

Spillemyndigheden's Certification Programme

General requirements

SCP.00.00.EN.2.0

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Spillemyndigheden's Certification Programme

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1 Introduction

The Danish Gambling Authority's certification programme is set out to ensure that the gambling system executes games in a correct way and that the security surrounding the gambling system is maintained.

The requirements in the certification programme are adapted to the different types of games based on an evaluation of the type of game's significance and risk in relation to extent, prevalence, nature, size of the prize and the risk of the customers being deceived etc. Currently the following types of games are in use:

- Online betting
- Land-based betting
- Online casino
- Charitable lotteries (Certification programme to be announced later)
- Land-based casino
- Lottery
- Class lottery (Certification programme to be announced later)
- Gaming machines with cash prizes (Certification programme to be announced later)

The accredited inspection and testing organisation performs testing and inspection of the gambling system, gambling equipment, business processes and business systems of the licence holder. The testing and inspection must be adapted to the individual licence holder's offer of gambling products.

Inspection – and testing organisations is referred to as “testing organisation” throughout the entire certification programme regardless of the section is about testing or inspection.

1.1 Spillemyndigheden's certification programme

Spillemyndigheden's certification programme consists of several documents, which are continuously adapted to the development in technology. The licence holder must always be certified in accordance with those parts of the certification programme which apply to their specific offer of gambling products.

Each type of game has a set of testing standards and a set of inspection standards associated. Furthermore, five documents apply as a rule across all types of games, unless otherwise mentioned in the document, and cover general requirements, information security management system, penetration testing, vulnerability scanning and change management.

Each document sets out minimum requirements for the arrangement of the gambling system, gambling equipment, business processes and business systems of the licence holder.

Spillemyndigheden's certification programme supplements the gambling regulation, individual licence terms and the administrative practice set out by The Danish Gambling Authority.

1.2 Definitions

Inspection:

The accredited testing organisation performs an assessment of the gambling system, business processes and business systems of the licence holder in relation to requirements set out by The Danish Gambling Authority and determines whether the requirements are met or not at the time of the inspection.

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<i>Sensitive information:</i>	Information of a sensitive nature related to either business or people.
<i>Testing:</i>	Depth testing of the gambling system of the licence holder, analysis the comprised data and evaluates the results with regards to the requirements set out by The Danish Gambling Authority and determines whether the requirements are met or not.
<i>Log:</i>	A log is a table that automatically records data that must not be manipulated after the initial recording. Any changes to the log shall happen through the recording of new log entries instead of changing or deleting existing records.
<i>Report:</i>	Extraction of data from one or more logs
<i>Gambling system:</i>	Electronic or other equipment used by or on behalf of the licence holder for offering, executing, and operating games including equipment that: <ol style="list-style-type: none">1. is used for the storage of information pertaining to a person's participation in gambling, including historical data and information concerning results,2. produce and/or presents games to the gambler, or3. determine the result of a game or calculate whether the gambler has won or lost a game.
<i>Gambling equipment:</i>	Physical equipment used for executing and presenting games, including roulette wheels, slot machines, card shufflers and dealer shoes etc.
<i>Business system:</i>	Electronic or other equipment used by or on behalf of the licence holder to support the offering of gambling without being a part of the gambling system.
<i>Business processes</i>	Described processes of the licence holders associated with the gambling system, business system and data contained in either. This can be described using formal management systems such as ISO / IEC 27001.
<i>User interface</i>	All kinds of remote communication through which the customer can interact with the licence holders gambling system for instance an app.

1.3 Legal basis for the certification programme

The certification programme is issued by The Danish Gambling Authority pursuant to section 41 in Act no. 1303 of 4 September 2020 on Gambling with later amendments, section 30 in executive order no. 1276 of 29 November 2019 on online betting, section 35 in executive order no. 1274 of 29 November 2019 on online casino, section 13 in executive order no. 1275 of 29 November 2019 on land based betting and section 45 in executive order no. 1290 of 29 November 2019 on land based casinos.

