**Large Society Lotteries

The Health Lottery’s position on the UK Government’s consultation on Society Lottery Reform**

The Health Lottery (ELM) welcomes the Government’s consultation and is pleased to see that Ministers acknowledge society lotteries as fundamental to charitable giving. Whilst we support some of the Government’s proposals for reforming the law on society lotteries, we strongly feel that some of the key proposals do not go far enough, and continue to restrict operators and charities from raising even more funds for good causes. We believe that as long as there are stringent measures in place to protect at risk and problem gamblers, and to prevent fraud and money laundering, society lotteries should be treated like any other form of incentivised giving and given the opportunity to offer products that the public demand and, in turn, help generate even more money for good causes.

**Individual per Draw Limit**
The Health Lottery believes that the proposal to increase the sales limit per draw to £5million should instead be raised to £10million. Any new legislation is likely to remain in place for many years and we feel that the proposed £5million limit will become an issue for operators within a relatively short period of time.
 **Annual Sales Limit**The Health Lottery fully supports the Government’s proposal to increase the annual limit on lottery sales to £100million. This will mean that licence holders will no longer need to take out additional licences in order to continue raising money and also allow more funds to be raised for good causes. Even with this significant increase, there is still no threat to The National Lottery.

**Maximum Prize**The Health Lottery strongly believes that the proposed increase to a maximum jackpot of £500,000 per draw is insufficient. We believe that a jackpot limit of £1,000,000 per draw, regardless of sales, would provide operators and charities the flexibility to offer significantly more attractive jackpots, which will undoubtedly increase sales and returns to good causes. We acknowledge that society lotteries exist to help fund good causes and that many supporters play primarily for altruistic reasons. However if we are to maintain and expand the support that our communities so desperately need, we must increase our player base. Offering a jackpot of up to £1million will help secure new interest in, and support of society lotteries. Again, a maximum £1million prize per draw, regardless of sales, creates no threat to The National Lottery.

The jackpot limit is currently £25,000 or 10% of the ticket sales for each draw. We strongly urge the Government to increase the jackpot limit to £1million per draw regardless of sales, thus removing the ‘10% of ticket sales’ restriction.

**Prize Cap of £500,000 and raising the Draw Limit to £10million**The Health Lottery believes that operators should be allowed to offer a top prize of £1million per draw regardless of sales, and that the sales limit per draw should be capped at £10million. We do not support any alternative to this.

**Small Society Lotteries

Reducing the regulatory burden on small society lotteries**The Health Lottery supports the Government’s consideration of raising the sales thresholds for small society lotteries to £40,000 per draw (currently £20,000) and £500,000 per year (currently 250,000).

**Aggregation of 20% statutory minimum contribution to charity over three years for new society lotteries**

The Health Lottery believes that the Government should consider the plight of new small society lotteries with large start-up costs, making it difficult to contribute the statutory minimum of 20% to good causes in the early years. We agree with The Lotteries Council proposal that the contribution is met over the first three years.

**Timescale of implementation**The Health Lottery, Lotteries Council and People’s Health Trust have been lobbying for changes to society lottery legislation for many years. We hope that decisions based on the needs of the sector will be made and implemented in Q1 of 2019.