidence suggests that National Lottery marketing materials in Ireland are overly child oriented.

Objectives: This study explored child-oriented marketing practices associated with National Lottery draws in Ireland.

Methods: Secondary analysis of data relating to National Lottery draw scheduling for 2023 and 2023 was examined to determine scheduling time and associated programming.

Results: National Lottery draws in Ireland routinely take place at approximately 8.00pm on Saturdays and Wednesdays, long before the 9.00pm watershed in broadcasting. All of the associated programming with this time slot is 12/12A or younger (for a General audience [G], or Parental Guidance [PG]).

Conclusions: These findings highlight longstanding child-oriented marketing practices associated with the National Lottery in Ireland. It is recommended that live National Lottery draws are moved to after the 9pm (21:00 Hrs) television broadcasting watershed. It is also suggested that current legislative separations are removed and the National Lottery becomes regulated under the more stringent Gambling Regulation Act, 2024. Finally, it is argued that a public health approach to all forms of gambling, including national lotteries, is adopted by the Office of the Regulator of the National Lottery (ORNLI) and the Irish Government.

Keywords: National Lottery; Lotto; Youth gambling; Marketing; Advertising; Ireland; Public Health; Health Promotion

INTRODUCTION

Recent research has identified child and youth-oriented advertising for the National Lottery and its products in Ireland [1-2]. Ireland is not alone in having identified such youth-focussed marketing by the gambling industry. Research has noted similar issues in the UK, Australia, New Zealand and elsewhere [3-7].

This is an important issue as online protections on Irish gambling platforms [8], including online

age verification mechanisms to prevent underage gambling, have been found to be lacking [9]. Underage protections designed to prevent the underage purchasing of lottery scratchcards in Ireland have equally been found wanting [10-11].

Such research is important as there is a significant volume of literature that has identified worrying levels of underage gambling in Ireland with almost a third of 15-16 year olds engaging in gambling [12-15]. An equally concerning level of gambling has also been noted amongst adults in Ireland [16]. Recent research

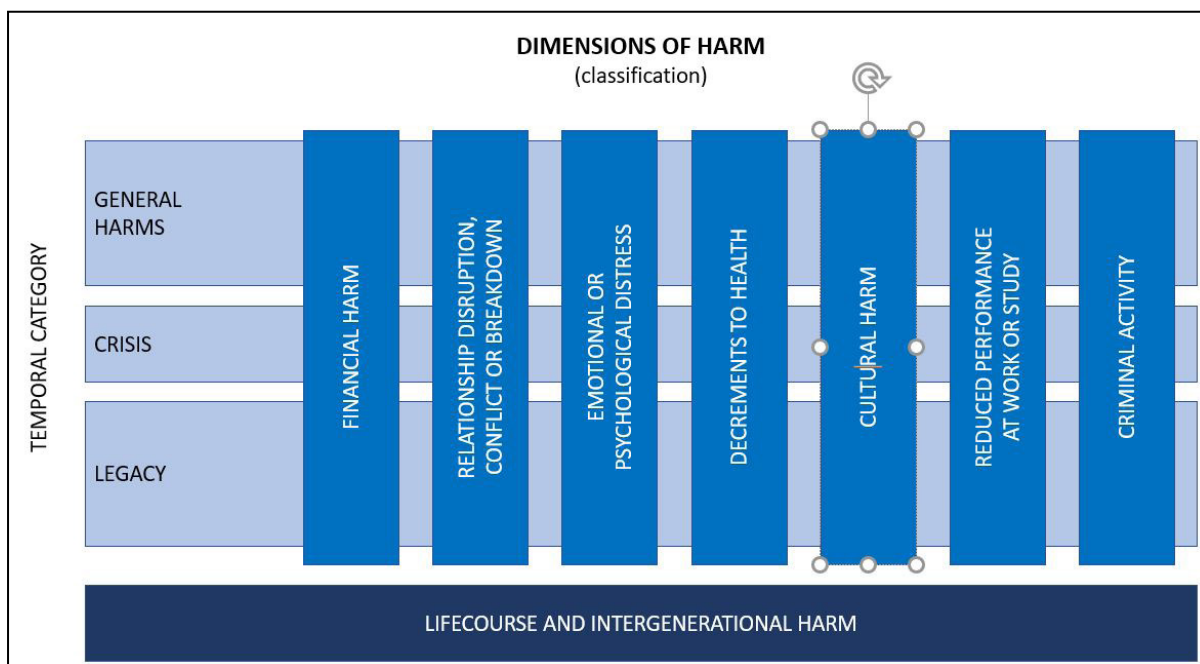
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Figure 1. Langham et al.'s Conceptual Framework of Gambling Related Harm [33]



has suggested there are 130,000 problem gamblers in Ireland, with another 279,000 people displaying evidence of problem gambling [14].

