



Rialálaí an Chranachuir Náisiúnta
Regulator of the National Lottery

CONSOLIDATE & COMMUNICATE



STRATEGY STATEMENT

2022 - 2024



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Regulator's Foreword



The first seven years of the Office of the Regulator of the National Lottery's (ORNL) existence has been a time of immense change and progress in the operation and regulation of the National Lottery. A comprehensive system of regulatory oversight has been established and the full range of tools available to the Regulator have been deployed. There has been continuous growth in returns to good causes during the period and increased public appetite to understand more about how the National Lottery is operated and regulated.

The unprecedented disruption brought by the Covid-19 emergency tested the controls and strategies of the ORNL and they did not falter. Our strategic goals guided us through the uncharted waters of urgent, novel, and complex issues that the pandemic created. Specific pandemic-related protections were put in place for players and the National Lottery continued to be resilient throughout 2020 and 2021 and returns to good causes were maintained. I would like to pay tribute to the excellent work of the staff of ORNL during this time, whose agility and determination made this possible.

The period ahead will certainly be one of further change. The long-term impact of the Covid-19 pandemic on how consumers engage with, pay for, and use products and services has yet to become apparent but the consumer and technology environment in which the National Lottery operates continues to change with speed. At the same time, public attitudes to the National Lottery are also impacted by their views on its origins and ownership, its regulation, the funding it generates for Good Causes, and concerns about problem gambling in society. Forthcoming debate on legislation to re-regulate the gambling sector will shine a spotlight on how National Lottery products are sold and regulated. In this period, we will consolidate and build on the system of regulatory oversight that has been established.

In preparing for this Strategy period, the ORNL sought feedback from stakeholders - independently collected – on how the ORNL communicates with its stakeholders: players and participants, lottery retail agents, the operator, the Department of Public Expenditure and Reform, industry experts, and the media. It was clear that all stakeholders want more information on the regulation of the National Lottery that is easier to find and in easy to digest formats. I would like to thank all those who gave their time to assist us in this regard.

The ORNL must also evolve to meet new regulatory requirements and best practice regarding blended working and climate change action that will be determined by Government in this strategy period.

The full range of strategies that will be employed by the ORNL to support each of our five strategic goals in 2022 to 2024 are set out in this Strategy Statement. Each strategy will be employed in a manner that takes



account of the prevailing environment in which regulatory oversight of the National Lottery is being delivered. Five strategies that are specifically targeted at the anticipated commercial, social, and regulatory environment in the three-year period ahead are highlighted.

This Statement of Strategy will be supported by detailed annual business plans over the three-year period. It will help us to build on the progress we have made to date and continuously improve how we deliver our statutory functions within the ever-changing context. It also reflects our commitment to a set of values that guides us in everything we do.

As Regulator of the National Lottery, I have the honour of working closely with a dedicated staff who share my commitment to ensuring that the National Lottery is run to the highest standards, that the interests of participants are always protected, that the future of the National Lottery is guaranteed and the support it provides to good causes across the country continues into the future.

A handwritten signature in blue ink that reads "Carol Boate".

Carol Boate
Regulator of the National Lottery

1. Introduction

This is the Strategy Statement for the Office of the Regulator of the National Lottery for the period 2022 – 2024. It sets out the vision, mission, values, and role of the Regulator and the strategies that will be employed to support each of her five strategic goals.

It has been informed by our statutory obligations, engagement with stakeholders, and our desire to fulfil our role as guardians of this important state asset and all who participate in National Lottery games.

The full range of strategies that will be employed by the Regulator to support each of her five strategic goals in 2022 to 2024 are set out in section 3. These have been tried and tested over the past seven years and found to be effective even in the face of the unprecedented disruption of the Covid-19 pandemic. All strategies will be implemented with cognisance of the prevailing environment.

Five strategies that are specifically targeted at the anticipated commercial, social, and regulatory environment in the three-year period ahead are highlighted below.

