

Spillemyndigheden's Certification Programme

General requirements

SCP.00.00.EN.1.3

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1 Introduction

Spillemyndigheden'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 is 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 a number of documents, which are continuously adapted to the development in technology. The licence holder must be certified at all times in accordance with those parts of the certification programme which apply to their specific offer of gambling products.

Each of the eight types of games has a set of testing standards and a set of inspection standards associated. Furthermore, five documents apply across all types of games 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 Spillemyndigheden.

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 Spillemyndigheden and determines whether the requirements are met or not at the time of the inspection.

Sensitive information: Information of a sensitive nature related to either business or people.

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<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 Spillemyndigheden 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 the offering of gambling, 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>	Equipment placed in land-based casinos used for running and presenting gambling, including roulette wheels, slot machines, jackpot progressives 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 Spillemyndigheden pursuant to section 41 in Act no. 1494 of 6 December 2016 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.

1.4 Version

Spillemyndigheden will continuously revise the certification programme and the latest version will always be accessible at Spillemyndigheden's website.

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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.

Spillemyndigheden will publish guidelines regarding the applicability of existing certifications and previously performed inspections and tests, when new versions of the certification programme is released.

It is important to emphasise that only the Danish version is legally binding and that 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
 - "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.1.0 would thus be version 1.0 of the inspection standards for land-based betting in Danish.

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A standard report with the identifier SCP.XX.XX.DK.1.0.SR is associated with each document and must be used when submitting certifications to Spillemyndigheden. The document identifiers for the standard reports follow the methodology above.

Land-based casino does not have to submit standard reports to the Danish Gambling Authority, but must retain the proper documentation at the casino in case of an inspection by the Danish Gambling Authority.

1.6 Enquiries

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

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

or

Spillemyndigheden
Englandsgade 25, 6. sal
5000 Odense C

2 Certification

2.1 Certification framework

A certification consists of inspection and testing 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 and on that basis attain certifications. Among these the licence holder must at all times have the scheduled tests and inspections performed.

2.2 Certification requirements

Reporting of inspection and testing 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 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.

As an extraordinary exception it may be accepted that the accredited testing organisation attests to the certification even if all requirements have not been met as described in this document. In this case the certifications must be substantiated by a risk assessment, taking into account 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".

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

2.2.1 Suppliers to the testing organisation

The accredited testing must attest that Spillemyndighedens requirements regarding test and inspection are met, if they are using a supplier to perform any parts of the inspection or test.

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 certified 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 certification of the requirement. In such cases there shall, instead, be a reference to the above-mentioned certification. 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

It is allowed to base the certification on inspections and tests carried out on previous occasions and to similar criteria. This could be certifications 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 means that if the certification is based on inspections or tests performed six months prior, then the renewal of said certification shall be performed six months earlier than ordinarily required. The certification cannot be based on tests and inspections, which have been conducted more than 12 months ago.

The above-mentioned option is also available if the prior certification 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, taking into account 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 Supplier certification

It is the responsibility of the licence holder that their suppliers are certified according to Spillemyndighedens certification programme. The testing organisation of the licence holder has to ensure that the suppliers of the licence holder have been certified during the period from the previous certification to the current certification.

The testing organisation of the licence holder must go through the supplier's certification to ensure that following is present:

- That the supplier has a valid certification report approved by a testing organisation

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- That the supplier can provide certification reports covering the entire period from the latest certification to the current certification.
- That the testing organisation of the supplier is accredited according to the Danish requirements.

The testing organisation of the licence holder has only to confirm that they have reviewed signed reports from a testing organisation with a Danish accreditation scope, where the relevant points of the supplier has been approved.

The accredited testing organisation of the licence holder shall, when testing the gambling system of the licence holder, only test the elements of the gambling system that have not been certified during the certification 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 has been certified already, it may be necessary to repeat parts of the certification, 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 certified product.

2.4.3 Compilation of the certifications

It is the task of the accredited testing organisation of the licence holder to ensure that all requirements in this document have been assessed. If a requirement is irrelevant for a licence holder due to their offering of games the standard report must reflect that.

Inspection- and test reports that are the root of the certification must be identified in the standard report. The date shall be stated in the standard report together with information about if the inspection or test is:

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

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.

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The approval is only valid in regards 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.