

**BRIEFING ON CERTIFYING
TECHNICAL GAMING
SYSTEMS IN THE CONTEXT
OF CHANGE
MANAGEMENT**

17/07/2013

AGENDA

1. Introduction
 - Legal basis
 - Procedures identified
2. Certification in the context of change management
 - Formal aspects:
 - Documentation to be submitted
 - Reusing reports
 - New descriptive questionnaire
 - Substantive aspects
 - Main differences between the initial approval and change management
 - Certification environment
 - ICS tests
 - Description of the scope of the certification
 - Aspects that have been clarified or corrected
3. Quarterly report on changes
4. Concerns and questions

1.1 LEGAL BASIS (I)

- The operator must establish a change management procedure.
- Obligations of the Operator
 - Formal internal approval process for all changes.
 - Change requests and decisions shall be registered.
 - For critical components, an assessment must be made of whether the changes are substantial.
 - Copies of the binary files of the software elements of all software versions used in the last four years must be stored.

1.1 LEGAL BASIS (II)

- Substantial modifications to critical components require a certification report and the prior authorisation of the DGOJ
 - Exceptional situation
 - Special emergency circumstances that affect security
 - Implementing the change before it is certified
 - Certification report and report accrediting the exceptional circumstances
- After the approval, the operator shall send quarterly reports on the changes made to the DGOJ

1.1 LEGAL BASIS (III)

- **Law 13/2011**
 - Art. 16 Approval of gaming systems
 - Art. 17 Requirements for Technical Systems
- **RD 1613/2011**
 - Art. 8 Deadline and procedure for approval and certification
- **Resolution 16 November 2011 on technical specifications**
 - Art. 4.13
- **Resolution of 12 July 2012**

1.2 PROCEDURES IDENTIFIED

■ Initial approval

as part of the procedure for granting general and specific licences.

Once the system has been approved, any change to it shall be managed within the change management framework, regardless of the nature of the change.

In this context three procedures may be identified:

- Request for authorisation of substantial change
- Request for authorisation of substantial change in special emergency circumstances
- Sending quarterly report on changes

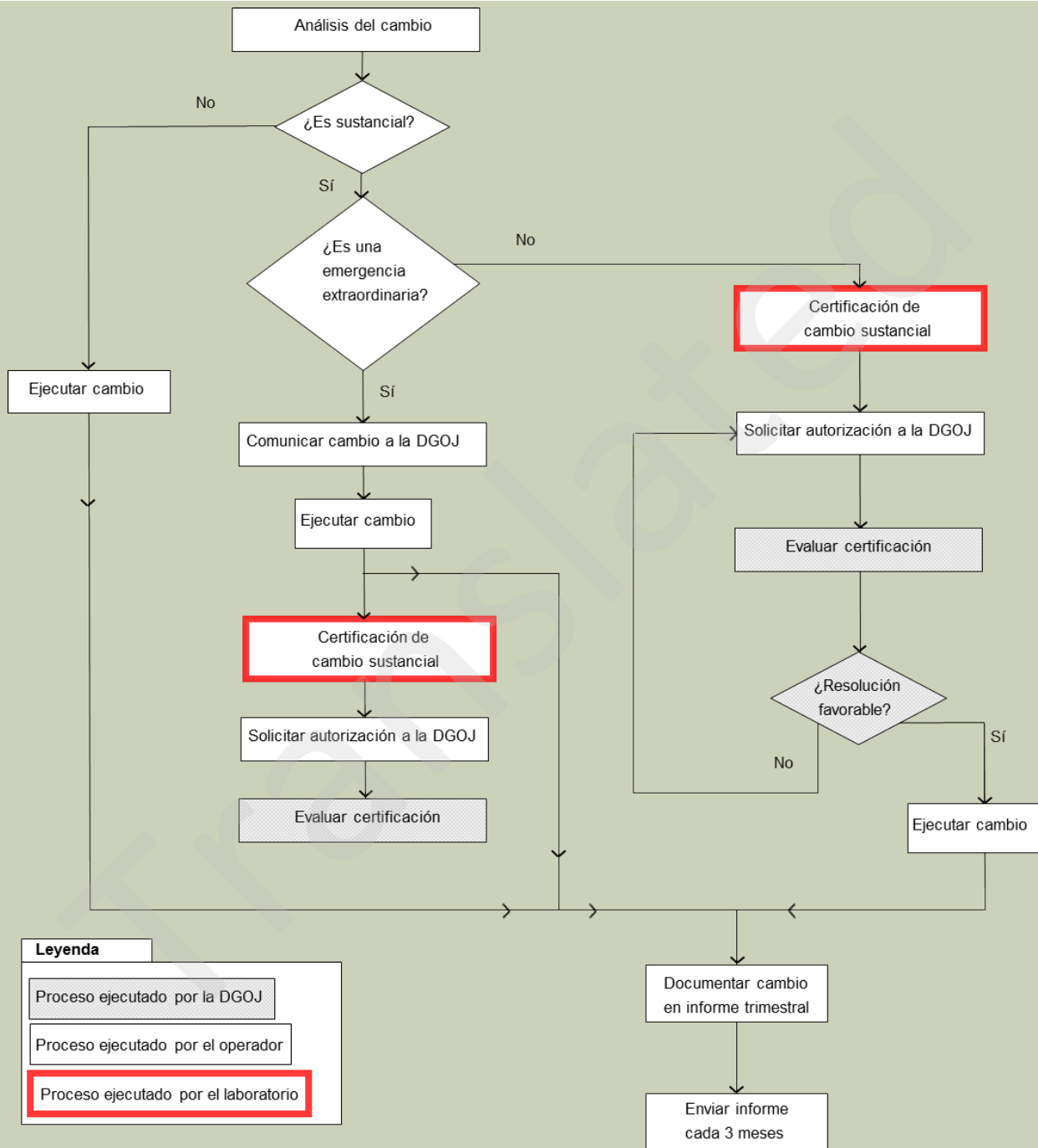
2. CERTIFICATION IN THE CONTEXT OF CHANGE MANAGEMENT

