

# Keeping bingo social, safe and fair

BINGO INQUIRY KEY FINDINGS AND  
PROPOSED ACTIONS

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# ACKNOWLEDGEMENTS

Thank you to all community, industry and government participants who contributed.

## Acknowledgement of Traditional Owners

We acknowledge the Traditional Owners of the lands and waterways on which we work and live.

We acknowledge all Aboriginal and Torres Strait Islander communities and pay our respects to Elders past and present.

As the First Peoples of this land belong to the world's oldest living cultures, we recognise and value their knowledge, and ongoing role in shaping and enriching the story of Victoria.

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## KEY TERMS

TERM	EXPLANATION
<b>BCO</b>	A <b>bingo centre operator</b> , licensed under the <i>Gambling Regulation Act 2003</i> (Vic).
<b>bingo</b>	A type of lottery. The aim of a bingo game to is to win a prize by matching a group of numbers on a ticket to those randomly drawn from a defined set. Games take a few minutes, so are grouped together in sessions.
<b>bingo centre</b>	Usually describes a stand-alone building dedicated to commercial scale bingo or a defined space within a community club or other community facility. The Gambling Regulation Act defines a ‘bingo centre’ as ‘a house or place in which sessions of bingo are regularly conducted on a commercial basis’ for the purpose of establishing who needs to hold a BCO licence.
<b>CCO</b>	A declared <b>community or charitable organisation</b> under the Gambling Regulation Act that is ‘conducted in good faith’ for: <ul style="list-style-type: none"> <li>• any philanthropic or benevolent purpose, including promoting art, culture, science, religion, education or charity</li> <li>• the purposes of any sporting or recreational club or association of a prescribed kind</li> <li>• the purposes of a political party.</li> </ul> A CCO can conduct bingo once it has notified the VGCCC of its intention to do so. A CCO may also simply receive proceeds from bingo sessions through an arrangement with a BCO or distribution arrangement with another CCO.
<b>EFT</b>	Electronic Funds Transfer.
<b>free bingo</b>	Bingo run on a no-fee-to-play or full return-to-player basis, which is generally exempt from the requirements of the Gambling Regulation Act. The term is used in venue and provider promotions and advertising.
<b>harm minimisation code</b>	Under the Gambling Regulation Act, BCOs must implement a responsible gambling code of conduct to minimise gambling harm. Codes must align with a 2018 ministerial direction.
<b>PET</b>	Personal electronic terminal. An electronic device used to store bingo tickets. It can be portable (like a computer tablet) or fixed (like a desktop computer). It enables a person to play many tickets (e.g. up to 48) simultaneously. PETs are preset to automatically mark off numbers when called but can be used in manual mode.

TERM	EXPLANATION
<b>session</b>	<p>A collection of bingo games played without a substantial break.</p> <p>Most bingo providers offer sessions of between 10 and 30 games. Sessions are usually 30–90 minutes, depending on provider, customer preference and call speed. For example, a session of 30 games would take 90 minutes at 3 minutes per game.</p> <p>In bingo provider advertising, ‘session’ is also used to describe a group of sessions, such as a day or night session. In this report, a group of sessions is called an ‘event’.</p> <p>The Gambling Regulation Act defines a ‘session’ as no more than 30 games in 8 hours.</p>
<b>ticket</b>	<p>The 9x3 (9 columns and 3 rows) set in which 15 of the 27 squares are numbered; used for bingo games in Victoria. It is also a (broadly) defined term under the Gambling Regulation Act.</p>
<b>VGCCC, the Commission</b>	<p>Victorian Gambling and Casino Control Commission.</p>

## KEY FINDINGS

In early 2024, the Commission initiated an inquiry under section 33 of the *Victorian Gambling and Casino Control Commission Act 2011* into the conduct of bingo in Victoria.

While bingo is a relatively small part of the overall gambling industry, it is an area of gambling regulation that has received little attention since the laws relating to bingo under the *Gambling Regulation Act 2003* were amended in 2008.

