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SURVEILLANCE AND SECURITY MINIMUM STANDARDS ISSUED PURSUANT TO REGULATIONS 31(2) AND 32 OF THE CASINO GAMING (GENERAL) REGULATIONS

DEFINITIONS

1. Terms defined in the Casino Gaming (General) Regulations shall have the same meaning when used herein. As used in these standards, the following definitions apply:

(1) "Critical areas" means cage, Keno drawer(s) area(s), vault, count rooms, table games, drop route, and any required cameras inside the surveillance room.

(2) "DVR" means digital video recorder.

(3) "Fields" mean half of one frame.

(4) "Fisheye Camera" means camera that can PTZ and record 360 degrees.

(5) "FPS" means frame rate or frame frequency per second. FPS is the measurement of the frequency (rate) at which an imaging device produces unique consecutive images called frames. Each frame consists of two fields.

(6) "IP" means Internet Protocol camera.

(7) "Monitor Size" means the display area measured diagonally and excludes the cabinet.

(8) "PTZ Digital" means a pan-tilt-zoom camera.

(9) "Remote access" means any access to the surveillance system outside the company firewall.

(10) "Stationary cameras" means a camera that once it is installed it cannot be remotely moved.

(11) "TVL" means total video lines of resolution.

GENERAL

2. (1) It is the responsibility of each licensee to ensure that its surveillance system is used to accomplish the purposes set out in Regulation 33(1) of the Casino Gaming (General) Regulations and is not used in an improper manner which would cause the casino gaming industry in Jamaica to fall into disrepute.

(2) All casinos shall have in place digital recording systems that meet the minimum standards set out herein.

(3) All casinos shall have digital cameras in place. Analog cameras will not be allowed.

(4) Each casino must have a surveillance room in-house.

(5) The time displayed on the surveillance systems must be within 30 seconds of https://www.time.gov/ or the surveillance system's time must be synced to the same source that the licensee utilizes for its gaming system. A date/time must be imbedded on all recordings of gaming areas. The date and time must be synchronized and set correctly and must not significantly obscure the picture.

(6) The casino operator is responsible for ensuring all surveillance equipment is properly functioning and the playback quality meets Commission requirements.

(7) The casino operator must have all documentation, approvals, and variances, or copies thereof, relating to surveillance, kept in the surveillance room and available upon request.

(8) The casino operator is responsible for training licensed surveillance employees in game protection, the play of all games, the odds payouts of table games, investigations, and the use of its surveillance system.

Security and surveillance staff

3. (1) The casino operator shall submit a Surveillance Plan that, in accordance with regulation 3, set out the organizational structure and specify the positions of head of surveillance staff and the head of security staff.

(2) The head of the surveillance staff shall report to the Compliance Committee any relevant information coming to his or her attention that, in his or her judgement, warrants review or action by the Committee.

(3) The casino operator shall ensure, by methods set out in the Surveillance Plan, that –

(a) Surveillance staff operate independently of other casino employees; and

(b) Surveillance staff are regularly assessed to ensure that they satisfy high standards of integrity; and

(c) There are no temporary appointments of surveillance staff who have not recently been so assessed; and

(d) Turnover of surveillance staff is minimised.

(4) The Surveillance Plan shall set out the minimum qualifications and training requirements for all positions of the surveillance and general security staff.

(5) The Casino operator shall ensure that there are always sufficient surveillance and general security staff on the casino premises to ensure the safety and security of casino operations.

(6) The Surveillance Plan shall set out the following –

(a) The minimum number of surveillance and general security staff at each level who will be employed and present on the casino premises during its periods of operation.

(b) The contingency plan for addressing periods of unexpected increased numbers of patrons or unexpected absences of surveillance staff or general security staff.

(c) The contingency plan for addressing any shutdown of the surveillance system or any failure of equipment affecting surveillance or the surveillance monitoring room.

(d) The casino operator shall ensure that lists containing the name, address, licence number and job description are maintained of each of the following –

(i) The general security staff; and
(ii) The surveillance staff.

(e) The Surveillance Plan shall describe the reporting structure within the surveillance and security department, including hierarchy and communication lines.

Surveillance Systems

4. (1) The casino operator shall ensure that –

(a) There is always in place a surveillance system that satisfies regulation 36.
(b) The transmissions generated by each camera are received and viewable in a surveillance monitoring room.
(c) The system and the monitoring room are under the exclusive control of surveillance staff.

