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The DNA of Bingo: Charity and Online Bingo

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“It [charity] ... is in the DNA of bingo”. (Commercial bingo operator)

“It was our nightmare scenario that someone picked up on the idea that a charity is running a bingo website and ran a massive expose on why that was such a bad thing.” (Charity worker)

Introduction

In 1995, the International Lottery in Liechtenstein allowed the general public purchase lottery tickets over the internet (Williams et al. 2012). This is reported to be the first time persons have been able to gamble online. The first internet bingo website, www.ibingo.com, opened three years later in 1998 (Williams et al. 2012). Placing lotteries and bingo at the birth of online gambling is important for two reasons. Firstly, it foregrounds the prominent role online gambling plays in raising money for good causes and broader welfare objectives. Secondly, it defocuses attention away from commercial forms of gambling such as poker, casino and sports book, which have dominated online gambling debates and discussions.

The global online gambling revenue in the European Union (EU) has been estimated to be over €20 Billion (See H2 Gambling Capital Report in Folkspel 2017). Of this, just over €920 Million was attributed to online bingo. While less economically significant than other forms of online gambling, bingo plays an important role for many non-commercial operators with charities and charity lotteries offering online bingo in a number of EU Member States. In the United Kingdom (UK), the People’s Postcode Lottery uses online bingo to fundraise for the Dogs Trust and the Dame Kelly Holmes Trust. Marie Curie, a charity that provides support to persons with terminal illness and their families, offered online bingo in the UK up until 2016. The Health Lottery in the UK, which manages lotteries on behalf of 51 smaller society lotteries that fundraise for local health care causes, also raises money through online bingo. In Sweden, online bingo is used as a means of fundraising for good causes by Folkspel, IOGT-NTO and the Swedish Postcode Association. In Ireland, Rehab Lottery is the main charity that uses online bingo to generate revenues. The funds generated by Rehab lottery are used to provide services to persons with disabilities, persons with autism and persons

with brain injuries. Whilst exact figures on the share of charitable income derived from online gambling is sparse, the importance of online bingo for charities is emphasised in a report by the Swedish charity lottery Folkspel, whose members include 73 non-profit organisations ranging from the Swedish Red Cross to the Swedish Motorcyclists (Sveriges MotorCyklister). Folkspel's report outlined that online bingo was its biggest digital product and accounted for 71% of its digital revenues (Folkspel 2017). This chapter examines charitable online bingo in the EU and critically assesses a number of distinct challenges that emerge from the game's use as a fundraising mechanism.

Methods and Data

This chapter draws upon research undertaken for "The Bingo Project" (Bedford et al. 2016). The project explored how bingo is regulated in different places and what this understanding can contribute to broader debates about gambling in law, politics and political economy. The project is situated within law and society research that is interested in rules on the ground and how stakeholders experience regulation. The examination of online bingo in the EU sought to ascertain what happens to bingo – a game that is firmly rooted in the local – when it moves online, and how regulation responds to this shift. The UK, Spain, Italy, Ireland, Denmark, Portugal and Sweden are key EU online bingo markets. However, this chapter focuses on the UK, Ireland and Sweden. The countries were chosen as they emerged from the research as the significant sites of charitable online bingo in the EU.

We collected empirical data from 2015 onwards. We analysed and coded the data with NVivo to draw out key themes and compare across the project's case studies.¹ We employed a range of qualitative methods to collect data. In addition to informal conversations and scoping chats, we conducted 40 semi-structured interviews with online bingo stakeholders in the period June 2015 to March 2016.² Interviewees included regulators, trade associations, lotteries, commercial operators, charities, testing houses, lawyers, software providers, affiliate marketers and responsible gambling consultants. The interviews were recorded and transcribed. We sent transcripts to interviewees to approve and make changes if needed. The interviews were anonymous and confidential. Observations of online bingo sites complemented

the interviews. We chose six online bingo sites, ranging from a large operator running proprietary software to small white-label sites operated by charities. These observations gave us a sense of the game's mechanics, the interactions during play, and how regulations impact upon and are experienced by players as they sign-up and play. Further, we conducted participant observation at nine industry conferences and events. The documentary analysis used in this study spanned legal cases, policy documents and political debates. We collected CJEU and the EFTA court judgements, Advocate Generals' opinions, and data relating to European Commission's infringement proceedings. We used the European Commission's Technical Regulation Information System (TRIS) to identify changes in Member States' regulation. We examined policy documents and political debates at the EU level relating to gambling, and more recently, online gambling.

