Machines Security Communications

Camera 02

Why do we need standards?

Other reasons;

Purpose – why should we do this?

- To catch criminals?
- To gather evidence for prosecutions?
- To warn operators of criminal activity in their locality or on their route?
- To advise operators of how crimes are being carried out?
- To provide operators with security & fraud prevention information?
- To help operators to protect their businesses?
- To advise machine technical updates/precautions?

For who's benefit?

- Gaming floor staff?
- Managers?
- Security personnel/teams?
- Operators?
- Retailers?
- Machine manufacturers?
- Police?

Considerations;

- Where should the information appear?
  - What media methods are to be used (email/WhatsApp/Facebook/etc)?
  - Mobile devices (can we prescribe who's and delete leavers)?
  - PCs etc.
  - Will need to risk assess this area & record findings.
- Do we also need to consider the need to explain why this information is being shared and stored?
- When does the information get shared and by whom? Who decides?
- How (and where) will the information be stored?
  - Who will manage it?
  - Who owns it?
  - Who will pay for it?

- What type of information is to be included?
  - Photo's
  - CCTV clips?
  - What personal information?
  - Fraud equipment & devices?
  - Which machines are vulnerable to attack?
  - Venue data?
  - Reporter's information?
  - Criminal activity (suspected/proven/which categories)?

- GDPR

GDPR LAWFULNESS PERSONAL DATA PROCESSING

Legal grounds and lawful basis - processing lawful if at least one of legal bases below

Consent
The consent of a data subject to the processing of his/her personal data

Legitimate interests
There is a weighed & balanced legitimate interest where processing is needed and the interest is not overridden by others

Public interest
Public authorities and organizations in the scope of public duties and interest

Contractual necessity
Processing is needed in order to enter into or perform a contract

Legal obligations
The controller is obliged to process personal data for a legal obligation

Vital interests
It is vital that specific data are processed for matters of life and death

Crime Prevention & Prosecution

- Each year (without fail) there is at least one form of crime wave or another.

- The same criminals tend to be committing the crimes in venues such as MSAs

- Police forces have less resource to investigate crime

- Cross border crime continues to be a challenge for the police

- The length of time it takes to obtain a prosecution increases each year

The Prosecution Challenges

- Improving our co-ordinated response to police

- Ensure the police understand our case file presentation

- Ensure the partnership complies with GDPR

- Increase awareness of threats on site via agreed mechanisms

The Purpose of the New Protocols for MSAs

- To explore homogenisation of crime management procedures across MSAs by using current reporting structures but introducing standardisation

  - Agree Crime reporting formats
  - Agree effective collation methods
  - Agree CCTV image distribution methods/controls
  - Ensure new collaboration meets the tests of GDPR standards

- Enable GPG security to efficiently collate MSA crime information centrally (resulting in coherent case file production)

- To improve the probability of police forces accepting a collective MSA case file

