

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



Change Management Programme – SCP.06.00.EN.3.0

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# **Objectives of the change management system**

**1**

The change management programme ensures that all changes to the base platform and game platform are conducted to this set of standards, hereby seeking an adequate quality for the implementation of changes. The programme ensures transparency in relation to changes to the gambling system and the decision process behind those changes.

## 1.1 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 2020.01.01

- Spillemyndigheden has removed the requirement saying the ATO's accreditation must refer to a specific version cf. section 2.2.

Version 2.0 of 2023.01.01

- Update of requirements for accredited testing organisations and staff. Requirement of quarterly reports have been removed. Detailed description of situations, where the DGA needs to give a prior approval of new and changed games have been removed. Furthermore, general adjustments and specifications have been made.

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 because of the introduction of supplier licences. The document is updated so it takes the licence holders and game suppliers obligations regarding system changes into consideration. The term 'gambling system' is changed to the terms 'base platform' and 'game platform', where found applicable.

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 must be emphasised that only the Danish version is legally binding. The English version holds the status of guidance only.

## 1.2 Applicability

The Change Management Programme is applicable for provision of online- and land-based betting (section 11 in the Danish Gambling act), provision of online casino (section 18 in the Danish Gambling act) and supply of games (section 24a in the Danish Gambling act).

# Frequency and testing organisations

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## 2.1 Certification frequency

The licence holder and game supplier are responsible to ensure to be certified in accordance with the requirements in this document with an interval of maximum of 12 months.

### 2.1.1 Initial certification

The licence holder and game supplier must be certified before a licence to offer games can be issued unless the Danish Gambling Authority has informed otherwise. See section 2.1.2 in the general requirements for further information.

### 2.1.2 Renewed certification

The licence holder and game supplier must, as a rule, have completed a new certification within 12 months of the latest certification. The standard report must reflect when the certification has been renewed.

The standard report, which documents the renewed certification, must be in the Danish Gambling Authority's possession no later than two months after the certification was done.

### 2.1.3 Postponement of renewed certification

The licence holder and game supplier can choose to postpone the certification up to two months from the time where a new certification should have been completed. The new certification must be finalised no later than 14 months after the latest certification and the standard report must be submitted to the Danish Gambling Authority within the same deadline.

The Danish Gambling Authority must be notified before the certification is postponed.

The deadline for renewal of certification is shortened with the equally amount of time the former 12-month deadline has been postponed. Meaning that if you for instance make use of the maximum two months postponement, then the next certification is due 10 months later. The time for the next certification shall be reflected in the standard report.

## 2.2 Accredited testing organisations

To ensure that the necessary qualifications are in place during the certification the testing organisation and their staff shall fulfil the requirements in this section.

### 2.2.1 Requirements for testing organisations

Certification in accordance with the change management programme shall be conducted as an accredited certification by a certification body, who is accredited after ISO/IEC 17021-1 or ISO/IEC 17065 for certification referring to Spillemyndighedens Certification Programme SCP.06.00.DK by DANAK (the Danish Accreditation Fund) or a similar accreditation body, who is co-signer of EA's (European co-operation for Accreditation) multilateral agreement with regard to certification of management systems or by certification bodies outside EA's jurisdiction, who is co-signer of the relevant multilateral agreement on reciprocal recognition under IAF (International Accreditation Forum).

Documentation for fulfilment of the requirements shall be enclosed with the certification. Alternatively, a link to the accreditation can be provided in the certification report.

### **2.2.2 Requirements for personnel who performs the certification work**

The certification work shall be carried out by staff with sufficient qualifications cf. section 6 in ISO/IEC 17021-1 or section 6 in ISO/IEC 17065, which means that the accredited testing organisation shall hire and educate sufficiently qualified, competent, and experienced personnel.

### **2.2.3 Supervision and attest of the standard report**

The certification work shall be supervised cf. section 2.3 in the general requirements. It is the supervisors responsibility to sign the standard report and thereby warrant that the certification work has been completed in an appropriate professional manner.