The bingo inquiry set out to explore what action might be needed to keep bingo social, safe and fair.

The aims of the inquiry were to:

- understand how bingo is played in Victoria and for what purpose
- explore key issues, risks and opportunities to improve regulatory oversight
- identify regulatory actions to enhance the integrity, safety and fairness of bingo in Victoria.

Our approach included:

- examining academic and government research, reports, studies and source material
- venue visits, industry surveys and an in-person roundtable
- public consultation through a discussion paper on [Engage Victoria](#), where we received 14 written submissions, and customer surveys and in-person sessions
- analysing annual return data and other information we collect from sector participants
- reviewing regulatory approaches in other jurisdictions and for other commercial gambling offerings
- exploring changing technology and innovation.

The inquiry did not explore:

- other forms of charitable gambling such as raffles, lucky envelopes or fundraising events
- trade promotion lotteries
- social bingo offered in seniors centres, faith or community centres, schools or similar settings
- the delivery of bingo in online settings (for example, via Facebook or social apps)
- loyalty programs offered by commercial gambling providers.

### Bingo crosses over community and commercial gambling

Overall, we discovered that there are two types of bingo offerings.

Community bingo which is either free (where players don't pay to play or all money is returned in prizes) or small scale pay-to-play (paid) bingo, operates widely across Victoria. We have found that our current regulatory approach is largely sufficient for overseeing community bingo, with some minor adjustments, such as improved data upload options and refreshed sector guidance (discussed below).

Bingo conducted at a commercial scale or in commercially operated gambling venues is where modernisation of the regulatory framework is most needed.

- If not conducted carefully and with appropriate regulatory oversight, commercial scale bingo can present risks of harm to players and criminal influence.
- Since 2008, not all commercial scale bingo providers have been subject to the same regulatory obligations under Victoria's regulatory framework.

## Inquiry principles

We developed 6 principles which underpin our approach to this inquiry. The principles reflect our efforts to promote the integrity, safety and fairness of gambling in Victoria.

Specifically, through this inquiry into the bingo sector we have set out to:

- meet community expectations about the conduct of bingo as a form of gambling
- facilitate the benefits of bingo, as envisaged in the Gambling Regulation Act
- ensure providers and suppliers act with integrity in delivering bingo
- ensure games are fair
- minimise gambling harm to players, staff and the community at large
- effectively regulate bingo, with regard to current and emerging risks.

## What is bingo?

Bingo is a type of lottery that is easy to play, where the chance of winning is directly related to the number of tickets in play. The chance of winning can also change when a different version of the game is played. Games run for 3 to 4 minutes and are grouped into sessions and events.

We have heard that bingo is typically played as a social activity used to support fundraising; even so it is a significant form of gambling for some people. It is also a substantial commercial enterprise for some operators.

In commercial settings, people can use electronic tickets stored on personal electronic terminals (PETs) as well as paper tickets. While 200 tickets can potentially be purchased and played per game on a single PET, in practice, the number is limited to 48 tickets per game. In comparison, we have been told that even the most proficient bingo players can only play up to 12 paper tickets per game.

Bingo games are often offered alongside other forms of gambling, including trade promotions, raffles and lucky envelopes. Food, music and sometimes alcohol are also offered. In a pub or club setting, alcohol and additional forms of gambling might also be offered, including poker machines, betting terminals and Keno.

Bingo has been offered in Victoria for over 100 years as a way for community and charitable groups to fundraise. From the beginning, there were concerns about criminal infiltration and profiteering. Bingo was banned from 1954 until 1977. In 1977, permits were introduced for community and charitable organisations (CCOs) to run no more than 2 sessions a week.

Bingo centre operators (BCOs) were not subject to gambling regulation until 1985, when licensing was introduced. These centres operate for-profit but support the fundraising efforts of one or more CCOs.

