NICVA response to The Lotteries for Communities Bill consultation

31 July 2025

INTRODUCTION

NICVA (the Northern Ireland Council for Voluntary Action) welcomes the opportunity to respond to Sian Mulholland MLA's private member's bill, The Lotteries for Communities Bill (the Bill) which was launched for consultation on 9 May 2025.

NICVA is the umbrella representative organisation for the voluntary and community sector in Northern Ireland with a membership of over 1,400 organisations.

NICVA's response is based on its role as the representative body for the voluntary and community sector in Northern Ireland. NICVA's understanding of the rules covering Societies' Lotteries is based on our advisory role on fundraising practice and informed by previous gambling regulation consultations held by the Department for Communities' (the Department), the roundtable discussion held in NICVA in February 2020 and engagement session with Sian Mulholland, MLA on 25 June 2025 in NICVA.

About The Lotteries for Communities Bill (the Bill)

The consultation proposal aims to introduce legislation that allows large society lotteries to operate in Northern Ireland. The consultation states that:

> *"My proposed legislation would introduce a regulatory framework to allow larger society lotteries, to operate here, aligning Northern Ireland with the rest of the UK unlocking a vital funding stream to support local causes facing unprecedented financial pressure…This consultation focuses on large society lotteries, as opposed to existing small society lotteries which should play a key role in raising substantial funds for good causes through the sale of tickets to the public."*

General comments

NICVA welcomes this consultation as certain aspects of our gambling regulations in N.Ireland (NI) are still restrictive and are limiting the fundraising capacity of some charities, sports clubs and other voluntary led organisations (Societies).

NICVA acknowledges that other charities which have experience of the fallout from problem gambling will be best placed to comment on the negative issues of gambling.

NICVA welcomes the prospect of a new funder such as People's Postcode Lottery bringing much needed funds to the plethora of organisations carrying out great work across the voluntary and community sector in NI. The proposed changes to the legislation to permit large societies' lotteries from Great Britain (GB) to operate in NI should also allow other Societies in NI to operate large societies' lotteries for their own good causes.

While the prospect of more money being raised for good causes in NI is a great incentive to change the legislation NICVA is very mindful however of the need to be objective and take into consideration any unintended negative consequences that could arise for societies' lotteries in NI from the introduction of any new legislation.

The consultation document

"invites your views on whether Northern Ireland should reform its society lottery laws to align more closely with Great Britain's framework or retain its current, more conservative approach."

It is important therefore to fully understand the rules governing societies' lotteries in the different jurisdictions of NI and GB and to consider the relatively recent legislative changes which have been made in NI, including those outstanding changes which we are waiting on the Department for Communities (the Department) to introduce.

Society lottery legislation in NI

In N.Ireland, the legislation covering Society Lotteries is the Betting, Gaming, Lotteries and Amusements (NI) Order 1985 (the Order) as amended by the Betting and Lotteries (NI) Order 1994. Further details of the law are contained in the Lotteries Regulations (NI) 1994, the Lotteries (Amendment) Regulations (NI) 2021 and the Betting, Gaming, Lotteries and Amusements (Amendment) Act (NI) 2022. This consultation does not include the National Lottery, it is regulated by separate legislation from Westminster.

According to the Department for Communities' guidance note on 'the law on lotteries in Northern Ireland' a society's lottery is one in which tickets or chances may be sold to the general public. Article 2(2) of the Order defines society and society's lottery as follows:

"society" includes any club, institution, organisation or association of persons, by whatever name called, and any separate branch or section of such a club, institution, organisation or association;

"society's lottery" means a lottery promoted on behalf of a society established and conducted wholly or mainly for one or more of the following purposes:

a) charitable purposes
b) participation in, or support of, athletic sports or games or cultural activities; or
c) other purposes which are not purposes of private gain or of any commercial undertaking

Overview of recent legislative changes to Societies lotteries

In February 2020, NICVA held a roundtable discussion on the Department's consultation on the Regulation of Gambling in Northern Ireland.

At the roundtable discussion, most participants agreed that they didn't associate buying a raffle ticket as gambling but rather seen it as supporting a good cause.

At the time of the 2020 consultation, society lottery tickets could only be sold for £1 and they were not permitted to be sold online. During Covid NICVA wrote to the then Minister for Communities, Deirdre Hargey, to highlight the urgency for changes to legislation so that organisations could fundraise both online and without the restrictive thresholds on ticket prices and prizes.

The then Minister was instrumental in ensuring that the necessary legislative changes were made, and in September 2021 society lottery tickets were permitted to be sold online. In April 2022, new legislation was introduced to increase the £1 cap on the price of a ticket to £100. Both these changes should have had a positive impact on the fundraising efforts of charities and other Societies here in NI.