(2) The Surveillance Plan describe the surveillance system in detail, specifying in particular –

(a) The areas to be covered; and
(b) For each area to be covered –
(i) The nature and purpose of the surveillance and the activities to be observed:
(ii) The cameras and other equipment to be used; and
(iii) The positioning, or the criteria for positioning, of the cameras and other equipment; and
(c) The arrangement of the monitoring room and the monitors and other equipment to be used in it; and
(d) The procedures for monitoring camera feeds and for use of the monitoring room; and
(e) How the system is to be operated, and the levels of monitoring that are required, at different time to take account of –
(i) Varying levels of gaming activity or patronage; or
(ii) Non-gaming activities on the casino premises or nearby.

Surveillance system requirements

5. (1) The areas covered shall include –

(a) Within the casino premises –
(i) Approaches to entrances to and exits from the casino premises;
(ii) Approaches to areas not open to the public;
(iii) Approaches to bathroom;
(iv) Gaming areas and approaches to gaming areas; and
(v) Restricted areas and approaches to restricted areas; and

(b) Outside the casino premises –
(i) Approaches to entrances to and exits from the casino premises;

(ii) Approaches to nearby bathrooms likely to be used by patrons; and

(iii) Nearby areas where surveillance is appropriate in the circumstances, such as –

1. Areas that offer concealment to loiterers;
2. Carparks likely to be used by patrons; and
3. Automatic teller machines and approaches to them.

(2) The casino operator shall ensure that all cameras used by the casino meet or exceed the following requirements –

(a) All IP stationary cameras and IP PTZ cameras covering critical areas will be at a minimum rate of 22 FPS and must be of sufficient clarity.

(b) All IP stationary cameras covering non-critical areas will be at a minimum rate of 7.5 FPS and must be of sufficient clarity.

(c) All PTZ cameras must be 360 degrees functional in gaming areas and must be enclosed in a shaded housing, so that it is hidden from view.

(d) All PTZ cameras that are required by the Commission shall be digital colour PTZ cameras.

(e) Manual iris lenses, or auto iris lenses with a manual override, are required for PTZ cameras. Auto iris lenses are acceptable if they are properly adjusted at all times to ensure that recordings are captured at the best quality given the limitations of the camera and the environmental conditions such as lighting, to prevent diffraction and blurring.

(3) The casino operator shall always maintain a detailed floor plan and description of the current surveillance system, including the details and position of each camera and other items of surveillance equipment, and shall provide the Commission with an updated version as soon as practicable after each change which is approved in accordance with the Casino Gaming (General) Regulations.

(4) The surveillance system shall continuously record transmissions from its cameras 24 hours per day and shall comprise –

(a) Light sensitive cameras with –

(i) Lenses of sufficient magnification and 360° PZT capabilities without camera stops;

(ii) Full camera control capability for each camera; and

(b) Video recording equipment, which at a minimum shall –

(i) Be capable of video review in forward, reverse, slow motion, and frame-by-frame;

(ii) Permit the preservation and viewing of a clear copy of the transmission produced by any camera connected to the surveillance system;

(iii) Superimpose the time and date of the transmission on each recording;

(iv) Enable the casino operator to identify and locate, using a metre, counter, or other device or method, a particular event that was recorded;

(v) Store recordings for the minimum period specified by the Commission by written directions; and

(vi) Have a failure notification system that provides notification of any recording system failure within 15 minutes. All recording failures must be addressed within one hour of system notification.

(c) Motion Detection –

The use of motion detection is authorized with a five second pre-event recording with the Commission's approval prior to initial use.

(d) Monitors –

(i) At least one digital monitor in the surveillance room shall have the capability of displaying any camera (live or playback) in a 23-inch or greater viewable area, not to include system controls.

(ii) A separate monitor station for reviews that does not interfere with normal operations.

(e) Power source –

Digital recording devices must be connected to an uninterruptible power source to ensure safe shutdown of the system in the event of a power loss and must reboot in the record mode.

(f) Printers/Email -

If the surveillance room does not have the capability to deliver a clear still photo of a camera image through email, then one colour capable video printer is required in the surveillance room.

(5) The casino operator shall ensure sufficient and continuous lighting in the areas covered by the surveillance system to enable clear video recordings and still picture reproductions.

(6) If the casino operator uses a network for the digital recording equipment, it must be a closed network with limited access. The licensee must have procedures in place that prevent unauthorized access to the surveillance system.