2 procedures:

- Request for authorisation of substantial change
- Request for authorisation of substantial change in special emergency circumstances

Table of Contents:

- Diagram of processes
- Formal aspects
- Substantive aspects
- Aspects that have been clarified or corrected



2.1 FORMAL ASPECTS: DOCUMENTATION TO BE SUBMITTED

REGARDING THE OPERATOR

- ✚ Descriptive questionnaire from operator
- ✚ Report on compliance regarding personal data

FOR EACH LICENCE

- ✚ Final certification report:
 - Functionality
 - Security
 - **Laboratory certification including the list of certification reports**
- ✚ Specific rules
- ✚ Technical project
- ✚ Binary files

After the request, as many files are opened as there are licenses affected by the change.

2.1 REUSING REPORTS AND TESTS

- **General** approach to the certification of each license.
- Analyze which tests or reports are reusable.
- **Submit a certificate** with the list of certification reports needed in order to completely cover the technical system (**include report codes**).
- **Security:**
As many as there are providers.
- **Functionality:**
Functionality reports must be complete. They may be based on prior reports, but the results of other reports will only be accepted as a last resort.
*They may be limited to a single variant if the scope so warrants.



2.1 NEW DESCRIPTIVE QUESTIONNAIRE

- Latest version published on 12 April 2013
- Available on the web page
- Unique to each operator
- Simplification of the earlier version

2.2 SUBSTANTIVE ASPECTS: MAIN DIFFERENCES

INITIAL APPROVAL

- The system is certified while in production.
- Certification in production environment mandatory
- ICS tests may be submitted after approval
- Initial complete certification of the systems

CHANGE MANAGEMENT

- The certification must be received before the changes are put into production.
- Certification in production environment not mandatory
- ICS tests may not be submitted after the fact.
- Possible reuse of previous tests and reports

2.2 LIMITATIONS OF THE PREPRODUCTION ENVIRONMENT

It is not imperative to perform the tests in the production environment (they may be conducted during the preproduction environment or production environment prior to publication online).

Each test and technical requirement must be assessed accounting for the limitations of the environment, and indicating acceptance in accordance with this approximation.

In the event of discrepancies, the reports must state the approximations accepted when granting approval.

