

# The Danish Gambling Authority's Certification Programme for betting and online casino



General requirements – SCP.00.00.EN.3.0

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# Introduction

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The purpose of the Danish Gambling Authority's certification programme for betting and online casino is to ensure that, the gambling system executes games in a correct way and the security surrounding the offering of games is maintained. Licence holders and game suppliers shall at all times be certified in accordance with the parts of the certification programme, which is relevant for their licence.

The certification programme consists of a number of documents, which are continuously adjusted to the legislation and the technological development. The requirements in the certification programme are adjusted to the different game categories. Each document outlines a minimum set of requirements of the licence holder's and game supplier's platforms, business processes and business systems.

The certification programme for betting and online casino covers the following game categories:

- Online betting
- Land-based betting
- Online casino

At the Danish Gambling Authority's website, you will also find a certification programme for land-based casino and lotteries.

## 1.1 Definitions

### **Actors:**

Licence holder:

- Person or company etc. (legal entity), who has a licence to offer betting cf. section 11 in the gambling act or a licence to offer online casino cf. section 18 in the gambling act.

Game supplier:

- Company, who has a licence after section 24a in the gambling act to supply games to licence holders for the offer of betting cf. section 11 in the gambling act, or to offer online casino cf. section 18 in the gambling act.

Testing organisation:

- Company who performs tests and inspections. This also includes companies, who perform penetration tests or vulnerability scans.

### **Terms:**

Test:

- Accredited testing by a lab, who is accredited after ISO/IEC 17025 or ISO/IEC 17065 in accordance with the Danish Gambling Authority's certification programme for betting and online casino.

Inspection:

- Accredited inspection by an inspection body, who is accredited as type A after ISO/IEC 1702 or ISO/IEC 17065 in accordance with the Danish Gambling Authority's certification programme for betting and online casino.

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,
  - determine and stores the result of a game or calculate whether the player has won or lost a game.

Gambling system:

- Base platform and game platform together.

Game certificate:

- Standard report completed as documentation for test and inspection in accordance with SCP.07.01-03 requirements for games. The standard report can cover one or more games.

Business system:

- Electronic system or other equipment used by licence holder or game supplier to support the supply or offering of gambling without being a part of the gambling system.

Business processes:

- Licence holders or game suppliers written processes 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.

Gambling equipment:

- Physical equipment used for executing and presenting games, including roulette wheels, card shufflers and dealer shoes etc.

Sensitive information:

- Information of a sensitive nature related to either business or people.

Log:

- Automatic recording of 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.

Report:

- Extraction of data from one or more logs.

User interface:

- All kinds of remote communication through which the customer can interact with the gambling system e.g., a website or an app.

## 1.2 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, and section 31 in executive order no. 1140 of 28 August 2023 on land-based betting.

## 1.3 Version

Version 1.0 of 2014.07.04

- 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.

#### Version 1.1 of 2015.12.21

- Changes completed to implement requirements for lotteries in the certification programme.

#### Version 1.2 of 2018.01.01

- 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.

#### Version 1.3 of 2020.01.01

- Update to section 1.3 because of new executive orders. Added a definition of user interface.

#### Version 2.0 of 2023.01.01

- 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.

#### Version 2.1 of 2023.10.01

- Updated visual layout of the document. Minor linguistic corrections. No changes to requirements.

#### Version 3.0 of 2025.01.01

- Update based on the introduction of supplier licences, which has led to multiple rephrases throughout the document and a division of the certification programme, since supplier licences are only introduced for betting and online casino.
- The certification programme for betting and online casino does no longer follow the structure of the certification programme for lotteries and land-based casinos.
- Addition of the following new definitions: Licence holder, game supplier, testing organisation, base platform, game platform and game certificate. The definitions of test, inspection and gambling system have been rephrased.
- Addition of a new section about document SCP.07.00 Requirements for games.
- Addition of a new section about the game suppliers first certification in connection with the licence application.
- The section about supervision has been updated.

The Danish Gambling Authority continuously revises the certification programme for betting and online casino. The latest version is accessible at The Danish Gambling Authority's website.

When a new version of the certification programme is released, the Danish Gambling Authority will, if necessary, publish guidelines for a transition period and validity of already completed certifications.

