



Crannchur Náisiúnta
Sráid na Mainistreach Íochtarach
Baile Átha Cliath 1
D01 Y1X2

National Lottery
Abbey Street Lower
Dublin 1
D01 Y1X2

T: +353 1 889 1000
E: info@lottery.ie
W: www.lottery.ie

Mr Sam Keenan
Committee Secretariat
Committee of Public Accounts
Dail Eireann
Leinster House
Dublin 2

8th March 2023

Reference: S1221 PAC 33

By email – pac@oireachtas.ie

Dear Mr Keenan,

I refer to your letter of 22 February 2023.

As you will be aware, as the operator of the National Lottery, Premier Lotteries Ireland DAC (PLI) is accountable to the Regulator of the National Lottery (the “Regulator”) in relation to the operation of the National Lottery to ensure compliance with the National Lottery Act 2013 and the Licence to Operate the National Lottery. A key part of that oversight concerns player protection matters.

In terms of responding to the questions that you have raised, I am mindful of our compliance requirements in the context of our accountability to the Regulator and to reference the oversight of that office in their supervision of the operation of the National Lottery.

I will deal with the questions you have raised in the order you raise them;

1. The National Lottery’s Player Protection measures

The manner in which PLI acts to protect players is subject to independent regulatory oversight, is certified as meeting the highest relevant international standards and is subjected to external expert review which facilitates continuous improvement.

It is among the key functions of the Regulator to ensure that the National Lottery is run with all due propriety, and that the interests of players are protected. The Regulator’s website details her office’s focus and priorities concerning player protection (www.rnl.ie). PLI provides detailed player protection reports to the Regulator on a weekly and quarterly basis.



Príomh-Chrannchuir Éireann CGA, Premier Lotteries Ireland DAC.

Cuideachta Gníomhnaíochta Ainmnithe, Cláraithe in Éirinn, Uimhir Chláraithe na Cuideachta 527900. Seoladh Cláraithe: Sráid na Mainistreach Íochtarach, Baile Átha Cliath, D01 Y1X2.

Stiúrthóirí D McRedmond (Éireannach), P Quinn (Éireannach), V Jupp (Éireannach), A Algeo (Éireannach), D Kelly (Éireannach), D Byrne (Éireannach), I Echave (Spainnis), J Mendonca (Ceanadach).

Designated Activity Company, Registered in Ireland, Company Number 527900. Registered Address: Abbey Street Lower, Dublin 1, D01 Y1X2.

Directors: D McRedmond (Irish), P Quinn (Irish), V Jupp (Irish), A Algeo (Irish), D Kelly (Irish), D Byrne (Irish), I Echave (Spanish), J Mendonca (Canadian).



The National Lottery's player protection measures are listed and updated from time to time on our website. This information is prominently signposted including by multiple references on our home page (www.lottery.ie).

Many specific player protection measures can be viewed on our website at www.lottery.ie/useful-info/play-responsibly/our-commitment-to-our-players-and-our-player-protection-scheme and can be categorised as follows:

- Providing responsible games;
- Limiting player spend;
- Limiting the availability of games;
- Communicating with players;
- Advertising controls;
- Training of PLI staff and retail agents;
- External review of PLI operations;
- Research and support for player protection charities.

A more complete description of the measures is detailed in the appendix below for your ease of reference. In particular we provide advice for players on the website at www.lottery.ie/useful-info/play-responsibly under the following headings:

- Set Spend Limits
- Take a Break
- Lock Instant Win Games
- Verify Your Account
- How to play safely

The protection of players is of key importance to the National Lottery and consistently evident in the manner in which games are designed, marketed and operated. All requests to modify or introduce games are subject to detailed risk assessments. There are significant player protection measures and messages in retail outlets at the point of sale as well as in all digital channels.

In terms of transparency, the Regulator's Annual Report provides details on our compliance with the extensive player protection requirements. The Regulator's Annual Reports are also available to view on the Regulator's website.