2.2 TESTS RELATED TO THE ICS

INITIAL APPROVAL

- Real data from one month of activity
- Production environment
- These may be submitted after approval
- Attach evidence

CHANGE MANAGEMENT

- Fictitious data
- Preproduction environment
- They should be performed during certification, before authorisation.
- Attach evidence of tests performed and qualifications taken into account if necessary.

2.2 DESCRIPTION OF OBJECT OF CERTIFICATION

- Section 2 of the certification reports submitted, “**Description of the object of certification,**” must include a description of
 - the games offered that fall under the scope of the certification, indicating the game variants certified,
 - the role of the operator: certified as a co-organiser of the network, as a B2C operator or B2B operator
 - certified web sites and trade names
 - access channels certified (Internet, text message, IVR, in person...)
 - access clients certified (flash access, PC client, Smartphone client, etc.)

2.3 RECURRING ISSUES SUBJECT TO CORRECTION

- Translation
- Scope of the certification
- Include the specific rules
- Quality and orderly evidence, in particular related to:
 - Financial limits on participation
 - Obligations to inform participants
 - Identification prior to participation in the game
 - Data recovery guarantees in the event of any kind of incident
 - Secure communications with the participant

Specifics of change management:

- ICS tests in preproduction for managing non-accredited changes.
- New applications for smartphones: the approval of secure communications as well as the penetration test and vulnerabilities analysis are not accredited.

2.3 MAIN CONCERNS RAISED

- Reusing tests, reports and evidence
- Scope of the penetration test and vulnerabilities analysis
- Limitations of the preproduction environment
- Substantial nature of a change
 - Redirecting domains
 - Changes to the graphic interface

2.3 CRITERIA FOR A CHANGE TO BE CONSIDERED “SUBSTANTIAL”

A series of substantial and insubstantial changes are identified

- Substantial changes to functionality
- Substantial changes to security
- Substantial changes to the user registration
- Substantial changes to the gaming account
- Substantial changes to the gaming software
- Substantial changes to the random number generator
- Changes that could be considered Insubstantial

The remainder must be assessed by the operator, based on the change's impact on the system.

3. QUARTERLY REPORT ON CHANGES (I)

CONTENTS OF REPORT

- Substantial changes made due to an exceptional emergency
- Substantial changes made with the prior authorisation of the DGOJ
- Insubstantial changes for which the operator's criteria does not match that of the DGOJ for considering a change to be insubstantial (in accordance with Appendix I)
- Insubstantial changes for which the operator's criteria does match that of the DGOJ for considering a change to be insubstantial (in accordance with Appendix I)

3. QUARTERLY REPORT ON CHANGES (II)

Identificador del cambio	Date of implementation	Conceptual description	Justification for insubstantial changes

- **Conceptual and qualitative description.** Changes of the same nature or governed by the same motive may be abstracted or grouped.
- **Justification is especially necessary** in cases in which the operator's criteria does not match the general criteria of the DGOJ as stated in Appendix I.

REFERENCE DOCUMENTATION

GOBIERNO DE ESPAÑA
MINISTERIO DE HACIENDA Y ADMINISTRACIONES PÚBLICAS
SECRETARÍA DE ESTADO DE HACIENDA
DIRECCIÓN GENERAL DE ORDENACIÓN DEL JUEGO

Conócenos Normas en vigor **Supervisión y Control** Relaciones Institucionales Estudios

DIRECCIÓN GENERAL DE ORDENACIÓN DEL JUEGO

FOE
I Foro Español de juego responsable

Participantes

Homologación de sistemas técnicos

- Comunicación en relación con la homologación de los sistemas técnicos de juego de los operadores. 12 de abril 2013 - (PDF, aprox. 181 Kb)
- Resolución de la Dirección General de Ordenación del Juego por la que se aprueba la disposición que establece el modelo y contenido del informe de certificación definitiva de los sistemas técnicos de los operadores de juego y se desarrolla el procedimiento de gestión de cambios. (PDF, aprox. 381 KB)

- Resolution establishing the model for the certification report
- Technical and operational note on managing changes to the technical gaming system
- Model descriptive questionnaire for operator

4. CONCERNS AND QUESTIONS



Thank you very much!

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