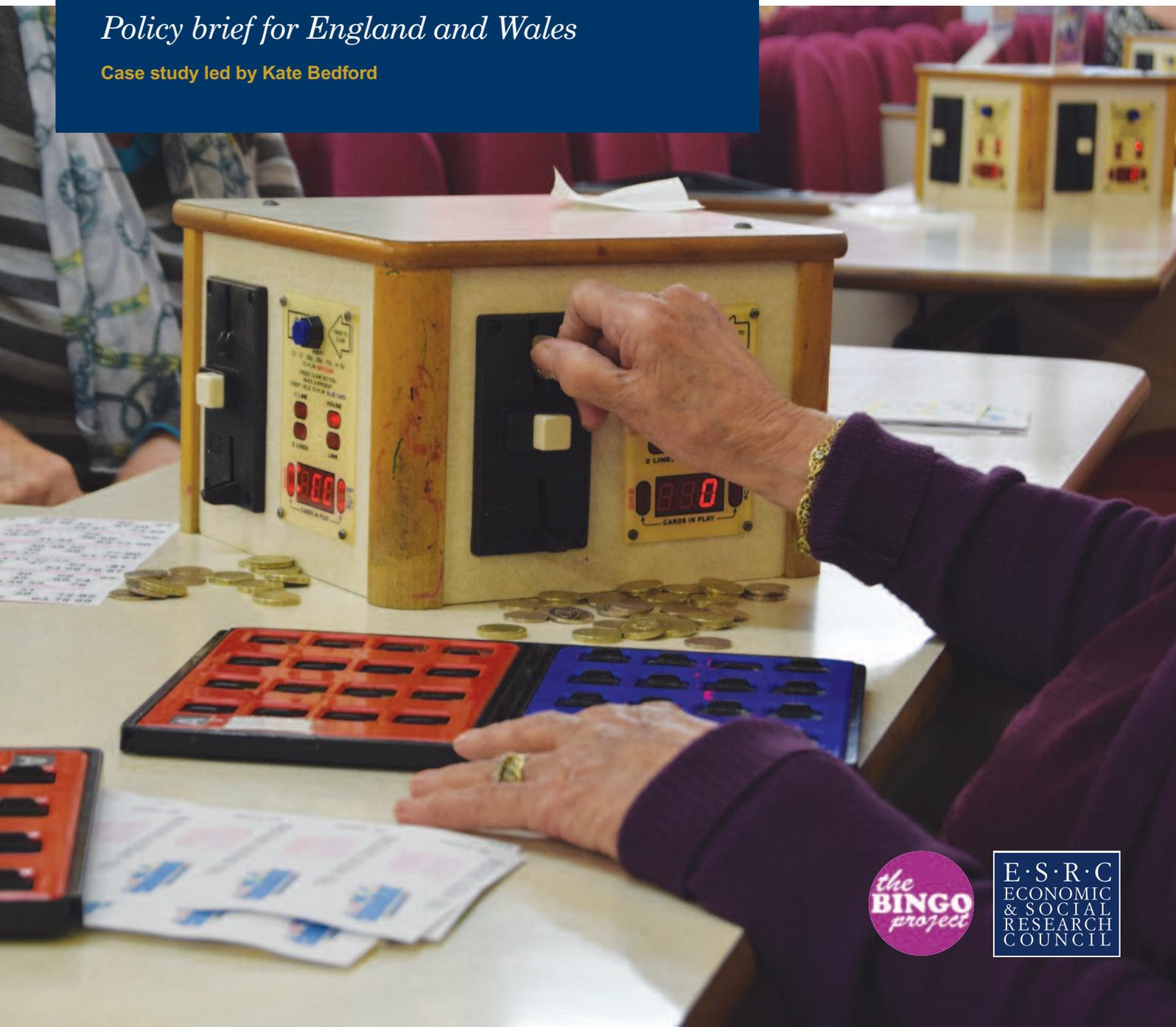


THE BINGO PROJECT FINAL REPORT

Policy brief for England and Wales

Case study led by Kate Bedford



POLICY BRIEF FOR ENGLAND AND WALES

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 England and Wales.