(7) The surveillance system shall ensure that the casino operator can continuously monitor the movement of the casino's assets such as cash, gaming chips, tip boxes, drop boxes, payout boxes, and slot cash storage boxes within the casino premises.

(8) When a gaming machine or gaming table is modified, moved, or replaced, with the approval of the Commission the casino operator shall ensure that the sufficiency of coverage by the surveillance system of the machine or table is reviewed and that a senior member of its surveillance staff reports the result of the review to the Compliance Committee.

(9) The casino operator shall ensure that recording equipment is replaced immediately if there is any significant degradation in the quality of the images or sound that it records. The casino operator must ensure that a senior member of its surveillance staff reports all such incidents to the Compliance Committee, whose responsibility it is to report such incident to the Commission no later than 24 hours.

Surveillance of particular areas

6. (1) Surveillance of table games, other than fully automated table games, shall include -

(a) At least one camera (PTZ or stationary) recording each of the following –

(i) The players
(ii) The dealer
(iii) A top view of the game; and

(b) Other cameras as necessary to ensure that the casino operator continuously -
(i) Identifies patrons, dealers, and currency denominations; and
(ii) Simultaneously views the table and determines the configuration of gaming equipment such as coupons, card, dice, and tile values so that wagers and game outcomes can be observed.

(2) Surveillance of fully automated table games and slot machines shall ensure that the casino operator can continuously –

(a) Read information on a reel strip or electronic table layout and the credit metre; and
(b) Identify patrons; and
(c) Provide coverage to –
(i) the route of any person walking through the slot gaming area at all times;
(ii) the access to the progressive controller and the slot machine doors;
(iii) aisles where hard drops are transported;
(iv) progressive jackpot liability of any multi-linked progressive slot machine and/or any non-multi-linked slot machines.

(3) Surveillance of a cage shall ensure that the casino operator can continuously monitor operations conducted at the cage, including identifying each patron conducting business at the cage.

(4) Surveillance of the count room shall ensure that the casino operator can continuously monitor operations conducted in the count room.

(5) Surveillance of automated bill breaker machines, automated gaming voucher and coupon redemption machines, automated jackpot payout machines and automatic teller machines shall ensure that the casino operator can continuously monitor operations conducted at the machines, including identifying patrons using the machines.

(6) If the casino operator operates a restricted gaming area, the Commission may require that it provide additional surveillance measures, which may include, for example –

(a) More camera coverage of the area to which access is restricted;
(b) Longer retention of recordings; or
(c) A direct video and audio feed from the surveillance equipment operating in the gaming area that is under the control of the Commission and separate from that monitored by the casino operator's surveillance staff.

Surveillance monitoring room

7. (1) The casino operator shall include in the Surveillance Plan, a detailed description of the current surveillance monitoring room, including details of the monitoring equipment and layout. A similar up-to-date description shall be maintained in the surveillance monitoring room.

(2) The surveillance monitoring room shall -

(a) Be connected to all casino alarm systems;
(b) Be set up to allow surveillance staff to conveniently –
(c) Direct any camera and observe its feed; and
(d) Provide for a number of simultaneous feeds as appropriate for the casino, in accordance with any written direction by the Commission;
(e) Have an up-to-date photo library, consisting of photographs that are no more than five years old from the date taken, of –
  (i) All current casino staff members; and
  (ii) Excluded persons, if applicable
(f) Have a complete index and guide to the casino cameras, monitors, and controls. The guide must include –
  (i) A map of the camera locations;
  (ii) Direction of coverage;
  (iii) Camera numbers; and
  (iv) Operating instructions for the surveillance equipment.

(3) Subject to any written direction by the Commission, the recording equipment of the surveillance system shall be housed in the surveillance monitoring room.

(4) The casino operator shall ensure that no entrances to the surveillance monitoring room are visible from the gaming floor.

(5) The casino operator shall ensure that a current list of authorized employees and service personnel that have access to the surveillance room must be posted in the surveillance room.

(6) The casino operator shall ensure that any person entering the surveillance monitoring room who is not a member of the surveillance staff assigned and on shift to work in the surveillance monitoring room at the time of entry shall -

(a) Show his/her face to the surveillance system on entry;
(b) Sign an entry log on entry; and
(c) Be accompanied by a member of the surveillance staff assigned and on shift to work in the surveillance monitoring room at the time of entry.