In July last year, the Department communicated it's intention to increase the maximum prize limit for societies' lotteries as well as the limits on ticket sales by introducing secondary legislation to the Assembly after the summer recess. It was then anticipated that the new rules could be in place by the end of 2024 or early in the New Year.

Unfortunately, these changes have not been made as planned and after a recent query to the Department for an update, officials have said that the "*matter is under consideration".* NICVA believes that this will be disappointing for some Societies here as the income limit for a society's lottery is currently restricted to £80,000 and the maximum value of a prize in any one draw is £25,000.

Table 1 below outlines the proposed increases that the Department was planning to introduce last year. These proposed increases to the thresholds on prizes and income from ticket sales could make a significant difference to the fundraising efforts of Societies in NI, helping them to maximise their income from their societies' lotteries.

Table 1. NI Societies' lotteries current rules and changes that had been proposed, but not enacted, by the Department for Communities in 2024

	Current NI Society Lottery rules	**Changes already made or proposed by the Department**
Ticket price	£100 max	Ticket price increased in 2022 from £1
Maximum value of a single prize	£25,000 or 10% of proceeds, whichever is greater (currently up to max £8,000)	£200,000 Requires secondary legislation
Total *proceeds in each lottery	£80,000	£500,000 Requires secondary legislation
Total value of combined lottery sales in a year	£1m	£2m Requires secondary legislation
Online sales	Permitted, no restrictions	Permitted since Sept 2021

*Proceeds are the total amount paid for tickets before any deductions.

Societies' lotteries legislation: NI and GB compared

At the roundtable discussion on the Department's consultation in 2020 most participants acknowledged that the regulations for societies' lotteries in GB are a good benchmark to examine any changes to the rules in NI. The Department advised that when comparing NI thresholds to those in GB, that we need to take into consideration the different regulatory framework and not just focus on the thresholds, for example, the role of the Gambling Commission with large societies' lotteries.

Table 2. NI Societies' lotteries legislation and GB Small and large Society Lotteries comparisons illustrated

	Current NI Society Lottery rules	**GB Small Society Lottery rules**	**GB Large Society lottery rules**
Ticket price	£100 max	No fixed amount	No max price
Maximum value of single prize	£25,000 or 10% of total proceeds, whichever is greater (subject to 50% limit on use of proceeds for prizes)	£25,000 (even if donated)	£25,000 or 10% of total proceeds whichever is greater (up to max of £500,000 if £5m proceeds achieved)
Total proceeds in each lottery	£80,000	£20,000	£5m
Total value of combined lottery sales in a year	£1m	£250,000	£50m
% of proceeds for prizes	Not more than 50% of proceeds	Up to 80% of proceeds for prizes and expenses	Up to 80% of proceeds for prizes and expenses
% permitted for expenses	Not more than 20% of proceeds	Up to 80% of proceeds for prizes and expenses	Up to 80% of proceeds for prizes and expenses
Can tickets be sold online?	yes	yes	Need a 'remote' ancillary license if non-remote lottery is registered. Can register for a Remote lottery.

Sources: Department for Communities: Law on lotteries in Northern Ireland

Gambling Commission: How to run a small society lottery

Gambling Commission: Promoting society and local authority lotteries

The legislation in GB provides for a two-tier system of society lotteries: large society lotteries and small society lotteries. In NI we don't have large or small, charity or smaller societies' lotteries, we simply have one type of society lottery which is called 'societies' lotteries'. These are different to the 'small lotteries at exempt entertainments' and 'private lotteries'. Table 2 above outlines the rules on societies' lotteries in our current legislation compared with the small and large society lottery regime in GB.

The Table illustrates that the only similarity between NI and the small society lottery rules in GB is the maximum value of a prize which is set at £25,000. However, if the Department's 2024 proposals, outlined in Table 1, were introduced it would mean that NI society lotteries would have a more favourable max prize threshold than small societies in GB.

In NI, a society lottery can sell £80,000 worth of tickets in a single draw but a small society lottery in GB can only raise £20,000 in ticket sales. The total value of all society lottery ticket sales in a year is £1m in NI but in GB it is only £250,000 for a small society lottery. In GB there is no max amount on the price of a society lottery ticket but in NI the maximum price is £100.

Regarding expenses and prizes: a society's lottery in NI must not spend more than 50% of ticket sales on prizes and not more than 20% on expenses which means that at least 30% of the proceeds will go to the purposes of the Society. This is compared with only 20% of the proceeds going to the purposes of the Society in GB.

In terms of regulation and registration, a society's lottery in NI must be registered with the local council, there is no gambling regulator in NI. In GB small society lotteries must also be registered with the local authority but a large society lottery must obtain a license and be registered with the Gambling Commission. The costs associated with this are laid out in Table 3 below.