	Target Strategy	Outcome	Related Strategic Goal
A	Obtain independent expert assurance regarding aspects of the Operator's systems and controls related to the security of player and winner identity data	The National Lottery Operator has appropriate security for player identity data	The National Lottery is run with all due propriety
B	Codify the responsible gaming practices in place to prevent problem play and identify areas for improvement.	Improved effectiveness in the National Lottery Operator's responsible gaming practices to prevent problem play.	The interests of participants are protected
C	Conduct an underage mystery shop exercise to assess progress made in the prevention of sales to minors, compared to the baseline established in 2018; take any action required.	The National Lottery Operator has effective measures in place to prevent minors from purchasing in retail.	The interests of participants are protected
D	Provide more accessible information to the public on how the National Lottery is regulated and returns for Good Causes are calculated and transferred to the Exchequer.	Greater transparency and understanding of the National Lottery.	The long-term sustainability of the National Lottery is safeguarded and Funds for good causes are maximised
E	Introduce new hybrid working in a manner that supports effective performance and meets new targets for remote working and climate change.	High performing ORNL that complies with new governance requirements.	Governance of the Office achieves best practice and value for money



Consumer Behaviour

Consumers are increasingly moving towards online products and services and this trend was accelerated by the pandemic. While National Lottery tickets continue to be played predominantly in the retail setting, the digital channel is growing, and younger players are more likely to engage online. In-store retail shopping patterns are also changing. Shopper appetite for convenience and speed has seen a move to self-service and automated processes and away from manned tills. Digital payment methods and digital interfaces are increasingly popular. These trends have been accompanied by the decline of cash, cheques, and paper-based processes, and consumer demands and legal requirements for robust security over personal data and establishing identity.



Technology Development

Technology development has made store-level lottery hardware smaller, cheaper, and capable of relying on mobile and wireless communication. It has facilitated a greater speed of innovation in lottery product design, particularly online instant win games. Licenced online gambling companies have developed cross-jurisdictional betting products that offer to match the jackpot prize of Irish National Lottery draws. Consumers do not always understand that these products are not the same as purchasing a National Lottery ticket: National Lottery products are held to strict regulatory standards and 65% of returns must go to the State to support Good Causes.



Social Context

Increased public concern about the potential harm caused by gambling has led to a stronger need for assurance that the National Lottery games are safe, fair, and robustly regulated. At the same time, the National Lottery needs to be relevant and of interest to adults who were born after its launch in 1987 or the long-term value and benefits of this State asset will diminish over time. There appears to be little public understanding of *how* the National Lottery is regulated and there is public appetite for assurance that returns to Good Causes are properly calculated, transferred to the Exchequer, and distributed.



Regulatory Context

It is anticipated that a Gambling Regulatory Authority will be established in the period of this Strategy Statement to regulate the broader gambling sector. This will shine a comparative spotlight on how National Lottery products are sold and regulated.

Like many organisations, the ORNL faces the challenge of successfully introducing and managing hybrid working. This must be done in line with public sector rules and targets. Public bodies will also be required to do their part in halting Climate Change by meeting new targets in the period.



Targeted Strategies

Strategy A: Obtain independent expert assurance regarding aspects of the Operator’s systems and controls related to the security of player and winner identity data

Outcome: The National Lottery Operator has appropriate security for player identity data

External expert reviews of aspects of the operation of the National Lottery on behalf of the Regulator are a useful tool for supplementing the expertise within the ORNL and obtaining independent assurance that the Operator’s systems are fit for purpose. The work programme in the period ahead will include a review of aspects of the Operator’s systems and controls to confirm that the National Lottery has robust security in place for player identity data, particularly in the growing online channel.

Strategy B: Codify the responsible gaming practices in place to prevent problem play and identify areas for improvement.

Outcome: Improved effectiveness in the National Lottery Operator’s responsible gaming practices to prevent problem play.

Several specific measures to prevent problem play are required by the Act and Licence, for example: sales are limited to the hours of 7am to 11pm; purchasers must be over 18; daily, weekly, and monthly spend limits are applied to individuals playing online. Additionally, the Licence obliges the Operator to operate the National Lottery in accordance with “*responsible gaming practices that prevent problem play*”.