The Victorian bingo sector peaked in the early 1990s with \$167 million in turnover (\$390 million in today's dollars) before declining after the introduction of poker machines.

From 1994 to 2008, bingo was progressively deregulated to enable it to compete more effectively with poker machines.

Around 77,000 people play bingo each year.

The bingo sector turned over \$107 million in reported revenue in 2022–23. Almost all bingo providers operate in cash only, including those that generate significant revenue.

The sector has become increasingly concentrated, with 15 bingo providers (9% of all providers) generating 85% of total bingo revenue in 2022–23. Each of these providers turned over more than \$1 million for the year. Most providers supported just one community organisation.

A dual licensing system currently operates under Victorian bingo laws. As a result, CCOs offering commercial scale bingo and BCOs face different regulatory obligations despite operating on near identical terms.

At the other end of the scale, it is common to see 'free bingo' being promoted. In practice, this can mean different things, including bingo where:

- no fee is charged to participate and prizes are not cash, for example, a seniors centre where the prize is a meat tray
- all revenue from ticket sales in a session is fully distributed in prizes during that session
- it is offered as part of a broader event, where a fee is charged to participate in the event.

We have found free bingo is often available in otherwise commercial settings, such as in hotels (or pubs) and clubs.

Our research found that bingo (including free bingo played in a commercial setting) is played in 219 known locations across Victoria. Of these venues, 89 are clubs with poker machines (including 22 RSLs) and 18 are pubs with poker machines.

## Who plays bingo?

There is limited, and sometimes conflicting, data on people who play bingo. In this report, we focus on two important Victorian data sources: the Victorian population gambling and health study 2023 (Victorian population study), which surveyed 11,000 randomly selected Victorian adults; and our survey of bingo players via Facebook and in selected venues in July 2024, where we received 564 responses.

We also spoke with customers and staff during our 16 venue visits. We expected variation in the data sets, noting our survey was targeted at bingo players exclusively while the Victorian population study focused on all Victorians' engagement with all gambling offerings, including bingo.

Based on this research, bingo appears to be more popular with women, favoured by people on lower incomes, and players aged 45 and over. Customers commonly attend in family and friendship groups. Children and young people are often present in venues but are not allowed to play if they are under 18. Staff are a mix of paid employees and volunteers who often enjoy playing bingo, sometimes blurring the line between supervision and participation.

People have told us they play because they enjoy the game and enjoy winning. We also heard that some customers travel between or attend multiple venues to pursue large prizes and jackpots. They also indicated that socialising with family and friends is an important part of their participation. Contributing to fundraising is not a motivation for most players.

We observed that night-time and other special events attract larger, younger crowds and more men than day events. It can cost up to \$750 to participate in a special event hosted by a large bingo centre.

Of the people we surveyed, 72% reported playing bingo weekly or more often and the average fortnightly spend on bingo was \$100 to \$200. Given we deliberately targeted regular bingo players either at a venue or with Facebook accounts, our survey figures were significantly higher than the 20% of bingo players that reported playing bingo weekly or more often in the Victorian population study.

Both data sources indicated that more than half of bingo players gambled on other gambling products. The Victorian population study found that more than half of people who gambled on bingo gambled on 4 or more products (including bingo). However, the data sets varied widely when indicating whether bingo players also gambled on poker machines. Our survey indicated that 14% of those surveyed also use poker machines, while the Victorian population study indicated that many people who played bingo also gambled on poker machines.

During our onsite discussions, players generally reported not drinking alcohol while playing because the game requires concentration.

Our discussions with players also highlighted concerns about the risks of gambling harm and fairness when players are able to play many tickets per game on a PET.

Gambling harm is a matter of increasing public policy concern. The causes of and contributors to gambling harm are complex. Research has found that people gambling across 3 or more products are at greater risk of gambling harm. This includes bingo.

