



REGULATING VOLUNTARISM: LESSONS FROM BINGO

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“Our products support local needs and local people. Charitable gaming allows communities to have fire and rescue vehicles, parks and playgrounds; it allows kids to play sports, go to camp and discover art and music; it helps parishes provide quality education; it builds community centers, funds programs for senior citizens, and the physically and mentally challenged; and it provides much needed services to our veterans and military families” (Annual Report of the National Association of Fundraising Ticket Manufacturers, 2010, 3).

“A ridiculous word – charity... We know that charity cloaks a multitude of sins” (E Jebb, co-founder of Save the Children, quoted Mahood 2009, 165).

Introduction.

Volunteering has been identified “a lost continent” of social life (Saloman et al 2000, quoted Mohan et al 2006, 267), since so little is known about its patterns and determinants, its socio-legal regulation, or its meaning to participants.¹ Yet many types of contemporary social provisioning rely on the mobilization of volunteer labour. For example international aid organisations have developed strategies to motivate and reward people providing free care to HIV/AIDS patients, including volunteer initiation and celebration ceremonies and training materials that encourage them to eschew pay for their work (Maes 2012). The use of volunteers during the 2012 London Olympics was central to the successful domestic marketing of the games as a collective national endeavor. Moreover during the UK’s 2012 Jubilee holiday a charity with a contract for job training under the government’s increasingly punitive welfare regime used unpaid workers to help steward the celebrations.² Given such widespread reliance on voluntarism, critical interrogation of how volunteers are legally constituted and regulated is an urgent priority, in many jurisdictions.

The foundations for such enquiry necessarily rest on a critical approach to charities. Critical charity analysts repeatedly point to the narrow, conservative priorities of many charities; their key links with business and state actors;³ the distance between many charities

¹ Research on the economic contribution made by the non-profit sector often values the labour of volunteers: see Ministry of Government Services 2007, on Canada. However we know little about their *experiences* or the *socio-legal regulation of their labour*.

² Brought to London on coaches the night before the main parade, the volunteers slept under Thames bridges until their labour was required. They were warned that they would lose job training in future if they left.

³ E.g. see Valverde (1995) and Maurutto (2003) on how philanthropic institutions have modelled themselves on capitalist enterprises. See Rekart (1993) on the intertwining of state and charity in B.C., and Wolch (1990) on voluntary organisations as a ‘shadow state.’

and the communities they claim to represent;⁴ and the legal restrictions on their political roles that may render them unable (if willing) to advocate openly for the interests of the most ‘needy’ in society without losing charitable status and associated tax benefits.⁵ Such critiques are well-established in legal scholarship. In 1977, in the only substantive article on charities thus-far published in the *Law and Society Review*, Sidney Haring identified charities as instruments of class power (a common-enough move to Marxist legal scholars in the mid-1970s). His research traced the role of Buffalo’s Charities Organization Society in the violent police repression of local labour movements in the late 1800s, in the interests of business owners. More recently numerous authors have noted the increased reliance on user fees by voluntary agencies (Rekart 1993; Kelley 2005; Salamon 1999); the key role played by charities in the public relations strategies of profit-making enterprises (Moore 2008); the drive to professionalize that has made many charities resemble businesses (Milligan and Fyfe 2006; INCITE! 2007); and the ways in which discourses of new philanthropy legitimize the amassing of extreme wealth (Raddon 2008).

The broader political, economic and social effects of charity reliance on volunteers have also reemerged as a pertinent topic of debate. Critiques of voluntarism are long-standing (Mahood 2009; Kelley 2005; Dominique Marshall) and regulators have clamped down in the past on charity exploitation of vulnerable people’s labour.⁶ However recently legal battles over (in)voluntary work have become key features of welfare state restructuring in several countries.⁷ This reflects pressures placed on people to “volunteer” their labour in exchange

⁴ See for example Eroche (2001).

⁵ Chesterman 1999; Wolch 1990; Kelley 2005; Brooks 2001a and b. See Bourgeois 2002; Phillips 2001a; Moran 2001; Drassinower 2001 on case law regarding the extent to which Canadian charities can engage in political activity, and on the legal test of whether non-profit activities have a public benefit. See Scott on “advocacy chill” within the Canadian non-profit sector, involving fear of losing funding by being outspoken (2003, 5).

⁶ E.g. *Alamo Foundation v. Secretary of Labor* 471 U.S. 290 (1985), where the US Supreme Court found that workers in the businesses of a non-profit religious foundation were employees for the purposes of the Fair Labor Standards Act, and were hence covered by minimum wage and overtime provisions. The workers were mainly indigent people offered ‘rehabilitation’ through the foundation. They worked for little or no pay and were punished for poor job performance or absence, including via withholding of food (Milani 1986, p 232).

⁷ On the UK see *R (on the application of Caitlin Reilly and Jamieson Wilson) and the Secretary of State for Work and Pensions* [2013] EWCA Civ 66, wherein two workfare participants successfully challenged the Jobseeker’s Allowance Regulations 2011 which imposed benefit sanctions on people who failed to meet unpaid work requirements. The coalition government fast-tracked emergency legislation through Parliament to nullify the effects of this ruling (see *Jobseekers (Back to Work Schemes) Act 2013* c.17). In Canada see *Gosselin v. Québec (Attorney General)*, 2002 SCC 84, [2002] 4 SCR 429, where the majority dismissed a class action suit brought by a welfare recipient against a 1984 Quebec social assistance scheme that set the base level of welfare payments for those under 30 at 1/3 of the rate given to those over 30, and required participation in education or training programmes to boost the benefits level. The Court found that “The regime constituted an affirmation of young people’s potential rather than a denial of their dignity” (para 3). In 1989 the age distinction was removed. Several other provinces, including Alberta and Ontario, also enacted workfare schemes as part of welfare reforms. See the *Ontario Works Act* (1997, S.O. 1997, c.25). In the US, see Miller 1999 on the TANF’s workfare requirements and the contested applicability of minimum wage legislation; and Luer (1998-9) on

for welfare benefits, the turn away from job creation towards ‘active labour market policies’ and the subsequent undermining of the ‘freedom to work’ protections enshrined in many legal systems,⁸ and the key role played by volunteers in sustaining charitable organisations as they in turn pick up the slack of state cuts. Many scholars thus identify the rise of voluntarism as a key component of contemporary neoliberalism wherein the poor are responsabilized through charity – including through providing unpaid labour to charities - rather than being entitled to benefits as welfare state citizens (Brooks 2001a and b; Milligan and Conradson 2006, 1; Milligan and Fyfe 2006; Wolch 1990/2006; Raddon 2008; Macmillan and Townsend 2006, 24; Michaud 2004; Molyneux). Such trends make it especially urgent to interrogate various manifestations of voluntarism as a political-economic and socio-legal phenomenon: to identify how volunteers are constructed and regulated in law and policy, and to ask what we can learn about political economy from current schemes to mobilize volunteer labour.

In this article I use bingo to enquire into the regulation of voluntarism. Bingo is a game where players cross numbers, called randomly, off a ticket to form patterns and win prizes. It is a dominant form of charitable gambling in many countries. The game’s popular status as associated with charity, community, and welfare makes it a key case study for those trying to better understand the legal mediation of the relationship between states and charities in the contemporary era of institutionalized volunteering. I thus ask what we learn about voluntarism, charity, and regulation when we explore this site of unpaid labour mobilization.

Gambling liberalization has been extensively debated within political economy literatures. A variety of governments have turned to gambling – via lotteries and casinos – to raise money as tax revenue has fallen.⁹ More recently, a number of commentators have used Susan Strange's (1986) concept of "casino capitalism" to critique the valorisation of risk in financial markets (Cassidy 2009). However little has been written on the role of *charitable* gambling in such reorganisations of capitalism, even though this is “the most widespread form of legalized gambling” (Dolan and Landers 2006, 6) in many jurisdictions, including the US and Canada. In 2010-11, over 41,000 licences for charity gambling were issued in

whether non-cash benefits received by workfare beneficiaries could be considered ‘wages.’ See also *Archie v. Grand Central Partnership, Inc.* et. al, 95 Civ. 0694 (SS), 1998 WL 122589 (S.D.N.Y.), involving the employment of homeless persons in New York’s Pathways to Employment Program. The court held that the workers were employees under the FLSA, and that the ability to pay them below the minimum wage allowed the employer to meet its contractual obligations.

⁸ See Freedland et al 2007 on freedom to work protections in the Italian, French, and Danish constitutions; English common law and legislation; the European Social Charter; and the EU Charter of Fundamental Rights. They argue that the ‘duty to work’ component of active labour market policies has diminished the protective power of such freedom to work provisions.

⁹ See Della Sala 2004; Neary and Taylor 2006; Cosgrove 2006; Kingma 2010; Reith 2007.

Canada, an increase of almost 1000 on the year before (Canadian Partnership for Responsible Gambling 2012, 6). Although casinos are often positioned as the globally salient form of gambling in neoliberal times, in the UK bingo halls outnumber casinos 4 to 1 and employ more people (Bedford 2011) and in Alabama bingo, not casinos, dominated the 2010 governor's race (White, Brown and Dowd 2010). Companies seeking to expand online gaming have used EU mechanisms to legally challenge the Dutch government's charity-only model of bingo (so far unsuccessfully), and President Lula's 2004 criminalization of charity bingo in Brazil has led to a series of legislative attempts to re-instate the game under closer regulation. While such broad international dimensions are beyond the scope of this article, it is my contention that attention to bingo regulation is relevant to many jurisdictions.

Moreover, I centre bingo out of a sense that seemingly mundane, unglamorous sites deserve more space in socio-legal studies debates about how political economic life is regulated. In this sense I draw on those who focus on 'crap towns' rather than global metropolises (in Edensor et al 2010); those who look at everyday manifestations of long-lasting economic turmoil rather than on stock-market crashes as definitive moments of neoliberal crisis (Shevchenko 2009); or those who look at the political economy of spaces of vernacular creativity, like gnome collections (Potts 2010), rather than on well-studied gentrification-through-art efforts in major cities. Hence I am interested in local charity volunteers, municipal bingo inspectors, and what Marianna Valverde calls the "the lowly legal mechanism of licensing" (2011, 297) as a pathway to understanding voluntarism.