The current fee for registering a society's lottery with the local council in NI is £35 and for a small society in GB it is £40 however a large society lottery in GB must pay an application fee to the Gambling Commission for a license which is tiered to the amount of annual income it hopes to achieve from its lotteries in the year.

The annual renewal fee for a large society's lottery is significantly more expensive in GB than what a society's lottery would pay here. There is an annual fee of £400 for annual proceeds of up to £100,000 and rising to £8,350 for annual proceeds of £30m or greater. The first annual fee is due 30 days after the licence is issued and is then reduced by 25%.

We spoke to the Local Hospice Lottery, which runs a large society lottery in GB to enquire about its experience of registering and reporting to the Gambling Commission and it had a positive experience overall however it said that a recent audit carried out had questions derived from another gambling sector rather than society lottery specific questions. They also advised that a statutory levy must now be paid rather than the previous voluntary contribution to the voluntary organisation concerned with problem gambling. Large Society lotteries appear to be treated in the same way as commercial gambling operators.

Table 3. Costs of registering Societies lotteries - NI and GB compared

	Current NI society lottery rules	**GB small society lottery rules**	**GB large society lottery rules (Remote and non remote fees)**	
Must register with:	Local Council	Local Authority	Gambling Commission [Non-remote society lottery operating licence](#) [Remote society lottery licence](#)	
Registration/ Application fee	£35	£40	**Annual Proceeds** Up to £100,000 £100k - £499k £500k - £10m £10m - £20m £20m-£30m £30m or greater	**Application Fee** £235 £352 £469 £1,340 £2,233 £3,572
Annual / renewal fees	£17.50	£20	**Annual Proceeds** Up to £100,000 £100k - £499k £500k - £10m £10m - £20m £20m-£30m £30m or greater	**Annual Fee** £400 £796 £1,677 £3,350 £5,025 £8,350
Ancillary Fees for operating online			If large society has a non-remote licence then need to pay an extra £100 registration fee and annual £50 fee, to allow online sales of up to £250k otherwise need a remote license.	

Can GB lottery tickets be sold in NI?

The Department for Communities is responsible for gambling policy and legislation in NI and according to the Department the law in NI is not clear if GB society lottery tickets can be lawfully sold in NI. The Department revised its guidance on the Law in Lotteries in NI in Feb 2023 to state:

> *"tickets in a Great Britain society's lottery may not be lawfully sold in Northern Ireland by a person in Northern Ireland. The law in Great Britain and Northern Ireland is not clear on whether the sale of a GB society's lottery tickets by post*

or telephone directly to a person in Northern Ireland is lawful. The law is also not clear on whether it is lawful to sell Northern Ireland society's lottery tickets by post or telephone directly to a person in Great Britain. However, the sale of tickets in foreign lotteries in Northern Ireland, although lawful in their country of origin, is prohibited."

Previous guidance from the Department stated that there was nothing in the legislation to prevent a GB society lottery being promoted or tickets sold in NI, including tickets online.

On the question of whether a GB society's lottery tickets could be sold online in NI, the Department changed its guidance in Feb 2023 to state:

"Whilst the Lotteries (Amendment) Regulations (Northern Ireland) 2021 permits the online sale of tickets, these regulations only apply to lotteries that are permitted under the 1985 Order."

NICVA communicated to the Department that the revised guidance was unhelpful as there was no clear direction for GB Society Lotteries and enquired if it had any plans to introduce new legislation to clarify the grey area for the sale of GB tickets in NI. The Department did not have any plans at that time to make legislative changes to clarify the law for this grey area. NICVA believes that clear legislation is needed to make it clear that GB society's lotteries are permissible in NI.

NICVA Comments on consultation

NICVA believes that society lotteries, large or small, from GB should be permitted to operate in Northern Ireland as there are many organisations that operate across the UK and would like to be able to involve NI supporters in their draws.

NICVA is cautious however about aligning Societies in NI to the current GB society lottery regime over concerns for the Societies here which may be happy with the current NI thresholds. If NI were to align itself with the current rules in GB, would NI Societies then have to adhere to the same rules for small society lotteries in GB which have more restrictive thresholds?

The consultation paper on the Bill states that it is focusing

"on large society lotteries, as opposed to existing small society lotteries…"

which implies that it is not looking to change the society lottery regime in NI. The consultation refers to our current societies' lotteries as being 'small' or 'smaller' but our societies' lotteries are larger than the small society lottery permitted in GB as outlined in Table 2.

NICVA is concerned that the thresholds for societies' lotteries here would be impacted negatively as an unintended consequence of aligning with the GB regime to allow for large society lotteries.

For example, a society here can sell £80,000 worth of tickets in one lottery but a small society lottery in GB is only permitted to sell £20,000 worth of tickets. That is £60,000 difference which is significant in terms of running a raffle or draw here. As Table 2 illustrates, the total value of all society lottery sales permitted in a given year is £1m in NI but in GB it is only £250,000 for a small society lottery.

