

# THE BINGO PROJECT FINAL REPORT

*Policy brief for online bingo  
in the European Union*

Case study led by Donal Casey



# POLICY BRIEF (ONLINE BINGO REGULATION ACROSS THE EUROPEAN UNION)

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

It is available to download:

[www.kent.ac.uk/thebingoproject](http://www.kent.ac.uk/thebingoproject).

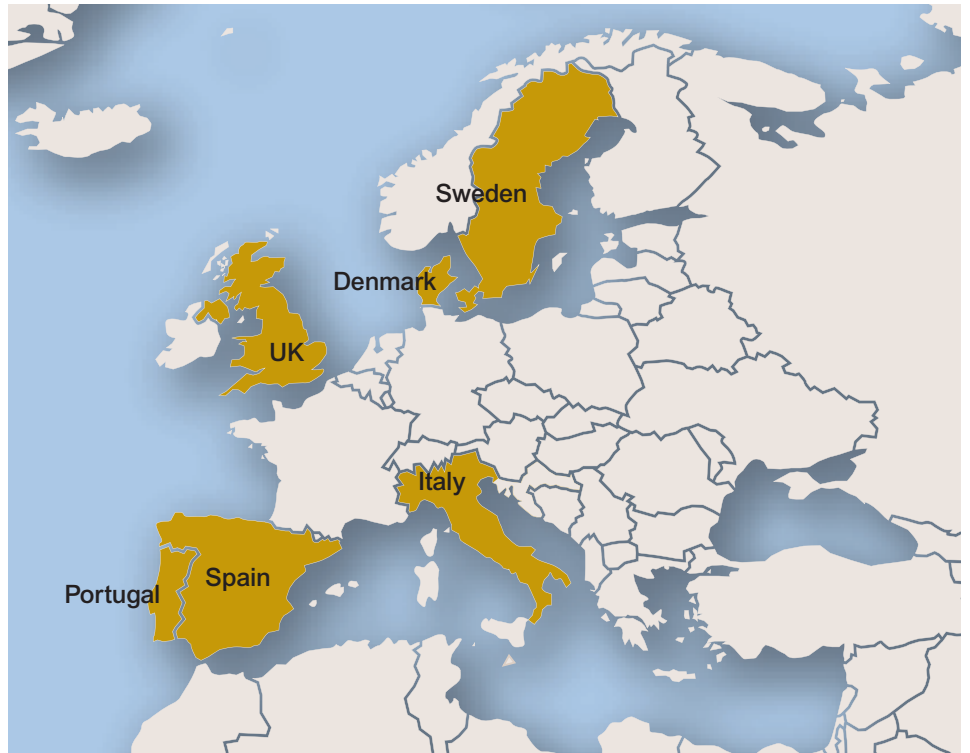
Here are some highlights, relating to our case study of online bingo regulation across the European Union.

## 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 (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.



EU Member States mentioned most frequently by our interviewees in relation to online bingo.

## 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.

## Online bingo in the European Union

In 2013 it was estimated that the total gambling revenue from online gambling in the European Union's 28 Member States was €10.9 Billion. Of this, just over €926 Million was attributed to online bingo. Online bingo is especially popular in the UK, Spain, Portugal, Italy, Denmark, and Sweden, although it tends to generate less revenue than online sports betting, casino games and slot machines. Women participate more than men in many countries, but in some (Sweden, Italy, and Spain) there are reported to be more male than female players.

### The regulation of online bingo across the European Union: Key themes from the research

- Regulation of online gambling is a complex, and developing, area of law and policy. Although in 1992 the European Commission decided that it would not seek to harmonise gambling rules, in 2011 it published an online gambling action plan which called for the creation of an expert group, increased cooperation between regulators, better consumer protection, and common technical standards for online gambling equipment. The provision of online gambling services also falls within the scope of the EU's Treaty rules relating to the freedom of companies from one member state to provide services to another. However the Court of Justice of the European Union has ruled that member states have wide discretion about how to regulate online gambling, leading to diverse approaches across the 28 countries.
- While there is an assumption that online bingo is a solitary activity, chat forums and the social interaction that they allow are crucial for many players.
- The move to the online environment challenges how national regulators seek to regulate online bingo play. In particular it raises the question of whether, and to what extent, the rules governing land-based bingo are appropriate for online bingo.
- Slots, casino games and other side games are a significant revenue stream for online bingo operators, generating up to 50% of revenue in some cases.
- Online bingo is used as a means of revenue generation by states and by the third sector, especially by state lotteries and charitable organisations.

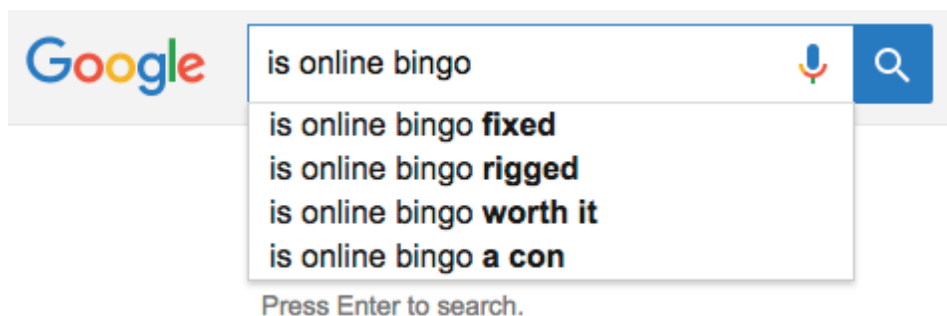
- Bingo is largely absent from discussion of online gambling at the EU level. Courts and political bodies have tended to speak of online gambling as a singular form of gambling. When different forms of gambling are distinguished by European institutions, it is largely with reference to lotteries and sports betting. State lotteries are especially well-represented as lobbyists at the EU level.

### Recommendations from the EU case study

- Policy makers and regulators should consider how bingo could be better represented in policy debates at the EU level. More comprehensive outreach with stakeholders, ranging from large commercial operators to small charities, would help improve the depth of conversations about the distinctiveness of the game and the effectiveness of regulations impacting operators and players.
- Policymakers and regulators should consider giving greater consideration – at the EU and Member State level – to the fundraising role of online bingo for third sector organisations.
- The focus of EU level discussions about consumer protection in online gambling has been on issues such as problem gambling, underage gambling, and responsible gambling. Greater attention should be paid to ensuring a minimum level of substantive fairness for customers.

### 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.



A screenshot from an internet search engine, suggesting player concern with the fairness of online bingo. Image taken by Donal Casey.

If you would like more information about the research, please download the report ([www.kent.ac.uk/thebingoproject](http://www.kent.ac.uk/thebingoproject)), or email us at [klsresearch@kent.ac.uk](mailto: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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