Consequently, although the article is located within critical debate about neoliberal trends in social policy, it takes the lead from those authors who have urged attention to the grounded experiences of volunteers in specific localities (Maes 2012; Milligan and Conradson 2006; Skinner and Rosenberg 2006, 105; Molyneux, Dolinhow; Mahood 2009; Prochaska 1977; McDowell 2005; Parsons; Michaud 2004). In this way it seeks to complement existing (if sparse) work on the production of voluntary sector spaces;¹⁰ on the diverse meanings that volunteering holds for those who engage in it, and on the social relations made possible, and challenged, by philanthropic mobilization of labour.

In particular, research on charitable gaming rarely centres volunteers as stakeholders. Many charitable gaming disputes have involved fights between businesses, charities, and regulators over which of the three should be allowed to get their "mitts" on the money

¹⁰ E.g. Creese 2006 on voluntary settlement agencies in Vancouver; Parsons 2006 on charity shops in England; Valins 2006 on the role played by Jewish care home volunteers in creating a sense of 'home' for residents.

raised.¹¹ Academic analysis and popular commentary tends to take the side of charities, assuming them to represent the community of grassroots stakeholders. For example in the same spring as Harring published his piece on charities as instruments of class oppression in Buffalo, two women published an 84 page commentary on charitable bingo regulation in the *Akron Law Review* (Ravenscraft and Reilly 1977). Prompted by a lengthy tussle over charitable exemptions from gambling prohibitions in Ohio, and involving detailed comparison of bingo regulation across 10 US states, Ravenscraft and Reilly took aim at what they saw as the inefficient, ineffective nature of current law on charitable bingo, leading to concerns about misuse of proceeds, inadequate oversight, and lack of transparency in licensing procedures. They offered a five part proposal for law reform, including that the volunteers who operated charitable bingo be more strictly monitored via licensing (to ensure that they were active members of the sponsoring organization); pre-screening (to ensure that no former gambling offenders were involved); and state-issued identification badges (Ravenscraft and Reilly 1977, 708; 716-19). Such initiatives would help ensure that “bona fide charities (will) be assured of maximum benefit from the games which are operated in their name” (Ravenscraft and Reilly 1977, 729).¹² The issue I wish to explore, in contrast, is what contemporary regulatory reforms in bingo mean for *volunteers*.

Specifically I consider the lessons about volunteer regulation that emerge from interviews and participant observation on bingo that I conducted in Ontario and Alberta. Canada is an excellent site for research into charitable gaming and voluntarism. Although many Canadian provincial governments have turned to state-operated gambling to raise revenue, the Canadian Criminal Code also carves out exceptions to general gambling prohibitions for licensed charitable organisations, meaning that charities fundraising for themselves are key actors in the gambling arena. The struggle over gambling revenues between provincial governments and charities has been particularly intense in bingo, seen by many charities to have been harmed by state promotion of casinos.¹³ In turn, the decline in bingo has resulted in a number of provincial bingo revitalization initiatives, aiming to bring charities, bingo businesses, and regulators together to revive the game. As I explain in greater

¹¹ See especially *Nanaimo Community Bingo Association v Attorney General of British Columbia*, 1998 BCSC 1192 and *Bingo City Games Inc. et al v. B.C. Lottery Corp. et al* 2005 BCSC 25. In the latter case, Rogers J reiterated that the provincial government is “not...supposed to get its mitts on the gaming revenue” if licensed charities are conducting and managing the games (*Bingo City Games Inc. et al v B.C. Lottery Corp. et al*, 2005 BCSC 25 (CanLII) at para 7).

¹² More recently see Christensen et al 2009.

¹³ For a history of Ontario’s charitable gaming regulation see, inter alia, Bourgeois 2002; AGCO 2005a. For Alberta see Williams, Belanger and Arthur 2011. For Canada overall see Campbell and Smith 2003; Campbell Hartnagel and Smith 2005; Morton 2003; Cosgrove and Klassen 2009.

depth below I chose two of the most significant revitalization initiatives in order to explore the impact of bingo reforms on how volunteers are regulated. In winter 2011 I spent 3 months in Ontario researching the province's bingo revitalization initiative, conducting 28 interviews (26 recorded) with bingo stakeholders, ranging across provincial government policymakers, inspectors, suppliers, bingo hall managers, bingo volunteer coordinators, charity volunteers, presidents of hall associations, and bingo industry stakeholders. In summer 2012 I spent 1 month in Alberta for a small study into bingo stakeholders funded by the Alberta Gaming Research Institute, conducting 27 interviews (23 recorded and transcribed) with the same mix of stakeholders. I also played bingo in many of the halls in which I was interviewing, speaking with players, volunteers and staff.

The argument that follows from this research is organized into 5 sections. Section 1 introduces the legal framework on charitable gaming in Canada, and the reasons why bingo, in particular, merits further attention. Section 2 focuses on bingo regulation in Alberta and Ontario, introducing the bingo revitalization efforts undertaken in each. Section 3 summarizes the legal framework governing bingo volunteers, focusing on the tension between, on the one hand, efforts to improve provincial oversight of unpaid workers so as to ensure that they genuinely are volunteering and, on the other, the difficulty that charities face in staffing games. Two solutions to this tension have emerged from Alberta's and Ontario's bingo reforms: a) using alternative currency systems ('bingo credits') (section 4); and b) professionalizing the volunteer role (section 5). In both of these ways, I show that concerns about volunteer labour are central to bingo reform and revitalization initiatives. Preserving the distinctive volunteer base of bingo is seen as essential to its success, and regulators and charities have shared interests in securing a reliable supply of unpaid workers who can ensure that bingo continues to accrue benefits to charities, businesses, and the state.

I conclude with some lessons that bingo might hold for those interested in voluntarism, focusing in particular on the importance of more research into the production and regulation of diverse voluntary spaces; and the urgent need to critique shared charity/state interests in regulatory reform. It may not be immediately apparent to the reader why they should care about provincial dress codes on appropriate hats, or technicalities of how a charitable gaming credit is created, transferred, and 'spent.' I thus aim to bring the regulations and their effects together to suggest that examination of such a seemingly esoteric field can shed much-needed light on our debates about the mobilization of unpaid labour. If charity cloaks a multitude of sins, critical exploration of bingo – as the paradigmatic site of charitable gambling – can help uncloak them.

Section 1. Charitable gaming in Canada: the bingo terrain.

“Few golf tournaments or bake sales have the same level of return per volunteer hour as does charitable gaming” (Bourgeois 2002, 423, on Ontario bingo).

Charitable gaming can, depending on the jurisdiction, include small lotteries, bingo, break open tickets, raffles, charity casinos, and ‘Montecarlo’ nights allowing card games and roulette. Where permitted, charitable gambling typically enjoys legal exemptions from gambling prohibitions on the grounds that the money raised is going to good causes. For example the 1938 Canadian Criminal Code excluded from the definition of a common gambling house a space ““occasionally being used by charitable or religious organizations for playing gaming therein for which a direct fee is charged to the players if the proceeds are to be used for the benefit of any charitable or religious object”” (quoted BRC 1999, 21). This permitted charities and religious groups to operate bingo and other games, leading to an explosion of provision and a spate of legal cases on the precise definition of ‘occasional’ (Smith 1959).

Part VII of the current Canadian *Criminal Code* (hereafter CC; RSC, 1985, c. C-46) criminalizes those found gambling and betting, alongside those who offer gambling, promote or advertise gambling, or supply gambling devices (s. 206). The key exemptions for our purposes are as follows:

- 207.** (1) Notwithstanding any of the provisions of this Part relating to gaming and betting, it is lawful
- (a) for the government of a province, either alone or in conjunction with the government of another province, to conduct and manage a lottery scheme in that province, or in that and the other province, in accordance with any law enacted by the legislature of that province;
 - (b) for a charitable or religious organization, pursuant to a licence issued by the Lieutenant Governor in Council of a province or by such other person or authority in the province as may be specified by the Lieutenant Governor in Council thereof, to conduct and manage a lottery scheme in that province if the proceeds from the lottery scheme are used for a charitable or religious object or purpose.

Furthermore, s. 207 (4) (c) reserves to provinces the authority to legally run a lottery game “operated on or through a computer, video device or slot machine.” This means that charities can not conduct and manage gaming that is computer-reliant (such as electronic bingo): such

games have to be run by the province, under s.207 (1) (a) (usually via a business that is contracted to provide the gaming services).

To explore the way that the legal regulation of charitable gaming in Canada sheds light on broader political economic debates about voluntarism, I focus the remainder of the discussion on bingo. Bingo is intriguing for a number of reasons, and space prevents discussion of them all here. In North America the game has a distinctive demographic of older working-class female players (Morton 2003; Paarlberg et al. 2005), a long connection with struggles for indigenous sovereignty over economic development,¹⁴ and an intricate system of rules and conventions. The Alberta Gambling and Liquor Commission's bingo licensing terms and conditions manual is 430 pages long: it is far from exhaustive on the conventions that govern the game.¹⁵

In its traditional, paper form bingo is conducted largely under the s.207 (1) (b) exemption on charitable gaming, under which licensed charities and religious organisations use the proceeds for approved purposes and rely primarily on their own volunteers to run the gaming. Although bingo funds a wide range of good works, from rape crisis shelters to immigrant support groups, in Alberta and Ontario the largest proportion of organisations with bingo licenses are youth sports and recreation organisations, falling under the fourth category of the common law Pemsel test for charitable purposes (a catch-all category of 'other purposes beneficial to the community').¹⁶

Depending on the province the bingo is held either in a hall owned by a private operator, to which a charity pays rent; by an association of charities; or by a religious association, charity, or service club licensed to conduct and manage gaming on its own behalf

¹⁴ The game is played extensively within Native American, First Nations, Inuit and Métis communities in North America, and on-reserve bingo has been key to legal struggles for indigenous sovereignty over economic development. E.g. the Seminole tribe legally contested the state of Florida's attempts to restrict high-stakes bingo games on its reserve land, prompting litigation that eventually resulted in the 1988 Indian Gaming Regulatory Act (Pub.L. 100-497, 25 U.S.C), the federal legislation that governs state-tribe gaming compacts in the U.S. Bingo also played a key role in the conflict over gambling and jurisdiction in the Mohawk territory of Akwesasne (Johansen 1993), one result of which was the establishment of internet gaming services on the Kahnawá:ke reserve (Lazarus, Monzon and Wodnicki 2011). On First Nations gambling in Canada see, inter alia, Belanger 2011.