Security alarms

8. (1) The casino operator shall ensure that each of the following is equipped with a security alarm system including intrusion or duress alarm systems -

(a) Doors to a cage;
(b) Doors to the count room;
(c) All emergency exits from the gaming floor; and
(d) Any other entry or exit specified by the Commission.

(2) The security alarm system shall -

(a) Provide a visible or audible signal that is perceptually distinguishable from a fire alarm and any non-emergency alarm; and
(b) Be monitored from the surveillance monitoring room.

(3) The casino operator shall notify the Commission of -

(a) Any malfunctioning of any alarm system or any alarmed doors, immediately upon becoming aware of the malfunction;
(b) Any non-emergency repair, maintenance, or replacement of any alarm system or alarmed door within 24 hours of the repair or replacement.

(4) The Minimum Internal Controls shall describe procedures for responding to security alarms, including notification and follow-up actions.

Surveillance Logs and Records

9. (1) The casino operator shall maintain a log of all surveillance activities, which shall be -

(a) Housed in the surveillance monitoring room;
(b) Maintained by the surveillance staff; and

(c) Maintained in an electronic format that prevents any modification or tampering of information after it has been entered onto the log.

(2) At a minimum, the following information shall be recorded in the surveillance log:

(a) Date;
(b) Time commenced and terminated;
(c) Activity observed or performed;
(d) The name and license credential of each person who initiates, performs, or supervises the surveillance; and
(e) A summary of the results of the surveillance of any suspicious activity.

(3) If there is a malfunction of any camera or other equipment in the surveillance system, the surveillance log shall record a complete description of the time and date and, if known, the cause of the malfunction, and the time at which the casino operator's surveillance staff learned of the malfunction.

(4) The surveillance log shall be retained for a minimum of one (1) month unless the Commission by written direction determines otherwise and shall be made available to the Commission upon demand.

(5) All camera recordings must be erased or destroyed prior to disposal of any part of the surveillance system, sale thereof to another licensee or manufacturer, or when discarded by any other means.

Access to Restricted Areas

10. (1) For these Standards, each of the following is a 'restricted area" of the casino premises -

(a) a cage;
(b) the count room;
(c) the surveillance monitoring room;
(d) all rooms containing computer equipment that is linked to any game or any electronic monitoring system;
(e) all rooms containing records maintained pursuant to the Casino Gaming Act or these minimum standards;
(f) all rooms used for recording or maintaining confidential information or for housing computers used to record or store confidential information; and
(g) any other area specified by written direction to the Commission as a restricted area.

(2) The Surveillance Plan shall, for each restricted area, specify the casino staff members who are permitted to enter the area.

(3) The casino operator shall ensure that -

(a) only the specified casino staff members enter the restricted area;

(b) the movements of the casino staff members into and out of the restricted areas are recorded electronically; and

(c) if an unauthorised person enters the area –

(i) the person can be identified; and

(ii) the surveillance staff and the general security staff are made aware of the unauthorised access as soon as reasonably practicable.

Transportation of High-Risk Items

11. (1) The casino operator shall ensure, by methods set out in their Internal Controls the safe distribution and collection of cash storage boxes, drop boxes, cash, and other items of value through or in the casino premises.

(2) The Internal Controls shall detail –

(a) the routes used and the order of collection or distribution;

(b) the times and days of each collection or distribution; and

(c) the procedure for distribution and collection at the count room and the employees who will be present.

(3) The Internal Controls shall –

(a) distinguish between the collection of drop boxes or cash storage boxes from fully automated gaming machines and those that are not fully automated;

(b) include details of the job description of each person involved in the distribution and collection process and the specific responsibilities of the security department in the handling of all drop boxes; and

(c) include details regarding the storage of drop boxes not in use.

Keys Required to Secure Certain Areas

12. (1) The casino operator shall ensure that each item of the following shall be secured by a lock with a secure key –

(a) drop boxes;

(b) slot cash storage boxes;

(c) trolleys or other equipment used to transport drop boxes;

(d) storage cabinets on trolleys for unattended slot drop boxes;

(e) doors to the count room;

(f) doors to a cage;

(g) locations or compartments housing slot drop buckets or slot drop boxes;

(h) locations or compartments housing any computers, processors or control units relating to progressive meters, progressive gaming machines etc.