A significant element in the Irish gambling landscape is the National Lottery, which has had a gross revenue of between €829.4m and €1,053.7m in the last five years [17-21]. An important component in this growth has been the development of online lotto sales, which now constitute 18.1% of total sales and yielded €155.1 million in 2024 [21].

Underage gambling participation is a concern, as evidence suggests that youth gambling is more likely to lead to problematic gambling in adulthood [13, 23-25]. Concerns over youth lottery participation are not limited to Ireland [25-28]. The harms caused by gambling are extensive, impacting across a range of domains [29-32]. Langham et al. provide a useful typology of such harms, which are detailed in Figure 1 [33]. The negative impacts of gambling can extend intergenerationally, and include individual, family, community and societal harms [33-39].

Although the threat posed to children and young people by gambling and also gambling advertising is significant [7, 40], Ireland has traditionally opted

for light touch regulation, often denoted by industry self-regulation [41-43]. This approach has been in keeping with Ireland's traditionally conservative and increasingly neo-liberal government policies [41, 44-46].

Although Ireland has media advertising guidelines relating to children and gambling advertising, it is interesting to note that the National Lottery is explicitly exempt from these guidelines [47]. It must be acknowledged however that the *National Lottery Advertising and Promotion Code of Practice* [48] is almost identical to the guidelines that relate to the wider gambling industry [47, 49].

Of particular relevance to this examination is Section 37 of the *National Lottery Advertising and Promotion Code of Practice* which relates to the positioning of advertising viz-a-viz young people (see Table 1) [48].

As well as the National Lottery's own advertising and marketing policies, media broadcasters themselves have policies relating to both topics and audiences. Some pertinent aspects of Ireland's state broadcaster's (Raidió Teilifís Éireann [RTÉ]) content standards relating to children are detailed in Table 2 [50].

Table 1. National Lottery Advertising and Promotion Code of Practice [48]

Section 6. Under 18 (Children)...
32. Advertising and Promotion activities shall not be aimed at persons under 18 years of age...
37. No Advertising should appear in media or parts of media (to include online advertising and social media) directed primarily to people under the age of 18 years, or in media where more than 50% of the audience is expected to be under the age of 18;

Table 2. Child-oriented Programme Content Standards at RTÉ [50]

RTÉ Programme Content Standards

2.10 Children

...Content which might be unsuitable for children will be scheduled appropriately.

5.2 Our Standards on Harm and Offence

- We will not broadcast material that might seriously impair the physical, mental or moral development of children and young people.
- We observe the 9pm television watershed to ensure material that might be unsuitable for children is appropriately scheduled...

5.5 The Watershed and Scheduling for TV, Radio and Online Television Scheduling...

The 9pm television watershed is used to distinguish between programmes intended mainly for a general audience and those programmes intended for an adult audience... The 9pm watershed signals the beginning of the transition to more adult material, but the change should not be abrupt... Programmes broadcast between 5.30am and 9pm must be suitable for a general audience including children...

Scheduling of Programme

Promotions and Advertising

Promotions and advertising that are unsuitable for a general audience including children must be carefully scheduled. Promotions or adverts scheduled next to programmes targeted at children or when children are particularly likely to be watching, or in online content likely to appeal to a significant number of children, should be suitable for that audience.

These Programme Content Standards clearly articulate the importance of a 9.00pm (21:00 Hrs) watershed in programme content to safeguard children. As noted above, the National Lottery in Ireland is specifically exempt from the controls imposed by Ireland's Gambling Regulation Act, 2024 [51]. However, it is worthy of notice that other gambling operators such as Paddy Power, Betfair and Boyle Sports will be subject to such a watershed in advertising under this Act when it is enacted.