Bingo and Charity

Bingo originated from the Genoese lottery (Depaulis 2016; Reith 2002). States used the lottery to raise revenues, and the lottery spread throughout Europe in the seventeenth and eighteenth centuries (Depaulis 2016; Reith 2002). Towards the end of the eighteenth century, a table game derived from the lottery appeared. The game, 'using individual cardboard layouts and 90 numbered balls drawn from a bag', was called various names such as 'Loto' in France and 'Tombola' in Italy (Depaulis 2016, p.49). The game was played as 'Housey-Housey' and 'Tombola' in the British Army and Navy (Dixey 1996). In the United States, the game was introduced as Keno, but renamed Bingo in the 1920s (Depaulis 2016). In the following discussion, I sketch the contemporary link between bingo and charity and explain why many charities use online bingo as a fundraising mechanism.

The connection between gambling, charity and good causes influences gambling regulation in a number of ways. As Campbell argues, '[a] major consequence of charity or "worthy cause" gambling has been to legitimize what was once seen as a vice or a sinful activity' (Campbell 2009, p.77). The legitimating role of charities and good causes partly constitutes Kingma's 'alibi' model of gambling regulation (Kingma 2008). In the 'alibi' model, gambling remains controversial and is legalised primarily to

channel players from illegal markets. Further, private profit is ‘discouraged’ and gambling revenues are ‘allocated to social interests, in terms of welfare, sports and other “just causes”’ (Kingma 2004, pp.49-50). Kingma contrasts the ‘alibi’ model to the ‘risk’ model of regulation in which gambling is framed as acceptable commercial entertainment and an important economic sector and the State’s role is to regulate risks emerging from liberalised markets (Kingma 2004, p.49). It is the ‘alibi model’ of gambling regulation, Kingma contends, that is aligned with ‘the principles of the welfare state’ (Kingma 2004, pp.49-50).

Charitable gambling also provides a ‘halo effect’ that inoculates it from the negative perceptions associated with commercial gambling (Christensen et al. 2009, p.217). For example, Fure-Slocum describes how, in 1940’s Milwaukee a district attorney that refused to issue warrants for illegal bingo operators or players was accused of putting a ‘*halo of innocence on gambling conducted for religious and charitable purposes*’ (Fure-Slocum 2013: 145, emphasis added). Christiansen and colleagues further explains how the ‘halo’ effect produced by charitable gambling led to decreased monitoring by authorities (Christensen et al. 2009).

This juxtaposition of virtue and vice in charitable gambling is discussed by Annette Shiell in the context of 19th century charity bazaars in Australia (Shiell 2012). The bazaars offered not only goods for sale and spaces for socialising, but also lotteries, raffles and games of chance used for charitable fundraising (Shiell 2012). Shiell describes the charity bazaar as a paradox – ‘it encapsulated responsibility and civic duty through its rason d’etre, which was the provision of support for charitable causes’, whilst it ‘also encouraged gambling through games of chance (Shiell 2012, p.17)’. As a ‘key form of charitable gambling’, bingo also ‘directs our attention to ... the complex mix of virtue and vice involved in gambling liberalization debates (Bedford 2015, p.469).’

An interviewee exclaimed that charity ‘is in the DNA of bingo’. In many EU Member States, and indeed globally, bingo is traditionally associated with charitable fundraising more than private profit. The association between bingo and charitable fundraising, some have argued, has led to greater public acceptance of the game (Moubarac, Shead, and Derevensky 2010). In this context, Bedford describes bingo as having a

'liminal status as "not real gambling", but a site of social interaction, community, and even care' (Bedford 2011, p.376). Indeed, Dixey explains that the 'significance of bingo lies not in the game itself-a simple game of calling numbers and ticking them off, with a prize to the first person to tick off all the numbers (Dixey 1996, p.138).' Rather, Dixey argues that, 'bingo is a cipher' to which different groups 'attach meaning and content' (Dixey 1996, p.138). What value, then, do charities and charity lotteries attach to online bingo and why is bingo viewed as a legitimate means of charitable fund raising?