(2) The Internal Control shall –

(a) specify which items, or groups of items, require separate keys;
(b) set out the procedures relating to keys and the counterpart locks which shall include -
  (i) the maintenance of inventory ledgers for each key;
  (ii) the requisition of keys from vendors;
  (iii) the storage and issuance of keys;
  (iv) any loss, removal from service, and subsequent replacement of keys or the counterpart locks;
  (v) the destruction of keys or counterpart locks;
  (vi) the storage of keys and duplicate keys; and
  (vii) the carrying out of physical inventories of all keys and counterpart locks at least once every six (6) months.

(3) In this document "secure key' means a device or mechanism for unlocking a locked box, compartment, or location that utilises a patent that ensures that the key cannot be duplicated except by the manufacturer or its agent or successor.

Emergency and maintenance procedures

13. (1) The casino operator shall ensure that –

(a) The surveillance system is equipped with an emergency power system, tested at intervals not exceeding six (6) months, which can be used to operate the surveillance system in the event of a power failure;
(b) In the event of a complete power failure in a casino or power failure in the pit area or surveillance room, all table games must be shut down until power is restored and the surveillance system is fully operating. Should the power or surveillance system shut down, it is proper to complete the hand in play before table play is stopped. The games may only commence if power has been restored, or if the establishment is equipped with a back-up generator able to fully operate all surveillance systems.
(c) There is a preventative maintenance programme, implemented by surveillance staff, to ensure that the entire surveillance system is maintained in proper working order and that the covers over the camera are cleaned in accordance with a routine maintenance schedule.
(d) When necessary to perform maintenance on digital recording systems, a casino may temporarily take system components offline to perform those functions. If it becomes necessary to take the surveillance system

completely offline, the Division of Gaming of the casino must be notified, and gaming operations must cease prior to the commencement of the planned maintenance. Maintenance functions would generally be described as rebooting, defragmenting, or other necessary information technology functions necessary to keep the digital surveillance recording system operating properly.

(e) There is a testing schedule, implemented by surveillance staff, to ensure that the entire surveillance system is in proper working order and that the system is checked at least once every six (6) months in accordance with a routine testing schedule.

(f) Maintenance functions are performed at a time when it is least disruptive to operational functions of the casino.

(2) The casino operator may allow remote access to its network for maintenance purposes and within the casino with prior approval by the Commission. Written procedures must be submitted to the Commission for approval prior to allowing remote access. Remote access must be by way of a secure network. The use of any video and/or still images obtained from remote access is strictly prohibited outside of what is defined and approved within the written procedures.

(3) Licensees must maintain a manually generated and system generated log that documents system upgrades, modifications, problems, and all remote access. At a minimum the logs must include:

(a) date of remote access;

(b) reason for the remote access;

(c) full name, licence number and position of person remotely accessing the system; and

(d) description of how the problem was resolved or modification made to the system.

(4) The system generated log, at a minimum, must include the date, start time, and end time of access. The report must be printed monthly and traced to the manual log. The Commission must be notified, in writing, of any variance between the manual and system log, which must include an explanation for the variance, and a reconstruction of the events that occurred. The system and manual log must be maintained together in the surveillance room and available to the Commission upon request.

(5) The licensee must provide the Commission with the necessary software/hardware to review a proprietary downloaded recording. The media player must be embedded within the recorded medium and must be capable of review in forward, reverse, slow motion, and frame-by-frame.

(6) In the event of any equipment failure, a casino operator shall notify the Commission of –

(a) The time and cause of the malfunction, if known;
(b) The time the security department was notified of the malfunction; and
(c) The nature of communications with the security department relating to the malfunction.

Physical Security

14. (1) The casino operator shall ensure that adequate personnel and systems are in place at all times to ensure for the overall security of the establishment including, without limitation, the following:

(a) The enforcement of the law;
(b) The physical safety of patrons in the establishment;
(c) The physical safety of personnel employed by the establishment;
(d) The physical safeguarding of assets transported to and from the casino, slot, and cashiers' cages, and the immediate notification to the Division of any incident that has compromised the safeguarding of such assets;
(e) The protection of the patrons' and the casino's property from illegal activities;
(f) The control and maintenance of a system for the issuance of temporary credentials and vendor access credentials;
(g) The recording of all unusual occurrences within the casino which falls under the responsibility of the Surveillance and Security Department, or which involves any of its staff. Each incident, without regard to materiality, shall be assigned a sequential number and shall be recorded in an unalterable format, which shall include:

(i) The assignment number;
(ii) The date;
(iii) The time;
(iv) The nature of the incident;
(v) The person involved in the incident; and
(vi) The security department employee involved/assigned;

(h) The identification and removal of any person who is required to be excluded.

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