

Strategy Statement 2025 – 2027



Rialálaí an Chrannchuir Náisiúnta
Regulator of the National Lottery

Foreword from the Regulator

The Office of the Regulator of the National Lottery (ORNL) provides independent oversight of the operation and licensing of the National Lottery. The ORNL monitors and enforces the Operator's compliance with the terms and conditions of the Licence, to ensure that all games and draws are run fairly and transparently, with important protections for participants, before optimising returns for Good Causes in Ireland.

It is important to continue to build on the increased regulatory scrutiny, data reporting and enhanced player protection measures implemented by this Office in the first half of the 20 year Licence to operate the National Lottery awarded by the State to Premier Lotteries Ireland DAC (PLI) under the National Lottery Act 2013.

I am therefore pleased to present this Statement of Strategy, which sets out our priorities for the next three years. In looking ahead, we do so with the benefit of more than a decade of National Lottery regulation through a period of considerable evolution – from the transition to a private operator when the Licence was awarded in 2014, through a global pandemic, and into the digital age where the traditional, physical experience of National Lottery in-store converges online through new technologies and mobile. During this time, the Regulator has not shied away from using any of its powers to develop and deploy a comprehensive system of regulatory oversight. Our relentless focus on protecting children and problem gamblers has yielded additional protective measures, beyond those specified in the 2014 Licence. Returns to Good Causes annually grew under the first five years of the Licence and have been maintained since. The retail network has been maintained and expanded and comprised 84% of sales in 2023. All of this has been achieved by adhering to our five clear strategic goals, outlined in this strategy, which will again underpin our work in 2025-2027.

This body of work now allows us to look forward and consider the challenges of tomorrow for the National Lottery and how it is regulated, informed by ongoing engagement with stakeholders regarding the work of the ORNL to date and the important areas we should be alert to over the coming years.

Comprehensive feedback obtained from stakeholders has confirmed that the vision, mission, strategic goals, and values of the ORNL are appropriate to the Regulator's core purpose. The future-focused ethos of the ORNL was considered vital as technology and consumer behaviours continue to change at pace.

Our focus in this strategy period, therefore, will be on leveraging new digital resources that can support the ORNL to be effective and efficient, in an appropriate and secure manner. This includes expanding the ORNL's capacity to monitor the Operator's online advertising and promotion. We will continue to keep up to date on new lottery technologies and opportunities, while staying alert to emerging risks and new laws regarding digital services. We will deepen our engagement with lottery regulators in other jurisdictions to share and apply learnings in this space.

As guardians of the valuable state asset that is the National Lottery, and the rights and interests of participants, the ORNL team will continue to employ strong accounting and governance practices, and to hold the Operator to the "best in class" standard for responsible gaming practices. Innovations are welcome where they ensure continued public interest in playing National Lottery games without increasing risks to player welfare.

As digital technologies continue to develop and provide players with more ways to play than ever before, the Regulator remains highly aware of the fundamental role of local retailers in the present and future of the

National Lottery. They remain highly appreciated by players and provide the physical 'link' within communities where Good Causes are funded through National Lottery sales.

Stakeholders have welcomed the new ORNL website, which was launched in 2023 to provide more and better information on the regulation of the National Lottery and how funds for Good Causes are earned and transferred to the Exchequer. Details of any breaches of the Licence are always published by the Regulator, and in a timely manner, and this has supported transparency and confidence in the regulation of the National Lottery.

I will continue to engage closely with stakeholders in this three-year strategy period and increase the visibility of the important work of the ORNL in the public interest. Greater awareness of how closely and rigorously the National Lottery is regulated supports public confidence in our safe, properly-run National Lottery, safeguarding this vital national asset both now and for the future.