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1.4 Version

The Danish Gambling Authority will continuously revise the certification programme and the latest version will always be accessible at The Danish Gambling Authority's website.

Date	Version	Description
2014.07.04	1.0	A new document structure than the previous version 1.3 alongside with a range of updates in different areas. A new version 1.0 is therefore published. It is the intention to follow normal versioning for future changes.
2015.12.21	1.1	Changes completed to implement requirements for lotteries in the certification programme.
2018.01.01	1.2	Changes completed because of liberalization of online bingo, betting on horse- and dog races and betting on pigeon races and implementation of requirements for land-based casinos in the certification programme
2020.01.01	1.3	Update to section 1.3 because of new executive orders. Added a definition of user interface.
2023.01.01	2.0	Updated definition of "gambling equipment". Implemented information from Newsletter #43 about list of games and supervision among others. Added section about certification in connection with a licence application. Updated section about the use of risk assessment. In addition, several rephrasing.

The Danish Gambling Authority will publish guidelines regarding the applicability of existing certifications and previously performed tests and inspections when a new version of the certification programme is released.

It is important to emphasise that only the Danish version is legally binding. The English version holds the status of guidance only.

1.5 Document identifier

Each document in Spillemyndigheden's Certification Programme has a unique identifier comprised of:

- "SCP" – Which indicates Spillemyndigheden's Certification Programme.
- Two digits – Which indicates the type of document. The identifiers are:
 - "00" General requirements
 - "01" Testing standards
 - "02" Inspection standards
 - "03" Information Security Management System
 - "04" Penetration Testing
 - "05" Vulnerability Scanning
 - "06" Change Management Programme
- Two digits – Which indicates the type of game covered. The identifiers are:
 - "00" All types of games
 - "01" Online betting
 - "02" Land-based betting
 - "03" Online casino
 - "04" Charitable lotteries
 - "05" Land-based casino
 - "06" Lottery

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"07" Class lottery

"08" Gaming machines with cash prizes

- "DK" or "EN" – Which indicates the language version. "DK" for Danish and "EN" for English.
- Version number – Which is described in section 1.4 above.

The document identifier "SCP.02.02.DK.2.0" would thus be version 2.0 of inspection standards for land-based betting in Danish.

A standard report with the identifier SCP.XX.XX.DK.2.0.SR is associated with each document and must be used when submitting certifications to The Danish Gambling Authority. The document identifiers for the standard reports follow the methodology above.

1.6 Enquiries

Enquiries concerning this document should be sent in writing by using the contact form on The Danish Gambling Authority's website. Select the category "Certification":

<https://spillemyndigheden.dk/en/contact>

or send to:

Spillemyndigheden
Englandsgade 25, 6. sal
5000 Odense C

2 Certification

2.1 Framework for test and inspection

A certification consists of test and inspection of the gambling system, gambling equipment, business processes and business systems of a licence holder based on the requirements set out in Spillemyndigheden's certification programme.

It is the responsibility of the licence holder to use an accredited testing organisation to complete the required tests and inspections.

2.1.1 Reporting requirements

The result of testing and inspection shall be submitted using the standard report of the given certification document. The testing organisation can choose freely between the Danish and the English version of the standard report. The standard reports along with annexes will in most cases be sufficient documentation. If the Danish Gambling Authority needs supplementary documentation, the licence holder will be requested to submit it.

The accredited testing organisation must make sure that all requirements in the certification programme have been assessed. If a requirement is irrelevant for a licence holder due to their offering of games the standard report with appendix must reflect that.

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The accredited testing organisation shall report to what extent that the gambling system, gambling equipment, business processes and business systems of the licence holder adhere to the requirements set out in the given certification documents in the inspection- or testing period. The report must be attested by the accredited testing organisation.

