



Original Research

Child Oriented Advertising on Ireland's National Lottery Website: A Visual Content Analysis

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Abstract

Background: Gambling represents a significant threat to a small proportion of society, including children. People who engage in gambling while children are more likely to become problem gamblers in later life.

Methods: A visual content analysis of Irish National Lottery webpages was conducted. The coding schema for this analysis was based on five key elements from the Advertising and Promotion Code of Practice of Ireland's National Lottery.

Results: Four separate web pages comprising a total of 48 distinct elements were examined. There was no evidence of materials relating to three of the five criteria examined. However, there was substantial evidence of the web pages exhibiting material relating to the remaining two criteria.

Conclusion: There is clearly evidence of marketing materials on Ireland's National Lottery website that are likely to be of significant appeal to young people. A more robust evaluation of lottery marketing materials is required by the Office of the Regulator of the National Lottery. It is recommended that current legislative separations are abolished and that in future the National Lottery is governed under Ireland's new Gambling Regulation Act, 2024.

Keywords: *Advertising; Children; Gambling; Halloween; Ireland; Lottery; Marketing; Online.*

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Introduction

The global gambling industry is rapidly developing. As a result of growing digitisation and technological improvements, access to gambling is now almost universally accessible on a twenty-four hour basis (Thomas et al., 2023; Riley et al., 2021). The industry's revenue has increased exponentially due to near-universal accessibility, and, by 2028, consumer net losses are expected to approach US\$700 billion globally (Wardle et al., 2023). Ireland is a significant contributor to this growth. In 2019, the Irish population was in the top 25% percentile of gamblers in the EU (Michael, 2019); wagering a total of 9.8 billion euros (Hutton, 2021).

With ticket sales of over €1 billion in 2021 (Slattery, 2022; Regulator of the National Lottery, 2022), The National Lottery accounts for a sizeable proportion of Irish gambling. According to the National Drugs and Alcohol survey (NDAS), 49% of Irish adults gambled in the year 2019-20; 29% accredited to the lottery alone (Mongan et al., 2022). In recent years, The National Lottery has also increased its online presence – with virtual platforms reaching €132.2 million worth of game sales in 2023 (Regulator of the National Lottey, 2024).

The National Lottery's broadening outreach may appear harmless, since lottery wagers are often not regarded in the same way as other forms of gambling (Fulton, 2015). However, compared to its offline equivalents, online gambling can have more detrimental effects, including worsening mental and physical health, negatively impacting general quality of life, and increasing financial instability (Papineau et al., 2018). Additionally, having mobile gambling apps and/or online gaming accounts have been associated with increased reports of problematic gambling practices (Murphy et al., 2024). 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 (Ó Ceallaigh et al., 2023). In addition, another 7.1% of adults, or 279,000 people, display 'moderate evidence' of problem gambling (Ó Ceallaigh et al., 2023). Recent research in Ireland has identified deaths associated with problem gambling in Ireland (Reynolds et al., 2025). Figure 1 details seven domains of gambling harm that can result in general, crisis and legacy harms across both the life-course and intergenerationally.

