



Original Research

Complicit in the Charade: A critical content analysis of the Annual Reports of Ireland's Regulator of the National Lottery 2014-2024

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Abstract

Background: The potential harms of gambling are routinely under-reported. Revenue from the National lottery in Ireland peaked in recent years at over €1 billion. The National Lottery in Ireland is regulated by the Office of the Regulator of the National Lottery (ORNL). Other forms of gambling are subject to the Gambling Regulation Act, 2024. Participation in the National Lottery is often not considered gambling.

Methods: Reports of the Regulator of the National Lottery between 2014 and 2024 were examined using critical content analysis (CCA) to explore the framing of the National Lottery.

Results: Participating in the National Lottery is routinely framed in terms of play, and as a game. The Annual Reports also focus intensely on Good Causes and prizes. A focus on governance, safety, and player protection in the reports is also evident. In contrast, the terms Gambling/Gambler/Gamble are seldom mentioned, while terms such as addict/addiction or danger never appear across the entire dataset.

Conclusion: The Annual Reports of the Office of the Regulator of the National Lottery (ORNL) frame the National Lottery in a very positive light and portray participation as a game in which prizes can be won. This serves to minimise negative aspects of gambling. To protect gamblers using the National Lottery, a public health approach to gambling needs to be adopted by both the Irish Government and the ORNL.

Keywords: *Addiction; Framing; Gambling; Ireland; Lottery; Lotto; Regulation; Public Health.*

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Introduction

Marionneau et al. (2022) have discussed the rise of a global gambling industry from earlier, often local, and charitable origins. The gambling industry in Ireland is now estimated to be worth over €10 billion per annum (Hutton, 2021). Evidence suggests that the value of per capita gambling there is particularly high, averaging €300 per adult per annum (Michael, 2019; Hutton, 2021; Griffiths, 2009). Ireland's National Lottery alone is estimated to be worth approximately €1 billion per year (Regulator of the National Lottery, 2021; 2022; 2023; 2024). As such gambling represents an important commercial determinant of health (CDoH).

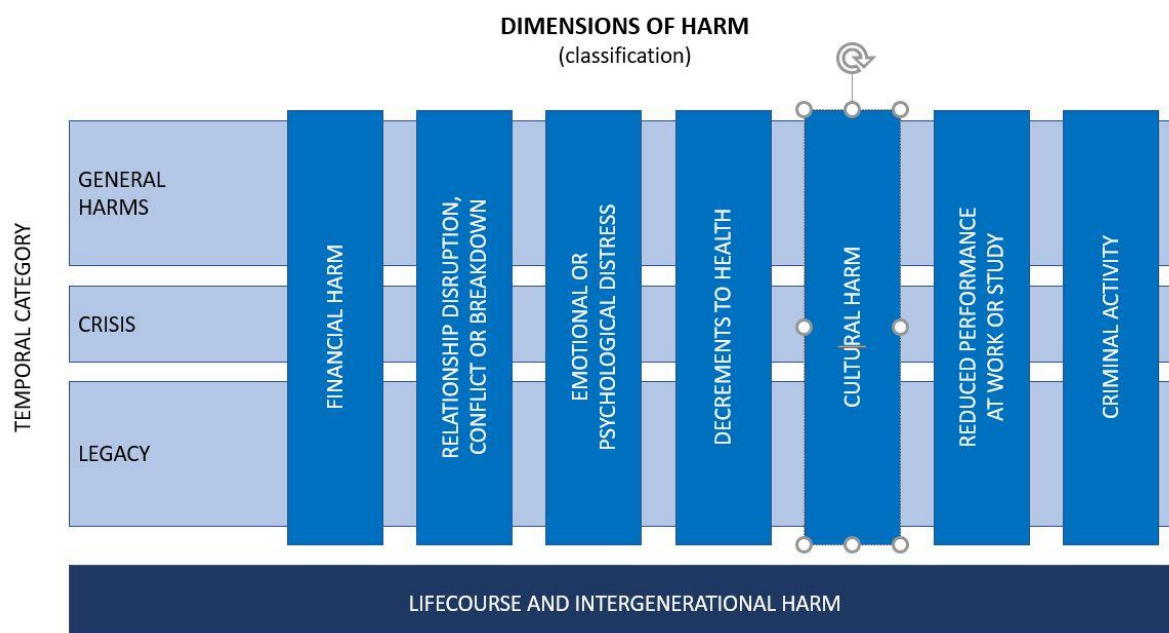
The College of Psychiatrists of Ireland as referred to gambling in Ireland as a 'major Public Health concern' (College of Psychiatrists of Ireland, 2020: 3). This concern over the growing threat of gambling has been echoed internationally (Wardle et al., 2024). A number of recent studies have scoped the scale of the developing problem of gambling in Ireland (National Advisory Committee on Drugs and Alcohol, 2018; Kerr et al., 2021). A recent comprehensive study of gambling in Ireland by Morgan et al. (2022) suggests that 0.3% of the population (which corresponds to 12,000) were problem gamblers. A further 0.9% (corresponding to 35,000 adults) were identified as moderate risk gamblers. 2.3% (corresponding to 90,000 adults) of the adult population met the criteria for low-risk gambling,