Despite its roots in State-run lotteries, online gambling is now associated with private profit, international capital and risk. As such, one must ask why is it that charities now use online bingo to generate revenues. One explanation is purely instrumental - online bingo can raise revenues for charities in the same way as lotteries, raffles and other forms of gambling. However, the more interesting question is why charities perceive online bingo as a legitimate means of fundraising. One answer lies in the perception of the game as a soft, socially acceptable form of gambling that resembles a lottery and which is recognisable and attractive to potential players.

The launch of the Rehab Lotteries' online bingo site in 2005 gives us a sense of these drivers for charities to expand into online bingo (Parlay Entertainment 2005). The managing director of Rehab Lotteries exclaimed that the site was 'the most serious attempt yet in [Ireland] to use the internet to generate fundraising income for good causes'. He went to emphasise the close connection between bingo and lottery, pointed to the site as 'ideal for the distribution of new and fun lottery products'. Revealing the link between global capital and the third sector in this sphere, the Vice President of Parlay games (a Canadian based bingo software provider) noted the connection between charities and land-based bingo and that online '[b]ingo will provide an excellent community-based environment to the existing lottery games'.

Interviews with key stakeholders also emphasised the perception of bingo as 'fun', rather than risky, and the perceived similarities between bingo and lotteries as the key reasons why charities exploit online bingo as a fundraising vehicle. When asked why charity lotteries sought to expand into online bingo, a software provider explained that lotteries 'perceive that if they are going to enter e.gaming, it's the softest entry point from lottery through to bingo.' The software provider went on to say that:

The perception of bingo is obviously that it's a softer, more acceptable form of gambling and maybe there isn't the same societal taboo that there might be about casino or table games. So the lotteries think well, if we are going to enter this market we don't want to cannibalise or piss off customers we've already got or create a perception that we are some sort of hard gaming companies. So actually, the way we could do that is going to enter through bingo.

The interviewee explained further that bingo and lottery 'are very similar games' and that bingo 'is a lottery ultimately'.

Nevertheless, an interviewee that worked for a UK charity pointed out that online bingo was still 'a grey area' for the organisation. The interviewee explained that there had been discussions within the charity about whether or not online bingo was 'a justifiable fund raising product' and 'whether or not it was appropriate that a charity was doing this.' The interviewee outlined that:

The feeling was that as long as charities are allowed to offer low level, low stakes gambling activities like society lotteries that this was in line with our fund raising. Therefore, anything that provides fund raising return to the charity and then can be used to fulfil the charity's stated purpose is acceptable.

The interviewee went on to note that it was important that people were already familiar with online bingo given its popularity in the UK. They noted that online bingo 'is a product that you instinctively already know' and 'you are familiar with that from dealing with it in the commercial space'. As such, all that the charity needed to do was convince players to 'do it for charity'. While the expansion of charities into the online bingo market is legitimated by perceptions of the game, we also need to address the regulatory environments that allow charities and charity lotteries to expand into the online gambling markets.

The Regulatory Environment for Charitable Online Bingo in the EU

The Court of Justice of the European Union (CJEU) has recognised that Member States may regulate gambling for a number of public interest reasons. However, in *Schindler*, the CJEU noted that using gambling to generate revenues for the State or good causes cannot be the primary objective of a Member State's regulatory framework (*Schindler Case C-275/95: Para 60*). Interestingly, the Advocate General took a different approach to the CJEU and stated that liberalisation and competition 'could hardly fail to have far-reaching consequences for a number of lotteries of long-standing which are a major source of finance for important benevolent and public-interest organizations.' Despite this, the CJEU has kept with the *Schindler* decision. In *Läärä*, the Advocate General noted that '[t]he fact that lotteries may be an important means of financing benevolent ... activities or social and charitable works ... cannot in itself be regarded as an objective justification (*Läärä Case C-124/97*).' In *Zenneti*, the CJEU reiterated that the contribution that gambling revenues make to good causes could be 'only an incidental beneficial consequence and not the real justification for the restrictive policy adopted (*Zenatti Case C-67/98: Para 36; Markus Stoß Case C-316/07*).' Nevertheless, the CJEU and the EFTA Court have recognised that gambling services may be restricted to prevent gambling becoming a source of private profit, which can facilitate charitable gambling and is closely linked to what Kingma's 'alibi' model of regulation (*Sjöberg & Gerdin Case C-447/08: Para 45-46; Ladbrokes LadbrokesCase E3/06*).