¹⁵ One BC judge described bingo and its "arcane world" of regulations as like a "cult." (See *Bingo City Games Inc. et al v. B.C. Lottery Corp. et al*, 2005 BCSC 25 at para 18, Rogers J.) and a government review of the industry in Alberta noted that gaming inspectors may alienate licensees because they do not "appreciate the intricacies of bingo" (BRC 1999, 12).

¹⁶ The criteria for charitable purposes were codified in the preamble to the *Charitable Uses Act, 1601* (43 Eliz. 1 c. 4) as advancement of education, advancement of religion, relief of poverty, or other purposes beneficial to the community.

(e.g. a local branch of the Canadian legion).¹⁷ Usually associations of charities with licenses to conduct bingo take responsibility for activities such as setting schedules for which charity is responsible for which bingo slot,¹⁸ dividing and distributing proceeds, monitoring that volunteers show up on time and sending warnings if they do not, etc. Bingo associations also allow charities to benefit from linked bingo games that require a computer and that must, given s. 207 (4) (c), be conducted and managed by the province under s. 207 (1) (a).

Bingo has a long history as a gambling form in North America, and it has undergone numerous boom periods (Morton 2003; Williams, Belanger, and Arthur 2011). Most recently, bingo boomed in many Canadian provinces in the 1980s as associations of charitable licensees opened facilities, often in alliance with businesses to whom they paid rent and various expenses. Bingo halls seating 700 or 800 people were regularly filled to capacity, in both Alberta and Ontario. In 1997/1998 bingo was generating \$334 million in gross revenue in the former, providing \$57 million in net proceeds for Alberta charities (BCR 1999, 10). The game has declined since then, with halls closing and attendance falling. Lower attendance means lower prize pots, leading to a vicious circle. Charities that were making \$3000 on a monthly bingo event in the early 1990s now make almost nothing – one group estimated revenues of \$60 or \$70 for some quiet months. Alberta’s linked game used to run in over 100 halls; it now runs in 56, since “the other ones have just disappeared, gone out of business” (AHPL002).

Yet there is also evidence of resilience and revival. I have interviewed (and played) in small rural halls that were packed to capacity in summer (usually the quietest season). A weekly radio bingo game run by an aboriginal station made total sales in 2011-2012 of over CAN \$1.5 million, enough, they hope, to fund new transmitters. Across Canada over 12,700 licenses were given for charitable bingo in 2010-11 (Canadian Partnership for Responsible Gambling 2012, 6), and in 2010 gross receipts from bingo were CAN\$609 million in Ontario, \$140 million in Alberta; and \$44 million in Manitoba (NAFTM 2010, 8). More Canadians report playing bingo than casino table games,¹⁹ and the side games played along with the standard paper bingo (notably a form of pull tab called balls tickets) have proved very

¹⁷ Service clubs typically donate 207 (1) (b) proceeds to charitable organizations in their community, although they can fundraise for their own charitable activities if they fulfil the licensing conditions (Bourgeois 2002, 438). Religious congregations (mostly Catholic and Jewish) typically use bingo proceeds for the public benefit dimensions of religious activity.

¹⁸ On Ontario, municipal regulators in charge of gaming licensing sometimes fulfil this function, especially in smaller towns where hall associations may lack capacity.

¹⁹ In Alberta 8.5% of those surveyed said that they played bingo. 5.7% played casino table games (Canadian Gambling Digest 2010/11, 17).

successful, saving many halls from closure. Some operators are also hopeful that electronic variations of the game will lead to a resurrection.²⁰

Moreover, dying or not bingo also matters because we can learn lessons from exploring how its decline has been managed by regulators. Several provinces have engaged in initiatives to restructure and revitalize bingo, including by changing the relationship between government, charity, and business stakeholders so as to forge a common interest in new strategies. Below I briefly summarize two of the most significant initiatives, in Alberta and Ontario, before considering what these mean for regulation of volunteer labour.

Section 2: Bingo Reforms in Alberta and Ontario, in the shadow of B.C.

“For sure the casinos put a really big dent in bingo” (Alberta interviewee).

Bingo revitalization initiatives across Canada rely on alliances between provincial governments and charities. These actors have often competed for bingo revenues in the past, clashing over charitable gambling regulation (Bedford 2013). With s. 207 (1) (a) and s. 207 (1) (b) essentially setting the stage for a competition between charities and provincial governments over the spoils of legalized lotteries, bingo has provided a key site for conflict. Many provincial governments across Canada have turned to 207 (1) (a) gambling to raise revenue, with negative effects on 207 (1) (b) charitable bingo revenues. As Scott notes:

“When one of four Ontario casinos was built in Thunder Bay, it put the existing charitable bingos out of business.” (Scott 2003, 10).

Although charities were able to apply for grant money, to access revenues raised by 207 (1) (a) gaming, only 11 groups were successful in such applications. 116 had received money from operating their own 207 (1) (b) bingos.²¹ Overall, according to 2011 figures, government-operated gaming contributed 91.3% of overall gaming revenue in Canada, with charity-operated gaming contributing 6.5% (horse-racing contributed the rest) (Canadian Gambling Digest 2010/11, 9). Moreover, the charity portion is falling.²²

²⁰ It is also hard to know much about the decline in bingo given the poor state of data. For example the 2010-11 Canadian Gambling Digest reports a total of 188 bingo venues in Canada (27 in B.C., 29 in Alberta; 15 in Saskatchewan; 2 in Manitoba; 74 in Ontario; 41 in Quebec), yet this counts only full time bingo association halls, not bingos run in churches, part time halls, and so on (Canadian Gambling Digest 2010/11, 2). Such poor data explains why 12% of the population in Nova Scotia can report that they play bingo, even though the province apparently has no bingo facilities (17).

²¹ See also Manitowabi (2011, 265) on the impact of the Rama casino on community bingos in the Chippewas of Rama First Nation.

²² Total revenue generated from government-operated gaming in Canada in 2010-11 was \$13,956,407,000, \$311,158,000 more than generated in 2009-10 (Canadian Gambling Digest 2010/11; 6; CPRG, 2011; 2012). Total charity-operated gaming revenue was at least \$987,002,000 in 2010-11, \$68,831,000 less than the estimated \$1,055,833,000 reported in 2009-10 (CPRG, 2011; Canadian Gambling Digest 2010/11, 8). Moreover

The sense that charities were being harmed by competition from provincial government (which could authorise a greater array of electronic games) was entrenched in the conflict over bingo in B.C.²³ B.C. enacted a vigorous programme of 207 (1) (a) gambling expansion in the late 1990s that involved limiting charity ability to conduct and manage 207 (1) (b) gambling, resulting in protracted legal disputes over bingo that continue to haunt reform efforts elsewhere. The provincial government expanded electronic bingo in facilities run by the B.C. Lottery Corporation (a provincial crown corporation). Paper bingo halls became community gaming centres, wherein games requiring a computer (falling under s. 207 (4) (c)) are played under government control. Although B.C. charities can still apply for a license to run independent bingos, most bingo in the province is operated by the government and allied gaming operators, under s.207 (1) (a). Community organisations can apply for grants made available from the proceeds, but the ability of charities to fundraise independently via gaming has been undermined, and the pool of organisations eligible for grant funds is far larger than under the old 207 (1) (b) bingo model (see *Bingo City Games Inc. et al v. B.C. Lottery Corp. et al*, 2005 BCSC 25 at para 104). In 2011/12, total B.C. government revenues from gaming were approximately \$1.1 billion, while B.C. charities earned approximately \$36 million through licensed s.207 (1) (b) gaming activities (<http://www.gaming.gov.bc.ca/revenue/index.htm>). These developments remain extremely contentious and hover over bingo reform initiatives elsewhere in Canada, including in both Alberta and Ontario.

Alberta occupies a distinctive position in Canadian charitable gaming research. Nationally it gets the highest proportion of its provincial government revenues from gaming (4.22% of Alberta's provincial revenue was derived from gaming in 2010-11, compared with an average of 2.33 (Canadian gambling Digest 2010/11, 11)). It also follows a charitable model of gambling policy that professes to make charities the key beneficiaries. Licensed charities are allowed to conduct and manage table gaming in casinos, for example, and many thousands apply annually for licenses to fundraise in this way, sending their volunteers to work at the casino in exchange for a split of the profits. Bingo thus plays a less significant role for charities than elsewhere: in Alberta, 857 charitable gaming licenses were issued for bingo, out of a total of 4900. 3524 licenses were issued for casinos (Canadian Gambling

“charitable organizations earned at least \$453,940,000 from their gaming operations in 2010-11. *This is \$15,860,000 less than the estimated \$469,800,000 reported in 2009-10*” (Canadian Partnership for Responsible Gambling 2012, 12, emphasis added).

²³ I cover this conflict in depth in a companion article on legally-recognized stakeholder disputes over bingo regulation: see Bedford 2013. See also Campbell 2000.

Digest 2010/11; 5). That said, however, in part because of waiting lists for casino licenses and in part because casino participation is less lucrative for rural charities than urban ones, bingo remains an important source of regular revenue for many organisations, especially outside of the Edmonton/Calgary belt. One organization that ran a small rural bingo game had just been licensed for a casino slot (meaning that it would not qualify again for over 2 years), raising just over \$20,000. It raised about \$38,000 a year from bingo, mostly used to fund core costs that are hard to build in to program grants such as cleaning and janitorial supplies, insurance, office supplies, equipment purchases, rent, repairs and maintenance, and telephone bills. Bingo thus remains significant even in the province renown for allowing charitable casino gaming.

In contrast, Ontario charities can not directly fundraise from casino gaming (although they can apply to the provincial government for grants available from s.207 (1) (a) revenue). Instead bingo remains the dominant form of charitable gambling. Of 8512 charitable gaming licenses issued to organisations in Ontario in 2010-11, 8036 were for bingo (Canadian Gambling Digest 2010/11, 5). In 2010-11 the net revenue flowing to Ontario charities from bingo was \$43 million; Alberta charities received \$3.7 million (compared to \$67.2 million from casinos) (Canadian Gambling Digest 2010/11, 12). According to a presentation at a provincial bingo revitalization initiative, in Ontario in 2010 bingo halls were visited by 10.4 million people – more than visit the iconic CN tower in Toronto²⁴ – and over 3,000 charities and non-profits raised money through bingo, funding activities ranging from youth ice hockey clubs to rape crisis centres. Over 60,000 volunteers were involved in running games (Ontario Bingo Development Fund 2010).