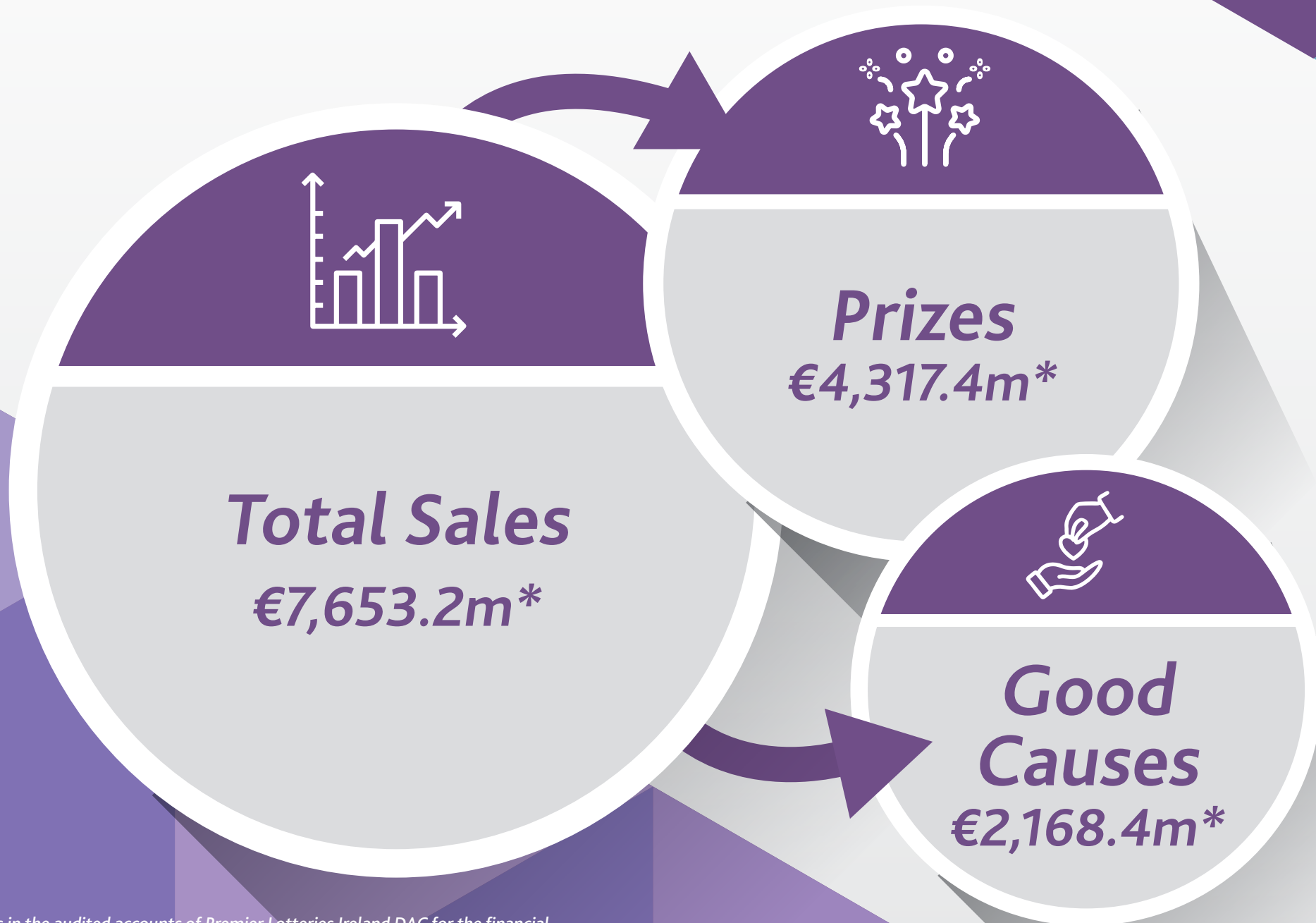
Carol Boate

Regulator of the National Lottery

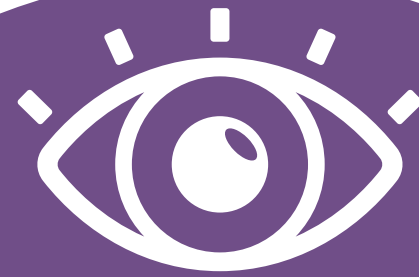
Highlights from the First 10 Years



10 Years in Numbers



* Summations of figures in the audited accounts of Premier Lotteries Ireland DAC for the financial years ended 31 December 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022 and 2023.



Vision

**A safe, sustainable,
properly-run
National Lottery
that optimises funds
for Good Causes.**



Mission

To independently oversee
the operation of the
National Lottery.

Monitor.

Enforce.

Protect.



Strategic Goals



Strategic Goal 1: Propriety

The National Lottery is run with all due propriety

- 1 Monitor and enforce compliance by the Operator with its licence obligations.
- 2 Monitor the integrity of the games.
- 3 Ensure timely, transparent, accountability and reporting.
- 4 Ensure accurate management of ticket sale proceeds through the National Lottery Fund.
- 5 Uphold the reputation of the National Lottery.