Why only England and Wales?

A case study of UK bingo regulation would be, in our view, unwise, because Northern Ireland's gambling law is very distinct from the rest of the country and needs in-depth exploration in its own right. In Scotland, local level licensing procedures for gambling premises are different to those in England and Wales. Since local licensing was a key aspect of our research we wished to hold that element of this case study steady to allow for valid comparisons between regions that are covered by the same rules and procedures. However some commercial bingo operators involved in the research on England and Wales also operate in Scotland. We also reviewed Scottish cases in our analysis of case law on bingo. As a result we hope that the research has some applicability there.

Why bingo?

Bingo is a globally significant, but understudied, 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, 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

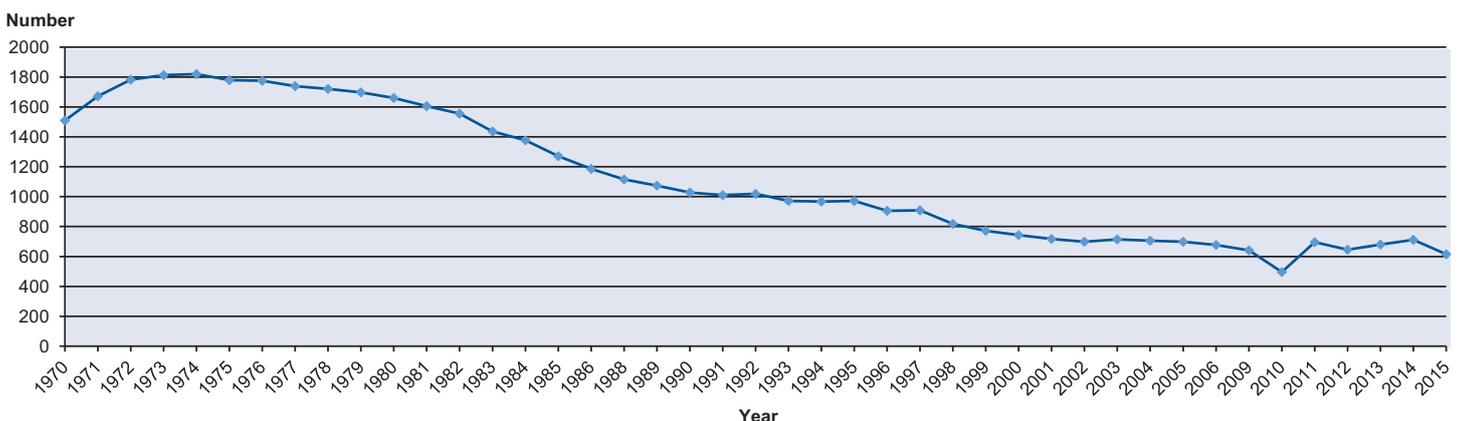
examined the diverse ways in which bingo is played and regulated, and we related that information back to debates about gambling that occur in law and policy.

Land-based bingo in England and Wales

The Gambling Act (2005) regulates commercial and non-commercial bingo. It is driven by 3 licensing objectives: to keep gambling crime free; to ensure that gambling is conducted fairly, and to protect children and vulnerable persons from being harmed or exploited by gambling. Commercial bingo (in places such as bingo halls, holiday parks, and commercial sports and social clubs) requires an operating license for the company and a personal license for key staff, both issued by the national Gambling Commission. It also requires a premises license from the relevant local authority. In non-commercial bingo (in places such as ex-services clubs, miners welfare institutes, and working men's clubs), proceeds are donated or used for the benefit of members. This type of gambling is often exempt from gambling licensing requirements, so long as play remains within limits set for stakes, prizes, and participation fees.

Land-based bingo in England and Wales is especially popular with older, working class women. However commercial and non-commercial bingo has been in decline when measured by the number of licensed commercial clubs, the duty paid to government, the money staked, and the number of permits issued by local authorities for non-commercial clubs. The smoking ban, implemented in 2007, had a particularly significant impact on attendance.