Significantly, both provinces have engaged in efforts to revitalize bingo. In 1998 the Alberta Gaming and Liquor Commission (AGLC) conducted a review of Alberta's bingo industry, via a Bingo Review Committee made up of stakeholders from the provincial government's gaming regulator, the charitable sector, and the bingo industry. The review noted that bingo poses numerous regulatory challenges. Increased reliance on community to provide services previously provided by the government had intensified competition among charity groups for funds, leading them to 'jealously guard' their bingo slots and block access to newcomers. There was no single voice for the "highly-fragmented" bingo industry (BRC 1999, 41), "no universal, up to date definition of a "charitable purpose;" (BRC 1999, 11); and no statutory guidance on the percentage of proceeds that should go to charities from s. 207

²⁴ Notes from OBDF 2009 (e-bingo presentation).

(1) (b) gaming (BRC 1999, 14). Specific concerns at the time included inadequate oversight;²⁵ and the growing gap between the gross revenue from bingo and the net proceeds to charities.²⁶ Moreover casinos had just (as of 1996/7) surpassed bingo as a charitable gaming revenue source (BCR 1999, 10), and it was clear that the bingo boom had begun to falter.

Since the 1999 review the province has improved oversight in terms of charitable purposes including via imposing a new requirement that organizations show their need for funds and their record of delivering charitable services or programs on their license application (BRC 1999, 61). The province now keeps a waiting list of eligible organizations, to help reduce gatekeeping problems of association halls excluding new members. The AGLC has also allowed for private bingo halls, called class B facilities, where charities have less responsibility to conduct and manage the gaming directly and businesses can take a greater role. One is in existence so far. Otherwise licensed bingo occurs in the remaining 30 association halls (class A facilities) and some 140 licensed community bingos.

The province's gambling commission supports an organisation called Bingo Alberta which represents the interests of association bingo halls and works to channel industry concerns to regulators in an attempt to generate the 'single voice' that was seen to be lacking in the 1999 review. The AGLC, in close collaboration with Bingo Alberta, is currently in the early stages of a new review of the industry, aiming again at revitalization. The key aim is to streamline regulation and simplify the terms and conditions of bingo licenses. Other concerns include the extent to which bingo events – which can vary between halls and between areas - should be standardized across the province (or across regions within the province), and how to stimulate increased custom, including by introducing new games and new technology.

Meanwhile in Ontario – where hall numbers and attendance have also fallen since the 1990s - in 2005 the Alcohol and Gaming Commission of Ontario (AGCO) began work on a Modernization of Charitable Gaming initiative, aiming to modernize regulation to protect charitable revenues and “to reflect the (bingo) industry's changing needs in the 21st century” (AGCO 2009, 1). It created a Bingo Development Fund as part of a province-wide bingo revitalization initiative. This included a new revenue model for charitable bingo, implemented in 2007, allowing greater flexibility for charities and hall owners with regard to

²⁵ The report contained a list of particularly egregious examples of recreational and social groups using bingo proceeds for activities with dubious links to legal definitions of charitable purposes (bike clubs, card playing clubs, race car clubs, a hot air balloon club that spent most of its proceeds on travel for their members, etc.) (BRC 1999, 60).

²⁶ the % of money going to charities fell from 25% in 1981 to 17% in 1998 (BRC 1999, 31)

game timing and mix and changing the revenue allocation such that charities received 45% of the net revenue, with the hall owner or operator receiving 55%. Other key initiatives included a review of advertising and promotions guidelines to enhance the ability of charities and owners to market the game, and development of a provincial marketing fund (funded initially by a compulsory fee based on bingo revenue) (OBDF 2010a; b).

The province also piloted e-bingo in six sites (Barrie, Kingston, Peterborough, Sudbury, Toronto, and Windsor), introducing a range of electronic gaming. In order that the province complies with 207 (4) (c) of the Criminal Code (which reserves to provinces the authority to run games requiring a computer), the e-bingo pilot halls moved from AGCO to Ontario Lottery and Gaming Corporation (OLG) authority. The OLG – the Operational Enterprise Agency set up to operate gaming services on behalf of the province – hereby assumed responsibility for gambling in the e-bingo sites, taking over from the charities that had operated bingo under 207 (1) (b) licenses. The pilot is currently being expanded and promoted on-line,²⁷ with the hope that 30 halls will agree to switch from traditional, paper tickets to e-bingo in the near future (e bingo presentation notes). In spring 2011 24 operators had apparently indicated a desire to participate.

While there has been some disquiet about this strategy, linked to B.C.-related fears that the provincial government would squeeze charities out of gambling, in general conflict was minimized through attempts at building consensus between regulators, charities, and bingo businesses. The province established a Bingo Strategic Working Group with representatives from municipal government, the Ontario Charitable Gaming Association, the Commercial Gaming Association, and the Registered Gaming Suppliers of Ontario (AGCO 2005a, 1). Later the Ontario Charitable Gaming Association was asked by OLG to provide support services to charitable organisations engaged in the charitable bingo and gaming initiative, and to develop policies, procedures and standards (OCGA 2012/3). In particular, those involved in the e-bingo initiative emphasized that unlike B.C. they were seeking ‘to take charities with us’²⁸, including by rejecting a community chest, grant model of funding. Rather, the revenue gained from e-bingo would still be available for hall charities, who would

²⁷ See <http://www.charitablegaming.com/Public/Current-News>; http://www.olg.ca/bingo/gaming_initiative.jsp

²⁸ The common perception among Ontario’s bingo stakeholders that B.C. had imposed its model without charity consultation is simplistic. The BC Lottery Advisory Committee (appointed to implement the province’s new gaming initiatives) included members of nonprofits on its taskforce, and it undertook a tour to show how charities would benefit from the reforms. Charity representatives became disillusioned that their concerns were not being addressed, and that the province was using them to sell the initiative to the charity community (Campbell 2000, 8): but they were consulted.

apply for a permit to attend the hall during specified time slots to advertise their charity (rather than to run the bingo game): they would receive a share of the profits on this basis.

That is not to say, however, that there are no conflicts over the revitalization model – just that one must look beyond the business/charity/regulator policy consultation process to find them. Hence in the remainder of this article I consider the impact that Alberta’s and Ontario’s bingo revitalization initiatives have had on the volunteers who sustain bingo, since it is here that some of the most interesting, and contentious, dimensions of charitable gaming revitalization can be found.

Section 3. Bona Fide Surveillance: The Legal Framework on Volunteering in Bingo.

“Whenever we sell a membership we ask, ‘Are you interested in volunteering?’ 99% will say, ‘No’, the other 1% will say, ‘Yes’, and then avoid our calls” (Alberta community organisation)

207 (1) (b) bingo rests on volunteer labour. It makes gaming profitable for charities and the businesses with which they partner, and it distinguishes charitable gaming events from 207 (1) (a) ones. Striking the correct balance between regulating and motivating volunteers is thus a crucial issue. Ravenscraft and Reilly were worrying in 1977 that those operating the games in Ohio (who were supposed to be unpaid) might be unsavoury characters, with no real connection to the organization they were (allegedly) representing and maybe even fixing the result. Hence they urged better regulation – via licenses, screening, or at least badges – to prevent abuses (1977, 716). Additionally, as Bourgeois notes in relation to Canada, there has long been concern in the charitable gaming sector that some volunteers may be closer to employees, being paid under the table by the charity and/or the business (which then charges the charity) to staff bingos (2002, 433). Charities may have interests in such arrangements if they can not otherwise produce the volunteers to administer the gaming in their designated slot, and likewise businesses can mitigate against the risk of a game being cancelled due to unreliable charity volunteers. However regulators often regard this arrangement as highly problematic because of the supposed drain on charity resources. One Ontario regulator remarked that such undocumented workers were “parasites, feeding off the backs of charities.” An Alberta bingo industry insider noted that during the boom years of the late 1980s and early 1990s, “some of the groups were paying volunteers, which was a no-no; you’re not supposed to pay anybody; they’re supposed to be benevolent. So there was a whole raft of that; it went right to the core of that volunteer community.” Though she clarified that this was “more minor than major,” it was a widely acknowledged problem.

Yet regulations on volunteer labour have to also account for the fact that it is extremely hard to mobilize people to work bingos. Importantly, as Maes puts it in his research on volunteer mobilization in Addis Ababa, NGOs “do not simply “tap” volunteer spirit as one would a free-flowing natural resource like petroleum or rubber” (Maes 2012, 55): rather they engage in extensive efforts to coax, sustain, and drum up volunteers and encourage them to eschew material rewards. Bingo games are long: a normal evening session will require a volunteer to be present from 5-10, and for a late night session they must work until midnight. Most of those interviewed, in both provinces, said that it was hard for charities to mobilise people to do such work for free. Some organisations tried to reward volunteers, with pizza parties, for example, or with food from the concessions²⁹; one organization that relied heavily on young volunteers rewarded those who gave the most hours with a funded recreational activity and gift certificates (e2). But problems of burn out, attrition, and funding cuts (resulting in loss of money for pizza, for example) limited the success of such initiatives, leading to persistent worries about volunteer mobilization. Indeed some charities were unable to fulfill their obligations to the hall associations of which they were a part, leading to repercussions such as fines, loss of proceeds, or threats of losing their place at the hall.

This tension – between regulating and motivating volunteers – is evident in the rules that Alberta and Ontario impose on charitable licensees. Regulators in both provinces attempt to monitor the bona fide status of volunteers, to ensure that bingo remains rooted in unpaid labour. It is worth briefly outlining the rules before exploring how they relate to various strategies to motivate volunteers.