Since its inception, the ORNL has engaged the Operator on the responsible gaming practices required and how to make them most effective. As a result, several other measures have been put in place over the past seven years and the effectiveness of measures is improving over time. These measures include a “Think 21” campaign in retail; training for contact centre agents to spot and respond to signs of problem play in player calls and emails to the National Lottery; using an algorithm to monitor online play for signs that a player may be at risk of problem play; credit cards no longer accepted for payment online.

Consolidating the responsible gaming practices already in place and identifying areas for improvement, in a living document, will codify current practice and new or better practices as they are applied.

Strategy C: Conduct an underage mystery shop exercise to assess progress made in the prevention of sales to minors, compared to the baseline established in 2018; take any action required.

Outcome: The National Lottery Operator has effective measures in place to prevent minors from purchasing in retail.

In 2018, the Regulator commissioned the first ever test purchase research to establish baseline measures for assessing the effectiveness of the systems in place to prevent underage purchase of National Lottery



retail products. The results were disappointing: the key “Over 18s” sign was found to be on display in just 73% of retail premises tested and underage test purchasers were challenged (i.e., asked their age and/or for ID) by the staff member in just 63% of purchase attempts.

Following the publication of the ORNL Mystery Shop report, the Operator initiated a retail communications plan reminding retailers and customers of the Over 18 requirement. It commenced its own mystery shop campaigns and a “Think 21” campaign.

Underage purchase of any gambling product is a known risk factor for developing problem gambling. The Regulator will commission a repeat of the 2018 test purchase exercise within the period of this Strategy Statement to assess whether the Operator’s actions have led to sufficient improvement in retailer compliance with these important measures to protect minors.

Strategy D: Provide more accessible information to the public on how the National Lottery is regulated and returns for Good Causes are calculated and transferred to the Exchequer.

Outcome: Greater transparency and understanding of the National Lottery.

In preparing for this Strategy period, the Regulator sought stakeholders’ views on how the Regulator communicates the role and work of the Office. The findings were that, while information may be available in annual reports and other publications on rnl.ie, stakeholders wish to see more information that is easier to find and in easy to digest formats. Areas of particular interest were how the returns to Good Causes are calculated under the Licence and transferred to the Exchequer; how the National Lottery protects players at risk of problem gaming; what assurance is available to the Regulator that the National Lottery is being properly run.

During the three-year period of this Strategy Statement, a new website and new communications will be launched with the aim of providing more information on how the National Lottery is regulated in a more accessible form.

Strategy E: Introduce new hybrid working in a manner that supports effective performance and meets new targets for remote working and climate change.

Outcome: High performing ORNL that complies with new governance requirements.

The period of this Strategy Statement coincides with new requirements on public sector organisations regarding remote working and climate change and with the ending of the lease on the Office’s current premises. The Regulator will work to develop and implement a hybrid working model that supports effective performance of the Office. The new office premises will support the optimal hybrid working model and lower carbon emissions.



2. About the Office of the Regulator of the National Lottery

The office of the Regulator of the National Lottery is an independent statutory office established in 2014 under the National Lottery Act 2013, and the holder of the office is known as the Regulator of the National Lottery.

Vision

The Regulator’s vision reflects the statutory objectives given to her by the Oireachtas:

“a safe, sustainable, properly run National Lottery maximising funds for good causes”

Mission

1. **Overseeing the operations of the National Lottery and enforcing compliance as required**
2. **Considering proposals from the Operator and approving them as appropriate**
3. **Managing and controlling the National Lottery Fund**
4. **Exercising the enforcement rights of trademarks of the National Lottery**
5. **Ensuring best practice in governance is adopted in the management of the Office**

Values

The staff of the Office of the Regulator of the National Lottery (ORNL) act as guardians of this important State asset and these values apply to its activities and underpin its culture:



Role of the Regulator

The **functions** of the Regulator are described in the Act and include the following:

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

The Act gives clear statutory **objectives** to the Regulator in the performance of her (his) functions. The Regulator must carry out these functions in an independent 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 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.

The **Operator** of the National Lottery (Premier Lotteries Ireland) has the responsibility of operating the National Lottery in compliance with the Act and terms of the Licence to operate the National Lottery.