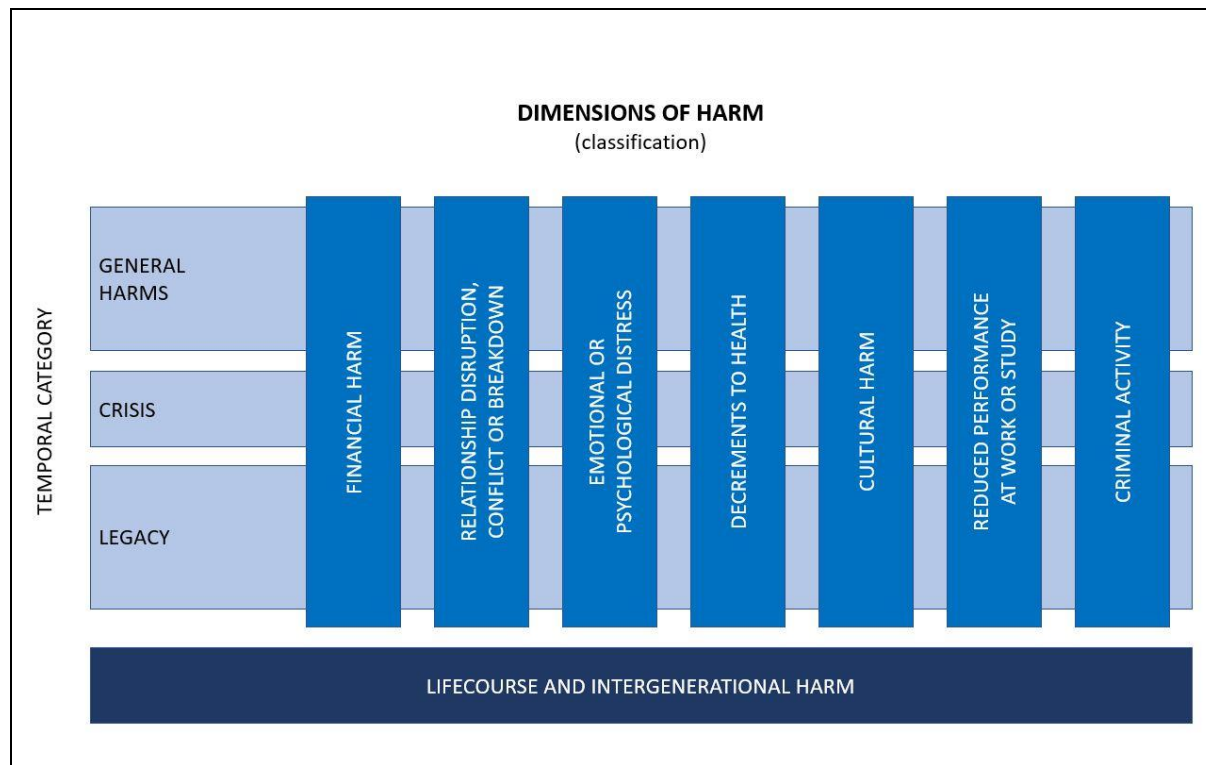
Although gambling on the National Lottery is typically considered acceptable within Irish households (Fulton, 2015; Dalton, 2024), accepting the money allocated to 'Good Causes' from the funds raised through gambling is not without the risk of moral jeopardy (Adams & Rossen, 2006). This term usually refers to the primary goal of a body potentially being unduly influenced by a secondary interest. One example of this is the acceptance in 2018 by Public Health England of funding from Drinkaware to fund Drink Free Days (Adams & Gegan, 2024). Drinkaware, although a registered charity, are largely funded by the alcohol industry. The concern is that potential conflicts of interests may emerge and cause the primary mission of an organisation to be jeopardised by also trying to safeguard the secondary interest, i.e. revenue creation.

Evidence suggests that the best predictor of youth lottery purchases is their parents' participation (Ariyabuddhiphongs, 2011). Online gambling not only increases the likelihood of problem gambling but also poses hazards of underage access and harm (Cooney et al., 2021). According to the European School Survey Project on Alcohol and Other Drugs (ESPAD) for Ireland in 2024, 32.2% of 15–16-year-olds had wagered that year (Hanafin et al., 2025), up from 24% in 2019 (McAvoy et al., 2023); highlighting the serious problem of youth gambling.



Additionally, 26.1% of adolescents reportedly use online gambling platforms (Hanafin et al., 2025), linked with a 4.2-fold increased risk of problem gambling (McAvoy et al., 2023). Lotteries continue to be one of the most popular forms of gambling among teenagers, with 15.6% playing in person and 7.2% playing online (Hanafin et al., 2025).

Figure 1. Dimensions of Gambling Harm Identified by Langham et al. (2016)



Recent research has shown that gambling prior to age 18 nearly doubles the likelihood of developing problem gambling habits in adulthood (Ó Ceallaigh et al., 2024). In a similar vein, an analysis of 3,000 adults who received treatment for problem gambling between 2008 and 2019 found that half of the cohort had started gambling prior to age 17 (Condrón et al., 2024). Additionally, it was discovered that online gambling at 17 years of age is a significant independent predictor of online gambling activity at 20 years of age (Duggan et al., 2023).

Two test purchasing exercises on the underage purchase of National Lottery items in retail establishments by Ipsos MRBI were commissioned by the Irish Office of the Regulator of the National Lottery (ORNL), in 2018 and 2024 respectively. Five hundred and sixty-two retail locations were included in the 2024 iteration. According to this study, 71% of test purchases made by 15–17-year-olds were contested, which is 8% more than on 2018 (Ipsos MRBI, 2018). However, nearly three out of ten test transactions were accepted even though 92% of stores had the required '18+' signs (Ipsos B&A, 2024).