The Victorian population study found that 32.5% of bingo players experienced gambling harm and 9.8% were in the problem gambling risk category. It is not clear from these findings the extent to which bingo – rather than other gambling products used by bingo players – contributed to that harm. We received some feedback during the inquiry that playing bingo can help people to avoid more harmful forms of gambling, but we note this claim is not supported in the research literature.

In commercial gambling settings, factors increasing the risk of gambling harm can include higher frequency play using PETs, integrated gambling offerings, the attraction of larger prizes, other gambling products (such as poker machines), and the availability of alcohol (especially in pubs and clubs).

## The bingo sector

Bingo is offered at a commercial scale by both BCOs (on behalf of CCOs) and CCOs. It is also offered by a small number of other commercial operators. The direct beneficiaries of bingo proceeds are the BCOs (private profit) and CCOs (proceeds that support the organisation). In some instances, CCOs distribute proceeds to other community organisations. We have less visibility of this level of distribution. From time to time, we receive (and investigate) community tipoffs and complaints identifying integrity concerns with how funds are being distributed or used.

As already noted, the bingo sector turned over \$107 million in reported revenue in 2022–23. Our analysis found that 7 of the top 15 providers by revenue were BCOs and 8 operated as CCOs, despite having very similar business models. Each generated over \$1 million in bingo revenue. The CCOs accounted for 32% of total sector revenue (\$34 million). This level of turnover is likely enabled by customers using PETs to play many tickets per game. This supports larger game prizes and jackpots to be offered, which in turn attracts more customers and more ticket sales.

In the same year, 46 clubs with poker machines (who are declared by us to be CCOs) reported revenue from conducting bingo. Reported revenues ranged from over a million dollars to a few thousand dollars.

We also found free bingo is offered in pubs and clubs by third party commercial promoters who are paid a fee by the venue. Free bingo is offered alongside other promotional activities as a way of attracting customers to the venue. Almost all of these venues have poker machines.

Bingo is offered illegally online by offshore operators. There is research suggesting 6% of Victorian bingo players play online.

BSG Australia Pty Ltd is the dominant supplier to the Victorian bingo sector. It supplies operators with paper books, sector-specific software programs, associated hardware (including PETs), book markers and a wide



range of bingo accessories. BSG Australia also conducts 'Big Bucks Bingo', which is a nation-wide trade promotion lottery offered to bingo customers. Despite its centrality to the integrity, safety and fairness of bingo in Victoria, BSG Australia does not require a licence or approval for any of its activities. Bingo is the only sector in the Victorian gambling industry where the central technology provider is not subject to regulatory oversight.

## How is bingo regulated?

Bingo is regulated in Victoria under chapter 8 of the Gambling Regulation Act which covers 'community and charitable gaming'. There are also regulations, ministerial directions and Rules of Bingo which support the requirements of chapter 8.

Progressive deregulation of bingo laws has created some gaps, inconsistencies and confusion.

- There is less regulatory oversight of CCOs, their nominees, associates and key staff in comparison to BCOs even though they can operate otherwise identical businesses.
- There are inconsistencies in how the law applies to clubs and pubs, with and without poker machines, when they offer bingo.
- There is confusion in the industry about interpretation of key terms in the legislation, such as 'bingo centre', 'sessions' and 'expenses'.
- There is confusion in the industry about when free bingo can be offered in commercial settings.
- There is a gap in oversight of equipment suppliers.
- Equipment standards are outdated when compared to other jurisdictions and other gambling products.
- Unlike other jurisdictions, Victoria does not regulate the provision of PETs.

As a result, the sector and individual operators have sometimes been left to make their own interpretations of what is required by law. This has led to non-uniform practices across the sector. For example, most providers self-regulate PET sales at a maximum of 48 electronic tickets per device per game (some providers set lower limits). Some providers allow people to use more than one device.

Providers publish their own house rules which are usually based on the Rules of Bingo. House rules might also include, for example, an explanation of the different game versions offered, rules about PET use or rules about the presence of children in venues. There is significant variation in the content and quality of house rules across the sector.