In Alberta, charitable bingo games require anything from 3 to 16 volunteers (depending on how licensees choose to staff various positions, and whether the hall is a class A or B facility or a community bingo). The positions of bingo chairperson (responsible for the overall operation of the bingo event, supervision of all staff; assigning duties to other volunteers; and ensuring secure handling of cash); paymaster (who supervises the awarding of prizes); and bonanza and special games controller(s) (responsible for special games) “must be filled by volunteers who are bona fide members of the licensed charity(7.2)” (AGLC Bingo Licensee Terms and Conditions Licensed Bingo facilities sec. 2.6; sec 10.2; sec 10-8;

²⁹ See 12.9 of the Alberta Bingo Ts and Cs on approved concession expenses for volunteers, especially: d) the total concession expense shall not exceed an average of \$5.00 per volunteer for morning events, \$8.00 per volunteer for afternoon and evening events, and \$7.00 per volunteer for late night events; and g) volunteers may be given a coupon worth a fixed dollar amount. The coupon may be used to purchase concession items. Volunteers may not present the coupon to the concession for a cash reimbursement. “ (AGLC Bingo Licensee Terms and Conditions Licensed Bingo facilities)

sec. 7.2.1 of AGLC Bingo Ts and Cs; (sec 7.8.4 of Ts and Cs; sec 7.8.5 of Ts and Cs)).³⁰ The AGLC Bingo Terms and Conditions manual defines a BFM of a licensed charity as “an individual who is listed or named in the licensed charity’s official records as a current member in good standing of the licensed charity” (sec 1.1.1.m AGLC Bingo Tc and Cs; see also Bingo Licensee Terms and Conditions Licensed Bingo facilities, 2.6 and sec 10). The bingo chairperson is responsible for verifying the identity and source of all volunteers (7.8.4 b i), including ensuring that the roles requiring BFMs are staffed by such individuals, while the hall manager (usually a paid position) is responsible for tasks such as informing charities of their slots and the number of volunteers required, and training volunteers (s7.9.6).

Class A facilities have a list of other named positions which they can fill using either paid or volunteer staff. If they use volunteers for some of these positions (e.g. a pull ticket seller), they must be a BFM (sec 7.3.1. of Ts and cs), but they may use:

“outside help (non-members) on a volunteer basis to fill other positions as required, or continue to use only members in all positions.... When using non-members to work as volunteers the individual(s) must be known to the licensed charity. (3.15)

NOTE: The above is intended to allow licensed charities more flexibility in raising funds to support their approved charitable objectives. It is not intended to provide an opportunity for a charity that is not licensed to work a bingo event in return for a donation³¹. (AGLC Bingo Licensee Terms and Conditions Licensed Bingo facilities, 2.7).

In another limitation, volunteers “are prohibited from volunteering at bingo events to fulfil a requirement under the Fine Option Program or Alternative Measures Program of the Province of Alberta“ (11.1f AGLC Bingo Licensee Terms and Conditions Licensed Bingo facilities).

The one class B (private) facility in the province is required to use paid staff in most positions, including pull ticket seller; pull ticket manager; cashier; hall manager, and caller (AGLC Bingo Licensee Terms and Conditions Licensed Bingo facilities; sec 7.4.1 of Ts and cs).³² Overall the class B facility must have 8 volunteers per bingo event: most class A facilities run with more than this. Inspectors from the gaming regulator will check that volunteers and paid staff are signed in (“if you are not signed in that event you are not to be in that cash cage!” (d6)), and wearing name tags and aprons (in accordance with sec 10.7: AGLC Bingo Licensee Terms and Conditions Licensed Bingo facilities).

³⁰ http://www.aglc.gov.ab.ca/pdf/handbooks/bingo_terms_and_conditions.pdf. The 60-page long section of the bingo ts and cs on staffing explains the duties of each role.

³¹

http://www.aglc.gov.ab.ca/pdf/handbooks/Bingo_Licensee_Terms_Conditions_Licensed_Bingo_Facilities.pdf

³² The latter 2 positions (of hall manger and caller) are usually paid in class A facilities anyway, but class A halls vary as to whether they use volunteers or paid staff for other roles (such as ticket sellers and checkers; pull ticket seller and manager).

In Ontario, an application for a 207 (1) (b) charitable bingo license also requires use of BFMs, defined as:

“an active member of an eligible organization in good standing, who has activities within the organization beyond conducting lottery events. “Members of convenience” whose only activity is to assist at lottery events are not considered Bona Fide Members” (AGCO Lottery license terms and conditions, 1).

The AGCO’s terms and conditions for bingo halls require “no fewer than three Bona Fide Members, to carry out the activities required for the conduct and management of the Lottery or Lotteries for which a Licence has been issued” (sec 1.4; see also s3.1 of AGCO regular and special bingo license terms and conditions). However most association bingo halls use more volunteers per event, often up to 10. Designated individuals are in charge of and responsible for the conduct and management of the game (sec 1.4), including ensuring that the appropriate license is properly displayed; verifying bingo paper and bingo balls; paying out prizes; reconciling accounts; depositing cash; and completing the required reports for AGCO. Ontario bingo licensees in paper halls have somewhat greater flexibility over how to meet their need for labour than their counterparts in Alberta: they have the option of using BFMs, employees of the bingo hall owner/operator; or “using volunteers, who may be members of the licensees in the bingo sponsors’ association³³ or may be family, friends or volunteers from other organizations” (s 3.2.d. regular and special bingo license terms and conditions). However if they use the latter option, those individuals can “*receive no remuneration or reimbursement for out of pocket expenses.*” Only “Bona fide members of the licensee, including a bona fide member acting as the caller on behalf of the licensee, and designated members in charge acting on behalf of the licensee who are present and assist at the event may be reimbursed for actual out of pocket expenses incurred.” (s 9.2a). These expenses are capped at \$20 per person per event, or 3 % of the prize board for that event, and they “shall not be paid where it would result in a loss or no profit for the bingo event “ (s. 9.2b). Moreover the Lottery Licensing policy manual states that runners working on the floor in pooling bingo halls (who sell paper, identify winners, and pay prizes) must be paid employees of the hall operator (s 10.5.1 (b)), although BFMs are still responsible for distributing and reconciling bingo paper and break open tickets.

³³ A hall association

The e-bingo halls, under OLG control, have especially strict policies and standards with regard to volunteering. Fewer volunteers are required (2, or in some circumstances only 1³⁴), and they are removed from work around the bingo game: rather, their role is to provide information about their charity, enhance the “charity feel” of the location so as to distinguish it from 207 (1) (a) gaming sites, and “promot(e) awareness of how the charitable gaming funds benefit the local community” (OCGA 2012/3, 4). Those who carry out this labour are more strictly regulated in OLG halls than in ACGO ones, in part because the role of volunteers is crucial to the identity of the gaming centres as benefiting local charities. As explained in the new publication on policies and standards in Charitable Gaming Centres (written by the Ontario Charitable Gaming Association):

“OCGA has negotiated, on your behalf, an agreement that maintains direct local funds for participating charities. In order to receive these funds, each charitable organization must provide services on-site at the Charitable Gaming Centre and in the local community as required. In order to maintain this important local funding model, it is critical that charities play a very visible and meaningful role in this initiative and are seen to be making a meaningful contribution to the operation” (OCGA 2012/3, 4).

Charities that hold permits to participate in a charitable gaming centre are required to provide two bona fide member volunteers for the charity’s assigned two hour slot (scheduled for them by a paid charity coordinator). Furthermore:

“the same volunteers should not be used for extended lengths of time.... In order to achieve customer service excellence a time limit is placed on how long a bona fide volunteer may be in attendance. No charity volunteer will volunteer for more than two consecutive assignments due to the need for breaks and to ensure customer service levels are maintained. “ (OCGA 2012/3, 7).

In an attempt to eradicate the presence of workers seen to be posing as volunteers in bingo halls, the OLG has also introduced new rules to e-bingo halls to restrict the number of charities that volunteers can represent and to improve record-keeping about volunteers, making it easier to identify and act against people who are working across multiple bingo sites. These rules exist in the belief that ‘excessive’ volunteering, for too many charities, is evidence that the person is not a genuine volunteer. For example, the standards used to measure whether individual charities with permits to operate in charitable gaming centres are abiding by the policy on volunteering include:

³⁴ The policies and standard refer to 2 people attending the assigned slot, but section B5 explains that 1 of them can be a paid employee of the charity: “providing this is not their primary role within the charitable organization and that the second bona fide member is a volunteer.” (OCGA 2012/3, 8).

“a. A bona fide volunteer participating in the Charitable Bingo and Gaming Revitalization model may only volunteer to carry out “assignments” for a *maximum of three individual charitable organizations* under “permit” in Ontario.

b. Each Charitable organization must provide and maintain a list of trained bona fide members who are oriented to all policies and standards in advance of carrying out scheduled assignments. This list must include the name of charitable organizations with the names of their trained bona fide members and the respective training dates. To keep numbers manageable and to properly facilitate training and customer service standards, the number of volunteers each charitable organization may utilize during a six-month period must be *no greater than twenty volunteers*.

c) Where more than one CGCA (charitable gaming centre association) is present in a municipality, the Charity Coordinators will collaborate, sharing bona fide member lists... If bona fide volunteers are found to be in contravention, the respective charities will be contacted to resolve the issue.

e) Volunteers must sign into the CGCA designated logbook upon arrival to their scheduled charity assignment to confirm their attendance.

i) There will be no remuneration or reimbursement of expenses for volunteers (no honorariums).“ (OCGA 2012/3, 8-9 original emphasis).

Action can be taken against charities who fail to comply with these policies, including via withholding all or part of their share of the proceeds (OCGA 2012/3, 14 SECTION ? c-e) and suspending or revoking a permit. Moreover, in another attempt to stop charities sharing volunteer resources: the guidelines states that “e) If a charitable organization fulfils the assignment of another charitable organization that is either late or fails to provide the required number of volunteers, they shall receive the funds withheld from the charitable organization that is in non-compliance.” (OCGA 2012/3, 14).

Such rules on volunteer labour can at a minimum be taken as evidence of the on-going concerns of regulators to ascertain volunteer status in relation to licensed charities’ ability to conduct and manage bingo. But they are more significant than this, since in their implementation they can have substantial, and sometimes harmful, impacts on volunteers. When the new rules on limiting volunteering to a maximum number of three charities were applied to one of the halls piloting e-bingo in Ontario, for example, long-standing volunteers were ‘fired.’ This caused one disgruntled ex-volunteer to stage a protest outside the refurbished hall (now under OLG control). Her protest took the form of warning players that the provincial government would be monitoring bingo winnings, and off-setting them against welfare benefits. She stood outside announcing this, trying to discourage players from going in. Although offsetting of winnings was not part of the plan involved in shifting to OLG

control of bingo,³⁵ the fear of it reflects a history of gambling surveillance whereby poor people's play has been scrutinised by provincial welfare agencies. Bingo players have long been targets for accusations that they are wasting public funds (Morton 2003, 94), and they have been targeted by the allied power of charity and state in this regard, as Little notes in her account of the administration of the Ontario Mothers' Allowance:

“Bingo halls are yet another site where charitable organizations are involved in the moral regulation of single mothers... Social workers and charity leaders in North Bay and Elgin County have been known to attend bingo events, take account of the winners, and then report it to the OMA office. These public and private welfare workers are fondly called the “bingo police.”” (Little 1995, 105).

