



**NICVA response to the Consultation on a  
GAMBLING CODE OF PRACTICE  
20 December 2024**

## **Introduction**

NICVA (the Northern Ireland Council for Voluntary Action) welcomes the opportunity to respond to the Department for Communities' (the Department) consultation on the Gambling Code of Practice.

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. Comments are based on practice in our role advising charities on fundraising rules as well as other regulations and informed by previous gambling regulation consultations including the draft Gambling Codes of Practice.

NICVA's response to this consultation will focus on the implications for society lotteries.

## **Gambling Code of Practice**

The purpose of the Code of Practice is to ensure that gambling operations:

- are conducted in a fair and open way;
- protect those under the legal age for gambling and other vulnerable persons from being harmed or exploited by gambling; and
- assist persons who are or may be affected by problems relating to gambling.

While NICVA agrees with the importance of protecting vulnerable and underage people from being harmed by gambling we do not however agree with all of the detail in the proposed Code of Practice.

## **Implications for society lotteries in N.Ireland**

This Code of Practice will not be applicable to small lotteries or private lotteries run by voluntary led organisations but it is applicable to those running societies' lotteries.

## **Credit and ATMs**

The Code states that if you have a societies' lottery certificate then you should not accept "any form of credit or credit payment (including a credit card to load an account held in the premises)".

NICVA would seek clarification on whether or not this affects a society lottery selling tickets online for its raffles? Does this affect only a Lottery consultant/manager which is required to hold a lottery certificate?

People, in general, would use a credit card for purchasing a product online as it is a safer method of payment (in terms of minimising fraud), than using their debit card. We would ask that an exception be made for Societies Lotteries with regard to the

use of a Credit Card as the stake and the prizes on offer would be considerably lower than that offered by commercial gambling operators.

Also, we think the first paragraph needs to be made clearer that the use of the credit card is in relation to a gambling product and not other services or products available on the premises. We would propose the inclusion of the words in red as follows:

"1 Any form of credit or credit payment **to purchase a gambling product** (including the use of a credit card to load an **gambling** account held in the premises)..."

## **Special provisions with respect to children and young persons**

### 1. General

This section outlines various rules for engaging with a person under the age of 18 and then the last paragraph outlines the rules for the sale of societies lotteries which is prohibited to someone under the age of 16. All of the other preceding paragraphs should say 'except for society lotteries' as it is confusing and looks like there are contradictions.

### 2. Age limit notices

"Age limit notices should be displayed both outside and immediately inside the following locations or parts of locations where gambling may take place":

Licensed tracks; • Bookmakers' offices and shops; • Licensed bingo clubs; • Registered clubs; • Licensed premises; • Entertainments not held for private gain; • Amusement arcades and adult gaming centres; • Travelling fairs • Premises hosting societies lottery events; and • Gambling or gaming on other premises

Under the above list it should make it clear that "Entertainments not held for private gain" does not include small societies or private societies lotteries. An asterisk and footnote could be used if necessary.

Should there be an additional note at 2.6 to say that Society lottery tickets should include a statement on the societies lottery ticket stating that they can't be sold to anyone under the age of 16 years?

### 3. Age verification checks

NICVA agrees with the proposed age verification checks proposed in the Code and is that the "Age verification checks should be carried out wherever doubt arises as to whether a customer or prospective customer has attained the legal age for gambling or wherever a person(s) providing facilities for gambling, or anyone employed or authorised to act on their behalf, suspects that a customer may be under age."

### 4. 'Challenge 25'

NICVA does not foresee any issues in relation to societies lotteries operating under the principles of the 'Challenge 25' scheme operated by the Retail Standards of Alcohol Challenge Group but believes that this would be more important for betting shops.

## 5. Societies' lotteries – fundraising involving children

NICVA does not understand the inclusion of references to street collections and house to house collections in paragraphs 5.1 and 5.2 reading as follows:

*“5.1 Organisers of societies' lotteries should take particular care when involving children in fundraising, whether as fundraisers or as donors. No person under the age of 16 may carry out street collections or house-to-house collections on behalf of a societies' lottery.”*

*5.2 The exception to 5.1 above is if a houseto-house collection is taking place across Northern Ireland and the organisation concerned is a youth organisation which the Department for Communities has approved for carrying out the collection under an exemption order, in which case the lottery may have collectors aged 12 and over. Further information on Department for Communities' exemption orders can be found in the link below: House to house charitable collections - exemption orders | Department for Communities (communities-ni.gov.uk)”*

The text above completely confuses rules for Societies Lotteries with those with street collections and house to collections. Collections are *not* a form of gambling and should be removed from this Code of Practice on Gambling. If the Department is going to issue a Code of Practice on Fundraising then it would be appropriate to include it there but it is not relevant here in this Code.

NICVA believes that organisers of societies' lotteries should adhere to the relevant legislation regarding societies lotteries, that is, 'that tickets shall not be sold to, or by, any person under 16 years of age'. The reference in paragraph 5.3 to the UK Code of Fundraising Practice includes guidance in relation to collections and fundraising and is not relevant to the rules in relation to a Societies' lottery so should be removed. It would be more important to include an example where children could be potentially engaged in selling raffle tickets.

## 6. Advertising that causes or invites children and young people to gamble

NICVA agrees that no advertising, marketing, etc of gambling services and products should ever be targeted at people below the statutory age for gambling and agrees that the guidance and codes from the Advertising Standards Authority and Committee of Advertising Practice should be followed. The inclusion of the link to the relevant guidance is helpful.

### **Consultation responses**

The consultation can be accessed from the Department for Communities' website at the following link:

[Consultation on Article 180A of The Betting, Gaming, Lotteries and Amusements \(Northern Ireland\) Order 1985: Initial Gambling Code of Practice | Department for Communities](#)

The Consultation closes on the 24 December at 5PM. You can email your response to [gamblingcop@communities-ni.gov.uk](mailto:gamblingcop@communities-ni.gov.uk)