2. Expenditure on player welfare measures

Player welfare and player protection are incorporated in all aspects of how the National Lottery is operated. In particular, this can be seen in our wide ranging preventative measures, the effect of which can be to constrain ticket sales.

As a result, the cost of player welfare measures to PLI as the operator of the National Lottery comprises of revenue forgone, capital invested and operating costs incurred, as a result of the host of different initiatives referenced above and in the appendix attached.


Given the scale and breadth of the initiatives and measures which are ingrained across the entire breath of the National Lottery offering and PLI's technology, processes and organisation, and the substantial cost associated with foregone revenue from preventative measures, we have requested an external assessment of the cost of these measures to PLI. PLI will forward that information to the Committee, once verified. It is our expectation that the expenditure on player welfare, when estimated in aggregate will be significant and sustained.



3. Clarification of the contact made between the ASAI and PLI, and a copy of the relevant correspondence.

Following a comment made at the Public Accounts Committee meeting on 24 November 2022 suggesting that 40% of the complaints made to the ASAI relate to the National Lottery, PLI sought to clarify this allegation with the ASAI directly as PLI did not believe that the figure referenced was correct. Through contact with the ASAI, PLI was informed that by the end of November 2022, 3% of complaints received by the ASAI related to advertising by the National Lottery. PLI were pleased to obtain clarification on this point and to set the record straight. If the PAC needs any further information on this matter, PLI suggests that it would be advisable to contact the ASAI directly.

I hope that this information is of assistance to the Committee.

DocuSigned by:

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Yours sincerely
Andrew Algeo
CEO



Appendix: National Lottery – Player Protection Measures – March 2023

	Measure	Purpose	Basis
Appropriate Games	1. PLI does not offer sports or event betting, casino or table games.	These games, which have among the highest risk of causing problematic play, are not permitted by the state to be sold by the National Lottery.	Explicit in Licence
	2. All games must be approved by the Regulator before launch.	These games, which have among the highest risk of causing problematic play, are not permitted by the state to be sold by the National Lottery.	Explicit in Licence
	3. All new games are assessed using independent risk assessment tools.	So as to use objective frame of reference for assessing risk when ensuring that the National Lottery's products are appropriate.	Adopted during PLI's term.
	4. Players can block the availability of an instant win game or games within their account in the digital channel.	Players may wish to avoid some instant win games, for many reasons including avoiding problematic play.	Explicit in the Licence and expansion adopted during PLI's term.
Limiting spend	5. Daily, Weekly and Monthly spend limits apply to all digital accounts.	Limits the extent to which a player can spend on their account.	Explicit in Licence
	6. Spend limits on digital accounts can be reduced (self imposed) but never increased over the Licence limits.	Limits possible player spend on their account.	Explicit in the Licence
	7. Within any twenty four hour period; a player may seek to reduce the spend limit on their account such change will take immediate effect, or, a player may seek to increase their spend limit up to the Licence limit and such change will take effect with a twenty four hour lag.	The immediate imposition of a reduction in spend is protective of the player. While the lag in increasing a spend limit ensures the player has a cooling off period before they have access to potential for additional spend.	Explicit in the Licence and expansion adopted during PLI's term.
	8. Players are required to set a spend limit on their account at registration which is at or below the limits set out in the Licence.	Requiring players to preset account spend limits is considered best practice. By educating participants and	Adopted during PLI's term.



		requiring this interaction at registration, participants are encouraged to stop and think about their play in a responsible manner.	
	9. Maximum transaction limit on all scratch card purchases.	Limits transaction spend and creates a forced break in play.	Adopted during PLI's term.
	10. Prizes won on digital play that are greater or equal to €100 are paid directly to the player by cheque, or otherwise, rather than to their National Lottery digital account.	This ensures the player must actively decide what to do with the prize, and in any event interrupts play.	Explicit in Licence
	11. Players can choose to disable their account permanently.	This action of disabling a player's account has been improved to ensure it is as frictionless as possible, allowing a player to permanently remove access to their account. Creating an easy route to remove account access is recommended for people who are vulnerable.	Adopted during PLI's term.
	12. Players can choose to disable their account for customizable limited periods of time.	This action of disabling a player's account has been improved to ensure it is as frictionless as possible and time frames are customisable, subject only to a one month minimum. Creating an easy route to remove account access is recommended for people who are vulnerable.	Explicit in the Licence and expansion adopted during PLI's term.
	13. Players may not fund their National Lottery online account using a credit card.	By not accepting credit cards, we reduce the risk of our players falling into financial difficulty.	Adopted during PLI's term.