- To improve the probability of criminal apprehension and prosecution

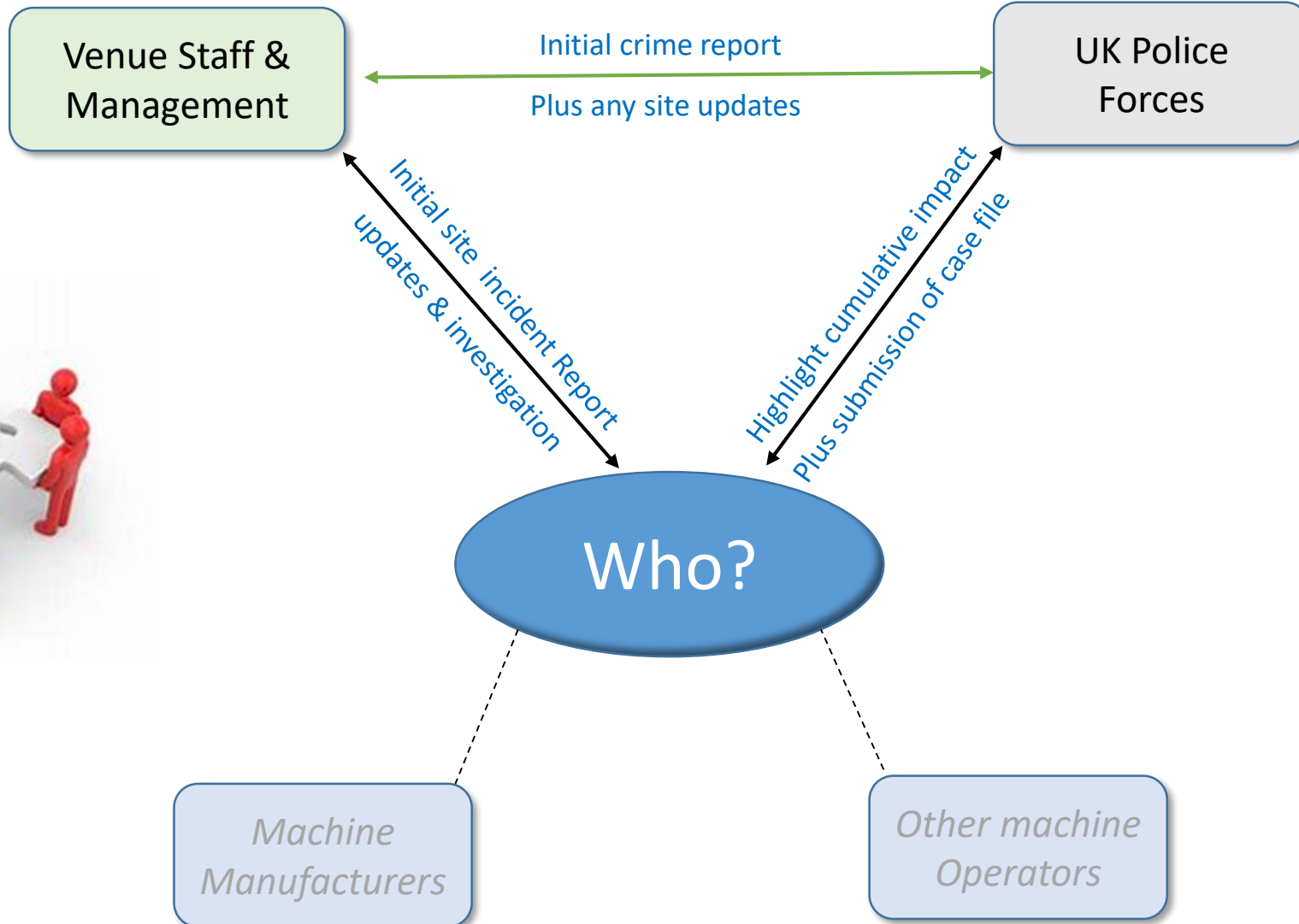- To avoid duplication of workload and simplify end to end process

Who Should have input to the protocols?

- Venue Operators

- Machines teams/Managers

- Operators

- Security Teams

- Gambling Commission

- Police

- Manufacturers

Do we Need Central Coordination & Moderation?

CCTV Image Protocol for MSAs

GAMBLING BUSINESS GROUP
Powering Gaming

Venues

Make two copies of incident on USB/disc labelling with site, machine, date/time

Mark disc for the attention of police and GPG Security

Ensure the disk is available for pick at any point of the day

GPG Security will be in contact with sites to arrange pick up of the CCTV images.

It is not recommended that mobile phone copies of images are made by site staff due to GDPR

Central Coordination

The disc will be kept secure and only visible by authorised Security Staff.

The images will be analysed for clues as to what the modus operandi is to enable evidence for the police and machine/peripheral manufacturer to produce counter measures.

Images may be used in security bulletins or updates to benefit all.

Operators

All images should only be distributed to an agreed network of direct contacts

UNDER NO CIRCUMSTANCES SHOULD ANY CCTV IMAGES BE PUBLISHED ON SOCIAL MEDIA OR ANY OTHER PUBLIC NETWORK.

GDPR Requirements

- Documentation;
  - Data sharing agreements
  - Partnership disclosure
- What should it include

- How does it protect the partnership

- Who should sign up to it

- How should this be communicated to the wider audience

The Potential Make up of a Working Group

- AGC Operators
- Bingo Club Operators
- MSA Operators
- LBO Operators
- Amos Davis (Gamestec Playnation Group)
- Machine manufacturers
- The regulator?
- Law?
- Technology providers?
- Compliance?
- Police?

Kicking off

- Formulate a working group to leverage the excellent work already done with MSAs

- Aim for a new set of GDPR compliant intelligence sharing documents which will allow better communication of criminal activity, relevant preventions and precautions.

- Identify communication rules and methods including Who? When? Why? and How?

- It will promote, improve and raise awareness of GDPR compliance between partners

- This GBG MSG meeting has effectively kicked off the next phase of discussion and development

ALL THAT IS REQUIRED IS AN AGREEMENT BETWEEN THE PARTNERS

END