# Change Management Framework

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This general framework for managing changes sets out the necessary foundation needed for the implementation of a change management programme. It requires the licence holder and game supplier to:

- delegate responsibilities and authorities in relation to change management,
- create a formal change plan defining the structure for change management,
- identify and classify the components of the gambling system for the configuration management,
- record changes in a change register, and
- determine a configuration baseline for the gambling system in its entirety.

When classifying components, it may be relevant to consider the differences between the games and the game types as well as the different risks involved.

## 3.1 Change Management Responsibility

### 3.1.1 Change Management responsibilities of the licence holder

The licence holder is responsible for changes to the base platform irrespective of whether such changes have been carried out by the licence holder or a third party on behalf of the licence holder.

The licence holder shall clarify and define responsibilities and authorities with regards to the implementation and approval of the change process.

If system changes are managed by one of the licence holder's suppliers, the licence holder shall ensure that the supplier complies with the requirements in this document.

### 3.1.2 Change management responsibilities of the game supplier

The game supplier is responsible for changes to the game platform.

The game supplier shall clarify and define responsibilities and authorities with regards to the implementation and approval of the change process.

### 3.1.3 Responsible personnel with licence holder and game supplier

The licence holder and game supplier shall appoint one or more people among its staff to take overall responsibility for system changes. The responsible personnel may be organised as a committee.

The responsible personnel shall possess sufficient proficiency and experience in change management and hold the necessary authority within the licence holder's organisation to make decisions with regards to change management.

The responsible personnel shall involve other relevant staff members at the licence holder, game supplier and/or at the relevant supplier(s) in the decision process in order to ensure changes of high quality.

Prior to the approval of a system change the responsible personnel shall confirm that:

- the proposed system change is consistent with Spillemyndigheden's Certification Programme,
- the proposed system change is necessary,
- the proposed system change has been documented and categorised,

- the consequences of implementing the change does not compromise the integrity of the gambling system, and
- the process for the planned actions when implementing the system change in documentation, hard-ware and/or software is consistent with section 4 of this document.

This, along with who has been involved in the decision-making process, shall be recorded in the change register cf. section 3.4.

## 3.2 Change Management Planning

The change management of the licence holder and game supplier shall be documented in a change management plan which sets out the overall framework for managing system changes.

The change management plan of the licence holder shall:

- be documented,
- be approved by senior management,
- be subject to sufficient internal control,
- identify the configuration management procedure to be used cf. section 3.3,
- describe the responsibilities and authorities of the personnel in relation to changes to the gambling system and its components as well as ensure that the lifecycle of components is described,
- integrate with the change management plans any suppliers,
- establish the delegation of responsibilities between licence holder and any supplier, and
- refer to relevant procedures of the licence holder and any supplier whenever possible.

## 3.3 Configuration Management

The licence holder and game supplier shall use a degree of configuration management which creates an overview of respectively the base- and game platform by identifying the individual components. When the individual components of the platforms have been registered and classified in the component register cf. section 3.3.2 the configuration baseline is created cf. section 3.5 which ensures the possibility of identifying changes to the gambling system in future certifications.

The configuration management set out in this document is meant to supplement the existing configuration management used by the licence holder.

If the licence holder and game supplier are not subjecting the base platform and game platform to any configuration management then this document is to be considered the minimum requirements for configuration management.

### 3.3.1 Structure of the gambling system and definition of components

The system structure of the base platform and game platform are comprised of the defined hardware and software components and the inter-relationships and -dependencies of the components.

The components shall be defined in the component register cf. section 3.3.2 based on whether their functional and physical characteristics can be managed separately.

The definition shall be based on:

- regulatory requirements,
- criticality in terms of risks to confidentiality, integrity, availability and accountability cf. section 3.3.3,
- new or modified technology, design or development, and

- interfaces with other components.