3. Strategic Goals



The Regulator has determined her five strategic goals to be:

Goal 1:

The National Lottery is run with all due propriety

Goal 2:

The interests of participants are protected

Goal 3:

The long-term sustainability of the National Lottery is safeguarded

Goal 4:

Funds for good causes are maximised (subject to goals 2, 3 and 4)

Goal 5:

Governance of the ORNL achieves best practice and value for money

The Regulator considers these five goals in every decision she takes, and they are strongly interdependent.

This section sets out the strategies that will be employed by the Regulator to support each of her five strategic goals, in the prevailing environment during the period 2022 to 2024.

Goal 1: The National Lottery is run with all due propriety

State lotteries vary significantly across the world in their design – from the product categories and sales channels allowed, to the Operator:Good Causes revenue model. 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.

Strategies

The current Licence to operate the National Lottery will not expire until November 2034. Therefore, in the period of this Strategy Statement, the strategies employed by the Regulator to support this goal are:

Continue to:	Target Outputs/Outcomes
<ul style="list-style-type: none"> Manage and control the Fund. 	<ul style="list-style-type: none"> Revenues raised from the sale of National Lottery tickets and the amounts going to prizes, Good Causes, retailers and the Operator are all accounted for correctly.
<ul style="list-style-type: none"> Monitor and enforce compliance by the Operator with the Licence and the Act using a variety of proactive and responsive tools (e.g., regular reports, themed reviews, investigations, feedback from the public, real time access to operational data, advertising, and social media surveillance). 	<ul style="list-style-type: none"> All monitoring activities completed, and any potential issues of concern raised in a timely manner Enforcement action taken where breaches identified Operator compliance with the Act and Licence
<ul style="list-style-type: none"> Maintain an awareness of the experience of other regulators, in awarding licences in Ireland and in designing, awarding, and enforcing lottery licences in other countries. 	<ul style="list-style-type: none"> Attend relevant meetings of European lottery regulators and Irish regulators. Current regulation and future licensing of the Irish National Lottery benefits from the experience of other countries and other licensing regimes in Ireland.
<ul style="list-style-type: none"> Monitor the governance of the Operator through regular reports and quarterly meetings. 	<ul style="list-style-type: none"> Quarterly meetings held Operator attains strong governance
<ul style="list-style-type: none"> Monitor key activities of the Operator and performance metrics on a weekly, monthly, and annual basis. 	<ul style="list-style-type: none"> Metrics reviewed and any potential issues of concern raised in a timely manner Operator achieves performance targets
<ul style="list-style-type: none"> Monitor the Operator’s controls and systems. 	<ul style="list-style-type: none"> Monitoring activities completed and any potential issues of concern raised in a timely manner. Operator has effective controls and systems



<ul style="list-style-type: none"> Consider the reputation of the National Lottery when considering requests for approval e.g., of new games. 	<ul style="list-style-type: none"> Reputation of the National Lottery considered in each request for approval from the Operator National Lottery brand trust maintained or increased
<ul style="list-style-type: none"> Employ a risk-based approach in all the above. 	<ul style="list-style-type: none"> ORNL resources deployed efficiently and effectively across all the above
<p>In this Three-Year Period:</p>	<p>Target Outputs/Outcomes</p>
<ul style="list-style-type: none"> Obtain independent expert assurance regarding aspects of the Operator’s systems and controls related to the security of player identity data. 	<ul style="list-style-type: none"> Report procured in 2024 regarding aspects of Operator’s systems and controls Findings acted upon The National Lottery Operator has appropriate security for player identity data

Goal 2: The interests of participants are protected

A variety of interests of participants are protected by the Regulator. These typically relate to protecting the interests of participants as consumers, as winners, and from the risk of excessive or problem play.

Preventing problem play applies to the general player population but is particularly focused on those who are underage (under 18 years of age) and vulnerable players (those who have a susceptibility to excessive or problem play).

