

Feedback on consultation on updated certification programme for betting and online casino

On the 15th of July 2024, the Danish Gambling Authority published a consultation on the updated certification program for betting and online casino due to the introduction of supplier licenses from the 1st of January 2025. The Danish Gambling Authority would like to thank everyone for your contribution to the consultation.

Below we have gathered the most important information about the update of the certification programme. Both the original changes as well as new changes that have been made based on the consultation with associated justifications. We have also prepared a Q&A, which contains questions from the consultation.

The restructuring of the programme

The Gambling Authority's certification program is being restructured so that the division of responsibility between licence holder and game supplier is clarified. This means that Testing Standards and Inspection Standards are deleted. Instead, 3 new documents are introduced: Requirements for RNG, Requirements for base platform and requirements for games.

Please notice the definitions of the different actors in our certification programme. A gambling provider/operator is referred to as a license holder and a game supplier is referred to as a game supplier, even though the game supplier also have a license.

Below is an overview of the documents, including the responsible actor, the submitting method and deadline for submitting:

SCP	Name of document	Responsible for having done and submitting	Submitting method	Deadline for submitting
01	Requirements for RNG	Game supplier and licence holder with own RNG	Games register	1 month
02	Requirements for base platform	Licence holder	Contact form	2 month
03	Information security management system	Game supplier and licence holder	Contact form	2 month
04	Penetration testing	Game supplier and licence holder	Contact form	2 month
05	Vulnerability scanning	Game supplier and licence holder	Contact form	1 month

06	Change management programme	Game supplier and licence holder	Contact form	2 month
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07	Requirements for games	Game supplier and licence holder with own games	Games register	1 month
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Frequencies

The DGA planned to change the deadline for submitting the standard reports for all annual certifications from two months to one month because the requirement for compilation of reports from suppliers was removed. This should make the reporting phase easier and less time consuming.

After reviewing the consultation responses, we have realized that in some areas it is not appropriate to shorten the period, as we acknowledge that there still can be reporting procedures, which can make a one-month deadline difficult to comply with. We have decided to keep the two months deadline for reporting of SCP.02 “Requirements for base platform”, SCP.03 “Information Security Management System”, SCP.04 “Requirements for penetration testing” and SCP.06 “Change Management Programme”.

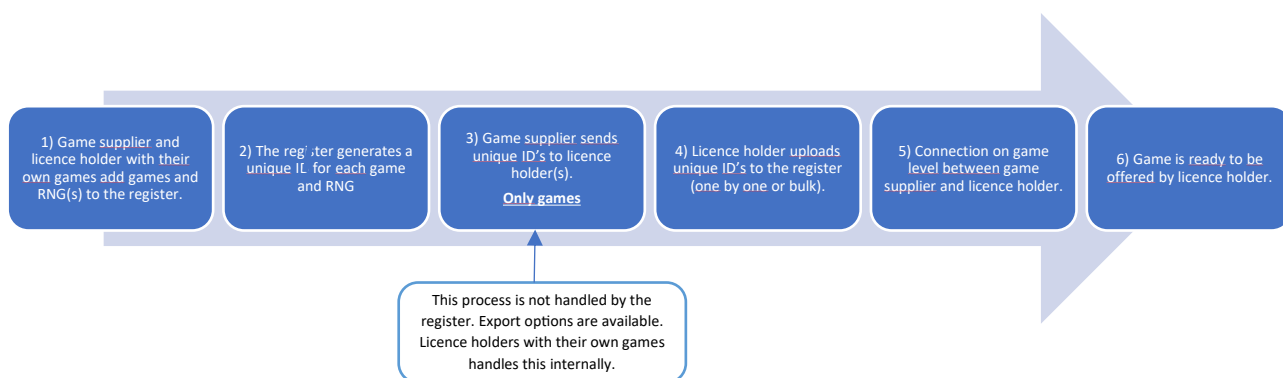
For SCP.01 “Requirements for RNG”, SCP.05 “Requirements for vulnerability scan” and SCP.07 “Requirements for games” the deadline will be one month.

Games register

SCP.01 “Requirements for RNG” and SCP.07 “Requirements for games” will in future have to be uploaded in our new game register by the game suppliers. The game supplier must add their games and RNGs in the games register with relevant information and attach a valid certificate.

Licence holders must log into the game register and add the games they offer. Licence holders with their own games will get 2 logins – one as a “game supplier” and one as a licence holder.

The process in the games register:



Further information on the games register can be found in the [guidelines for supplier licences](#). In addition, the game portal will contain a user guide.

Transition period

The updated certification programme will come into force on 1 January 2025. From this date it is ready for use and updated standard report templates will be available from this date as well.