Providers have different approaches to supporting customers to avoid the risk of harmful gambling.

Bingo laws were last updated in 2008. Since that time, there have been substantial changes in the broader gambling environment that may be relevant to modernising the regulatory oversight of the bingo sector.

- Commercial gambling is increasingly becoming omnichannel, where providers use multiple methods to engage customers or provide an immersive experience.
- Cash transactions remain the norm for bingo, in contrast to a broader shift to account based (or cashless) play in other gambling sectors as well as in the broader economy.
- Public health approaches to gambling harm are increasingly informing the design of Victoria's regulatory framework, though little attention has been given to date to modernising the regulation of bingo.
- Governance, risk-management and disclosure obligations on the not-for-profit sector continue to evolve. This is relevant to the expectations of how CCOs should be managing their businesses.

The bingo sector continues to evolve, as does the broader gambling and social environments within which it operates. Much has changed since 2008. This presents opportunities to modernise the regulatory framework governing the conduct of bingo in Victoria.

## Proposed actions

We have identified 11 actions for modernising the regulatory framework governing the conduct of bingo in Victoria. These actions vary in scale and complexity. We will investigate these actions further in ongoing consultation with the sector, customers, the community of interest and relevant agencies.

### Ensuring a level playing field for commercial scale bingo

We consider there is a strong case for all commercial scale bingo operators to be subject to the same regulatory obligations. A consistent regulatory approach is worth pursuing when these operators otherwise operate on an identical basis. Moreover, customers are unlikely to be able to distinguish between the different corporate structures when deciding where to play. A consistent approach would enable equal scrutiny of operators and protections for customers.

**Action 1:** We will undertake further work to ensure all commercial scale bingo providers are subject to the same regulatory obligations.

### Providing clarity for pubs and clubs offering bingo

Bingo is played in many clubs, and some pubs, hosting poker machines. In 2022–23, 3 clubs with poker machines were among the top 15 bingo providers by revenue. However, there is some uncertainty about where bingo can be conducted, and by whom.

**Action 2:** We will work with industry to clarify when and how pubs and clubs can offer bingo.

Clubs and pubs offering commercial gambling need to act responsibly to prevent gambling harm across all their gambling offerings in order to protect their customers and staff. This could be implemented through a review of harm minimisation codes.

**Action 3:** We will seek to address the risk of harm to bingo players in commercial gambling settings when the harm minimisation codes are next reviewed.

## Addressing risk factors for gambling harm

In commercial gambling settings, the use of PETs has emerged over time as a significant risk factor for gambling harm. Inquiry participants raised both gambling harm and fairness concerns about PETs, echoing issues raised in the research. PET use is not currently capped in Victoria. In New South Wales, a cap of 48 electronic tickets applies.

**Action 4:** We will amend the Rules of Bingo to set a cap of 48 electronic tickets per person per game.

Equipment standards require an update, given the changes in technology. Moreover, there is no supplier approval mechanism currently in place. Better regulation of equipment and suppliers would improve effective regulatory oversight and align the approach to regulating bingo with how we regulate poker machine manufacture and supply.

**Action 5:** We will amend the Rules of Bingo to modernise game equipment standards for PET software and hardware and random number generator software.

**Action 6:** We will work with relevant agencies on reinstating a legislated supplier approval requirement.

## Protecting staff and volunteers

During the past year, we received complaints about bingo staff playing while on duty. Some operators allow the practice while others do not. Staff and volunteers playing while on duty increases probity risk and creates perceptions of unfairness. According to research, staff in commercial gambling settings are also at greater risk of gambling harm. Staff are banned from gambling on poker machines where they are available at their place of work in pubs and clubs (and at the Melbourne Casino).