The woman's protest thus perfectly captures the perceived dangers posed to volunteers and players from bingo reform.

In the face of such protest, some regulators urged still stricter action. One municipal regulator, concerned about workers ‘posing’ as volunteers and, in his eyes, taking away from charities, asked all board members in one association hall to sign a declaration that they were not being paid and that none of their volunteer runners (who check bingo cards) were either. Even though they did, he remained concerned that “there are some people who signed that declaration who shouldn't have.” The concern of provincial regulators to ascertain volunteer status hereby filtered down to the municipal level in Ontario,³⁶ with additional disclosures being required of those volunteering for the game.

Yet as noted above such clampdowns *always* have to be balanced against the fact that it is extremely hard to mobilize volunteers to attend bingos. Bingo reformers hereby face a very clear tension: cracking down too hard on volunteers may jeopardise the ability to run the game at all. Hence compromise solutions have to be found, ones that allow charities and provincial governments to mobilise volunteers successfully and retain control over their activities. Two significant solutions emerge from consideration of bingo revitalization initiatives in Alberta and Ontario's - credits and increasing the distance between players and volunteers.

Section 4: Alberta's Alternative Currencies of Volunteer Value.

³⁵ The tactic of off-setting gambling winnings against benefits, or using winnings to recoup delinquent child support payments, has been used by governments running casinos and lotteries in some North American jurisdictions – see Pennsylvania Gaming Control Board 2007 for a summary.

³⁶ Municipal regulators have a role in charitable gambling in Ontario but not Alberta. See Bedford 2013 for the municipal role in jurisdictional squabbles over 207 (1) (a) and 207 (1) (b) gambling.

“I feel that volunteerism is really falling by the wayside and it’s harder and harder to get volunteers...You know you got to kind of bully them into it.” (bingo hall manager, Alberta).

“Most stakeholders appear to favour the issuing of bingo “credits,” in which parents help offset fee costs for their children’s participation in amateur sport.” (BRC 1999, 51)

A key solution to the tension between regulating and motivating volunteers, in both provinces, is some form of bingo credits, where people work bingos as volunteers in part to get reduced fees for accessing a charity’s services. Bingo credits tend to be used for children’s sports and recreation activities, where fees for participation are often high. Charities providing such activities constitute a key sector in the bingo arena. While sport and recreation provision per se is not recognized as a charitable purpose in Canadian law and policy, many organisations tie sports and recreation to another recognized charitable purpose such as education of the young, cultural preservation (i.e. ethnic singing and dancing groups); therapy and relief of suffering for the disabled, or the provision of sports facilities for public use (AGLC CGPH, 63). As Alberta’s bingo review committee noted:

“The last or fourth category of the Pemsel test has posed the most difficulty (in definition), even with the following legal qualifications as to what constitutes a “charitable activity”:

- it must be intended to benefit the public at large, not a private group (Williams’ Trustees V. Inland Revenue Commissioners, [1947] A.C. 447 (H.L.), at p. 457)
- the absence of benefit to oneself is crucial to the concept of charity (ibid, at p. 456)
- it seeks the welfare of the public; it is not concerned with the conferment of private advantage (Waters, Law of Trusts in Canada (2nd ed., 1989), at p. 550.)” (BRC 1999, 63).³⁷

Although in theory the regulatory divisions of each province should review a group’s by-laws to see if the membership fees are so excessive as to prohibit participation of ordinary members of the public (AGLC CGPH, 23),³⁸ in practice some people seeking the charity’s services can not afford the membership fees. Hence parents can – and sometimes must – volunteer for bingos in order to reduce the costs of participating, earning ‘credits’ that they can use to pay partial fees for their children’s sports. For example one youth sports charity interviewed offers parents of children who want to participate in its activities reduced rates if they ‘volunteer’ for the bingo. Another Ontario charity offering swimming to youth explains

³⁷ See also Ravenscraft and Reilly 1977 on efforts “to amplify Ohio “charitable organizations” to include youth athletic organizations.” (Ravenscraft and Reilly 1977, 685).

³⁸ For example non-profit day care groups holding government day care licenses can be eligible for gaming licenses in Alberta if applications are open to all parents and guardians in the community at large, and “the Regulatory Division shall ensure the group’s programs provide a community benefit rather than serve the self-interest of the group’s membership” (AGLC CGPH, 36).

on its website that bingo volunteering is required for parents, and it collects three undated cheques of CAN \$200 from them in an attempt to enforce their attendance. Missing a bingo slot means that the cheque will be cashed (their child will also be banned from the pool). As an Alberta interviewee – who managed bingo volunteers for a charity and who also volunteered herself for another organization - explained:

“A lot of our volunteers come to us because they’re having... not necessarily having trouble paying for their children’s sports but a lot of them...it’s an easy way. Like for me, I work bingo to pay for my son’s hockey so it’s... (stops)

Me: What are the fees?

Respondent: It depends how old they are. Last year it was... for him, he was only four going on five, so it was \$120; this year it’s \$200, next year it’s \$400.

Me: A year?

Respondent: Yes, for 18 weeks. We have a shorter hockey season because they’re little, but as they get older... and that’s just the registration fee, so it does help for me to work bingos.

Me: So how much can working the bingo, the credit from that, how much can that help you?

Respondent: For normal bingo I get 50 points which would be equivalent of \$50, and if I worked a late night it’s \$70. So if I work three or four bingos through the year I can pay for his hockey.“ (bhpl001).

The credit system downloads one of the key risks of charitable gaming on to volunteers. If the charity can not mobilize sufficient people (in theory raising the risk that the game will be cancelled, harming both the charity and the bingo business, but in practice usually requiring a last minute scramble for volunteers known to the hall who will step in), the charity’s own volunteers are charged, in cash. One strategy is to ask for pre-signed cheques from volunteers, but in other cases volunteers are required to pay fines imposed on a charity by a bingo association or business for missing a bingo, or they are required to pay a charge to the hall for the cost of finding replacement workers.

Almost all stakeholders recognize that this system of credits is essential for the game to run. Many also support it. One interviewee was dismissive of parents who objected to volunteering, saying that if they wanted to access the services being offered they had to ‘pay the freight,’ and another felt that the middle class parents whose children benefited from these sports and recreational facilities *should* have to do voluntary work to fund them. The latter interviewee (a bingo hall manager) was critical of the disconnect between many wealthy parents and ‘the real world,’ and felt that making them volunteer was a way to anchor them, while also providing them with a legitimate way to ‘save’:

“I think eliminating the volunteers is a really bad thing because they have a disconnection anyways. You know now people would just as soon pay the 50 bucks and not bother, they’re busy. But you know what; it brings them back to reality I think, volunteering.... A

lot of these programs they could never do if they didn't volunteer. XYZ is a primary example. I mean they swim all over the place. Where do you get that funding? As long as gaming has approved, whatever, if it's travel or uniforms or swim-time or ice-time or whatever, as long as it's an approved event through gaming – and I think that's good because then you get money going willy-nilly - but every kid in that group has a big fancy jacket and a big fancy hockey bag and a big fancy sweat outfit. Well you know what? If you come and volunteer your time here, buy the kid the big fancy sweat outfit. You've saved that money.” (c2).

Like many others, she approved of the rules on use of proceeds and did not think that a 'big fancy bag' was in any way a 'willy nilly' definition of charitable purposes.

The general acceptance of the credit system notwithstanding, it raises a number of regulatory concerns including the extent to which volunteering is undertaken voluntarily; whether membership fees are excessive and relatedly whether participation is open to all and members represent a broad-based group drawn from the community (a key factor in deciding whether an organization is charitable under the fourth Pemsel head of offering benefits to the community); and whether the credit arrangements offered are sufficiently distinct from actual payment that would make the 'volunteering' too much like paid labour, hence undermining the key distinction between charitable gaming (reliant on volunteers) and 207 (1) (a) gaming (conducted mainly by paid staff). Indeed the line between paying and rewarding volunteers is unclear to some who actually have to walk it. As one bingo hall staff member said when I asked “Let's start off first of all with just the mechanics of what you have to do in your job”:

“My job is to first of all find the bingo volunteers, schedule them. We pay our – we don't pay our bingo volunteers; we reward our bingo volunteers with points which they can use towards paying for hockey, soccer, and any kind of community orientated sports programmes.” (bHPL 001 original emphasis)

Many of these concerns were raised during Alberta's 1999 Bingo Review Committee, which raised the possibility that the system of having parents work bingos to earn credits towards membership might be scrapped. A key concern of the provincial government in the 1999 review of bingo regulations was to establish better control of volunteers in bingo halls, in particular by implementing stricter policies on volunteer credits. This was by far the most controversial element of the consultations, and youth sports groups mobilized vigorously to maintain the ability to use credits:

“Groups with the most at stake seemed to provide more individual written responses, including verbal submissions. This was evident among swim clubs from across the province. Collectively they realize a large return from bingo and expressed concerns about changes to bingo which might jeopardize this revenue.” (BRC 1999, 45).

While reiterating the key role of unpaid labour in establishing the distinctively *charitable* nature of the province's gambling model³⁹, and reiterating the regulations that bingo proceeds should not go to paying volunteers (e.g. section 1.4 of the *Bingo Terms & Conditions and Operating Guidelines*, quoted BRC 1999, 26), the review left credits mostly in place. This was because most charity stakeholders consulted vigorously defended them. Credits were distinguished from volunteer reimbursement on the logic that they did not allow individuals to personally profit from working bingos, but rather functioned to support charities. Hence “the committee recognizes that the elimination of “credits” would negatively effect the charitable programs of many organizations which have benefited from them. Therefore, it recommends that credits be permitted” (BRC 1999, 101). The section explaining this decision makes it clear that the credit system's power stemmed from its de facto dominance, and that while the benefits it grants to charities should be maintained, in terms of allowing them to get free labour in return for access to services, any ‘excess’ that might be construed as payment would in future be more tightly regulated:

“The use of credits should be allowed, but only to offset the cost of registration or competition fees in an acceptable charitable activity, such as amateur athletics.