2.1.2 Compilation of certifications

If the licence holder uses suppliers, the standard reports submitted to the Danish Gambling Authority shall be a compilation of all tests and inspections. In cases where a supplier has had their games tested and inspected themselves, the results of this shall be represented in the standard report to the Danish Gambling Authority. A single "approved" in the standard report may thus be a summary of many test results. This means that, if a single requirement to a single game is not met, then this requirement must be reported as not approved and the details must be described in the annex.

All inspection- and test reports from e.g. suppliers, which are the basis of the certification shall be identified in the annex to the standard report. The date of the test and inspection shall be stated along with information about if the test or inspection is:

- Conducted by the accredited testing organisation itself.
- Conducted by another accredited testing organisation.
- Conducted without accreditation by a testing organisation or the licence holder and evaluated by the accredited testing organisation.

2.1.2.1 List of games with testing- or inspection standards for online casino

To make it clear that a test and/or inspection covers the entire gambling system, a list of all games, which is covered by the test and/or inspection, shall be compiled with the reports for testing- and inspection standards for online casino (SCP.01.03 and SCP.02.03). The list shall be included in the standardized annex to the standard report. If the list is identical for both testing and inspection, and these are conducted simultaneously, the compilation of a single list is sufficient.

The list must contain the mandatory information set out in the table in the Annex:

- Title of the game
- Version number of the game
- Type of game (Gaming machine, roulette, blackjack etc.)
- Name of the supplier. If it is the licence holder's own game, this must be noted instead.
- Date of the most recent certification of the game. If the game is provided by a third party, this date will presumably differ from the date of the licence holder's annual test and/or inspection.
- Reference to a supplementary report if the game is not tested and inspected in connection with the licence holder's annual test and/or inspection.
- Any Comments

2.1.3 Certification in connection with licence application

This section only applies to online casino, online betting, and land-based betting.

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The first certification is done in connection with the application for a licence. The standard reports, which form the basis of the first certification shall be sent to the Danish Gambling Authority along with Annex B to the licence application form.

The first certification will only be approved by the Danish Gambling Authority, when test and inspection are done without any errors and/or shortcomings. This for instance means that there cannot be any requirements, which are not approved or any requirements, which have not been tested or inspected, just as there can be no untreated vulnerabilities in either the vulnerability scan or penetration test.

The first certification cannot be based on a risk assessment in accordance with section 2.2.2, as this would in practise mean, that a requirement is not fulfilled.

Please notice that the requirements in this section does not leave out the possibility for transferring results from previous inspections and testings cf. section 2.3.

2.1.4 Use of risk assessment

As an extraordinary exception it may be accepted that the accredited testing organisation attests the certification report even if all requirements have not been met as described in the certification programme. In this case the test or inspection shall be substantiated by a risk assessment, considering the purpose of the Gambling Act and the associated executive orders. The risk assessment shall be based on "ISO/IEC 31010 Risk management - Risk assessment techniques".

Use of risk assessment is a concrete assessment of the individual requirement, which is done in connection with the specific test or inspection. Risk assessment can therefore only be used as an exception on requirements, which have NOT passed test or inspection.

The standard report shall reflect whether this method has been used.

2.1.5 Suppliers to the testing organisation

If the accredited testing organisation uses a supplier to perform any parts of the test or inspection, the accredited testing organisation must attest that The Danish Gambling Authoritys requirements regarding test and inspection are met.

2.2 Supervision

In each document in the certification programme there is a section regarding requirements to the staff, who supervise and attest the certification reports. The staff requirements vary depending on the certification area. The following regarding supervision applies generally:

Through supervision, it must be ensured that the work is carried out properly. Supervision are actions in which a person reviews/controls/tests *another person's* work and results. This must be understood based on the general view of separation of duties. As a rule, it is therefore not be possible for a person to both complete a task and subsequently approve it.

An exception to the rule of separation of duties is if the person who carries out the work, possesses the qualifications that the Danish Gambling Authority requires from the staff that supervises and attests the work. This means that if a person has the proper education and qualifications, the proper certification, and

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the necessary work experience within this field of work, the Danish Gambling Authority allows self-supervision.