Other research has similarly explored underage gambling in Ireland, and has noted its worrying prevalence (Cooney et al., 2021; Hanafin et al., 2025; McAvoy et al., 2023). Examinations of problematic gambling in Ireland have explored the issue in a variety of sub-populations, including young athletes (Murphy, 2019). Youth gambling is a significant risk factor for engagement in future problematic gambling (McAvoy et al., 2023; Ó Ceallaigh et al., 2023). Evidence also suggests that the best predictor of youth lottery purchases is their parents' participation (Ariyabuddhiphongs, 2011).

Descriptions of gambling routinely and significantly underplay the negative impacts of gambling. More in-depth and useful analysis is provided by authors such as Latvala et al. (2019). However, a highly granular and realistic taxonomy of gambling harm may be seen in the work of Langham et al. (2015). This work is particularly notable given both the range of different domains explored and its focus on the life course and inter-generational impacts of gambling harm on quality of life and wellbeing (Currie et al., 2021, Langham et al., 2015, Li et al., 2017).



Figure 1. Langham et al.'s (2015) Conceptual Framework of Gambling Related Harm



Damage caused by the gambling industry

This paper adopts a public health approach to gambling, and as such is less concerned with clinical definitions and thresholds than with individual, family, community and societal impacts. As such gambling related harm is viewed as a continuum from slight to severe, without particular attention to diagnostic criteria, such as the latest definitions of gambling disorder in DSM V (Davies et al., 2022; APA, 2022). There is a general tendency, given the routine emphasis on clinical thresholds, to assume that those below the threshold of diagnostic assessments will not experience any real gambling-related harms. However, evidence clearly indicates that gambling-related harm may occur below clinical thresholds (Langham et al., 2015; Hsiang Tseng et al., 2023). Similarly, gambling related harms can be experienced without evidence of demonstrable behavioural dependence (Browne et al., 2021).

The wider societal impacts of gambling are rarely explored. For example, the relationship between gambling and organised crime is extensive, but seldom discussed (Banks & Waugh, 2018; Department of Finance, 2018). It includes among other things both money laundering and match fixing (McNamee, 2013; Huggins, 2018; Serby, 2012). The gambling industry is a routine avenue for money laundering (Pepi, 2018; Brooks, 2012), often including the washing of money gained through the production and sale of illicit narcotics (Schneider & Windischbauer, 2010). It is important to note that concerns over money laundering via gambling are not purely historical, but ongoing and on a global scale (Convery, 2022; Kassam, 2018; Butler, 2019).

Gambling in Ireland: a troubled history

Ireland's history in terms of State sanctioned gambling may be described as murky at best. Within a decade of independence from the UK the State facilitated the establishment of the



Irish Hospitals' Sweepstake (IHS). Although a proportion of the proceeds went to support many of Ireland's hospitals at a time of depression and economic crisis, subsequent revelations indicate that as little as ten percent of takings may have reached them. The illusion which carefully and often theatrically presented this endeavour as a philanthropic charitable lottery helped to camouflage its true nature as a private for-profit venture involving key members of Ireland's business elite. Tickets for the IHS were routinely sold illegally in other jurisdictions with strong Irish emigrant communities, such the US and UK, and as such there was little, or no oversight of revenue raised from such sales. The IHS ran for over fifty years and was only finally closed when overwhelming and damning evidence of financial corruption came to light (Coleman, 2009; Corless, 2010). The legitimacy and reputation of gambling in Ireland further declined when a former Taoiseach (Prime Minister) tried and failed to convincingly suggest unaccounted for funds were the result of horse-racing winnings during a tribunal into illicit payments related to planning processes in Ireland (Mahon Tribunal of Inquiry, 2012). Recent activities by the Irish gambling industry under the guise of corporate social responsibility (CSR) have also been condemned as little more than corporate camouflage (Houghton, 2022a; 2022b).