The Regulator seeks to ensure that the Operator employs effective responsible gaming practices and advertising standards; that information provided to participants is transparent, accessible, and does not mislead; and that winners have a reasonable opportunity to claim their prize and can maintain anonymity. International research into the causes and consequences of problem gambling demonstrates that those who commence gambling at an early age, including by playing lottery games, are far more likely to develop a problem. For this reason, the Regulator has always placed a high priority on the prevention of sales to minors as part of this strategic goal. This prioritisation will continue during the three years of this Strategy.

Strategies

The Regulator will therefore undertake the following:

Continue to:	Target Outputs/Outcomes
<ul style="list-style-type: none"> Monitor and enforce compliance by the Operator with its obligations towards participants in the Licence and the Act (e.g., the content of advertisements, the speed with which prizes are paid, protecting the anonymity of winners). 	<ul style="list-style-type: none"> Every report required from the Operator is reviewed by the assigned staff member(s) in the assigned timeframe and potential enforcement matters referred to Legal and Compliance for assessment
<ul style="list-style-type: none"> Monitor and assess communications with players (e.g., marketing communications, complaints). 	<ul style="list-style-type: none"> All complaints to the Operator are reviewed by the assigned staff member(s) in the assigned timeframe and potential matters escalated to the Regulator for consideration Legal and Compliance reviews Operator's advertising and PR activity and identifies any potential non-compliance
<ul style="list-style-type: none"> Assess whether the rules of each proposed game and key game information are readily available, clear, and complete. 	<ul style="list-style-type: none"> Game rules readily available, clear, and complete. Key game information readily available, clear, and complete.
<ul style="list-style-type: none"> Assess the structural features of each National Lottery game proposal and the playing environment. 	<ul style="list-style-type: none"> Structural features of each National Lottery game are assessed and fall within acceptable risk thresholds



<ul style="list-style-type: none"> Research and identify processes and practices that have demonstrated effectiveness in preventing or minimising the risk of problem play. 	<ul style="list-style-type: none"> Key research journals reviewed to identify new research of relevance Continuous learning in ORNL
<ul style="list-style-type: none"> Benchmark the National Lottery against other state lotteries internationally by gathering data. 	<ul style="list-style-type: none"> Attendance at (virtual) international meetings of regulators related to safer lotteries Weekly industry news monitoring
<ul style="list-style-type: none"> Monitor the Operator’s player protection controls and practices through regular reports, data, and random testing 	<ul style="list-style-type: none"> Review quarterly player protection reports and data and identify patterns Random tests performed on player protection tools in practice and findings acted upon National Lottery’s player protection tools operating effectively
<p>In this Three-Year Period:</p>	<p>Target Outputs/Outcomes</p>
<ul style="list-style-type: none"> Codify the responsible gaming practices that the Operator must employ to prevent problem play and identify areas for improvement. 	<ul style="list-style-type: none"> Consolidated document by end 2022 and published shortly thereafter. Operator compliance with framework. Improved effectiveness in the National Lottery Operator’s responsible gaming practices to prevent problem play.
<ul style="list-style-type: none"> Conduct an underage mystery shop exercise to assess progress made in the prevention of sales to minors compared to the baseline established in 2018, and take any action required. 	<ul style="list-style-type: none"> Fieldwork conducted in 2023. Assessment of Operator’s success in preventing sales to minors and any further action required. Report findings published. The National Lottery Operator has effective measures in place to prevent minors purchasing in retail.

Goal 3: The long-term sustainability of the National Lottery is safeguarded

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.

Strategies

To pursue this goal the Regulator will undertake the following:

Continue to:	Target Outputs/Outcomes
<ul style="list-style-type: none"> ▪ Prioritise long term sustainability over short term returns for good causes, such as by assessing the potential impact on the reputation of the National Lottery when considering requests for approval e.g., of new games. 	<ul style="list-style-type: none"> ▪ Long term sustainability of the National Lottery considered in each decision by the Regulator ▪ National Lottery brand positivity maintained or improved ▪ National Lottery sales are maintained at sustainable levels
<ul style="list-style-type: none"> ▪ Protect the rights of trademarks of the National Lottery through monitoring their use by the Operator and by third parties, and enforcement where required. 	<ul style="list-style-type: none"> ▪ Annual review by ORNL of use of trademarks by Operator and any findings acted upon. ▪ Operator monitors third party use of trademarks and bring any inappropriate use to Regulator's attention and takes enforcement action where necessary. ▪ Annual review by ORNL of use of trademarks by third parties. Where inappropriate use identified, the Regulator directs the Operator to take enforcement action.
<ul style="list-style-type: none"> ▪ Assess the sales levels and performance of National Lottery products. 	<ul style="list-style-type: none"> ▪ ORNL aware of the past performance of individual National Lottery games informs assessment of future proposals and their likely performance and longevity.
<ul style="list-style-type: none"> ▪ Monitor the business plans of the Operator. 	<ul style="list-style-type: none"> ▪ Annual presentation held. ▪ ORNL aware of the context of the Operator's view of the challenges and opportunities facing the National Lottery when assessing proposals.
<ul style="list-style-type: none"> ▪ Monitor public perceptions and brand tracking indicators regarding the National Lottery. 	<ul style="list-style-type: none"> ▪ ORNL aware of the general public's views on the National Lottery when assessing proposals from the Operator.



<ul style="list-style-type: none">▪ Monitor technological developments through local and international industry news monitoring and relevant industry events.	<ul style="list-style-type: none">▪ Weekly industry news monitoring▪ Attendance at relevant industry events▪ ORNL up to date on industry trends and understanding the challenges facing the lottery industry generally.
In this Three-Year Period:	Target Outputs/Outcomes
<ul style="list-style-type: none">▪ Provide more accessible information to the public on how the National Lottery is regulated, in particular regarding its probity, player safety, and returns for Good Causes.	<ul style="list-style-type: none">▪ New website offers more accessible information to the public on how the National Lottery is regulated.▪ Greater transparency and understanding of the National Lottery.

Goal 4: Funds for good causes are maximised

This strategic goal is subordinate to the first three goals.

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. Maximising the funds raised for these purposes 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 long term. The financial model in the Licence incentivises the Operator to maximise funds for good causes.

Strategies

Strategies employed by the Regulator to achieve this goal will be:

Continue to:	Target Outputs/Outcomes
<ul style="list-style-type: none"> ▪ Manage and control the Fund from receipt of funds from Operator to transfers to Exchequer. 	<ul style="list-style-type: none"> ▪ The amounts going to Good Causes are accounted for correctly.
<ul style="list-style-type: none"> ▪ Assess the potential impact on returns for Good Causes when considering requests for approval e.g., of new games. 	<ul style="list-style-type: none"> ▪ Impact on returns for Good Causes assessed and considered in each decision by the Regulator
<ul style="list-style-type: none"> ▪ Prioritise the interests of participants and the probity and long-term sustainability of the National Lottery over short term returns for Good Causes. 	<ul style="list-style-type: none"> ▪ Positive expected returns for Good Causes assessed considered only after the impact on the interests of participants and the probity and long-term sustainability of the National Lottery are satisfactory
In this Three-Year Period:	Target Outputs/Outcomes
<ul style="list-style-type: none"> ▪ Provide more accessible information to the public on how National Lottery returns for Good Causes are calculated and transferred to the Exchequer 	<ul style="list-style-type: none"> ▪ New website offers more accessible information to the public on the calculation of returns for Good Causes and their transfer to the Exchequer. ▪ Greater transparency and understanding of the National Lottery.

Goal 5: Governance of the Office achieves best practice and value for money

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 the goals.

It is important that mechanisms are in place to ensure the successful implementation the strategy in a timely manner and to ensure that the measures being implemented are having the desired effect. These mechanisms also provide an opportunity for management to reflect on what may not be working as well as anticipated and to put remedial measures in place to address issues identified. Actions will be undertaken in a manageable and prioritised manner with regular reporting to ensure that we stay on track to implement our strategy.