In GB a large society lottery is defined as having:

> *"proceeds that exceed £20,000 for a single draw or has aggregate proceeds from lotteries in excess of £250,000 in any one year."*

If the GB regime was extended to cover NI in its entirety, the extra cost, bureaucracy and restrictions that it would place on small organisations is concerning. For example, a Society in NI wanting to run a draw to raise £80,000 (which it is currently permitted to do) would then not be eligible to do so in NI without having to first register as a large society with the Gambling Commission in GB. This would incur more expense in running the society lottery as it would have to pay license fees and annual renewal fees which are considerably more in GB, £635 in GB versus £52.50 in NI, see Table3. The consultation paper states

> *"This proposal aims to introduce legislation that allows large society lotteries to operate in Northern Ireland….aligning Northern Ireland with the rest of the UK"*

There may be some Societies in NI that would want to run large society lotteries to avail of the income potential that it offers. For example, if a Society was confident that it could sell £5 million worth of tickets it could offer prizes of up to £500,000 as demonstrated in Table 2 above.

A charity or sporting organisation that wants to raise a substantial amount of money from time to time, for example for a costly capital project may be interested in a large society lottery. We have seen examples on social media of how some organisations are running 'competitions' as opposed to 'societies' lotteries' online in NI which wouldn't have the prize and income restrictions of a society's lottery.

If the Department's 2024 proposed thresholds to increase the prize and income thresholds were implemented, this should help many Societies in NI to achieve better income their societies' lotteries, as outlined in Table 4 below.

There has been no consideration in the consultation paper of societies that operate on the island of Ireland. Any change in NI legislation should also take account of those who currently have to run two separate draws in each of the jurisdictions in the Republic of Ireland and NI.

It is also important to note that in NI, there is no regulatory body for gambling. Local councils are responsible for the registration and renewal of societies' lotteries, and it is the PSNI that has responsibility for enforcing the law on this.

Table 4. NI current and Department proposed rules compared with GB

	Current NI rules	***Changes proposed by the Department in 2024 but not enacted***	**GB Small society lottery rules**	**GB Large Society lottery rules**
Ticket price	£100 max	*No change*	No fixed amount, but each ticket price must be of equal value	No max price
Maximum value of single prize	£25,000 or 10% of total proceeds, whichever is greater (subject to 50% limit on use of proceeds for prizes)	***£200,000***	£25,000 (even if donated)	£25,000 or 10% of total proceeds whichever is greater (up to max £500,000)
Total proceeds in each lottery	£80,000	***£500,000***	£20,000	£5m
Total value of combined lottery sales in a year	£1m	***£2m***	£250,000	£50m
% of proceeds for prizes	Not more than 50% of proceeds	*No change*	Up to 80% of proceeds for prizes and expenses	Up to 80% of proceeds for prizes and expenses
% permitted for expenses	Not more than 20% of proceeds	*No change*	Up to 80% of proceeds for prizes and expenses	Up to 80% of proceeds for prizes and expenses
Can tickets be sold online?	yes	*No change*	yes	Remote lottery. Non-remote lottery need a remote ancillary license

In Conclusion

NICVA has attempted to review NI rules with those in GB and would ask that consideration is given to any negative consequences that could arise for societies' lotteries in NI so that these can be prevented in any changes to the legislation. In an attempt to do this, NICVA would pose the following questions for consideration:

- In order to make large society lotteries a possibility in NI, would this require that the Gambling Commission's remit be extended to cover NI? Or could it cover those existing large societies that are registered with it and allow them to operate in NI?
- In charity law in NI, there is a special section of the legislation, Section 167 of the Charities Act (NI) 2008, specifically for charities registered in other jurisdictions that recognises they are regulated by another charity regulator and therefore would not be subject to the same requirements as NI charities. Could this be used as a precedent for GB society lotteries operating in NI also?
- Is it possible that there could be legislative changes to allow Societies in NI to apply to the Gambling Commission in GB to allow them to operate a large society lottery without impacting the current (and proposed) thresholds for NI societies' lotteries?

While not an issue as part of this consultation paper, there is a lack of publicly available information about societies' lotteries in NI. If statistics were publicly available on the number of societies' lotteries along with proceeds, prizes and expenses then it would be easier to see the size of the sector and income raised and identify any need for changes.

Currently, a Society in NI must report back to the local council within three months of the lottery date, but this information does not appear to be published anywhere. NICVA raised this issue in it's response to the Department's consultation in 2020 suggesting that the Department, gather the data from the local councils on an annual basis and publish this data on its website. In recent communication with the Department asking if this was possible, the Department advised that there is no legislative requirement for councils to provide this data to the Department and that it does not have any plans to extend the Department's current data gathering to include this information. NICVA would again ask that the Department gather this important data.