Ireland's national lottery

Studying a State's national lottery is particularly interesting as it serves to crystallise what has been described as the global industry-state gambling complex (Markham & Young, 2015). In the wake of the collapse of the Irish Hospitals' Sweepstake, the Irish State established the National Lottery in the mid-1980s, run by the State postal service, *An Post*. This lottery started with scratch cards but subsequently expanded dramatically to include a wide variety of activities, including participation in the Euromillions Lottery (Crowley et al., 2012). The highlights of a scathing review of the operation of the National Lottery after ten years of operation are given in Table 1.

Table 1. Review of the National Lottery by Harvey (1995: 5)

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| <ul style="list-style-type: none">- <i>Contrary to the commitments given in 1986 that the lottery would not be used for general governmental purposes, lottery funding was used for general governmental purposes immediately;</i>- <i>The government grossly underestimated the revenue which would be raised by the lottery by the order of 1,079%;</i>- <i>Contrary to commitments given in 1986 that the lottery would provide entirely additional resources, the level of additionality is only between 7% and 11%;</i>- <i>Contrary to commitments given in 1986 that voluntary and community organizations would be the beneficiaries of the lottery, in practice 63% of the lottery money is spent instead by government departments, semi-State bodies, or local authorities as part of their statutory responsibilities;</i>- <i>In allocating lottery money, the government has used a very wide interpretation of the categories of the National Lottery Act to instead fund educational and scientific projects which go beyond the scope of the original intentions of the lottery;</i>- <i>Contrary to commitments given in 1986 that the lottery would be transparent, the general operation of the lottery lacks transparency. Although there are individual examples of government departments and State agencies which operate lottery funds in a visible manner, the operation in some departments and health boards remains confused and opaque. Information about how some allocations are made is classified;</i> |
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- Two sets of recommendations, one by the Joint Oireachtas [Irish Parliament] Committee on Commercial State-sponsored bodies, the other by the Committee on Public Accounts, which would have improved the transparency of the lottery, have been substantially ignored;
- Whereas in the UK the organization responsible for allocating lottery money consulted with voluntary organizations before the lottery was established, no such consultation has taken place in Ireland, almost ten years after the lottery was established.

Many of these criticisms raised 30 years ago remain relevant today and will be discussed below.

Ireland's National Lottery was subsequently privatized as a condition of the State bail out by the Troika (the EU, the EB and the IMF) following the collapse of the Celtic Tiger. This sale to a consortium comprised of the Ontario Teacher's Pension Fund (OTPF), *An Post*, and the *An Post Pension Fund* raised €405 million for the State. In November 2023, *Premier Lotteries Ireland*, who runs the National Lottery, was then sold to *La Française des Jeux* (FDJ), a French gambling firm, for €350 million.

A proportion of the funding from National Lottery revenue is given to Government to help finance what are termed 'Good Causes'. However, research exploring the distribution of Irish National Lottery sports capital grant allocations over the 1999–2007 period revealed a clear bias towards the geographical areas represented by the Minister for Arts, Sports and Tourism and the Minister for Finance (Considine et al., 2008). Such partisan politics are perhaps unsurprising given the overwhelming evidence of widespread corruption in Ireland's political elites which has emerged (Considine & Doran, 2016; Murphy, 2006; Foxe, 2011; Connolly, 2014; Negra & McIntyre, 2020; O'Toole, 2010).

Although legislation dictates the proportion of money raised that is spent on so called Good Causes, the disbursement of such funds may be described as opaque at best. In its most profitable year, 2021, €304 million was returned to Government for 'Good Causes', out of ticket sales of €1,053.7 million (Regulator of the National Lottery, 2022). In 2024 €239.3 million was returned to Government for 'Good Causes', out of ticket sales of €855.7 million (Regulator of the National Lottery, 2025). Detail of how National Lottery funds are to be disbursed are detailed in Table 2.