Evidence suggests that there similar problems in youth accessing gambling via the lottery internationally (Zhai et al., 2021; Warpenius et al., 2016; Bellringer & Abbott, 2008; Gosselt et al., 2013; Derevensky & Gupta, 2001). There are increasing calls for the global public health



community to respond to the threat posed by the commercial gambling industry (Thomas et al., 2023; Wardle et al., 2021; Wardle et al., 2024; Ukhova et al., 2024).

Child oriented marketing by companies in the context of the commercial determinants of health (CDoH) has been an increasing focus of international research in recent years (Watkins et al., 2022; Kinsky & Bichard, 2011; Borzekowski & Pires, 2018; Arredondo et al., 2009; Kopelman et al., 2007). An increasing body of research has examined gambling advertising aimed at children, youths and young adults (Torrance et al., 2021; Bestman et al., 2015; Smith et al., 2020; Labrador et al., 2021; Hing et al., 2014). Although there are significant gaps remaining in our understanding of gambling marketing (Guillou-Landreat et al., 2021), much of this research has examined advertising by the gambling industry on social media and has noted substantial levels of marketing to youth populations (Singer et al., 2024; Lindeman et al., 2023; Hernández-Ruiz & Gutiérrez, 2021; Bradley & James, 2019; Gainsbury et al., 2016; Guillou-Landreat et al., 2021). Sport has been identified as a particular conduit for young people to be exposed to gambling advertising (Kitchin et al., 2024; Pitt et al., 2016; 2017a; 2017b; Nyemcsok et al., 2021).

However, rather than study such social media marketing, this analysis sought to explore the potential appeal of Ireland's National Lottery website to children. Studying a State's national lottery is particularly interesting, as it crystallises what has been described as the global industry-state gambling complex (Markham & Young, 2015). Prior research has noted the lack of protections for gamblers generally on online gambling platforms in Ireland (Cooney et al., 2021).

Concerns over the marketing of unhealthy products to children at Halloween has typically focused on issues such as unhealthy food or fireworks (Porter & Grills, 2013; Lenglinger et al., 2020), rather than Halloween themed lottery offerings. Relevant sections relating to children in the Advertising and Promotion Code of Practice of Ireland's National Lottery are detailed in Table 1.

Table 1. Extracts from the Advertising and Promotion Code of Practice of Ireland's National Lottery

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.

(PLI, 2022)

However, this research sought to examine Ireland's national lottery website in the run-up to Halloween (2025) for evidence of child-friendly marketing and advertising. The Irish National Lottery is explicitly exempted from Ireland's recently introduced Gambling Regulation Act, 2024 (Government of Ireland, 2024). Similarly, many of the advertising voluntary codes in Ireland explicitly exclude all (ASAI, 2016), or most, elements of National Lottery advertising (BAI, 2017).

Methods

Study design: This study is based on a cross-sectional examination of pages on Ireland's National Lottery website.

Data Collection: Web pages on Ireland's National Lottery website (www.lottery.ie) that were available on 21st October 2025 were examined.

Data analysis: This research utilised content analysis of visual imagery. This approach has been used extensively in media analysis (Bell, 2001). In her seminal text on visual methodologies Rose outlines four steps to content analysis: Finding your images; Devising your categories; Coding the images; Analysing the results (Rose, 2016). Content analysis of the material was based on a priori codes that were developed based on child protection marketing guidelines in place in Ireland (PLI, 2022; ASAI, 2016; BAI, 2017). Table 2 details the categories examined. Content of the website was screened by two of the authors (DH and FH), discussed and agreed.

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;



Ethical considerations: As this analysis was based on publicly accessible webpages this research did not require ethical approval.

Results

The main page of the national lottery website examined comprised 18 discrete elements, including the header/ masthead and the footer. Three of the 18 elements on the National Lottery landing page were assessed by researchers (FH and DH) as containing examples of both categories 1 and 2 of the coding framework (which relate to Sections 30 and 31a of the Advertising and Promotion Code of Practice; PLI, 2022). These 3 elements were hyperlinks to specific online gambling games. On the basis that these 3 elements ('Richcraft', 'Freaky Fortune' and 'Spooky Spondoolies') could potentially appeal to children, these pages were in turn similarly examined and evaluated. Therefore, a total of 4 web pages were examined that included a total of 48 discrete elements. Results of this analysis are detailed in Table 3. A total of 24 elements of these webpages (50%) were identified as content relating to category 1 of the analysis, with 20 (41.7%) elements also being identified as category 2 in the analysis.