Strategies

The strategies employed by the Regulator to enable and ensure that the Office performs at its best will be:

Continue to:	Target Outputs/Outcomes
<ul style="list-style-type: none"> Procure all goods and services for the Office in a manner that ensures both compliance with procurement rules and value for money. 	<ul style="list-style-type: none"> Positive Annual Assurance Reports from the outsourced Internal Auditor and from the Comptroller and Auditor General
<ul style="list-style-type: none"> Comply with the Code of Governance of State Bodies 2016, as it applies, and the most recent employment law and public sector circulars. 	<ul style="list-style-type: none"> Positive Annual Assurance Reports from the outsourced Internal Auditor and from the Comptroller and Auditor General
<ul style="list-style-type: none"> Prepare financial statements in compliance with all relevant accounting standards and ensure they are audited and laid before the Houses of the Oireachtas within required timelines. 	<ul style="list-style-type: none"> Draft accounts sent to C&AG by end February each year. Unqualified Statutory Audit Report annually from the Comptroller and Auditor General Final accounts laid before Houses of the Oireachtas within timeline in circular.
<ul style="list-style-type: none"> Continuously improve by keeping our professional knowledge up to date and through innovation underpinned by a risk-based approach. 	<ul style="list-style-type: none"> Staff attend continuous professional development events relevant to their role and/or professional qualification each year.
In this Three-Year Period:	Target Outputs/Outcomes
<ul style="list-style-type: none"> Implement an appropriate hybrid working model for the ORNL, in compliance with guidance, and ensure its effectiveness is supported with relevant training, technology, and staff engagement. 	<ul style="list-style-type: none"> Periodic measurement of staff feedback on hybrid working ORNL productivity is maintained High performing ORNL that complies with new governance requirements.



<ul style="list-style-type: none">▪ Ensure all single points of dependency mitigations are identified and in place.	<ul style="list-style-type: none">▪ Remaining single point of dependency mitigations implemented.
<ul style="list-style-type: none">▪ Implement a staff wellbeing programme in line with government guidance.	<ul style="list-style-type: none">▪ Staff wellbeing programme documented and delivered.
<ul style="list-style-type: none">▪ Better communicate the role of the ORNL.	<ul style="list-style-type: none">▪ New rnl.ie website▪ Communications strategy implemented.▪ Stakeholder knowledge of role of ORNL improved.
<ul style="list-style-type: none">▪ Develop a new dashboard of output and outcome metrics indicating progress towards our Strategic Objectives.	<ul style="list-style-type: none">▪ New metrics dashboard developed and utilised



4. Resources

Financial Resources

The Office of the Regulator of the National Lottery is funded by a levy on the Operator of the National Lottery income over the 20 years of the Licence. This is set in the Licence at €1,500,000 per annum, indexed to the Consumer Price Index.

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 energy costs and future large once-off research projects, and unforeseeable future costs, e.g., exceptional legal costs.

During the three-year period of this Strategy Statement, specific financial resources will be budgeted for:

- a consolidated document on responsible gaming practices;
- a new website providing more accessible information to the public;
- the procurement of an independent expert review of aspects of the Operator's systems and controls;
- a mystery shop exercise;
- a new office premises that meets the requirements of effective hybrid working and lowering carbon emissions.