**Action 7:** We will amend the Rules of Bingo to clarify that staff and volunteers must not play bingo while on duty.

## Improving data collection and monitoring

Our bingo data collection mechanisms require updating. Bingo providers are required to report data to the Commission through manual processes. Providers told us that they would value the ability to directly upload data, similar to other parts of the gambling industry. We intend to upgrade [our website portal](#) to allow the direct upload of bingo returns and related data. This will reduce red tape and enhance our monitoring of the sector by ensuring the data we receive is more accurate and timely.

**Action 8:** We will create an online portal for easier data upload to assist providers and support our monitoring activities.

## Modernising payment arrangements

Almost all bingo providers operate a cash business, including commercial scale bingo providers. Bingo providers can offer EFT for ticket and other customer purchases, as an alternative to cash. In doing so, they need to be mindful of including gambling harm safeguards. We will provide some practical guidance in relation to managing the higher risk of harm when EFT payments are used.

Bingo providers are reporting an emerging problem with the payment of winnings of \$1,000 and over. These winnings must be paid by cheque. Some banks are no longer supporting cheque facilities. According to the Commonwealth Treasury, the issuing of cheques will cease by 30 June 2028.

Addressing this emerging problem requires a change to the Gambling Regulation Act to enable bingo winnings to be paid by EFT. Victorian laws have already been changed to allow poker machine venues and the Melbourne Casino to pay winnings by EFT, with a 24-hour delay in access to help prevent gambling harm.

**Action 9:** We will work with relevant agencies to enable payment of bingo winnings via EFT, with a 24-hour delay in access to help prevent gambling harm, consistent with the Melbourne Casino and poker machines.

## Aiding greater transparency of the bingo sector

Most of the bingo data and information we collect from the sector is not made publicly available, unlike other data and information we collect. We can improve public transparency and scrutiny by releasing more annual return data and other information to the public.

**Action 10:** We will publish more of the bingo sector data we collect to aid greater transparency in line with our reporting on other gambling sectors.

## Promoting best practice across the bingo sector

### Improving governance and risk management practices across the sector

CCOs, which are not-for-profit entities, must act with integrity to maintain their declared status with us.

Previous VGCCC investigations have uncovered governance and risk management concerns. Good governance and risk management helps organisations comply with their regulatory obligations and weather disruptive change.

Good risk management also assists organisations to better align with customer and community expectations. For example, a key issue raised during the inquiry was the presence of children and young people under 18, especially in some commercial bingo centres. Community expectations of not-for-profit organisations have also increased over the past 10 years.

We will develop best practice guidance to align conduct in the bingo sector with modern expectations of gambling providers, including those which are not-for-profit organisations. See action 11 below.

### Improving clarity and consistency

The terms used to describe how bingo is played can be confusing and can vary between providers, while different providers have their own house rules. While these house rules usually build on the Rules of Bingo, they can still differ between providers. The Rules of Bingo were last updated in 2010. Modernising the 2010 Rules of Bingo will be an important step towards promoting greater clarity and consistency across the sector.

In addition, we will develop best practice guidance material to establish:

- template house rules which incorporate the Rules of Bingo in plain English
- what is permitted regarding the use of cash and EFT and measures for preventing gambling harm
- governance and risk management expectations of boards and committees
- restrictions on access to bingo centres by children and young people under 18
- transparent disclosure of distribution of bingo proceeds
- clear disclosure of bingo offerings at venue level, including PET limits and ensuring paper books are always made available to customers.

We will engage closely with the sector and other interested parties as we develop this guidance. We will also look to engage with other government regulators in this sector (Consumer Affairs Victoria and the ACNC) as well as related bodies like the Fundraising Institute of Australia.

**Action 11:** We will consult with stakeholders on the development of best practice guidance materials for bingo providers.

### Next steps

We will hold an online information session to explain our findings and the 11 proposed actions.

In the meantime, we will factor the 11 action items into our business-as-usual work program for staged delivery over the next 18-24 months.

We will consult with industry and the broader community of interest to inform our overall approach, including how we proceed with specific actions.

