



OPERATING STANDARDS SECURITY AND SURVEILLANCE EFFECTIVE DATE: AUGUST 3, 2020

Reviewed June 2021

OVERVIEW

Each Video Lottery Sales Agent (VLSA) shall submit proposed internal controls, security, and surveillance plans for video lottery gaming activities at such time as requested by the Ohio Lottery Commission (OLC) Director or prior to commencement of video lottery gaming activities.

REFERENCE DOCUMENTS

Ohio Administrative Code [3770:2-6-03](#)

Video Lottery Sales Agent Terms and Conditions

Operating Procedures – Minimum Internal Control Standards

Ohio Public Record Law and Security Infrastructure Exceptions [ORC 149.433](#)

STANDARDS AND COMPLIANCE

Security and Surveillance Plans submitted to the OLC Investigations and Security Department for approval must address the following:

Surveillance Monitoring Systems

- Any area where any portion of the operation of video lottery occurs must be under constant surveillance.
- Surveillance is to conduct independent investigations and reviews. Surveillance will not work remotely.
- The surveillance system must be capable of identifying all video lottery activity. Any such review remains the property of the VLSA.
- The office assigned to on-site OLC Investigators shall be equipped with surveillance monitoring equipment. Video reviewed remains the property of the VLSA.
- Prior notification of gaming floor changes to OLC investigators is required.
- Lottery configured as Priority One.
- Data Security and Data Loss Prevention: Video, Audio and other data.

The Surveillance plan must include training for use of the system by the Lottery Investigations and Security Department.

Radio Communications

- Always provide equipment to the OLC investigators to monitor radio traffic.
- Equipment must be capable to receive all frequencies.
- Racino staff are to call the OLC on-duty Investigator cell phone for service, day or night seven days a week.

Security Presence

- There must be a visible presence of security at any time video lottery is being conducted to address age control, criminal acts and other floor security concerns.
- All stored VLT's and related parts must be in an access-controlled environment and under constant video surveillance.
- The VLSA must describe the system for documenting incidents on the floor and will document all Lottery Violations. The OLC must have access to review entries, logs,



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reports and attachments. Any document reviewed remains the property of the VLSA and is not generated by or for the Lottery Commission.

Access Control

- Access to restricted areas must be monitored and limited to appropriate staff.
- A credentialing access card system or an access system controlled by security, surveillance or appropriate staff must be used to control access to all restricted areas.
- A system must be utilized for sensitive key control for VLTs and restricted areas including a system that will log the removal and return of sensitive keys.
- The VLSA shall describe the name badges or other credentials used to identify their staff and level of access.

Disaster Planning

- There must be an emergency procedures manual detailing the actions they will take during a major emergency or natural disaster or other event that interrupts business operations or endangers life or safety of persons. OLC Investigators will be granted access to the Emergency Command Center and racino/corporate person in charge.
- **Active Aggressor/Mass Casualty Incident**
 - An Active Shooter is defined by the Department of Homeland Security as an individual actively engaged in killing or attempting to kill people in a confined and populated area. The immediate deployment of law enforcement is required to stop the shooting and mitigate harm to victims.
 - This policy should address:
 - The VLSA's procedure for contacting local law enforcement for assistance in an active shooter situation.
 - The VLSA's Security and Surveillance staff must provide annual training for all personnel on how they should respond when an active shooter is in their vicinity.
 - Keep in mind that customers are likely to follow the lead of employees and managers during an active shooter situation.

Staffing

- A description of all Gaming or Key Gaming job duties of any employee of the VLSA must be submitted to the OLC for review and classification. Non-Gaming licensed personnel will not have access to or responsibility for any Gaming or Key Gaming duties.
- Employees may be required to identify themselves and provide their license numbers to Lottery staff.

Surveillance and Security Policies and Procedures

VLSA Security and Surveillance plans and procedures are NOT subject to the public records act under section 149.433 of the Ohio Revised Code.

A licensed VLSA must submit to the OLC Investigations and Security Deputy Director, for review and approval, a policies and procedures manual addressing the following:

- A policy and procedure on age verification to include prohibiting play for individuals less than twenty-one years of age. It is the VLSA's responsibility to verify the age and identity of all persons on, entering or leaving the gaming floor.



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- A policy and procedure on monitoring individuals less than twenty-one years of age that are escorted across the gaming floor.
- Plans to provide a visible presence of security at any time the VLSA is open for business or closed while VLT's are stored on property.
- Interaction with local law enforcement to arrest or remove unruly or intoxicated patrons as well as the investigation of other criminal acts that may take place in any area of the property.
- An emergency procedures manual detailing the actions they will take during a major emergency or natural disaster.
- Procedures for sensitive key control for VLTs and restricted areas including a system that will log the removal and return of sensitive keys.
- Enforcement for Ohio Voluntary Exclusion Violations, self-exclusion, trespass, and banned patron issues.
- Access control levels to all areas of the VLSA property, for all personnel, visitors and guests which includes issuing identification badges

Reporting Requirements:

Ohio Lottery Commission Reporting to On-Duty Investigator Requirements:

- VLSA's are required to report certain activities detailed in the VLSA version of the standards to the On-duty Investigators.
- The list is not all inclusive and best practices and judgment should be used.
- Any racino employee can make the notification(s), normally the Surveillance, Security, Compliance, Human Resource (license discipline issues) departments should be making these notifications, as appropriate.

APPROVAL AND VERIFICATION

The written policies and procedures shall be reviewed by the OLC Investigations and Security Deputy Director and items of concern will be brought to the attention of the VLSA for correction. The OLC Investigations and Security Deputy Director may conduct audits of the security, and surveillance plans and their implementation on a yearly basis or as often as decided. The policies and procedures shall be updated by the VLSA's as situations dictate, but no less frequently than annually.

CONTACT

Questions regarding minimum internal controls, compliance reviews, and ongoing audits may be directed to: vlt@lottery.ohio.gov