Officials at the ORNL interrogate and follow up on a range of regular weekly, monthly, quarterly and annual reports from the Operator. These cover Operator accounts, performance metrics, customer complaints, internal audit papers, unclaimed prizes and more.

In addition, the ORNL conducts its own proactive themed reviews, draw checks, investigations, and advertising and social media surveillance.

This strategy period will include procuring an external expert review of an aspect of the Operator's ICT systems and controls.

Details of any breaches of the Licence are always published by the Regulator, in a timely manner, to promote transparency and confidence in the regulation of the National Lottery.



Number 13 of 2013
NATIONAL LOTTERY ACT 2013

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The role of the Regulator is to ensure that Ireland's National Lottery is operated in compliance with the Act, the Licence, and the Codes of Practice, which together form the legal framework for the National Lottery.

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Strategic Goal 2: Player Protection

The interests of participants are protected

- 1 Check and approve games', and Operator initiatives', compliance with the Licence.
- 2 Monitor accuracy of player communications and advertising.
- 3 Benchmark the Operator's controls against best practice in protecting minors and preventing problem gambling.
- 4 Monitor prize claims process and Operator measures to alert winners of unclaimed prizes.

The Regulator protects the interests of players as consumers, as winners, and from the risk of excessive or problem play. Information provided to participants must be transparent, accessible, and not misleading. Winners must have a reasonable opportunity to claim their prize and their anonymity must be maintained. Preventing problem play applies to the general population but is particularly focused on those who are underage (under 18 years of age) and those who show signs of excessive or problem play.

In this strategy period, the Regulator will continue to hold the Operator to the "best in class" standard for responsible gaming practices, including through the use of mystery shopping exercises. As in previous years, any new initiatives or new technologies introduced by the Operator will be required to employ appropriate guardrails to protect players' interests. While the

Operator's use of social media platforms and online advertising more generally has been probed in a variety of ways and subjected to a range of additional restrictions, **the Regulator will seek to expand the ORNL's capacity to monitor the Operator's online advertising and promotion on an ongoing basis through technology,** and enforce the Advertising and Promotion Code where necessary.



One of the Regulator's objectives is that players enjoy taking part in the National Lottery in a safe and healthy manner and their consumer rights are upheld.





Strategic Goal 3: Long-term Sustainability

The long-term sustainability of the National Lottery is safeguarded

- 1 Protect the National Lottery trademarks.
- 2 Maintain and protect the profile and reputation of the National Lottery.
- 3 Monitor the Operator's ongoing investment in the National Lottery.
- 4 Maintain awareness of the challenges and opportunities facing the National Lottery.
- 5 Increase public awareness of how the National Lottery is regulated.

The National Lottery was established in 1986 to provide a safe, well-regulated lottery, with the important secondary benefit of the generation of funds for Good Causes across the country. It is owned by the State for this purpose.

Part of the Regulator's role is to safeguard the long-term future of this valuable State asset, far beyond the term of the current licence.

This involves maintaining awareness of new lottery technologies and opportunities, while staying alert to emerging risks, and keeping up to date with new laws and industry knowledge on delivering and regulating digital services. Innovations are welcome where they ensure continued public interest in playing National Lottery games without increasing risks to player welfare. The Regulator's objective is that appropriate measures are in place to protect the National Lottery and players from unsuitable use of new technologies, including artificial intelligence, and from cyber-attacks.

It is increasingly important that the general public is aware of how closely and rigorously the National Lottery is regulated. There has been extraordinary

growth in online gambling in Ireland over the past ten to fifteen years. As the State moves to regulate this industry for the first time, with the forthcoming establishment of the Gambling Regulatory Authority in 2025, it is vital that National Lottery players and the general public are assured that the National Lottery has been strictly regulated for over a decade.

In this strategy period, therefore, the Regulator will enhance communications with stakeholders and increase the visibility of the work of her Office through appropriate opportunities for engagement.

The Regulator will also work towards ensuring that, as more players move towards playing the National Lottery online, local retailers continue to be supported in their pivotal role in the National Lottery's future.

The Licence to operate the National Lottery was awarded for 20 years from November 2014. This goal relates to safeguarding the existence and value of the National Lottery beyond the term of the Licence.



Strategic Goal 4: Good Causes Funds

Good Causes funds are as great as possible in a safe and regulated environment

- 1 Facilitate raising Funds for Good Causes consistent with Propriety, Player Protection and Long-Term Sustainability.
- 2 Monitor and analyse the relationship between sales and Good Causes funds.
- 3 Provide timely, accurate, and transparent reporting of amounts raised for Good Causes.
- 4 Ensure timely transfer of Good Causes funds to the Exchequer.
- 5 Ensure appropriate promotion of the National Lottery by the Operator.