Table 2. Section 41 of the National Lottery Act, 2013 detailing the Disbursement of Funds

Disbursement of funds

41. (1) Moneys paid into the Central Fund pursuant to section 44 shall be applied for the purposes of such one or more of the following, and in such amounts, as the Government may determine from time to time:

- (a) sport and recreation;
- (b) national culture and heritage (including the Irish language);
- (c) the arts (within the meaning of the Arts Act 2003);
- (d) health of the community;



- (e) youth, welfare and amenities;
- (f) natural environment;
- (g) such other objectives (if any) as the Government may determine from time to time.

(Government of Ireland, 2013)

Given the sums involved in Government expenditure on ‘Good Causes’ funded by the National Lottery now exceeds €200 million annually it is not unreasonable to assume that governance structures would be in place to ensure transparency over funding decisions. However, despite over €6 billion having been allocated to Government from the National Lottery since its inception in 1987, no such clarity is available (Indecon, 2022). The lack of transparency identified in Harvey’s (1995) review continues and in 2021 the Government Minister responsible was forced to respond to this issue, as noted in the following Irish Times article:

Mr McGrath said it can be difficult to track the good causes expenditure... “Some Departments do not publish details of which organisations have been awarded funding, while others may publish details of expenditure grants but not mention that the grants have any link to the national lottery.” ... there is no legal structure setting out how funds should be assigned. (O’Halloran, 2021)

In a politically adroit manoeuvre, the Minister deflected and deferred further criticism by hiring an external consultancy firm to investigate the issue (Irish Government News Service, 2021; Department of Public Expenditure and Reform, 2022). Perhaps unsurprisingly no exploration of political or electoral manipulation of funding allocation was undertaken as part of this, and the review instead explored far less politically sensitive topics such as public and potential recipient awareness of National Lottery funding and the application process (Indecon, 2022).

Harvey’s (1995) criticism over additionality also remains pertinent today. As noted by Davidson Schuster (1994), debate around lottery funding often includes a focus on what is termed additionality or substitution. This refers to monies raised being either spent on what might be thought of as core or pre-existing Government activity (substitution), or purely on the provision of new or extra goods, facilities, services or supports (additionality) (Thirdsector, 2005). It was noted two decades ago that the lack of accountability and transparency in the Irish Governments policy of distributing National Lottery funding hindered moves towards such additionality (Bailey & Connolly, 2003).

To a greater or lesser degree lottery funding in the UK has historically generally followed a path of additionality (Bailey & Connolly, 1997; Miers, 2006). However, despite previous assurances by the Irish Government (Harvey, 1995), the very concept of additionality in relation to the lottery appears to have been forgotten. The most dramatic example of overt substitution rather than additionality in Government spending plans in Ireland may be seen in the promise given by Minister for Public Expenditure and Reform, Brendan Howlin, that €200 million from the sale of the lottery licence to Premier Lotteries Ireland (PLI) in 2013 would be ring-fenced and used to help finance the construction of a National Children’s Hospital (RTE, 2013).



The operation of the office of the regulator of the national lottery

Ireland's National Lottery is overseen by the Office of the Regulator of the National Lottery (ORNL). The Minister for Public Expenditure, Infrastructure, Public Service Reform and Digitalisation appoints the Regulator, which is an independent statutory office. The vision of the ORNL is to oversee a 'safe, sustainable, properly run National Lottery maximising funds for Good Causes' (Regulator of the National Lottery, 2025). It is important to note that the Regulator of the National Lottery has a requirement to safeguard the National Lottery. The functions of the Regulator are detailed in Table 3.

Table 3. The Functions of the Regulator of the National Lottery (Regulator of the National Lottery, 2025)

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.

It is noteworthy that the Regulator is required to achieve a balance between protecting both participants' interests and the interest of the National Lottery. These interests may be contradictory and may force the Regulator into a position of moral jeopardy (Adams, 2016). This issue is particularly acute as evidence on gambling patterns in Ireland suggests it follows the pareto (80:20) rule, meaning that 80% of income is derived from 20% of participants (Ó Ceallaigh et al., 2023).