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

## 1.4 Document identifier

Each document in the certification programme for betting and online casino 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" Requirements for RNG
  - "02" Requirements for base platform

- "03" Information Security Management System
- "04" Penetration Testing
- "05" Vulnerability Scanning
- "06" Change Management Programme
- "07" Requirements for games
- 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
- "DK" or "EN" – Which indicates the language version. "DK" for Danish and "EN" for English.
- Version number – Which is described in section 1.3 above.

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

A standard report is associated with each document in the certification programme for betting and online casino and must be used by licence holders and game suppliers when submitting certifications to The Danish Gambling Authority. Each standard report contains a document identifier, which follow the methodology above.

## 1.5 Contact

All questions related to the certification programme for betting and online casino should be send in writing using the contact form on the Danish Gambling Authority's website. Select the category "Certification".

# Certification

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## 2.1 Framework for test and inspection

A certification is based on test and inspection of the licence holder's or game supplier's platforms, gambling equipment, business processes and business systems of a licence holder in relation to the requirements set out in the certification programme for betting and online casino.

Test and inspection of respectively the licence holder's and the game supplier's platforms, equipment, business processes etc. is performed by accredited testing- and inspection organisations. The requirements for the testing organisations appear from each document in the certification programme.

It is the responsibility of the licence holder and game supplier to use a testing organisation, who has the required accreditations. Documentation for certifications performed and signed by testing organisations, who does not comply with the requirements, will, as a rule, be rejected by the Danish Gambling Authority.

The Danish Gambling Authority does not maintain a list of testing organisations.

### 2.1.1 Reporting requirements

The result of test and inspection shall be submitted to the Danish Gambling Authority 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 shall cover the performed certification work and shall, as a rule, be able to stand alone without additional documents. The standard reports will thus in most cases be sufficient documentation. If the Danish Gambling Authority needs additional documentation, the licence holder or game supplier will be requested to submit it.

The testing organisation shall make sure that all requirements in the certification programme have been assessed. If a requirement is irrelevant for a licence holder's or the game supplier's offering of games the standard report with appendix must reflect that. If the testing organisation thinks there is a need to give further information than what is already mentioned in the standard report, this is noted in the appendix to the standard report.

The testing organisation shall report to what extent the licence holder's or game supplier's platform, gambling equipment, business processes and business systems complies with the requirements set out in the given certification documents in the test- or inspection period. The standard report shall be signed by the testing organisation.

#### 2.1.1.1 Specifically, regarding SCP.07 game certificates

Standard reports completed for SCP.07 requirements for games shall be used as game certificates and makes up the documentation, for one or more games have been tested and inspected.

A game certificate can cover one or more games. If a game certificate covers more than one game the following applies:

- All games covered by the game certificate must have the same test- and inspection date. This is important since the date from the game certificate is used when the certificate is uploaded to the Danish Gambling Authority's games register.
- The game certificate must be a compilation of test and inspection of all games covered by the game certificate.
- From the appendix to the game certificate it must clearly appear, which games are covered by the game certificate. In the appendix the name of the game, version and game category is noted.

- Game certificate covering more than one game must be connected with each game in the Danish Gambling Authority's games register. See guidance for supplier licences on the Danish Gambling Authority's website.

### **2.1.2 Certification in connection with an application for a licence to offer betting and/or online casino**

The first certification for a licence holder is done in connection with the application for a licence to offer betting and/or.

The standard reports, which documents the certification in accordance with SCP.02-06 shall be sent to the Danish Gambling Authority along with Annex B to the licence application form.

In addition, the applicant shall update the Danish Gambling Authority's games register with information about games, which they apply to offer.

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 cf. section 2.1.4, 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 tests and inspections cf. section 2.4.

### **2.1.3 Certification in connection with an application for a game supplier licence**

The first certification for a game supplier is done in connection with the application for a licence as a game supplier.

The standard reports, which documents the certification in accordance with SCP.03-06 shall be sent to the Danish Gambling Authority along with Annex B to the licence application form.

The standard reports, which documents certification of SCP.01 requirements for RNG and SCP.07 requirements for games, shall be uploaded to the Danish Gambling Authority's games register in connection with the application.

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 cf. section 2.1.4, 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 tests and inspections cf. section 2.4.