The objective of defining the components is to optimise the ability to control the development process of the base platform and game platform. The definition of components shall be initiated as early as possible in the component's lifecycle and be reviewed on a continuous basis during the development of the component.

### 3.3.2 Registration of components in a component register

The licence holder and game supplier shall register all defined components in a component register.

The licence holder and game supplier are free to set the level of detail in the component register. If the level of detail is very low – e.g., if the base platform or game platform is the only component – then any change to this component would require a very high degree of management and control. A high level of detail would make it possible to scale the degree of management and control according to the significance of the individual component's role.

The following information shall be registered on each component:

- the definition of the component,
- a unique identification number,
- version number,
- identifying characteristics,
- the owner responsible for changes to the component,
- classification in relation to confidentiality, integrity, availability and accountability cf. section 3.3.3,
- Checksum/Hash value for components classified as (substantial relevance), cf. section 3.3.3 and
- the geographic location if the component is a hardware component.

This information shall be the foundation on which the accredited testing organisation can inspect whether the component has changed compared to the configuration baseline cf. section 3.5.

### 3.3.3 Classification of components

All defined components shall be classified against the following four criteria:

- Confidentiality: confidential information concerning the customer (e.g., identification and transaction information).
- Integrity: the integrity of the gambling system, its functionality and the information stored in the gambling system.
- Availability: the availability of information concerning the customer.
- Accountability: user activity (including customers, personnel and third parties) in relation to the component.

Each component shall be assigned a relevance code on the scale below based on the component's role in achieving or ensuring each of the above criteria:

- 1; no relevance (the component can have no negative impact on the criteria),
- 2; some relevance (the component can have an impact on the criteria), and
- 3; substantial relevance (the criteria is related to or dependant on the component).

The highest relevance code of the four criteria determines the classification of the component.

### 3.3.4 Classification of hardware components in virtual servers (cloud)

If the licence holder or game supplier are using a virtual server environment, this may affect the classification as described in section 3.3.3.

#### 3.3.4.1 Private virtual server environment

In situations where the licence holder or game supplier uses a private server environment to support respectively the base platform or the game platform, the supporting hardware shall have adequate redundancy and capacity, to ensure continuous performance of the system despite malfunction of individual hardware components, thus ensuring continuous and uninterrupted performance of the platform until the error has been rectified. In this situation it is allowed to classify the hardware components with a lower relevance code, cf. section 3.3.3.

In situations where the combined physical hardware, supporting the virtualisation layer, does not have adequate redundancy and capacity to mitigate malfunction of individual hardware components, and thus cannot ensure continuous and uninterrupted performance of the platform until the error has been rectified, then the individual hardware components shall be classified with a higher relevance code, cf. section 3.3.3.

#### 3.3.4.2 Public server environment

In situations where a licence holder or game supplier uses a public virtual server environment (public cloud), hardware components in the server environment shall not be classified according to section 3.3.3, when the owner of the public cloud fulfils the following conditions:

- The owner must not be a part of the licence holder's or game supplier's group or in other way be connected to the licence holder's or game supplier's business.
- Is certified according to ISO/IEC 27001.
- The hardware supporting the virtual server environment, shall have adequate redundancy and capacity, to ensure continuous performance of the system despite malfunction of individual hardware components, thus ensuring continuous and uninterrupted performance of the gambling system until the error has been rectified.

## 3.4 Recording changes in a Change register

All changes to the gambling system shall be recorded and dated in a change register. The change register shall be the foundation on which the accredited testing organisation can inspect the changes done to each specific component compared to the configuration baseline cf. section 3.5.

## 3.5 Configuration baseline of the base platform or game platform

The configuration baseline is established during the initial certification of the licence holder's base platform and the game supplier's game platform as the certified platform in its entirety.

The configuration baseline enables the accredited testing organisation to inspect all changes to the components in such a manner that upon the yearly re-certification a complete audit trail exists back to the initial configuration baseline.