- The use of “credits” in bingo has been widespread in the province for a number of years. If at any time credits had been considered to be prohibited, or contrary to bingo policy, the lack of enforcement has resulted in their becoming widespread and in effect legitimizing them through a now common practice.
- Credits take different forms but essentially allow a parent or guardian, by working at bingo, to offset a portion of their child's registration or competition fees in activities such as amateur athletics or dance. The amount offset by working bingo is often in direct proportion to the number of bingo events worked.
- Such credits should be permitted only to offset reasonable and legitimate costs of participation in an acceptable amateur or non-professional activity determined to be charitable in nature. That is, they should not be used to accumulate compensation or “earnings” to the volunteer beyond such costs.
- Moreover, credits must be viewed as belonging to the organization, not to its individual members. They are the property of the organization, are not transferable, and possess no cash value.
- Current policy prohibits paying cash to volunteers for working at bingo events. This prohibition must continue to be enforced.
- The practice of requiring volunteers to work at bingo as a condition of membership should be strongly discouraged.” (BRC 1999, 89 original emphasis).

In terms of protecting those who needed a charity's services from being coerced into working for free, this was an extremely weak regulatory response. ‘Strong discouraging’ of requiring volunteers to work bingos was clearly not going to stop this endemic practice: 13

³⁹ “The bingo licensee, operating on a voluntary basis, must continue to be the organization responsible for the bingo event, in keeping with the province's charitable gaming model” (BRC 1999, 5)

years after the review I spoke to several parents in Alberta who were required either to work bingos in order to get their children access to sports and recreational activities, or to pay their way out of volunteering via cheques. Only one had succeeded in arguing against a voluntary labour requirement – a professional man who was involved in anti-gambling campaigning and who implied the threat of legal action on religious and conscience grounds.

In terms of entrenching charity interests in volunteer credits, however, the 1999 reforms were a success. Although failing to protect volunteers, they spawned a new set of complex rules to regulate charity property in credits. The current Terms and Conditions on ‘volunteer expenses – use of proceeds policy’ lays out the ways in which “gaming proceeds may be used to reimburse volunteers for approved expenses incurred while working a gaming event”. Key provisions include:

- “6. Volunteers working a licensed event shall not be paid cash, from gaming proceeds or from any other source of revenue, for their services. This includes, but is not limited to:
 - a) cash payments;
 - b) association or bingo licensee “vouchers” which can be exchanged for cash; and
 - c) receiving money, goods or services for personal use, from individuals that provide premises, services, equipment or supplies to events sponsored by the volunteer’s group.
7. Volunteers working a licensed event may receive credits/points to help offset the cost of registration fees, competition fees and/or travel expenses for an approved charitable activity conducted by the licensee. The credits/points shall:
 - a) not be redeemable for cash; and
 - b) not be used for social/recreational purposes.
8. Volunteers may transfer the credits/points earned from working an event:
 - a) to other members of the licensed group; or
 - b) to individuals who are beneficiaries of the group’s programs (for example an amateur athlete participating in a structured and developmental sport); or
 - c) on the approval of the Commission, to other licensees if:
 - i) the groups redeeming the credits are community leagues/associations; or
 - ii) the groups redeeming the credits have structures with provincial, regional, district and/or zone components.”

The procedures for transferring the credits, via vouchers being used as a means of exchange, are extremely complex. Each must include the name of the licensed group issuing the voucher; a serial number; date of issuance; value; name and telephone number of the person to whom the voucher is issued; a redemption date; redemption purpose; expiry date (not to exceed one year from date of issuance); authorizing signature; and a “notice stating the voucher cannot be used for social/recreational or non-charitable purposes.” Records must be kept of such credit transfers, on the issuing and receiving end, and are subject to review by the AGLC (sec 10).

This labour-intensive system, requiring considerable record keeping, provides for an alternative currency of volunteer credits where the value accumulated by volunteer workers can be stored up for use by charities, and can move between organisations (providing the records are properly kept on both ends). The value can only circulate in the context of charitable purposes, and can not be exchanged for cash, although as noted above when volunteers fail to meet their obligations they have to reimburse the organization effected in cash. Neither can credits be exchanged for cash-like goods, such as grocery vouchers. One licensed charity had been audited and fined for the latter:

Respondent: What we used to do, and apparently you can't do this, we used to have... a long time ago we had quite a problem getting volunteers so what we ended up doing was we would give them their voucher, they would take their voucher, come back to us and we would give them a Safeway gift card in exchange. Because we live in a very low income neighbourhood and sometimes 40 bucks worth of groceries, 60 bucks worth of groceries is huge to people, but you can't do that. We rode that horse for as long as we could and then we got audited.

Interviewer: Was it a big fine?

Respondent: No. It made it worth it for that time but now that... we couldn't continue it because next time we could lose our gaming licence and that would be huge to us."

Later, s/he returned to this issue:

"Me: If you could change one thing about the way that bingo is regulated, that would make your life easier basically - what would it be?

Respondent: I would say what people can spend their vouchers on - that's huge. We have talked to people so much because people just don't understand why they're so limited. And I agree - I think it should be a little more broader what they can spend their earnings on as a bingo volunteer."

The regulatory disquiet about allowing volunteers to 'personally profit' from bingo, in the form of cash, has hereby resulted in a situation whereby charities are given better-protected property interests in volunteer credits. There is a clear dual state-charity interest in the multiple spoils of volunteer labour at work here. The Alberta bingo reforms represented an increased state interest in, and surveillance of, non-regularized workers being paid in cash to do what dominant actors feel should be done for free, and they simultaneously bolster charity power over the volunteers who sustain the game and whose labour defines, and legitimises, the province's charitable gaming model. However simultaneously concerns about economically-coerced volunteering in the context of dubious charitable purposes are sidelined. With the charities who mobilized to respond to the consultations assumed to represent the community of grassroots stakeholders, volunteer interests become harder to articulate: charities speak for them. It is significant in this regard that Alberta's forthcoming

bingo review has not, thus far, prioritized volunteer credit regulation as a key topic. The current standards will, it appears, be left largely unchanged.

Section 5. Volunteer Professionalization in Ontario bingo: class, customer service, and appropriate hats.

“*The Times* honored a sale of fancy work in May 1826, patronized by the Lady Mayoress, which raised over £600 to aid distressed Spitalfields weavers, and the reporter remarked that the ‘ladies acquitted themselves in their new characters of shopkeepers most admirably’” (Prochaska 1977, 65).

“You know what, I’ve worked with charities forever and a day and you have some good workers, you have some bad workers, you have people that don’t give a rat’s. The worst ones are the Daddy Hockey League guys because they don’t really want to work, they just want to be here and watch the game on our big screen TVs.” (laughs). (bingo hall manager).

The meanings that volunteers attach to their work is an under-researched topic, but in the limited scholarship that does exist attention is often focused on the relationships between volunteers and the users of a charitable service. One trajectory of voluntarism – associated with early philanthropic and missionary activity and still evident in some parts of the charitable sector– involves middle or upper class people engaging in a form of poverty tourism, temporarily trying out new roles such as food server in a homeless shelter, or, as in the example used by Prochaska, amateur shop keeper in a fancy fair. The fun to be had by volunteers in such work was in part the novelty of the labour: E Jebb (co-founder of Save the Children but somewhat of a charity skeptic) wrote bitingly of the poor being used as toys for the rich in this regard (Mahood 2009, 1).

However research on voluntary labour has emphasized the huge variety of meanings and social relations made possible by different forms of unpaid work. As Linda Mahood notes with regard to women’s voluntary work, studies that exclusively emphasize the repressive role of charities “do little to help us understand what the opportunity to do volunteer work represented in women’s lives in the late 19th and early 20th centuries” (2009, 3). While participation in charitable activity could enhance social status for the rural elite (13), volunteering could also provide, for some women, a source of adventure and rebellion, and opportunities to travel, form intimate communities with likeminded people⁴⁰, and

⁴⁰ See Mahood (2009) on the fact that “philanthropy and social welfare work created an environment where like-minded women formed close intimate communities” (Mahood 2009, 126).

express political opinions. It could also mobilize cross-class alliances, and lead to support for direct action forms of politics.

Moreover, although much research on volunteers has focused on middle or upper class people, other work examines the motivations of low-income volunteers and the way that these relate to political economic trends. For example Maes' interviews with unpaid carers for people living with HIV/AIDS in Addis Ababa found that motivations range concerns such as reducing suffering and pleasing God, to desires for direct remuneration (such as food), new knowledge, patron-client relationships, and paid job opportunities in a context of widespread unemployment and socio-economic uncertainty (Maes 2012, 55). The NGOs that organize volunteers try – never entirely successfully – to shape these motivations, a reality that “recasts economically-insecure volunteers' consent to donate their labor as a process of negotiation with their organizers.” (Maes 2012, 54).

In a very different context, Jacinthe Michaud researched the impact that Ontario's workfare policy had on poor women who already were volunteering for feminist and community groups. Those women had volunteered for many reasons, including to help secure resources for their children; to avoid social exclusion; to connect with people who shared their political values; and to be in spaces that they experienced as comparatively free of sexism, racism, xenophobia and anti-francophone prejudice (2004, 274). Many considered their non-waged work to be political activism (273). All reported that the implementation of workfare (see fn above) transformed these varied, nuanced meanings of volunteering into a coercive relationship giving rise “to a new economy of authoritarian working conditions within the community sector” (Michaud 2004, 287-8).

Parsons' research on charity shop volunteers offers another useful analysis of how the meaning of labour can be impacted by shifts in regulatory approach, themselves related to political economic trends. She found that UK charity shops created spaces for sociality and belonging in the local community, especially for older women volunteers (Parsons 2006, 236). Moreover, those volunteers – who were from a variety of class backgrounds themselves but who tended to identify as less well-off - saw the main beneficiaries of their labour as the shoppers (local poor people in need of a bargain), rather than those abroad that the charity was supposed to be aiding through its global humanitarian and development activities. Here voluntarism was valued for its ability to secure sociality and mutual aid, rather than as a form of class crossing. This localized ethos of helping people with whom there was a perceived common bond was harmed as charities moved to professionalize the shops, making them more work-inflected sites with professional managers at head office levels, increasing

standardisation of displays, and, in some cases, a move to uniforms and/or name badges (231).