The financial model in the Licence provides that, after prize monies for players have been allocated, Good Causes receive the largest proportion of proceeds of the sales of National Lottery tickets (65% of sales less prizes). The Operator, which incurs the cost of operating the National Lottery games, receives what remains after Good Causes monies, the Regulator's levy, and commissions to over 5,000 retailers have been deducted. The model also incentivises the Operator to maximise funds for Good Causes.

Maximising the funds raised for Good Causes from National Lottery sales means more projects, facilities and activities will be available to the people of Ireland. However, attaining this goal is always secondary to ensuring a safe and properly run National Lottery that will continue into the future. **The Regulator always prioritises the interests of players and the National Lottery's long-term reputation over short term financial gains.**



Returns from National Lottery sales go towards funding projects, facilities, and activities for the purposes of sport and recreation; national culture and heritage, including the Irish language; the arts; health of the community; youth, welfare, and amenities; and the natural environment.





Strategic Goal 5: Governance

Governance of the ORNL achieves best in class

- 1 Timely compliance with legal and public sector governance obligations.
- 2 Maintain a strong system of internal controls for all operations.
- 3 Leverage new digital resources in a secure manner.
- 4 Provide a supportive working environment for staff.
- 5 Effective and efficient use of financial resources.

The Regulator’s vision and strategic goals are most likely to be achieved if the ORNL is well governed and managed, within a culture that supports these goals.

It is important that appropriate physical, human, and digital resources are in place to ensure the successful implementation of the strategy in a timely manner and with the desired effect. The deployment of financial resources to achieve this will be governed with strong internal controls that achieve value for money as well as compliance with public sector rules and targets.

In this strategy period, the Regulator will focus on leveraging new digital resources that can support the effective and efficient use of the ORNL’s overall resources, in an appropriate and secure manner.

It is important that the ORNL leverages its resources in a manner that effectively and efficiently supports the successful implementation of the strategy while holding ourselves to the high standards expected of public officials.



Resources

Financial Resources

The ORNL is funded by a levy on the Operator of the National Lottery's income over the 20 years of the Licence. This is set in the Licence at €1,500,000 in the first year of operations and indexed to the Consumer Price Index thereafter. In 2025 the levy for the year was €1,817,100.