#### 2.1.4 Use of risk assessment

As an extraordinary exception it may be accepted that the testing organisation signs the standard 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 testing organisation uses a supplier to perform any parts of the test or inspection, the testing organisation must note information about the supplier in the standard report and attest that The Danish Gambling Authority's requirements regarding test and inspection are met.

## 2.2 Licence holder's base platform supplier

It is the licence holder's responsibility to make sure, their certifications in accordance with documents SCP.02-06 covers both the licence holder and any platform supplier. This is relevant in a situation, where the licence holder's base platform is entirely or partly supplied by platform suppliers.

Special attention is brought to the fact that a "platform supplier" is not to be understood as a game supplier as defined in section "1.1 Definitions". A game supplier with their own supplier licence can also be a supplier of components to a licence holder's base platform. This will however not be in their capacity as a game supplier, but as a platform supplier. The licence holder will always be responsible for certification of the base platform.

The testing organisation shall make sure, that the licence holder's base platform suppliers have been tested and inspected in the period from the licence holder's previous test and inspection until the current test and inspection. The testing organisation shall thus review the base platform supplier's certification reports to make sure that:

- The base platform supplier's certification report is valid and covers the entire period from the licence holder's previous test and inspection until the current test and inspection.
- The base platform supplier's testing organisation is accredited in accordance with the requirements in the Danish Gambling Authority's certification programme.

The licence holder's testing organisation shall in the standard report confirm, that they have reviewed signed certification reports from a testing organisation with accreditation in accordance with the requirements in the certification programme, in which requirements relevant for the base platform supplier, are approved.

The licence holder's testing organisation shall by test and inspection of the licence holder's base platform only cover parts of the platform not covered by any possible platform supplier's test and inspection.

In a situation where the licence holder's certification is based entirely or partly on test and inspection completed for their platform suppliers the standard report, which is sent to the

Danish Gambling Authority, shall be a compilation of all tests and inspections completed for both the licence holder and their platform suppliers. If a platform supplier for instance have had test and inspection completed cf. SCP.02 of components, which they supply to the licence holder's base platform, the result of this must be repeated in the licence holder's standard report. A single "approved" in a standard report can thus be a compilation of multiple results.

All certification reports from platform supplier, which serves as a basis for the licence holder's certification, shall be identified in the appendix to the standard report. The date of the test and inspection shall be noted as well.

*Guidance: From January 1 2025 licence holders shall not compile standard reports from game suppliers. Documentation for test and inspection of RNG and games cf. SCP.01 and SCP.07 is uploaded to the Danish Gambling Authority's games register, and the game suppliers are responsible themselves for reporting documentation of SCP.03-06 to the Danish Gambling Authority.*

## 2.3 Supervision

Through supervision, it must be ensured that the work is carried out properly. Supervision are actions in which a person reviews/controls/tests performed work and produced results.

From a general view of separation of duties supervision must, as a rule, be performed by another person than the person, who has performed the work.

If the framework, upon which the testing organisation has obtained their accreditation or approval e.g., ISO. PCI or CREST contains rules, after which an employee is allowed to supervise one's own work, then it is also allowed according to the Danish Gambling Authority's certification programme for betting and online casino.

No matter if a person supervises one's own or another person's work, 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).

## 2.4 Transfer of previous tests and inspections

### 2.4.1 Tests and inspections completed in accordance with the Danish Gambling Authority's certification programme

When a testing organisation has tested or inspected a given requirement in the certification programme and this requirement appears from several parts of the certification programme, it is not necessary to repeat the test or inspection of the requirement. In such cases there shall, instead, be a reference to the already completed test or inspection.

### 2.4.2 Tests and inspections completed 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 test or inspection shall be used when determining the certification frequency. This means that if the certification is based on tests or inspections completed for instance six months prior, then the renewal of the given certification shall be performed six

months earlier than ordinarily required. The certification cannot be based on other tests and inspections, which have been completed more than 12 months ago.

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

When the testing organisation is assessing whether to base the certification on tests or inspections 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.

## 2.5 Approval of identical equipment

To avoid duplicate testing of identical equipment of the licence holder or game supplier, their testing organisation can issue approvals of identical equipment used for supply or offering of land-based betting and online live casino. 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 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 the 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.