Number of licensed bingo premises Source: Gaming Board and Gambling Commission annual reports



The regulation of bingo in England and Wales: Key themes from the research

- 1 Attitudes to bingo, as expressed by lawmakers in Parliament, have shifted dramatically. In the 1950s, the game was regarded positively due to its association with the military, and non-commercial working class clubs. By the 1990s the commercial sector was discussed favourably by politicians of all parties, for both economic and social reasons. Non-commercial bingo has now largely slipped off the radar of lawmakers.
- 2 Although the definition of bingo has long been contested in courts, since the Gambling Act (2005) came into effect there has been a growing need for regulators to rule on boundary disputes between bingo and other forms of gaming. The guidance issued in this regard has focused on game mechanics, although regulators (at central and local government level) have also tried to limit the premises within which operators offer the game. The overlap between bingo as an atmosphere or environment, and a game, remains a challenge for regulators.
- 3 Bingo has relatively low levels of problem gambling, usually relating to ancillary products (gambling machines) rather than the main stage bingo game. However gaming machine revenue accounts for over 40% of gross gaming yield in licensed bingo facilities, and most managers we interviewed had encountered players who, in their view, gambled too much. There had long been informal mechanisms for dealing with this, including 'having a chat,' barring people from the premises or the machine section, refusing to sell alcohol to someone with a gambling problem, or telling people to only come in with family or friends. These mechanisms are being eclipsed by more formal 'customer interaction' measures laid out in codes of practice issued by the Gambling Commission. These rely on staff to identify, and intervene effectively with, customers who may be at risk of harm as a result of their gambling behaviours. Some staff were anxious about being held responsible for identifying problematic gambling behaviour.

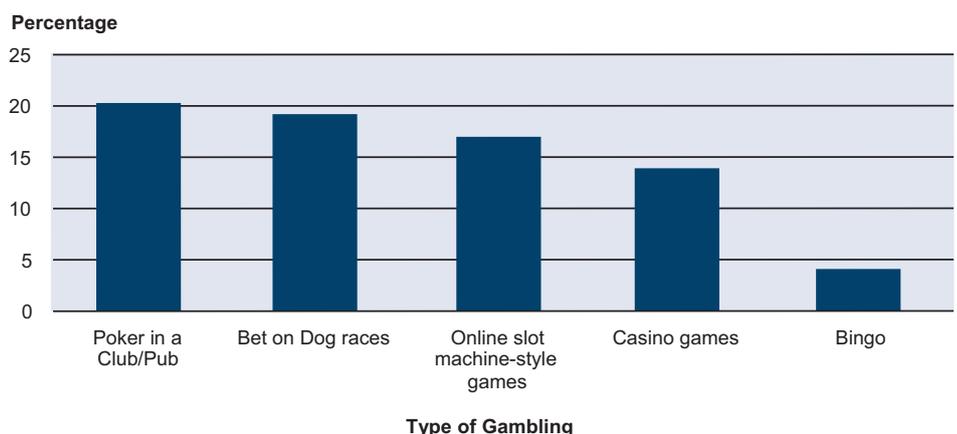
Recommendations for the England and Wales case study

- 1 Non-commercial bingo operators should be involved more systematically in debates about gambling regulation, since the scale of play in this sector remains significant.
- 2 To maintain the reputation of bingo as a soft, social gaming form with a variety of economic and non-economic benefits, regulators must remain attentive to the risks posed by ancillary products (especially gaming machines) available in commercial bingo environments, including by better monitoring of social responsibility training offered to staff.
- 3 Partial self-exclusion (where people can exclude from a product rather than a place) is worth further research in relation to bingo. We learned that some players had been reluctant to request self-exclusion, even if they had experienced problems with their gambling, since they understood the problem to only involve gambling machines and they did not wish to be cut off from the bingo hall as they tended to see friends and family and experience community there.

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.

Prevalence of problem gambling among those who reported that they took part in different gambling activities on a regular (at least monthly) basis. Source: 2010 Gambling Prevalence Survey p95-96.



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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