While political discussions at the EU level have ignored charitable bingo, the importance of charitable gambling has been recognised by a number of EU institutions. The European Parliament highlighted that Member States have an interest and a right to regulate and control their gambling markets in order to 'protect the culturally-built funding structures which finance sports activities and other social causes in the Member States (European Parliament 2008, p.3).' In 2010, the Council of the European Union addressed 'The Sustainable Contribution of Lottery and Related Services to Society' (Council of the European Union 2010). The Council stated that lotteries' role in funding good causes should be recognised at the EU level, and

importantly, *'[i]n the same manner, certain Member States allow for other games of chance to fund such benefits (emphasis added).'*' The European Commission's Green Paper on On-line Gambling in the Internal Market, published in 2011, also addressed the *'[f]inancing of benevolent and public interest activities'* (European Commission 2011, p.30). In response to the European Commission's Green Paper, the Association of Charity Lotteries in the EU - a number of whose members offer online bingo - stressed *'the importance of the private funds from charity lotteries for the civil societies'* in the EU, and noted that the Association regretted *'the fact that fundraising for good causes is considered a mere ancillary effect in European jurisprudence. For the members of ACLEU fundraising is their raison d'être (Association of Charity Lotteries in the EU 2011).'*'

Bingo is used by third sector organisations in a number of jurisdictions situated on the spectrum between 'alibi' and 'risk' models of gambling regulation. The UK's online bingo market, for example, was liberalised with the 2005 Gambling Act. As a result, charities operate under the same regulatory and competitive conditions as commercial operators. By contrast, Sweden and Ireland's regulatory frameworks carve out online bingo from the competitive market and reserve it for non-profit organisation and/or the state. With no specific online bingo regulation in Ireland, the game is regulated by the Gaming and Lotteries Act 1956. In the 1965 case of *Bolger v Doherty*, the Irish Supreme Court held that bingo fell within the definition of lottery for the purposes of the Gaming and Lotteries Act 1956. As such, bingo is categorised as a lottery in Ireland, with the consequence that online bingo can only be provided by organisations run for charitable and philanthropic purposes.³ In Sweden, Lotteries Act 1994 (SFS 1994: 1000) only permits 'true lotteries' to be offered by Swedish non-profit associations and to the state monopoly Svenska Spel.⁴ The Lotteries Act 1994 was amended in 2002 to allow these organisations to offer lottery games online (SFS 2002:592).⁵ Online bingo is categorised as a numbers game in Sweden and defined as a 'true lottery' in the Swedish Lotteries Act 1994 (Lotteriinspektionen 2017). Whilst online bingo is seen as economically productive for charities in these countries, charitable bingo *'is an activity in which the positive and negative aspects are closely intertwined, even simultaneously present'* (Paarlberg et al. 2005, p.433). With this in mind, I now examine what can be considered the 'negative aspects' of charitable online bingo.

The Challenges

“I think for a lot of people the online bingo ... is still a grey area, like is it the right thing to do for charity.” (Charity worker)

“You can argue that online bingo isn’t bingo anyway.” (Commercial bingo operator)

Land-based bingo is firmly rooted in national and local environments, and often associated with fun, neighbourliness, friendship, social interaction and community (Dixey 1996; Bedford 2011; Moubarac, Shead, and Derevensky 2010). These characteristics of land-based bingo colour perceptions of online bingo. As I noted, to understand why charities use online bingo as a means of fundraising we must look beyond regulatory frameworks and to stakeholders’ perceptions and framing of the game. Despite its perception and its use by charities, online bingo is a gambling product driven and shaped by the priorities of transnational commercial operators and service providers that supply the technological infrastructure such as software and platforms. As McMillen notes,

Whereas gambling in the past was shaped by cultural values of localized communities, contemporary gambling is increasingly commercialized, standardized and global. It has become big business, central to the activities, values and commercial imperatives of national and transnational organizations (McMillen 2003, p.50).

In what follows, I identify three key challenges that emerge from charities’ use of online bingo as a fundraising mechanism that flow from the dominant commercial logic of the online bingo market.

Charity and Profit, Altruism and Utility

The online bingo ecosystem is controlled and shaped by international operators and service providers that supply the technological infrastructure on which the game is

delivered to customers. In discussions in relation to the Dutch charity lottery market an interviewee observed that lotteries ‘end up drawing on private companies anyway to provide them with everything.’ In the words of the software provider:

[I]f you look at some of the dominant players in the Dutch market, where there is a very strong lottery culture, they are all looking to work with private operators. Not only to provide them with technology but also to run their businesses, their e.gaming businesses. Because whereas they may be making billions and billions a year in Lottery, they haven't got a clue what they are doing in e.gaming.

