Reference Risk Card: DRAW MANIPULATION

Element ID	Risk Element	Concern
Draw manipulation	Draw manipulation risk focuses on analyzing draw–based lottery games risks related to draw manipulations like theft/ fraud. Draw manipulation may end with significant financial and reputation losses.	▪ Financial impact ▪ Reputational impact

Manipulated draw (results) may lead to significant reputations and financial losses. Lottery organizers "sell reputation" and any kind of theft/fraud is devastating to the customer/player relations. Furthermore, fraudsters can embezzle large amounts of winnings, which leads to huge financial losses and violates the fair distribution of winnings to the real winners.

Frameworks/Methodologies/Standards/Tools (more relevant ones)

WLA–SCS:2020 – WLA Security Control Standard: L.2

Key Risk Control (Broad) Actions (KRC–Actions)

Area	Generic		Lottery/Gaming Specific Aspects
	Objective/Action	Outcomes	
	▪ Separated roles – always separate the roles in the whole organization (IT operations, production/draw team, supervision etc) and also in the draw team (including independent supervisor/observer). ▪ Clear draw working instructions which give the detailed information how the draw must be performed and what is allowed and what is not. ▪ Periodical IT security audits and monitoring of logs must be carried out.	▪ WLA SCS certificate. ▪ Log monitoring system to collect, aggregate and analyse the logs. ▪ Separated (and secured) room for performing draws and for securing draw appliances like balls. ▪ In RNG–based draws – have you set and fulfilled requirements for the RNG and its related IT systems (e.g. randomness, unpredictability, auditability, transparency)? ▪ Do you have a full understanding of the process description of full RNG–based draw process (e.g., process flow how the data is exchanged in case of RNG draw and its results)? ▪ Do you have detailed draw instructions, including separated roles? ▪ Do you have separated security or audit role which is monitoring and/or auditing the draws and its results?	

	▪ Records of logs and/or videos (physical draw) must be recorded and secured on necessary level. Logs/video records give an opportunity to go back and see who made what and how and when the operation was done. ▪ Regular inspections of draw appliance. ▪ Regular access audits to IT systems and physical sites. ▪ Physical security of draw appliances.	▪ Do you execute periodical information and physical security risk assessment, taking into account also related risks to draws? ▪ Have you implemented training program for the people involved in the performing draw? ▪ Do you regularly perform 3rd party IS and IT audits? ▪ Do you regularly inspect your draw appliances? ▪ Do you make a background check for draw team members (HR policy)?	

Key Performance Indicators (KPI) (Radar Diagram)	Means of Assessments of Controls and Management Effectiveness
	Self–assessment
	Peer assessment
	Second party assessment
	Accredited third party assessment
	EL Certification (eventually)