OVERVIEW

Each Video Lottery Sales Agent (VLSA) shall submit a proposed internal controls and security plan for video lottery gaming activities at such time as requested by the Ohio Lottery Commission (OLC) Director 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

STANDARDS AND COMPLIANCE

Security and Surveillance Plans submitted to the OLC 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.
- The surveillance system must be capable of identifying all video lottery activity including players and video lottery screens.
- All surveillance recordings must be held for a minimum of 14 days and be available for review by authorized representatives of the OLC.
- The office assigned to on-site OLC Security Investigators shall be equipped with surveillance monitoring equipment that will allow representatives of the OLC to view any camera scene the VLSA surveillance system monitors without intervention or assistance of VLSA personnel.
- Notification of camera moves, non-working cameras, floor changes to OLC investigators.
- Lottery configured as Priority One.

A licensed video lottery sales agent must submit to the Lottery for review and approval, a diagram of the surveillance monitoring system identifying camera placement and the intended view provided by the camera. The SURVEILANCE program must include a training component for use of the system by Lottery Security.

Radio Communications

- Provide equipment to the OLC investigators to monitor at all times.
- Equipment must be capable to receive all frequencies.

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.

- The VLSA must describe the system for documenting incidents on the floor, The OLC must have access to review entries, query to generate reports, and to edit entries, and to create new entries. (EG Biometrica Service, Filemaker)

Access Control

- Access to restricted areas (cage operations, computer facilities, etc.) 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 areas where VLT operations are conducted.
- 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 for maintenance, repairs, cashiers cage and count room.

Disaster Planning

- There must be an emergency procedures manual detailing the actions they will take during a major emergency or natural disaster.

Active Shooter Policy

- 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.
  - Scheduling joint training sessions with the responding law enforcement agency, the VLSA's Security and Surveillance staff and on-site OLC Investigators.
  - 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 job duties of any employee actively involved in the operation of VLTs must be submitted to the OLC by the licensed VLSA for review.
- BADGES / IDENTIFICATION – All employees must have their Lottery / Racing license available for inspection. The employee is not required to display the license on their person. The VLSA shall describe the name badges or other credentials used to identify their staff and access.

Surveillance

Security Policies and Procedures

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

- A policy on age verification, as well as a process for escorting individuals under 21.
- Plans to provide a visible presence of security at any time video lottery is being conducted
- 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 the VLT area of the racetrack.
- 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 for maintenance, repairs, cashiers cage and count room.
- Enforcement for self exclusion/trespass issues.
- Access control levels to all areas where the operation of VLTs is being conducted for all personnel, visitors and guests which includes issuing identification badges

APPROVAL AND VERIFICATION

The written policies and procedures shall be reviewed by the OLC and items of concern will be brought to the attention of the VLSA for correction. The policies and procedures shall be updated as situations dictate, but no less frequently than annually.

CONTACT

Questions regarding the OLC program may be directed to Ohio Lottery Security Director Jack O'Donnell via email at: John.ODonnell@olc.state.oh.us.