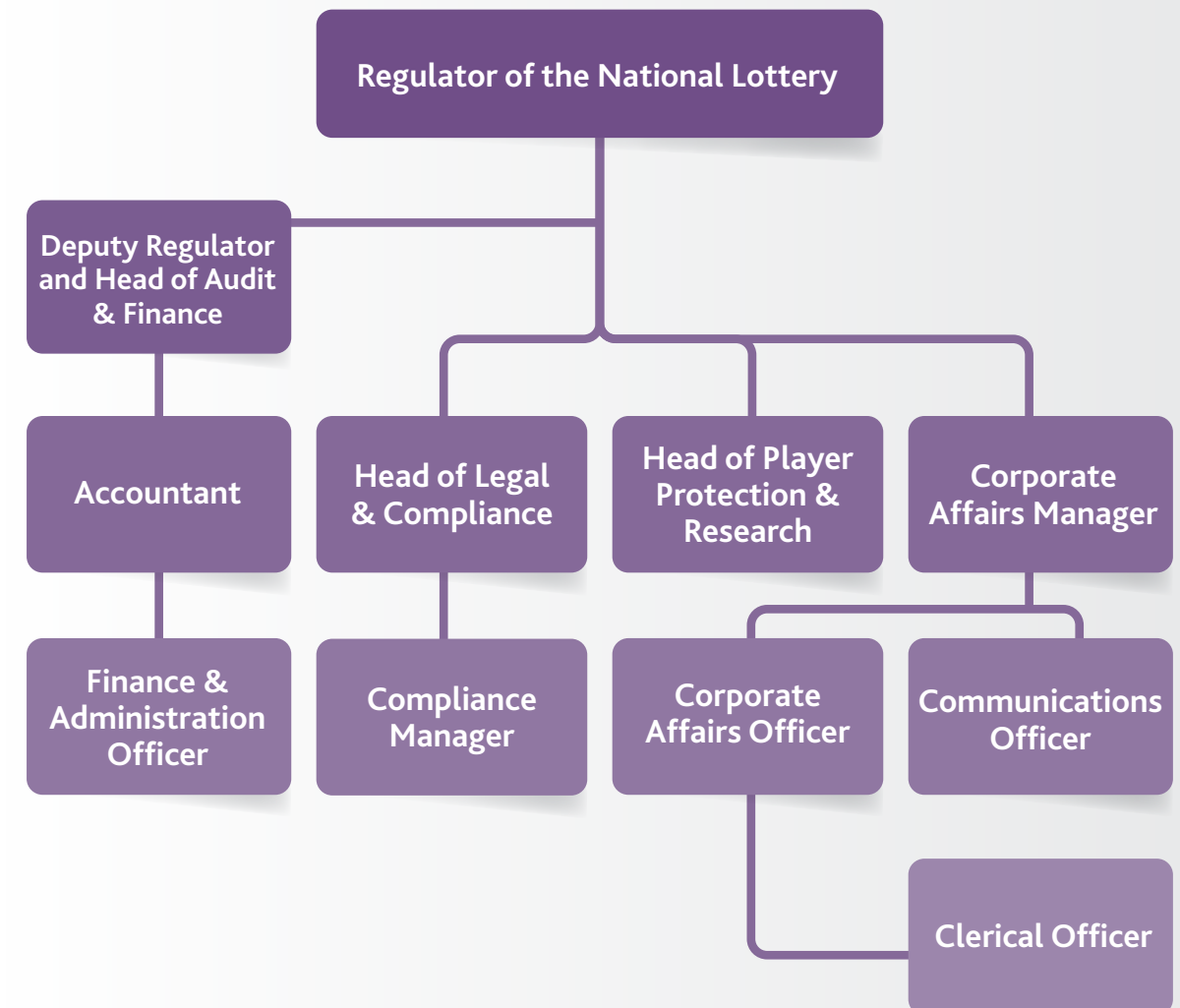
Given the fixed nature of the funding of the Office (subject only to Consumer Price Index changes), the Regulator adopts a prudent multi-annual approach to budgeting, to ensure in so far as is possible that sufficient funds are in place to meet foreseeable costs, e.g., rising staff and premises costs and occasional large research projects, as well as unforeseeable future costs, e.g., exceptional legal costs.

Personnel and Advisors

The Act provides that the Regulator may, with the consent of the Minister, determine the number, grading, remuneration and other conditions of service of staff to be appointed to the ORNL and that the Regulator may, from time to time, engage such consultants as considered necessary to assist in the discharge of the Regulator's functions.

The Regulator is assisted in the discharge of her responsibilities by ten permanent staff who have expertise and experience in accounting, auditing, law, psychology, research, governance, compliance, public sector administration, and communications. As the organisation chart demonstrates, the staffing resources applied to each area of the ORNL is designed to ensure that each of the Regulator's functions and objectives has dedicated resources at a senior level. These resources are supplemented with external experts - in particular in the areas of legal services, ICT, market research, finance/accounting, and communications - to provide a 360-degree view of the Operator, and to ensure the highest standards and informed decision-making.

Organisation Chart



Appendix: Human Rights and Equality

The Irish Human Rights and Equality Commission Act 2014 creates certain obligations for public bodies in relation to human rights and equality issues. The Act creates a “Public Sector Duty” which is to have regard to the need to eliminate discrimination, promote equality of opportunity and treatment, and protect human rights of both staff and those to whom they provide services.

The ORNL operates as an employer and deals with queries and complaints from participants in National Lottery games and members of the public and has interactions with individuals in Premier Lotteries Ireland (the Operator of the National Lottery), the Department of Public Expenditure, NDP Delivery and Reform, as well as service providers, the media, and other interested parties.

The ORNL has comprehensive policies in place in order to eliminate discrimination, promote equality of opportunity and treatment, and protect human rights of both ORNL staff and those they provide services to. All actions identified to be taken in the previous Strategy Statement period 2022 to 2024 were implemented within that three-year period.

Additional actions to be taken in the three-year period of this Strategy have been identified as opportunities to deepen understanding of “equality” within the organisation beyond the level achieved in the previous strategy period. Specifically:

- **All staff will receive expert collective training on Equality, Diversity and Inclusion throughout 2025;**
- **Staff who answer the main office phonenumber will also receive training on how to best assist people with a hidden disability or communication barrier who may need extra time and understanding when they contact the ORNL.**



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