Current certifications are still valid for a year (except vulnerability scanning, which is done every 3 months), which means that there will be no need for extra/additional certifications.

If licence holders are getting certified in the period from 1 January 2025 – 30 June 2025, the certification shall not contain a compilation of reports from suppliers, as licensed game suppliers themselves are obliged to submit their certifications directly to the Danish Gambling Authority.

From 1 July 2025 it is mandatory to use the updated certification programme, but we believe it will be beneficial for both game suppliers and licence holders to take the updated certification programme into use as soon as possible.

Q&A

The Danish Gambling Authority has received a number of questions, to which the answers can be found in the [Guidelines for supplier licences](#) or in the [General requirements](#) of the certification programme. We have therefore not included these questions in this Q&A.

SCP.00 General requirements

Section 1.1

Question:

With the updated certification programme two new terms are introduced: “base platform” and “game platform”. It is requested that it is specified, which components are covered by respectively the “base platform” and the “game platform”.

Answer:

The Danish Gambling Authority has the following definitions of "base platform" and "game platform", which appear from the certification program's general requirements:

Base platform

System used for gambling account management i.a. account registration and login, customer self limitation and handling of player funds including systems that is used for the storage of information pertaining to a person's participation in gambling, including historical data and information concerning results.

Game platform

Games and system or other equipment used for offering and execution of games including systems and equipment that produce and/or presents games to the player, that determine and stores the result of a game or calculate whether the player has won or lost a game.

The Gambling Authority cannot clarify this further, whereby license holders and game suppliers must themselves assess which components are covered by base platform and game platform, respectively, based on the above definitions.

Section 2.1.3

Question:

After a supplier has already once performed their first certification in accordance with SCP.02-06, as instructed by section 2.1.3 of SCP.00.00.EN.3.0 (...)

Answer:

This observation showed us that there unfortunately was a typo in section 2.1.3, so it incorrectly said that a game supplier should be certified in accordance with SCP.02-06. A game supplier must be certified in accordance with SCP.01, SCP.03-06 and SCP.07.

SCP.02 is the operator's responsibility.

Question:

It appears that reports on SCP.01 and reports on SCP.07 shall be uploaded to the DGA's games register. It is requested, that it is specified if it is the licence holder or the game supplier, who shall upload the reports.

Answer:

Section 2.1.3 is about the application for a licence as a game supplier. This means, that it is the game supplier's responsibility to upload the reports. A licence holder offering their own developed games and who does not need a separate licence as a game supplier (see the guidelines linked to above), does however have the same obligations as a game supplier. In addition, the licence holder is required to submit information about which games they offer from which game suppliers. This is based on unique game ID's, which the game supplier sends to the licence holder. Please see the guidance for game suppliers for further information.

Question:

It can be related with great difficulty to get a physical signature on the standard report. It is requested that the DGA waves the requirement of a signature and only rely on the information supplied about the testing organisation.

Answer:

The signature is important, because it is by the signature the testing organisation declares, that the information in the report is correct.

It is the testing organisation, who fills in the standard report, so while the report is in their possession either physically or electronically it should not be a problem for their employee to sign the report before sending the report to the licence holder / game supplier.

In this connection we would also like to add that it is possible to use digital signatures, which is possible in e.g. a pdf document. This is already used by testing organisations and accepted by the DGA.

SCP.01 Requirements for RNG

General

During the consultation, the Danish Gambling Authority has become aware that several requirements that were placed in SCP.01 "Requirements for RNG" should be placed in SCP.07 "Requirements for games", as they deal with the use and security of the RNG output in connection with the game.

These are the following requirements: 3.1.1.1 – 3.1.1.2 – section 3.1.2 – section 3.1.5.

These requirements have been moved to a separate section (The game's use of RNG) in SCP.07 – "Requirements for games". However, the additional questions and answers about RNG (regardless of the move to "Requirements for games") are dealt with below.

Section 2.1.2

Question:

Quote from section: *"If it can be documented that there have been no changes to the RNG since the previous test, the testing organisation can attest the standard report without any further test being necessary. The documentation for no changes can for instance be comparison of hash-values generated by the testing organisation or by use of validation software."*

Please can you confirm as to how should this be documented going forward?

Answer:

First, we want to mention that this is not a new option. This has always been allowed to avoid unnecessary testing. However, we believe that this option was not clearly described, which is why we added this paragraph.

Today this would be documented by marking all relevant requirements in a standard report as "approved". This is however somewhat inconvenient. Looking forward we plan to add a checkbox in the relevant standard reports, which can be used in this specific situation. The checkbox will be supported by a requirement for the accredited testing organisation to add information in the appendix to the report on how it was documented that the game(s) has not changed since the previous test and inspection.