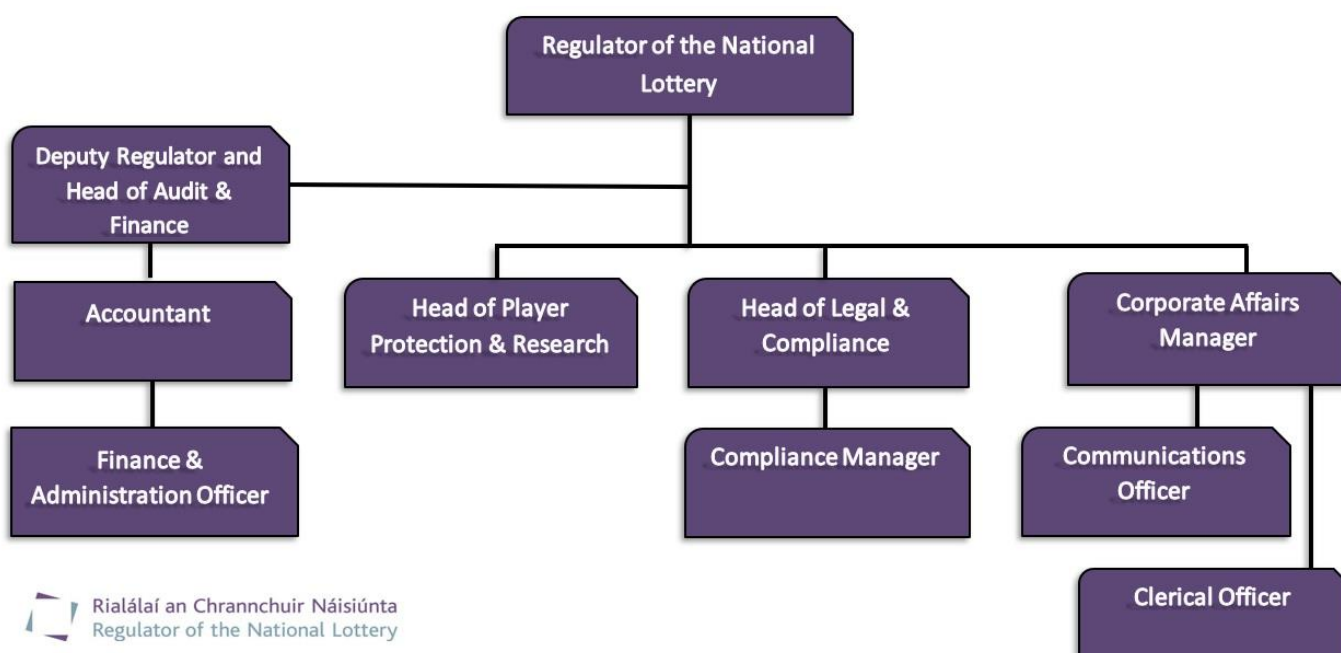
Personnel and Advisors

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 Office of the Regulator 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 nine permanent staff who have expertise and experience in accounting, auditing, law, psychology, research, governance, compliance, public sector administration, and communications. As the organisation chart below 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 and project work - in particular in the areas of research, law, finance/accounting, ICT, and communications - to provide a 360-degree view of the Operator, and to maintain the highest standards and informed decision-making in the areas of highest risk.

ORGANISATIONAL 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.

During the period of the previous Strategy Statement, an assessment was conducted to identify the human rights and equality issues that the work of the Regulator either directly or indirectly affects or is affected by. The assessment reviewed how the ORNL interacts with the public and stakeholders and how we work within our own organisation. 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 and Reform, as well as service providers, the media, and other interested parties. The assessment found that there were many policies already in place to to eliminate discrimination, promote equality of opportunity and treatment, and protect human rights of both staff and those they provide services to.

Additional actions to be taken in the three-year period of this Strategy were identified as:

- This Strategy Statement will be published on the ORNL website;
- Staff, and in particular those who provide services to third parties, will receive training which outlines the extent of the Duty and the ORNL’s structures and polices relating to it;
- Staff will be referred to the parts of the Staff Handbook that address the elimination of discrimination, promotion of equality of opportunity and treatment, and protection of human rights.
- The Positions Available page of the website will be amended to state that the Office is an equal opportunities employer, and this ethos will be followed when interviewing candidates and recruiting staff.
- The website will be updated to refer to and explain the Duty and provide easy access to related information (e.g., Strategic Plan, Customer Charter, etc) and include details of the Access Officer (see below);
- The Customer Service Charter will be amended to include details of the Access Officer;
- The Complaints Procedure webpage of the website will be amended to refer to the Duty and include an offer of assistance for anybody who requests it; and
- The FOI page of the website will be amended to include an offer of assistance for anybody who requests it.

The ORNL continues to review and update its policies on a cyclical basis in a scheduled manner and in so doing will ensure that each policy review is conducted in full consideration of the need to promote equality of opportunity and treatment, and protection of human rights of both staff and stakeholders, to ensure that we remain mindful of the impact the organisation has on its people and those we engage with.