Table 3. Visual Content Analysis Findings

Category Contains advertising and promotion activities that...	Number of elements assessed	Number of elements demonstrating the category being examined	Examples
1) ...exploit the susceptibilities, aspirations, credulity, inexperience, or lack of knowledge of children	48	24	WIN UP TO €100,000 Next Draw...€2 Million Top Prize €30,000 Win up to €120,000 Win up to €250,000
2) ...make direct use of signs, symbols, themes, drawings, fictitious characters, or real people of primary or particular appeal to children	48	20	Halloween pumpkin, witch's hat, crystal ball, magic mirror, cauldron, spellbook, potion, eyeballs, witches broomstick
3) ...depict adolescent, juvenile, or loutish behaviour;	48	0	N/A
4) ...contain endorsements by recognisable figures who would be regarded as heroes or heroines of children;	48	0	N/A
5) ...induce a child to regard National Lottery play as a natural element of his or her leisure time/activities;	48	0	N/A

Figure 2 details some exemplars of the child friendly images contained in these webpages. The child-friendly elements of these images featuring typical Halloween imagery and objects is clearly evident.



Figure 2. Exemplar Child-Friendly Images from the National Lottery Website





Discussion

A small but significant proportion of the population are routinely or sporadically engaged in problematic gambling (Wardle et al., 2024; Ó Ceallaigh et al., 2023; Mongan et al., 2022; Reynolds et al., 2025). Access to gambling via online sites has become increasingly ubiquitous (Thomas et al., 2023; Riley et al., 2021). Youth gambling is a particular concern as evidence indicates that early initiation to gambling is a significant predictor of future gambling issues (Cooney et al., 2021), and youth gambling on the National Lottery in Ireland is an acknowledged problem (Ipsos MRBI, 2018; Ipsos B&A, 2024). It is therefore an issue of significant concern that over 40% of elements of National Lottery web pages examined contained child friendly imagery. 50% of such elements could also be described as exploiting the susceptibility of children. Rossi & Nairn (2024) describe such advertising as ‘priming young minds’ for gambling.

The Regulator of the National Lottery describes its values as: Independence; Guardianship; Future Focused; Accountability; Professionalism; Valuing Our People; and Transparency (Regulator of the National Lottery, 2024). Of most relevance in this analysis is the value Guardianship, which the Regulator describes as ‘Acting in the public interest with integrity’ (Regulator of the National Lottery, 2024). However, as can be seen from Table 4, the listed functions of the Regulator of the Irish Lottery put it in a compromised position, especially given clear evidence of the pareto (80/20) principal in gambling, whereby 80% or more of income comes from 20% of gamblers (Deng et al., 2021).



Table 4. Functions of the Regulator of the (Irish) National Lottery

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

(Government of Ireland, 2013)

The Regulator of the National Lottery is charged with both safeguarding its long-term viability, as well as protecting gamblers (or ‘participants’ as they are termed). This balance is supposed to be maintained, while also maximising revenue.

The Office of the Regulator of the National Lottery (ORNL) routinely evaluates new games and marketing materials being proposed by the lottery operator. The results of these assessments are routinely detailed in the appendices of the annual reports of the regulator. However, a brief examination of these reports for the 2022-2024 period appear to show only 3 instances of game related proposals having to be withdrawn by the lottery operator (Regulator of the National Lottery, 2022; 2023; 2024). It is clear from the images identified in this examination that in future ORNL review process needs to be conducted more stringently.

Conclusion

In the short-term it is suggested that child friendly marketing materials on the National Lottery website are withdrawn and are not used in future advertising campaigns. It is also imperative that a more robust assessment of marketing imagery is undertaken by the ORNL to prevent the recurrence of such child friendly images. In the longer term it is recommended that the recently passed Gambling Regulation Act of 2024 is extended to include the National Lottery (Government of Ireland, 2024). Such a move would eliminate the problematic dual role of the ORNL in having to both protect gamblers and ensure the viability of the National Lottery. This move would also force the National Lottery to be subject to more stringent marketing restrictions that are being introduced for other gambling firms under the Act.



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