As mentioned above, the standard reports will be updated later this year.

SCP.02.00 Requirements for base platform

Section 3.1.1.9

Question:

What is the definition of a passive gambling account?

Answer:

The following guidance has been added: "A passive gambling account is a gambling account, which has not been used in a period. The period is determined by the licence holder."

Section 3.2.4.1

Question:

We would encourage the Gambling Authority to clarify what is meant by "reassuring identification of the player"

Answer:

The following guidance has been added: "This can for example be done by using a strong password or two factor authentication, e.g., by using the device's option of using biometric data such as face recognition or fingerprint."

Section 3.2.7, 3.2.8, 3.3.1.1, 3.3.1.2 and 3.3.1.7

Question:

It is unclear why the requirement is split in two, as it is our understanding that a function must work, if it does not work, it cannot be said that the licence holder has the function. We therefore believe that several of these requirements are repetitions.

Answer:

The requirements were split up, as we wanted to make it clear that the accredited test house should not only ensure that the licence holder had the function, but also that it works as intended. We have become aware that this seems unnecessary and have therefore decided to settle for one requirement that must be tested.

Section 3.4.1.1 and 3.4.1.2

Question:

It is unclear what "unambiguous, automatic and systematic manner" means.

Answer:

Requirement 3.4.1.2 has been deleted and instead the wording of this requirement serves as guidance for requirement 3.4.1.1: The customer shall have access to information about the currencies accepted by the base platform as well as the procedure for currency conversion.

SCP.04 Requirements for penetration testing

Section 2.2.2

Question:

From the draft it appears that the person performing the penetration test must have a personal certification. Testing organisations often use employees, who do not yet have a personal certification documenting their competence. The work is supervised by a more experienced employee, who has a

personal certification. It seems like it can be a disproportionate challenge, and perhaps cost, for licence holders and game suppliers, because the testing organisations are imposed to use more experienced staff for performing the penetration test and not just for supervision.

Answer:

Penetration testing is work that requires special skill and experience, and a penetration test is only as good as the person performing it. The DGA believe that it is important that the personnel performing the penetration tests are highly skilled professionals, which is why the requirements are on the personnel performing the penetration test. The person who performs the penetration test and the supervisor can be the same person cf. the requirements for supervision in section 2.3 in SCP.00.00 General requirements.

Section 4.0

Question:

Can the DGA specify whether the 12 months interval of the licence holder's and game supplier's penetration test must be synchronized, or if they can be offset in time?

Answer:

It has never been a requirement that the licence holder's and game supplier's penetration test is done at the same time. This would be a very incomprehensive and burdensome requirement for all involved parties. Since game suppliers often supplies their games to several licence holders it would be impossible for a game supplier to fulfill such a requirement unless all licence holders penetration test is done on the same date.

Question:

With regards to the draft requirement "SCP.04.00 3.0" section 4, we have noted that both the license holders and the game suppliers are required to submit their penetration test. Will license holders need to submit game suppliers' penetration test reports on their behalf to the DGA or will suppliers now be submitting their penetration tests directly to the DGA? This question also applies to all other certification reports that suppliers will need to produce i.e. Vulnerability Scan report, annual change report, ISMS report, annual platform reports etc.

Answer:

After 1st of January 2025 suppliers themselves will have to submit all certifications directly to the DGA. This means that the supplier's certifications must thus no longer be part of the licence holder's overall certification. See the table in the section "The restructuring of the programme" above, where it is illustrated who must deliver what, how and how often.

Section 4.1

Question:

It appears that vulnerabilities must be remediated and a new penetration test covering the identified vulnerabilities must be completed. Can the DGA clarify, if the requirement covers all vulnerabilities no matter the score (e.g. CVSS score)/risk associated with the vulnerability.

Answer:

The new penetration test must cover the vulnerabilities, which caused the penetration test to fail, which is

the testing organisations assessment. In this connection the DGA notices that a penetration test is not limited to vulnerabilities uncovered by a vulnerability scan.

SCP.05 Requirements for vulnerability scanning

Section 2.2.1

Question:

Would the DGA consider changing the requirements for testing organisations, so licence holders and game suppliers have a wider selection of companies to use for vulnerability scanning. Even though the CREST-accreditation has been added as an option, it is still a quite limited field of companies.

Answer:

The DGA does not have a problem to widen the field of companies, who can perform vulnerability scans for licence holders and game suppliers. It is however important for the DGA that scans are performed at a high and professional standard, which is why we have the accreditation requirement for scanning vendors. The DGA is aware that many other companies provide vulnerability scanning services, but quite often this service is provided without any prove of competence. PCI and CREST offers this prove by accrediting scanning vendors.