As part of the yearly certification a new configuration baseline is established, and this will serve as the baseline for system changes during the following year.

# Change Management Process

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All system changes shall be controlled. The degree of control depends on the impact the change is expected to have on the gambling system.

The change management process shall be documented in the change register cf. section 3.4 and the documentation shall include:

- a description of the change,
- a classification of the change in terms of complexity, resources and scheduling,
- a justification for the change cf. section 4.1,
- an evaluation of the proposed change cf. section 4.2,
- a description of how the change shall be approved cf. section 4.3, and
- a description of how the change shall be implemented and verified cf. section 4.4.

## 4.1 Justification for change

Prior to the formal approval of a change cf. section 3.1.2 the change proposal shall be substantiated and documented in the change register cf. section 3.4.

The change proposal shall include the following information:

- the component(s) and related documentation to be changed including the unique identification number, version number and status,
- a description of the proposed change,
- a listing of other components and related documentation that may be affected by the change,
- the personnel or supplier composing the change proposal as well as the date of the proposal,
- the reason for the change, and
- the category of the change.

The status of the change processing, the related decisions and dispositions shall be documented on an ongoing basis.

## 4.2 Evaluation of the proposed change

The change proposal shall be evaluated, and this shall be documented in the change register cf. section 3.4. The evaluation shall be conducted in accordance with the purpose of the Gambling Act and associated executive orders. The risk assessment shall be based "ISO/IEC 31010 Risk management - Risk assessment techniques".

The evaluation of the proposed change must include:

- the expected effect of the change,
- a description of the risk associated with the change,
- a description of the change's effect on the licence holder's or game supplier's regulatory compliance, and
- the impact of the change on the gambling system's confidentiality, integrity, availability, and accountability cf. section 3.3.3.

## 4.3 Approval of change

A process shall be established that ensures all change proposals and associated evaluations of proposed changes, are presented for formal approval cf. section 3.1.3 and the final approval or dismissal of the change can take place.

All decisions on changes including relevant considerations shall be recorded in the change register cf. section 3.4.

The game supplier has the responsibility for the game platform. It is therefore not necessary for the game supplier to request the licence holder's approval before making system changes to the game platform.

*Guidance: It is expected that the licence holder and game supplier make a bilateral agreement about which situations, it is necessary to include the licence holder when making system changes to the game platform. Attention is drawn to the section 4.5, which contains special requirements for the business processes related to the integration between base- and game platform.*

#### **4.3.1 Specifically for licence holder and base platform**

The following sub section only applies for licence holders. See also section 2.2 in the general requirements about the licence holder's base platform suppliers.

##### **4.3.1.1 Approval of changes to the base platform recommended by a platform supplier**

When a change to the base platform is initiated on the basis of a recommendation from a platform supplier, the licence holder's approval of the change can be based on the platform supplier's change justification cf. section 4.1 and evaluation of proposed changes cf. section 4.2. The licence holder shall still make a separate evaluation of proposed changes describing how the change will impact the entire gambling system.

The time between the platform supplier's recommendation and the implementation shall be justified in the change register cf. section 3.4. Documentation for the implementation of the platform supplier's recommendation shall also be recorded in the change register.

##### **4.3.1.2 Dismissal of changes recommended by a supplier**

If a licence holder dismisses the implementation of a change recommended by a platform supplier, it shall be justified in the change register cf. section 3.4.

The testing organisation shall attest on each individual justification and dismissal of the platform supplier's recommendations.

## **4.4 Implementation and verification of change**

This section applies to changes to components classified with relevance code 2 or 3 cf. section 3.3.3. Components classified with relevance code 1 have no relevance in relation to the criteria in section 3.3.3 and changes to these do not need approval from the testing organisation.

After the implementation of a change the compliance with the approved change shall be verified. The verification shall be recorded in the change register cf. section 3.4.