Table 3. Temporal Advertising Restrictions in Ireland's Gambling Regulation Act, 2024 [51]

Gambling Regulation Act, 2024 Prohibited hours for advertising on certain media

149. (1)... a licensee shall not enter into an arrangement (howsoever described) with an audio-visual on-demand media service, an on-demand sound service or a broadcaster for the purposes of advertising relevant content between the hours of 5:30 a.m. and 9:00 p.m. on the service concerned.

As can be seen in Table 3, the 9.00pm watershed in gambling advertising restrictions will be crucial when this recently passed legislation is enacted.

State lotteries often raise considerable revenues for the State [52-54]. As such they offer an interesting insight to what Markham & Young term the 'industry-state gambling complex' in Ireland [55]. This concept is particularly important in the context of this paper, given that not only is the State's National Lottery under examination, but so are the activities of the State broadcaster, RTÉ.

METHOD

As noted above a substantial proportion of the advertising content of Irish National Lottery marketing has been found to be child and youth oriented [1, 56]. However, to date there has been no examination of other potentially child-oriented aspects of National Lottery marketing, including the timing of National Lottery programming. In addition, to date, there has been no analysis of the contexts within which such National Lottery programming and marketing is featured. This research therefore sought to examine the timing of televised National Lottery draws, particularly in the context of the 9pm (21:00 hrs) watershed. It also sought to investigate the programming within which the televised draws appear, to determine if such programming was child and youth (<18 years) oriented. Finally, this research examined two years of data to explore potential temporal shifts.

National Lottery draws are televised live on Ireland's leading television channel RTÉ 1. These draws take place twice weekly, on Saturday and Wednesday evenings. The draws do not simply report the winning numbers, but feature a highly branded, glamourised and theatrical spectacle where each ball is consecutively extracted from the spinning metal spherical cage. As can be seen from Table 4, although not a form of advertising *per se*, the National Lottery draw is a form of marketing communication, as per the *National Lottery Advertising and Promotion Code of Practice* [48]. The colourful spinning draw may be viewed as a 'ritualized' media event [57]. The visual effects help secure brand legitimacy and holds audience engagement [58].

Table 4. National Lottery Advertising and Promotion Code of Practice [48]

Marketing Communications includes, but is not limited to, Advertising, as well as other techniques such as promotions, sponsorships, and direct marketing, and should be interpreted broadly to mean any form of communication produced directly by, or on behalf of PLI, intended primarily to promote the National Lottery and/or any National Lottery Game(s), to influence the behaviour of and/or to inform those to whom it is addressed...

Retrospective online retrieval of the relevant information proved impossible. However, RTÉ produces a weekly television and radio guide, the *RTÉ Guide*, which appears in print form, 51 times per year (there is a double issue at Christmas/ New Year). All RTÉ Guides for the years 2023 and 2024 were accessed through Ireland’s copyright library at Trinity College Dublin (TCD) and examined to try and determine the timing of the National Lottery draw and the programming before and after the National Lottery draw. An examination of the age rating of programmes either side of the National Lottery draw was conducted. This was primarily determined through the Irish Film Classification Office website (www.ifco.ie), using its online search facility (<https://www.ifco.ie/en/ifco/pages/titlesearch>). This IFCO age-rating classification schema can be seen in Table 5 [59].

This strategy worked very well for films but was less effective for television series. The age-rating of television series was primarily determined through

RTÉ’s online viewing platform, RTÉ Player (<https://www.rte.ie/player/>), which includes an age-rating for programming as standard. Data was manually entered into MS Excel and then analysed in SPSS using descriptive statistics and chi-square analysis.

This research was based on publicly available magazines, and as such ethical approval was not required.

RESULTS

There were 208 potential National Lottery draws within the two-year period (2023-2024). The RTÉ Guides detailed National Lottery draws on 196 occasions. It is unclear if the missing 12 draws did not take place (one was on Christmas Day) or were accidentally or deliberately left out of the RTÉ Guide (possibly due to space considerations).

