

THE BINGO PROJECT FINAL REPORT

Policy brief for Canada

Case study led by Kate Bedford



POLICY BRIEF FOR CANADA

The final report of the Bingo Project has now been released.

It is available to download:

www.kent.ac.uk/thebingoproject.

Here are some highlights, relating to our case study of land-based bingo regulation in Canada.

Why bingo?

Bingo is a globally significant, but under-studied, gambling form. It is a social, community activity for many people, and it attracts a distinctive demographic of players: it is often seen as a working class and female form of leisure. In many places bingo is associated with charitable fundraising and mutual aid as much as, if not more than, commercial gambling.

Our aims

The research sought to better understand how bingo is regulated in different places around the world. We wanted to examine the diverse ways in which bingo is played (eg, online versus land-based; in commercial halls versus in charitable facilities), and regulated (eg, criminal prohibition; licensing as charitable activity; licensing as commercial activity), in order to know more about gambling law and policy as it affects different groups of people.

What we did

The Bingo Project investigated the regulation and practice of land-based bingo in England and Wales, Canada (with a focus on Ontario and British Columbia), and Brazil, and of online bingo across the European Union. We interviewed 255 people involved in bingo and we observed legal bingo games to see how rules and regulations were implemented in practice. We reviewed case law, legislation, regulatory guidance, official records of political debate, consultations, and annual reports from bingo regulators and operators. We have a collection of over 1000 legal cases across the four case studies, stretching back to 1845. Over 100 of these are discussed in the final report. Through this research we examined the diverse ways in which bingo is played and regulated, and we related that information back to debates about gambling that occur in law and policy.

Land-based bingo in Ontario and British Columbia

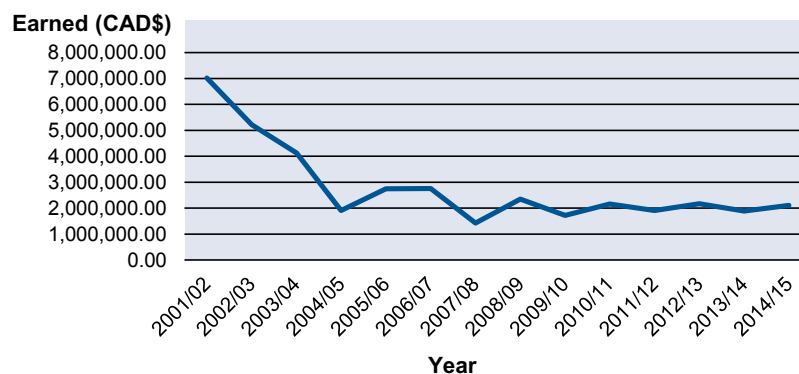
Under the Canadian Criminal Code, bingo can be legally conducted by licensed charities, or by provincial governments (alone or in alliance with commercial gambling providers). Some First Nations governments in Canada have claimed a constitutional right to operate and regulate gambling on their territory, although the Supreme Court of Canada has not recognised this right. Bingo was central to the development of case law in this area. Bingo is popular with older, working class women, and with First Nations players.

The regulation of bingo in Ontario and British Columbia: Key themes from the research

- 1 The limited law and policy attention that has been given to bingo in Canada has largely focused on a tripartite relationship of stakeholders: charities, provincial governments, and private sector gaming service providers. Particular attention has been paid to the perceived clash between provincial governments and charities, with some provinces expanding their own gambling operations and reducing the charitable role in bingo. While this tripartite model of stakeholders remains useful, there is also evidence of increased partnership between the three parties, and the need to listen to other stakeholders with interests in bingo. Volunteers – who are often required to work bingos to get access to a charitable service – are an especially important stakeholder group.
- 2 In the face of declining attendance, many attempts have been made to revitalise bingo in Canada. These include i. the introduction of new games (such as balls tickets) that run alongside main stage games rather than in breaks, due to the fact that smoking bans require players to go outside during breaks ii. entertainment-based innovations, such as drag bingo, and naughty bingo iii. electronic bingo iv. slots or slot-like machines.
- 3 Local/municipal and First Nations governments play key roles in bingo regulation, although they are not always consulted about provincial changes to regulations.

Money raised by independent bingos in British Columbia 2001/02 to 2014/15

Source: Gaming Policy and Enforcement Branch reports



4 Provincially-run bingo is being impacted by the roll-out of standardised responsible gambling (RG) policies designed with casinos in mind. Some respondents welcome the greater emphasis on RG, especially given that slot or slot-like machines have been introduced to some provincially operated bingo halls. Others are less positive, with some seeing the initiatives as unnecessary.

Recommendations for the Canada case study

- 1 Notwithstanding the importance of charities, provinces, and commercial operators, the views of other stakeholders – especially volunteers, local governments, and First Nations bingo regulators and operators – need to be included in policy debates. An expanded model of stakeholder interests should be considered.
- 2 Regulators concerned with charitable bingo, especially in BC, might consider how independently licensed charitable bingos could be better supported. Our interviews suggest that there is a strong desire from regulatory staff to provide such support.
- 3 While provincial governments have taken measures to share expertise on gambling regulation amongst themselves, and via international collaborations with other gaming regulators, jurisdictional collaboration is weaker at other levels of government. Collaboration could be improved at the local government level, within and across provinces, and we suggest exploring opportunities for provincial government regulators to learn from the bingo-related expertise of First Nations regulators.
- 4 Local and provincial level regulators could explore options for better supporting low-tech and entertainment-focused game innovations, such as drag bingo, disco bingo, dirty bingo, and so on. These often enjoy more local and player support than the expansion of automated gaming, and they do not require control of the gaming to be transferred to the province.

Stakeholders in Canadian bingo: A fuller picture.



5 As a result of a recent amendment to the Criminal Code, passed in late 2014, provinces may now authorize charities and religious organisations to directly run computerised raffles. Ontario's provincial gambling regulator is working with large charities (who wish to run such raffles during major sports events) to explore new regulations. Our research has shown that bingo operators are still subject to strict constraints on games involving a computer derived from the Criminal Code. In fairness bingo operators should be included in provincial discussions of whether and how to relax rules on raffles, in order that any concessions granted to large charities running electronic raffles are assessed for their impact on other sectors of charitable gaming.

Recommendations for all of the case studies

- 1 **Policymakers** and **researchers** should expand the concept of 'responsible gambling' to focus more on fairness for players and workers.
- 2 **Policymakers** and **researchers** should take better account of non-commercial organisations that use gambling to fundraise, by including them in debates about regulation and by exploring how they use proceeds, how they are connected to players as donors, and how they mobilise volunteers.
- 3 **Regulators** should ensure that rules reflect the distinctiveness of bingo as a game, and a playing environment.
- 4 **Policymakers** and **regulators** may have a role in supporting and preserving everyday forms of play like bingo.
- 5 **Local governments** that license low-level forms of gambling such as bingos should be better supported in their work, including through improved international collaboration.

If you would like more information about the research, please download the report (www.kent.ac.uk/thebingoproject), or email us at klsresearch@kent.ac.uk. If you require hard copies of the report, drop us an email and we will send some along.



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