#### **4.4.1 Changes to components classified with relevance code 3**

The testing organisation shall assess and approve the change evaluation cf. section 4.2 of the licence holder of all changes to the components of the gambling system classified with relevance code 3 ("significant relevance") cf. section 3.3.3.

The testing organisation shall certify all changes during or in direct continuation of the implementation.

The testing organisation can allow postponement of the certification, if the licence holder or game supplier have an internal function dedicated to undertaking quality assurance of

change management. This function shall be manned with appropriately skilled staff as well as being organisationally separated from the function implementing system changes.

If the certification is postponed the testing organisation shall assess, approve and certify these changes every three months.

The option to postpone certification to the interval of three months is only available to licence holders and game suppliers. The option to postpone certification is not available to the licence holder's platform suppliers without an individual licence in Denmark.

#### **4.4.2 Changes to components classified with relevance code 2**

The testing organisation shall assess and approve the change evaluation cf. section 4.2 of all changes to the components of the base platform or game platform classified with relevance code 2 ("some relevance") cf. section 3.3.3 and subject to SCP.02.00 Requirements for base platform or SCP.07.XX Requirements for games.

The testing organisation shall certify these changes every twelve months.

### 4.5 Specifically, regarding integration

If a system change includes integration between a base platform and a game platform, this could e.g., be when a licence holder adds new games from a new or existing game supplier, it is the licence holder's and game supplier's responsibility to ensure, that the base platform and game platform respectively functions correctly after the integration.

This means, that the responsible personnel cf. section 3.1.3 of the licence holder and game supplier shall establish a business process, with the purpose to ensure, that e.g., sanity check and spot checks of requirements in SCP.02 (licence holder) and SCP.07 (game supplier) are made. Documentation for these actions is registered in e.g., the change register cf. section 3.4, or in another way, so the actions can be related to the specific system change.

The business process can be established as a cooperation between the licence holder and their game supplier(s).

If it is relevant for a given system change, the testing organisation can in connection with the verification cf. section 4.4 request to see the licence holder's or game supplier's documentation for completed actions in relation to the above-mentioned.

The testing organisation shall during the annual certification of the licence holder's and game supplier's change management programme assess and approve the establish business process.



**Reports from the component register and the change register etc.**

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Upon request from The Danish Gambling Authority or the testing organisation the licence holder or game supplier shall be able to generate the following reports based on the information in the component register cf. section 3.3.2, the change register cf. section 3.4, verified changes cf. section 4.4 and integration checks cf. section 4.5:

- a report of all components including the registered information from the component register,
- a report of the change history of an individual component,
- a report of the geographical location of all hardware components, and
- a report of all verified system changes cf. section 4.4. It shall be possible to generate this report for a limited period of time e.g., 3 months, 6 months, 12 months etc.
- a report of system changes cf. section 4.5. including the actions, which have been completed to ensure, that the base platform and game platform functions correctly after the integration.

**Prior approval of change  
from The Danish Gam-  
bling Authority**

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The license holder and game supplier are obligated to inform the Danish Gambling Authority instantly when a suspicion regarding an error arises or an error is identified. This means, that if for instance an error occurs on a game supplied by the game supplier and offered by the licence holders, then the Danish Gambling Authority must be informed.

Furthermore, the license holder and game supplier are obligated to inform the Danish Gambling Authority when significant changes happen to the prerequisites upon which the license was granted. In some cases, the Danish Gambling Authority must approve a change before it can be implemented.

## 6.1 Random Number Generator

The implementation of a new Random Number Generator (RNG) and changes to an existing RNG shall be notified with The Danish Gambling Authority five working days before the implementation or change is carried out.

## 6.2 New games and changes in the existing offer of games

When implementing new games or making changes to the existing games, it can be necessary for the Danish Gambling Authority to approve the new games or the changes to the existing ones. This among other to insure, that the reporting of data from those games are done correctly.

Information on when the license holder must inform the Danish Gambling Authority and seek approval can be found in "Technical requirements – online casino and betting" on The Danish Gambling Authority's website.