The draws routinely take place at approximately 8.00pm. On Wednesdays these usually take place between a soap opera (typically *Eastenders*) and a cookery show. On Saturdays the draws either take place during, or immediately after the Saturday early evening film. Table 6 details the age classification of programming immediately adjacent to the televised National Lottery draws. None of the programming pre or post the draw was categorised as appropriate for ages 15 and above. Almost half (48.6%) of the pre-draw programming was categorised as 12 or 12A,

Table 5. Irish Film Classification Office Classifications [59]

Irish Film Classification Office (IFCO) Classifications				
Cinema Classifications			Home Entertainment Classifications	
Age Group	Classifications	Description	Classification	Description
Pre-teens (under 12s)	G	General audience: suitable for all viewers	G	General audience: suitable for all viewers
	PG	Parental guidance: a parent or guardian should decide if the content is suitable.	PG	Parental guidance: parents should decide if it is suitable
Early teens (12–15) The symbol 'A' stands for 'accompanied'	12A	Suitable for viewers of 12 years and over. Those younger than 12 may be admitted if accompanied by an adult.	12	Suitable for viewers of 12 years and over
	15A	Suitable for viewers of 15 years and over. Those younger than 15 may be admitted if accompanied by an adult.	15	Suitable for viewers of 15 years and over
16	16	Only those aged 16 and over can be admitted.		
18	18	Only those aged 18 and over can be admitted.	18	Suitable for viewers of 18 years and over

with much of the remainder categorised as either for a general audience (G; 22.6%), or parental guidance (PG; 23.1%).

Table 6. Age Classification of Programming Immediately Adjacent to Televised National Lottery Draws on RTÉ 1 in 2023-2024

Age Classification Rating	Programming Before the National Lottery Draw	Programming After the National Lottery Draw
G	22.6% (47)	62.5% (130)
PG	23.1% (48)	21.6% (45)
12/12A	48.6% (101)	10.1% (21)
15/15A	0% (0)	0% (0)
16	0% (0)	0% (0)
18	0% (0)	0% (0)
Missing Data	5.8% (12)	5.8% (12)
Total	100% (208)	100% (208)

Almost two-thirds (62.5%) of programming after the National Lottery draws were classified for a general audience (G), with much of the remainder being categorised as parental guidance (PG; 21.6%), or 12/12A (10.1%). Chi-square analysis was used to explore potential temporal changes in the age classification ratings of programming shown immediately before and after the National Lottery draw for the G to 12/12A programming. However, this analysis did not note statistically significant differences in either the before programming age ratings, $\chi^2 (2, N = 101) = 0.26, p = .876$, or the after programming age ratings, $\chi^2 (2, N = 99) = 1.53, p = .466$, between 2023 and 2024.

Table 7 details the timing of the National Lottery draws over the 2023-2024 period. In over half of

cases (56.2%) an exact time was detailed in the RTÉ Guides. Almost half (49%) of these took place at 8.00pm.

Table 7. Televised National Lottery Draw Times 2023-2024

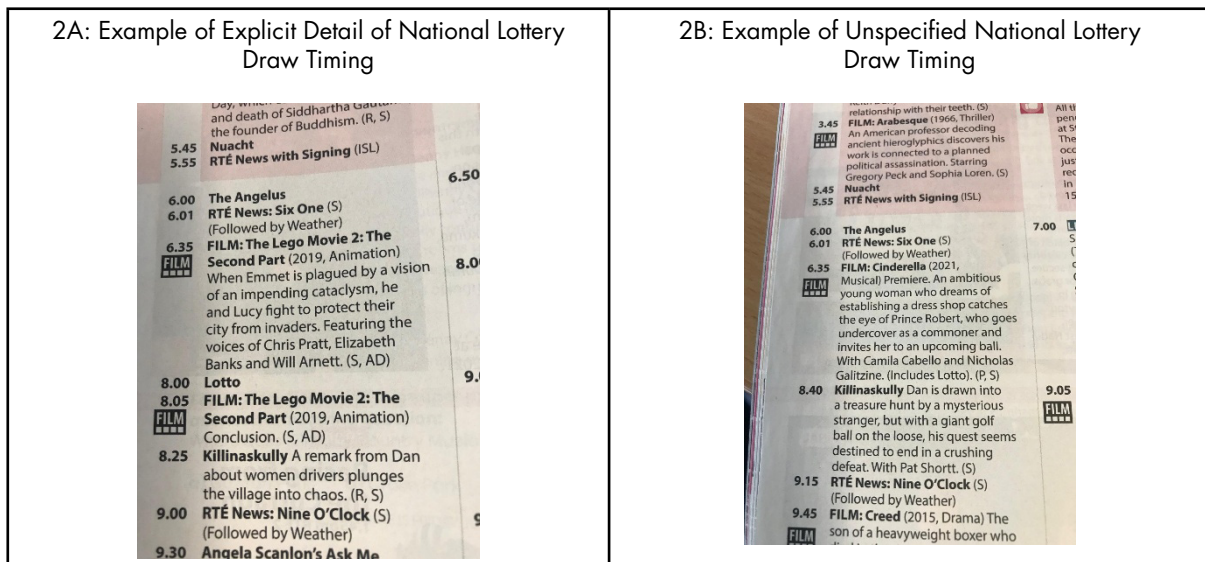
Time	
Approximately 8.00pm	49.0% (102)
Between 8.01pm and 8.30pm	7.2% (15)
Exact time unclear but before 9.00pm	35.6% (74)
Exact time unclear, but before 9.15pm	2.4% (5)
Missing	5.8% (12)
Total	100% (208)