Similarly, an interviewee who worked for a UK charity that entered the online bingo market described how, although the charity drove the marketing of their online bingo site, it was a large commercial platform provider that operated the website in return for a percentage of any of the websites gambling revenues.

It is clear that when charities and charity lotteries use online bingo as a fundraising tool, they are reliant upon those that provide this technological infrastructure and can be seen to merely ‘plug in’ to the infrastructure controlled by international capital. However, there is a tension between private profit and capital accumulation and ‘[t]he voluntary redistribution of private wealth for public benefit’ that ‘underpins the history of charity (O'Halloran 2012, p.10).’ With each node in the online bingo ecosystem extracting profit, a key challenges faced by charities and charities lotteries that employ online bingo to fundraise is how they reconcile this private profit with the ‘ethos of “charity”’(O'Halloran 2012, p.32).

Speaking in the context of gambling and charity, O'Halloran observes that ‘[i]t is an association that favors utility over altruism (O'Halloran 2012, p.59).’ The substitution of utility for altruism as a motivation was echoed in interviews. Indeed, a person that worked for a UK charity that entered the online bingo market explained that their charity online bingo site was run ‘exactly’ like a commercial online bingo site. Further, they noted that the goal of the site was to attract those that were not interested in giving to charity. In the words of the interviewee:

For the online bingo it is explicitly to engage with an audience of people who are not at all that interested in giving to charity as a specific thing, but would be interested in doing something they already do, but for charity rather than not.

Charities use of online bingo to fundraise poses a particular challenge because '[i]n terms of the "gift relationship", it has to be conceded that the altruism quotient is at least diluted for both parties when commerce intervenes' (O'Halloran 2012, p.42).

The Changing Nature of the Game

Sites of gambling, Reith explains, can be understood by 'delineating the categories of skill and chance, the rate of play of a game, the player's relation to the game, the spatial organisation and the social integration of the site, and the socioeconomic constitution of the players themselves' (Reith 2002, p.93). Like land-based bingo, online bingo attracts more female players than other forms of online gambling (Bedford et al. 2016). However, online bingo players tend to be younger than those that play the land-based game. In contrast to land-based bingo that is played in a brick and mortar premises, online bingo can be seen as a diffuse site of play, with a non-interactive relation between the players and the game. Further, in online bingo, any form of skill is removed as players do not have to mark cards or call 'Bingo' as cards are automatically marked and winners automatically announced. However, I wish to focus upon the mechanics of online bingo, and in particular, the rate of play.

The rate of play refers to the number of gambles that take place during a period of time (Reith 2002). Rate of play or event frequency is a risk factor problem gambling with some arguing that 'forms of gambling that allow the opportunity for rapid cycles of stake, play and determination having particularly great potential for causing problem gambling' (Orford et al. 2003, p.82). Indeed, 'some games are structurally more likely to encourage repeat play than others' (Reith 2002, p.95). Compared with land-based bingo, online bingo has much faster rate of play. A clinical psychologist interviewed as part of the project categorised online bingo as a high risk form of gambling given its rate of play. He explained that:

I think one part is of course the speed of the gambling form, where a lot of online gambling forms are kind of quick ones, online poker, online slots, other online casinos, but also online bingo.

When discussing the perceived risk of problem gambling associated with online bingo, regulators likened the mechanics of online bingo to casino games. One regulator explained that they 'didn't significantly distinguish between online bingo and online casino products, because most of the characteristics are the same'. Another regulator noted that:

[Online] bingo is considered as a casino game.... That way it's still a concern. It's not being considered as an innocent game. That's the difference from the land based game where everybody knows that elderly people like to play bingo at hotels and so on.

There is little published evidence on the relationship between problem gambling and the structural characteristics of online bingo (Stead et al. 2016). However, statistics published by GamCare, a UK gambling addiction charity, show that 2% of the 25,738 calls to the organisation in 2014/2015 and 1% of the 24,249 calls to the organisation in 2015/2016 related to online bingo (GamCare 2016, p.6). While low compared to other forms of gambling, these figures are much greater than the number of calls related to brick-and-mortar bingo (GamCare 2016, p.6). With this, we must then at least question the perception of online bingo as a 'softer', less risky form of gambling – a perception acquired from the land-based game – and the decision of charities to use a potentially harmful form of gambling as a means of revenue generation.

