
VAT exemption on fund raising events

HMRC publishes its response to the Yorkshire Show decision

HMRC has now published [Revenue and Customs Brief 3 \(2025\): VAT treatment of income received from charity fundraising events](#) in response to the Upper Tribunal (UT) Decision on the Yorkshire Show released in January ([The Commissioners for HM Revenue and Customs v Yorkshire Agricultural Society \[2025\] UKUT 00004 \(TCC\)](#))

In our May newsletter, we reported that HMRC had confirmed to CTG that a number of stakeholders have sought clarity on whether in the light of the UT decision they would update their guidance and/or legislation on fund raising events and to what extent charities may be able to rely on the UT decision for current and future events. In response to this HMRC indicated that they were planning to publish a Revenue and Customs Brief (RCB) to set out their views on the application of the relevant legislation (Item 1, Group 12, Schedule 9 VATA) following the decision, *including* the interaction between this and 'Retained EU Law'.

We are pleased that the RCB has now been published, and that HMRC do seem to be broadly accepting that charities can rely on the UT decision for current and future fundraising events. In particular, they accept that whilst a fund-raising event must be advertised as such, the promotion does not necessarily need to say that fund raising is the *primary* purpose of the event. They also appear to agree that a fund-raising event may have more than one primary purpose – one of which is fund raising. However, this does seem to be a reluctant concession on their part and the evidential bar that there are two primary purposes for an event may well be set quite high. Understandably HMRC are cautious about charities attempting to make use of the fundraising exemption for everyday events.

We are a little disappointed, but due to the difficulty of the question, not entirely surprised that HMRC have not opined on the retained EU law matter.

In summary, the RCB indicates that HMRC are accepting the rationale adopted by the UT in the Yorkshire Show case, but the flood gates for all fund-raising events to be exempt are not open. There are still conditions in place and charities need to observe those conditions carefully. HMRC guidance on this can be found [here](#).

Thank you for being a valued member of CTG.

Copyright © 2025 Charity Tax Group, All rights reserved.

You are receiving this email as you opted in.

Our mailing address is:

Charity Tax Group | 7/8 Avon Reach | Monkton Hill | Chippenham | SN15 1EE

Charity Tax Group (known as CTG)

Registered as a limited company by guarantee in England - 08028281

Registered charity No: 1211253

Want to change how you receive these emails?

You can **update your preferences** or **unsubscribe from this list**.