Framing gambling

Gambling on the National Lottery is typically considered acceptable within Irish households and is not routinely even seen as gambling (Fulton, 2015; Dalton, 2024). The framing of gambling and the National Lottery is of paramount importance and has power (Reith & Wardle,



2022). In the UK, gambling is framed as both economic activity and consumerism, despite calls for it to be approached as a public health issue (Reith & Wardle, 2022; Wardle, 2019; Sulkunen et al., 2019; Livingstone & Rintoul, 2020; Orford, 2019; Korn et al., 2003 Thomas et al., 2023; Wardle et al., 2021; Wardle et al., 2024; Ukhova et al., 2024).

The cultural framing of an industry affects its cognitive legitimacy (Humphries and Latour, 2013). Entman (1993: 52) states that framing performs four functions and allows people to

select some aspects of a perceived reality and make them more salient... to promote a particular problem definition, causal interpretation, moral evaluation, and/or treatment recommendation.

Examinations of framing have been conducted on other addiction-oriented industries including both tobacco and alcohol (Hawkins & Holden, 2013; Smith & Wakefield, 2005; McCambridge et al., 2018; Savell et al., 2014). Korn et al. (2003) have examined the various ways in which gambling is framed in Canada, while more recently, van Schalkwyk et al. (2021) have explored the framing of ‘responsible gambling’ in the UK. In their analysis van Schalkwyk et al. (2021) note that any gambling harms were portrayed as limited to an atypical minority. Gambling advertising is routinely framed to highlight three themes (Labrador et al., 2021); these tend to be winning money, normalising gambling, and portraying gambling as a form of entertainment (McMullan et al., 2012). Gainsbury et al. (2016) have explored the focus of gambling advertising to feature the high possibility of winning. This research aimed to explore how Ireland’s National Lottery is framed by the Office of the Regulator of the National Lottery.

Methods

Study design: This study is based on critical content analysis of all of the Annual Reports of Ireland’s Office of the Regulator of the National Lottery.

Data collection: All the Annual Reports of Ireland’s Office of the Regulator of the National Lottery available on their website were examined (<https://www.rnl.ie/data-publications/annual-reports>). This included a total of 11 reports, dating from 2014 to 2024 (Regulator of the National Lottery, 2014-2024).

Data analysis: This analysis was based on a critical content analysis of annual reports of Ireland’s Office of the Regulator of the National Lottery. Reports were downloaded in PDF format and then opened in MS Word and then examined using Word’s find function.

Reports were subjected to critical content analysis (CCA). CCA combines traditional quantitative methods with more critical cultural approaches (Hunting, 2021). The tension in crossing the traditional divide within the social sciences between quantitative and qualitative perspectives is acknowledged (Carpini, 2013). CCA offers flexibility in theoretical approach and textual selection (Utt & Short, 2018). CCA’s flexibility offers a hybrid method that can combine inductive and deductive approaches. Its reflexive approach has been described as thinking with theory (Utt & Short, 2018). Table 4 details the six-step framework for CCA used



in this analysis. This analysis was initially coded by FH, with decisions made being checked and agreed with DH as part of the process.

Table 4. Steps in Hunting’s Critical Content Analysis (CCA)

Step 1: Shaping the research question
 Step 2: Determining sample, taking into account particularities of the... text
 Step 3: Creating a coding schema, leaving room for the unexpected
 Step 4: Code the sample (either as a single coder or with multiple coders)
 Step 5: Analyse data for patterns related to the research question through textual readings
 Step 6: Integrating data and analysis into a written text

(Hunting, 2021)

Ethical considerations: As this examination was based on publicly accessible reports of a public entity that were freely available on the website of the ORNL ethical approval for this study was not required.

Limitations: This analysis was limited in being restricted solely to Annual Reports of the Regulator of the National Lottery. It is suggested that further research might attempt to explore media statements or statements to Government by the Regulator to achieve a more rounded examination of how the National Lottery is framed.

Results

Table 5 details the results of the critical content analysis of the Annual Reports of the Regulator of the National Lottery. Participating in the National Lottery is routinely framed in terms of play (n=639), and as a game (n=697). The Annual Reports also focus intensely on Good Causes (n=339) and prizes (n=629). A focus on governance (n=331), safety (n=112), and player protection (n=60) in the reports is also evident.