An Alibi for Side Games and Slots?

During our research, many commercial operators and regulators spoke about the importance of slots and other side games for online bingo operators. A software provider explained that:

It's [slot machines] critical in most instances. I think it's where the money is made. ... Most companies actually and we are included operate bingo

pretty much at a loss. So bingo itself does not make money. It just sits there and it draws customers in to play bingo and it's community-led and it's experiential and then they go and they play slots around the bingo and that's where the money is made.

A land-based bingo operator further argued that 'online bingo is just a portal and a gateway into harder forms of gambling online.'

Given that most commercial operators use slots as a means to generate revenue, charities that engage in online bingo must make the decision as to what types of products they are going to use to make money i.e. the product mix. An interviewee from a UK charity expressed caution as to the types of side games offered on their online bingo site:

We kind of do switch on and off any of the specific promotional games that we don't want. There are some long running games that we don't have. Anything with a casino feel, even if it is based on the same actual game mechanics as anything else.

However, online bingo sites run by charities and charity lotteries in the UK, Ireland and Sweden all offer some form of side games such as instant scratch games and slot machines. For example, the UK Peoples Postcode Lottery actively promotes slots and other side games on its online bingo site. The site asks customers to:

Play our fantastic Instant Scratch and slot games and start winning today! You can play these fantastic games while you play bingo too, so the fun never stops.

The mingling of these different forms of gambling on charity online bingo sites not only challenges how we perceive charitable online bingo, but also opens up the potential for bingo to be an alibi or camouflage for other forms riskier of gambling.

Conclusion

There has been very little research on charitable gambling. Despite this, the use of online bingo by charities and charity lotteries across many EU Member States emerged as a key theme from 'The Bingo Project' (Bedford et al. 2016). For some, online bingo is perceived as a familiar, 'soft' and less risky form of online gambling – a perception inherited from the land-based game. This perception drives the game's acceptance as a means of charitable fundraising. Nevertheless, concerns with harm need to be reassessed as bingo moves online. The game's rate of play has increased in the online environment, whilst online bingo websites are used as vehicles to cross-sell other forms of gambling. More fundamental, however, is the extent to which the foundations of altruism and public benefit that underpin charities are eroded by the instrumental nature of gambling transactions and the profit that accrue to private commercial gambling services providers. It is this jarring of private profit, harm and utility with altruism and public benefit that is at the core of the normative challenges posed by charitable online bingo.

Looking forward, we must ask what role online bingo will play in charitable fundraising in the future given the growing liberalisation and commercialisation of EU online bingo markets. In 2013, the Irish government published the Gambling Control Bill which sought to regulate online gambling for the first time in Ireland and proposed opening up the online bingo market to commercial operators (Department of Justice and Equality 2013). In March 2017, the governmental inquiry on Swedish gambling regulation recommended the liberalisation of the Swedish online gambling market, including online bingo (See Hallstedt 2017). In the Netherlands, the Remote Gambling Bill proposes to liberalise the Dutch online gambling market. While the Remote Gambling Bill proposes to reserve lotteries for the non-profit sector, commercial operators will be able to offer 'short odds' bingo on the liberalised market. (The State Secretary for Security and Justice and the State Secretary for Finance 2014; Roelofs and Littler 2014). The trend towards the liberalisation and commercialisation of online bingo markets raises questions about whether charities will be able to compete on liberalised markets, how charities will compete, and whether EU Member States too are questioning the that role online bingo should play in charitable fundraising.

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Notes

1. NVivo is a software package used for qualitative data analysis. The software facilitates the organisation of qualitative data, such as interview transcripts, and allows researchers to code this data in order to identify cross cutting themes.
2. The stakeholders we spoke with during the informal conversations and scoping chats included regulators, operators and affiliate marketers.
3. Bolger v Doherty [1970] IR 233.
4. Law on Lotteries (lotterilagen) (1994:1000), SFS 1994, No 1000: Section 15 and Section 45.
5. Law (2002:592) Amending the Law on Lotteries (lotterilagen) (1994:1000), SFS 2002, No 592.

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