It should be noted that if the exception is applied, just as when the rule is applied, the tasks must still be divided into two individual actions that cannot be performed in one procedure:

1. Performing the task (testing, inspection etc.)
2. Review/control/testing of the task performed (supervision)

2.3 Transfer of certifications

2.3.1 Inspections and tests conducted in accordance with Spillemyndigheden's certification programme

When an accredited testing organisation has tested or inspected a given requirement in Spillemyndigheden's certification programme and this requirement is part of several separate documents of the programme e.g. *SCP.01.01.EN Testing Standards for online betting and SCP.01.02.EN Testing Standards for land-based betting*, it will not be necessary to repeat the test or inspection of the requirement. In such cases there shall, instead, be a reference to the test or inspection already performed. This is only applicable for inspections and tests conducted by the accredited testing organisation.

2.3.2 Inspections and tests conducted in accordance with other standards

Tests and inspections may be based on tests and inspections carried out to similar criteria. This could be tests or inspections from other jurisdictions. When this option is utilised the actual time of the previous inspection or test shall be used when calculating the certification frequency. This for instance means that if the certification is based on tests or inspections performed six months prior, then the renewal of said certification shall be performed six months earlier than ordinarily required. Tests or inspections cannot be based on tests and inspections, which have been conducted more than 12 months ago.

The above-mentioned option is also possible if the prior test or inspection has been conducted by another testing organisation.

When the accredited testing organisation is assessing whether to base the certification on inspections or tests carried out to similar criteria, this shall be substantiated by a risk assessment, considering the purpose of the Gambling Act and the associated executive orders. The risk assessment shall be based on "ISO/IEC 31010 Risk management - Risk assessment techniques".

The standard report shall reflect whether this method has been used.

2.4 Suppliers to the licence holder

2.4.1 Test and inspection of a supplier

It is the licence holder's responsibility, that parts of the gambling- and business system, operated by suppliers are tested and inspected according to Spillemyndighedens certification programme. The licence holder's testing organisation shall ensure, that the suppliers of the licence holder have been tested and inspected during the period from the licence holder's previous test and inspection to the current test and inspection.

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The licence holder's testing organisation must review the supplier's test and inspection to ensure that following is present:

- The supplier has a valid certification report approved by a testing organisation
- The supplier's certification report(s) covers the entire period from the licence holder's latest test and inspection to the current test and inspection.
- The supplier's testing organisation is accredited according to the requirements in Spillemyndighedens certification programme.

The licence holder's testing organisation shall confirm that they have reviewed signed certification reports from a testing organisation with an accreditation in accordance with the requirements in Spillemyndighedens certification programme, where the requirements relevant to the supplier has been approved.

The licence holder's testing organisation shall, when testing and inspecting the licence holder's gambling system, only cover the elements of the gambling system, which that have not been covered by test and inspection of the supplier. Section 2.4.2 regarding integration testing in the gambling system of the licence holder might be relevant.

2.4.2 Integration into the gambling system of the licence holder

The accredited testing organisation shall be particularly aware of the fact that, even if the supplier's product is tested and inspected, it may be necessary to repeat parts of the test and inspection, when the product is integrated into the licence holder's overall gambling system. This will be particularly relevant when the implementation involves changes to the tested product.

2.5 Approval of identical equipment

To avoid duplicate testing of identical equipment of the licence holder, their testing organisation can issue approvals of identical equipment used for offering of land-based gambling services. The approval can be used for implementation of additional equipment, which is identical and has the same functionalities as the previous approved equipment.

When the accredited testing organisation approves equipment for this purpose, all hardware and software components must be inspected and evaluated to be deemed compliant with the requirements in Spillemyndigheden's certification programme.

The approval is only valid in regard to the tested configuration of hardware and software components. If any significant changes are applied to the equipment, a new approval must be issued in accordance with the change management programme.

Land-based casinos are not obligated to use the change management programme for renewed approval.