If the Saturday early-evening film was due to finish shortly after 8.00pm, then the Lotto was sometimes delayed by a short time, hence why it was occasionally scheduled for between 8.10pm and 8.30pm (See Table Seven). However, the custom and practice is for the Saturday evening film to be paused at approximately 8.00pm and then re-started when the draw has finished. Table Seven details two rows where the exact timing of the lotto is unclear, however these are highly likely to have taken place at approximately 8.00pm. The times given in Table Seven indicate when the films finished. Occasionally a break in a film was detailed in the programme schedule (See Figure 2A), while often the text simply read 'includes Lotto' indicating that the film would be paused at approximately 8.00pm (See Figure 2B).

DISCUSSION

The results indicate that most televised draws of Ireland's National Lottery's routinely take place

Figure 2. Examples of Televised National Lottery Draw Times in RTÉ Guides



at around 8.00pm, long in advance of the 9.00pm broadcasting watershed. Perhaps of more concern is the programming immediately adjacent to the National Lottery draw. The highest age rating of any of this programming was either 12 or 12A, with much of it rated as being for a General (G) audience, or with Parental Guidance (PG). Such programming is a particular issue on Saturday evenings, when the National Lottery draw either takes place within or immediately after the screening of an early evening family-friendly film. No differences in the age-rating classifications of programming before or after the National Lottery draws was observed between 2023 and 2024.

Social learning theory suggests that gambling behaviours, such as lottery participation may become normalised for children through observation and association with trusted institutions, family viewing contexts, and positive affect. Research suggests children whose parents/families normalise gambling are more likely to engage in it, with paternal gambling being a particular risk factor [60-62]. Additionally, the pageantry and spectacle of the early evening National Lottery draw could also be viewed from a classical conditioning perspective in the context of child viewers, given the pairing of the draw with music, flashy lights, and a sense of excitement [63].

In December 2025, RTÉ announced that it may cease to produce the lottery draws, and will outsource this programming [64]. It remains to be seen if this will impact the timing, context and content of the National Lottery draws.

CONCLUSION

The results of this examination clearly indicate child-oriented marketing practices in National Lottery advertising. This is a significant concern given the acknowledged problem of both youth participation in the National Lottery in Ireland and the risk trajectories into problematic gambling in later life for many underage gamblers [13, 22-25]. Recent evidence in Ireland has noted the relative ease with which young people can access National Lottery scratchcards [10-11], and failures in Irish National Lottery age-verification protections [9], heighten the relevance of this research.

In the short term, the Office of the Regulator of the National Lottery (ORNL), which oversees the running of the lottery, should require any televised National Lottery draws to take place after the 9pm (21:00 hrs) watershed. This should help reduce the exposure of children and young people to the draw and its associated advertising and excitement. At present the National Lottery in Ireland has significant latitude in its advertising and marketing activities. In the longer term, it is suggested that Ireland's more restrictive Gambling Regulation Act (2024) is extended to include

the National Lottery [51]. The Irish Government and the ORNL need to adopt a public health perspective towards gambling [65-69].

This research is limited in its quantitative approach. Further phenomenological research could usefully explore perceptions of National Lottery draws and advertising from the perspective of children and young people. Future research might also usefully explore youth-oriented gambling marketing strategies in other jurisdictions.

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CONFLICTS OF INTEREST

The authors declare no conflicts of interest.

AVAILABILITY OF DATA AND MATERIALS

The data is available from the authors upon request.

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