Section 4.2

Question:

When using the “National Vulnerability Database – Common Vulnerability Scoring System” scale (NVD CVSS) it is requested, that it is specified, if “base score” or “temporal score” is to be used.

Answer:

The DGAs requirements for vulnerability scanning aligns with PCI DSS standards, and in this context vulnerability assessments are typically based on the CVSS base score. This is because the base score provides a consistent and static evaluation of a vulnerability's severity across different environments, which is essential for maintaining uniformity in reporting and remediation. The PCI ASV program specifically uses this base score to ensure that vulnerabilities with a score of 4.0 or higher are identified and mitigated in line with compliance requirements.

SCP.06 Change management programme

Section 4.4.2

Question:

Due to the changes in the naming and numbering of the SCP's, SCP.01 v3.0 will only relate to RNG's in the future. With RNG's being the most critical of components, there would never be any “relevance code 2” changes applied to the RNG. For instance, if we were to take the scoring convention applied within the SCP, an RNG in a typical B2B Critical Asset Register would be shown as such:

Component	Confidentiality	Integrity	Availability	Accountability	Overall score
RNG.dll	1	3	1	3	3

So, the RNG would never handle nor store **confidential** player data and therefore would not affect the **availability** of player data either. The RNG does not have the ability to do either. But the impact of a poorly managed and controlled change upon the **integrity** of these components is major, as is the **accountability** in terms of user activity in relation to accessing these sensitive RNG components.

Answer:

The DGA agrees with the observation that all changes to an RNG will be relevance code 3. The first part of section 4.4.2 regarding relevance code 2 to the RNG is deleted.

Question:

In SCP.06 'System Change Management Program', a new section has been added with requirements for system changes that include integration between base and game platform. Could you please provide more details about system changes?

Answer:

The main purpose is that a business process must be established between the license holder and game supplier, which must ensure that, for example, sanity checks and random samples are carried out if there is a risk that a system change on either the base platform or the game platform could affect the other.

Section 4.5

Question:

With regards to the draft requirement "SCP.06.00 3.0", we have noted under section 4.5 that we are required to retain evidence of sanity and spot checks against requirements SCP.02 and SCP.07. We would like to understand further what is the expectation for these sanity and spot checks? Perhaps some examples would be beneficial?

Answer:

The purpose of this requirement is to ensure that the base platform and the game platform always work correctly. Changes to the base Platform may affect the integration with the Game Platform - or vice versa. It has therefore been found appropriate that the license holder/game supplier has procedures in place, where they are using sanity and spot checks to test that everything continues to function as intended if changes have been made that could actually affect the integration.

Section 5

Question:

With regards to the draft requirement "SCP.06.00 3.0" section 5, we have noted that the DGA has required the operators and the game suppliers to be able to submit a report of system changes, including the actions that was done to ensure that the base and game platforms are functioning correctly after integration. We would like to clarify if all system changes needs to be included in this report or only actions that was done

to ensure that the base and game platforms are functioning correctly after integration?

Answer:

It is important to emphasize that the reports mentioned in section 5 only shall be send to the DGA upon request in relation with supervision. Only actions that was done to ensure that the base and game platforms are functioning correctly after integration needs to be a part of this report.

SCP.07.03 Requirements for games (Online Casino)

Section 4.1.2.2

Question:

We encourage that "an appropriate period of time" be clarified in order to avoid ambiguity and difference between gaming provider/supplier.

Answer:

The requirement has been reformulated so that it is clarified that the player must have enough time to understand the outcome and the result.

Section 4.1.4.3

Question:

It appears unclear how the sentence: "The game shall ensure, that the number of symbols resulting in a pay-out are displayed" is to be understood. Combinations, including number of required symbols, for winnings are already shown in game instructions, and it is - in addition to lack of space, therefore unnecessary to have it in the game graphics itself.

Answer:

The following guidance has been added: It is sufficient that the numbers of symbols resulting in a pay-out appears from the game rules/game instructions.

Section 7.1.1.1

Question:

It is encouraged to clarify whether this requirement covers the same game type or whether it covers that the player must not be able to play the same game session on two or more devices.

Answer:

The requirement has been reformulated and the following guidance has been added: The player can play the same game type multiple times, but must not be able to open the same game in multiple windows.

Section 7.1.2

Question:

When a game with several states (e.g. a slot machine that has a feature game, where the game thus switches between the main game and the feature game) is deactivated, customers should be able to continue from the current state when the game is reactivated. This option may lapse after a period of not less than 90 days, if it is specified in the rules. Could you please elaborate what is meant by “current state”?

Answer:

If a game crashes when the player has entered the feature game, the player must be able to re-establish the connection and continue in the feature game.