Parsons' research is of great significance for charitable bingo, because volunteering is most effective in the game when those same features – of a sense of sociality and mutual aid, and a localized ethos of helping players with whom there was a perceived common bond – were present. The question of the extent to which bingo players know or care about the charities fundraising at their bingo hall is beyond the scope of this article, but it is significant that there is, in the most successful halls, a close relationship between volunteers and players. Several of those who work as paid and unpaid staff in bingo halls got involved in the game as players, and then became volunteers (usually for their children's sports). Several volunteers (and hall managers) also prioritised the sense of worth and achievement they gained from helping to provide a social space for people to gather, including people perceived as isolated, lonely, and under-served by other leisure providers. For example several mentioned that bingo was important because it helped older people, veterans, and disabled people get out of the house, or because it provided people in institutional settings such as care homes and hospitals with some entertainment. Here the sense of “giving back” was profoundly local, and about bingo players rather than charities.

When there was little perceived commonality between volunteers and players, problems arose. For example, some groups of middle class volunteers were evidently uncomfortable in bingo halls: one person who had to mobilise a group of well-off parents to work Ontario bingos in return for funds for a youth sports group said rather awkwardly that part of his struggle was to overcome their aversion to the ‘different sort of people in the hall, you know, less well-off.’ One bingo manager (also a bingo player and, in years past, a volunteer), considered that it was good to make middle class parents ‘connect’ to the real world via volunteering, but she lamented the additional work created by those she labeled (laughing) “Daddy hockey league guys” who were more trouble than they were worth and who upset the customers with their slow sale of tickets and general lack of knowledge about and interest in the game (c2). In particular, the class gap between bingo volunteers and players was a liability to smooth and friendly running of the game. Some middle class parents showed up to simply ‘hold up the wall’ in order to earn their credits, and players were more likely to be rude to middle class volunteers; one such volunteer said that it seemed as if bingo players enjoyed holding power over people to whom they would normally have to be deferential, by ordering them around.

Despite the general sense in halls that bingo worked best when volunteers were closely aligned to players, revitalization initiatives in Alberta and Ontario have tried, to varying degrees, to *widen* the gap between the two groups, by professionalizing volunteers and introducing a more business mindset into the game. Some stakeholders involved in Alberta's current bingo discussions support a standardisation of the game in part because of the perceived need to strengthen and support a business mentality within bingo. Such individuals regarded it as important to get control away from hall managers who started out as players and volunteers and who one interviewee dismissed as 'housewives,' instead turning control over to gaming entrepreneurs and 'business guys' who could better maximise revenue streams. Whether the business guys had a better understanding of the customer base than the housewives was a topic of much debate.

However it is in Ontario's bingo reforms that the most concerted effort has been made to professionalize bingo volunteers and increase the distance between them and players. Charities with permits to fundraise in the halls that move to OLG control under the provincial revitalization initiative are required to engage in marketing and public relations activities to promote awareness of their charity and of the gaming centre generally. For example under the policy on 'promoting awareness of charity contribution':

"Charitable organizations are obligated to promote how the funds raised in the Charitable Gaming Centre support the good works they carry out in their community. It is expected that the charity presence is very evident in the Charitable Gaming Centre. This means that when a customer enters a Charitable Gaming facility they are immediately aware of the presence of charities and have opportunities to become informed as to how the funds raised in the Gaming Centre benefit the local community. This "charity look and feel" distinguishes Charitable Gaming Centres from other gaming facilities.... Participating charitable organizations will also be required to promote and acknowledge their participation in Charitable Bingo and Gaming Initiative outside the Charitable Gaming Centre." (OCGA 2012/3, 10, Sect B 7).

To comply with such policies, the volunteers provided must be trained in customer service (sec B 8 standards a), and be knowledgeable about their charity and able to answer questions regarding the services it provides in the community (p10 sec b 7 standards b). Aside from this marketing work, sitting at a table to distribute information, they are prescribed narrow roles helping paid staff with support activities such as "assist(ing) in keeping the environment tidy" (d) or directing people to toilets ((g) (OCGA 2012/3, 12)). They are allowed to "assist in identifying winners for verification by gaming centre staff" but they are not allowed to handle gaming cash so they can not pay winners (f) (one of the most rewarding parts of working the game).

Finally, volunteers in OLG halls are subjected to a “professional dress code” intended to allow them to be readily identified by players (h; OCGA 2012/3, 11). This policy was first introduced in the e-bingo pilot halls, which initially had a rule on uniforms (black trousers, white shirts) and name badges. However after complaints from volunteers (on the grounds that not everyone owned such clothing and that charities should not be spending money buying it) the rule was changed in some halls to a generic smart-casual policy. The new policy and standards have departed from this compromise solution, detailing the ‘dress code’ in some depth:

“POLICY

To reflect the professional modern gaming facilities and to provide consistency to the customer base, trained volunteers must look professional and be easy to identify. Within reason, clothing with a charity logo purchased specifically to support the Charitable Bingo and Gaming model is an allowable expense” (OCGA 2012/3, 9)

STANDARDS

a) The dress code requirements at a minimum include conservative, dark pants or skirts. Collared shirts or vests with charity identification (logos) are preferred and recommended to increase exposure for the charities participating. If charity identified shirts or vests are not available then white collared shirts may be worn. Either option must include a nametag indicating the first name of the volunteer and the charity (if no logo). All volunteers from the charity should be dressed in the same colour shirts to make them easily identified. Denim jeans, track pants, stretch pants, shorts, tank tops, and sleeveless t-shirts are not permitted. No hats are permitted unless specifically related to the charity uniform (e.g., Shriner’s Fez). Baseball caps are not permitted as they distract from a professional look. Footwear should also be tasteful and appropriate to the role of the volunteer.

b) CGCA’s have the flexibility to add additional dress code requirements (in consultation with OCGA) providing these minimum requirements are maintained. “ (OCGA 2012/3, 10).

Failure to comply with these policies and standards on volunteers will result in financial repercussions for charities: (sec c?). If a volunteer violates the dress code, the charity will lose ¼ share of the proceeds. It will lose ½ a share if its volunteers fail to show up at all - quite a penalty for the wrong sort of hat.

It is likely that one key feature of this new scrutiny of volunteer attire, in the name of professionalism, taste, and customer service, will be to increase the distance between volunteers and players, making volunteers readily distinct and moving them away from the dress conventions that currently characterize the game. Volunteers will be moved into either charity uniforms or middle class conventional dress, which will significantly change the way that they appear. Currently most dress casually, like most players. Jeans, trackpants, and baseball caps (for men and sometimes women) are commonplace, and shoes are usually trainers since the volunteers are on their feet a lot and sometimes need to run to get to

customers who want to buy cards, or to verify a bingo. This dress is comfortable, in practical terms and in terms of signifying a relaxed sense of belonging with similarly-dressed players. This will change in OLG halls: volunteers will look more like staff.

In addition, the reframing of the volunteer role as about marketing and public relations will also increase the distance between volunteers and players, while tying volunteer work far more tightly to charities and to the provincial government. Volunteers in charitable gaming centres are taken away from the actual running of the game; rather than sell tickets, for example, they sit at a table giving information about their charity. The province's e-bingo initiative hereby restricts volunteers to public relations tasks, wherein they act as advertisements for the community benefit to be gained from the charity/state/business compact showcased in the new gaming centres. The substantive content of the volunteer/player link, so crucial to bingo when it works well, is weakened. The sense of sociality and mutual aid, and a localized ethos of helping players with whom there was a perceived common bond, recede.

Conclusion.

Bingo is as fascinating as it is understudied. In its own terms – as a globally salient and distinctive gambling form that merges speculation and welfare – we owe it more attention. However in this article I have argued that it also matters for what it can teach us about current trends in the regulation of voluntarism. In particular, attention to the 'lowly' level of charitable bingo licensing policies, standards, and terms and conditions shows that charities and provincial governments have increasingly shared, common interests in mobilizing and subsequently controlling unpaid labour. Rather than focusing on the assumed clash between charities and states over who gets their 'mitts' on gaming revenue, then, there is an urgent need to reframe the debate, to make clear what charities and government regulators share with regard to welfare state reorganization and to ask what this means for other stakeholders.

In particular, bingo teaches us that charities, with their increasingly close relationships to other powerful actors, must be approached critically, and that their success in speaking for, and over, the volunteers whose labour sustains the game is an effect of a distinctive set of legal and political arrangements. Indeed the bingo revitalization plans in both Alberta and Ontario – haunted by fears of a B.C.-style legal clash with charities over gaming spoils – brought government actors and charities together, and are hence likely to be heralded as a 'success' if charities are treated as the lowest relevant set of actors. However these plans did

not represent the interests of volunteers. In contrast, they increased surveillance of non-regularized workers, failed to protect charity service users from unpaid labour requirements, and extended charity control over, and ability to extract value from, volunteer work.

Moreover, while bingo volunteering does not have uniform meanings and the social relations it makes possible vary considerably, to the extent that provincial revitalization initiatives reframe the volunteer role in similar directions (to be more focused on customer service; to increase the distance between players and volunteers; to tie volunteering more tightly to the marketing of how charities - with provincial government help - benefit the community), that diversity of meanings and relations is narrowed. The potential for bingo volunteering to promote social spaces of mutual aid and interaction with players with whom one feels allied will thus decline.

In terms of the game itself, it would seem important to explore possibilities for other kinds of revitalization, involving consultations with other stakeholders. For example, greater regulatory interest in volunteer experience may foster the potential for regulators to better protect unpaid workers from charities, and lead to better rules on credits that would place more scrutiny on organisations that charge high membership fees, require back-dated cheques as a strategy to mobilise ‘volunteers’, or use proceeds to amass ever-fancier sports equipment for already privileged children. Charities will likely resist such reforms. Building the momentum to secure them requires regulators to consult with other actors, including volunteers and bingo players directly, hereby breaking the tendency of recent years to grant charities the ability to speak for, and mediate, community interests.

Beyond bingo, it would be helpful to learn more about the production and regulation of different kinds of voluntary spaces, and the relationship (if any) that exists between various sites. For example, given that much critical work on voluntarism and social policy has explored ‘workfare’ schemes, it would be interesting to relate this to the practices of non-profits that coerce parents to participate in unpaid work in order to access services for their children. Similarly, the marketing of charity-state projects to mobilise unpaid labour likely has a range of effects on different kinds of volunteering, and there is a pressing need to explore how the celebration of voluntarism relates to the punitive actions taken against those who refuse to work unpaid. Equally, however, the charitable justification for gambling liberalization requires more critical attention from those interested in law and political economy. Casinos, and especially roulette wheels, have hogged the limelight for a while in our conversations about regulating capitalism. It is time to deepen the conversation by centring some other, equally rich, research sites.

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