Table 5. Content Analysis of Regulator of the National Lottery Reports

Key Words	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	Total	Mean
Good cause(s)	2	12	9	22	20	41	44	38	46	53	52	339	30.8
Prize(s)	0	16	17	32	27	60	133	111	53	90	90	629	57.2
Game(s)/ gamer(s)/ gaming	3	41	36	71	60	90	99	80	57	100	60	697	63.4
Play/ Player(s)/ Playing/ played	1	49	60	66	47	50	57	70	87	94	58	639	58.1
Problem play/playing/player	0	9	8	4	3	4	7	3	4	5	4	51	4.6
Player Protection	1	6	9	9	7	5	4	6	4	5	4	60	5.5
Governance/ govern/ governing	5	21	19	37	35	37	36	35	36	35	35	331	30.1



Safe/safety/safeguard/safeguarded/safeguarding	3	5	3	12	10	11	19	13	11	15	10	112	10.2
Gambling/ Gamble/ Gambler(s)	0	1	1	1	0	0	0	5	2	5	3	18	1.6
GambleAware	0	1	1	1	0	0	0	0	0	0	0	3	0.3
Addict(s)/ addiction(s)	0	0	0	0	0	0	0	0	0	0	0	0	0.0
Harm (s)/ harmful/ harmed	0	0	0	0	0	1	1	4	1	0	0	7	0.6
Danger	0	0	0	0	0	0	0	0	0	0	0	0	0
Underage	0	7	9	7	6	9	2	4	6	6	11	67	6.1
Test purchase/ purchasers/ purchasing	0	0	0	0	2	2	0	0	0	0	3	7	0.6
Mystery shop/ shopper/ shopping	0	0	0	0	2	10	0	0	1	2	6	21	1.9

In contrast, the terms Gambling/Gambler/Gamble are seldom mentioned (n=18), while terms such as addict/addiction or danger never appear across the entire dataset (n=0). Instead, terms such as problem play/player (n=51) are used instead. Although the term underage does appear 67 times across the dataset, the term Mystery shop/shopper/ shopping (n=21), is more likely to be used than Test purchase/purchaser/purchasing (n=7).

As noted above the National Lottery was privatised as part of Ireland's bailout after the crash of the Celtic Tiger. The newly privatised National Lottery only operated for a few months in 2014, and as such the 2014 report can be largely disregarded. Looking at changes over the 2015 – 2024 period, there has been a dramatic increase in the use of some terminology in the Annual Reports. For example, the phrase 'Good Causes' appeared 433% more in 2024 than it did in 2015, while 'prize/s' and 'game/er/s' appeared 562% and 146% as often respectively. In contrast both the terms 'problem play' and 'player protection' were used less frequently in 2024 than in 2015.

Discussion

The heavy emphasis on play and participation in the lottery being a game seriously undermines the reality that the National Lottery is a form of gambling. The careful and overwhelmingly positive language used in the report very deliberately frames the lottery as focused on prize winning and Good Causes. The reports are devoid of mention of terms such as addiction to gambling. Even the term gambling is very rarely mentioned. Finally, there is little attention given to underage participation in the lottery. The practice of test purchasing to determine if shops will sell tickets to underage children is more commonly referred to as a Mystery shopper. This serves to undermine the seriousness of the issue, which is a legal offense, albeit one that appears never to have been prosecuted in Ireland (Houghton, 2025).

Conclusion

The National Lottery is systematically framed in the Annual Reports of the ORNL as entertainment, essentially as a game to played. The framing is focussed positively on the 'Good



Causes' funded by National Lottery and the prizes that can be won through participation. The term gambling and its variations are barely mentioned, while the terms addict and addiction never feature. This serves to present an overwhelmingly positive and sanitised image of the National Lottery and effectively hides the darker side of gambling. The ORNL is charged with not only managing and protecting the long-term viability and sustainability of the National Lottery, but also with protecting the interests of participants. A vital first step in such protection is to acknowledge that participation in the lottery is gambling and that gambling can lead to gambling harm and addiction. At present the actions of the ORNL, as evidenced through these reports, appear to prioritise economics over participant protection. A public health perspective towards gambling needs to be explicitly adopted by both Government and the ORNL in relation to gambling. Further research examining other communications by the ORNL should be conducted to explore how the threats posed by gambling are framed.

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