	Measure	Purpose	Basis
Constraints on availability	14. All players must present a valid ID in order to make their first deposit to their digital account and upon changing the payment mechanism on their account.	Having to provide valid identification makes it harder for vulnerable players to avoid age limits (18) or open duplicate accounts.	Adopted during PLI's term.
	15. PLI operates systems intended to identify multiple accounts which have been registered by the same player. PLI suspends such accounts where identified.	PLI seeks to strengthen its player protection measures through this action.	Adopted during PLI's term.
	16. Large prizes must be claimed at An Post prize centres or National Lottery HQ – at which ID is checked (universal)	Requiring ID documentation strengthens age control measures.	Explicit in Licence
	17. All staff in National Lottery retail agents exercise a "Think 21" policy except where a retail agent imposes a more onerous requirement such as Think 25.	Having to provide valid age identification makes it harder for underage players to play	Adopted during PLI's term.
	18. Retail terminals closed (10pm-7am)	This provides a forced break in play over night.	Retained by PLI.
	19. Digital channels closed for ticket purchase (11pm - 7am).	This provides a forced break in play and ensures vulnerable persons cannot gain access late at night	Retained by PLI.
Communication	20. Play interruption messages for the online channel.	Notifying players in real time of spend limits or number of tickets purchased, is a recommended responsible play practice.	Adopted during PLI's term.
	21. Player activity programme targets communications to selected players based on analysis of cumulative activity on all accounts over specified reference periods.	Providing information on available responsible play tools and resources is a recommended practice.	Adopted during PLI's term.
Advertising	22. All advertising activity complies with the ASAI Code of Practice on Advertising and a bespoke Code of Practice on Advertising and Promotions which is agreed with the Regulator and reviewed annually.	Advertising must not target vulnerable players or carry messages which are likely to cause difficulty	Explicit in the Licence



Training	23. All PLI staff are trained, at least annually, in player protection	Player protection permeates all the National Lottery does and is incorporated by design. It is necessary that all staff understand player protection obligations.	Adopted By PLI during Licence
	24. All National Lottery agents complete player protection training, at least, annually	National Lottery agents need to understand the player protection program as they interface with customers	Adopted during PLI's term.



	Measure	Purpose	Basis
External review and standards	25. PLI carries out external academic reviews of the National Lottery's player protection measures	Given the developing international understanding of player protection and changing nature of technology available, PLI regularly benchmarks its player protection activities against international best practice and submits to academic review.	Adopted during PLI's term.
	26. PLI complies with Level 4 World Lottery Association and European Lottery Player Protection Standards	So as to ensure that PLI meets at least best practice internationally, PLI is obliged to meet certain standards.	Explicit in the Licence
	27. The Regulator has oversight on player protection measures.	The Regulator of the National Lottery oversees the operation of the National Lottery and in particular the standards and operation of player protection measures.	Explicit in the Licence
Supporting Player Protection Charities, Research and awareness	28. PLI advertises the presence of, solicits the opinions of, and provides funding support to not-for-profit groups and academics who help people who are experiencing or are at risk of gambling harm.	It is appropriate to learn from and support entities who provide treatment to those who experience difficulty with gambling.	Adopted during PLI's term.
	29. PLI has, for the past number of years, carried out a dedicated and focused responsible play week which highlights support services, self-help tools and educational information	Raises awareness of the availability of support services and tools to self regulate.	Adopted during PLI's term.