



REF. NUMBER WLA-SCS:2020	CONTROL NAME	CONTROL DESCRIPTION WLA-SCS:2020	STATUS	REF. NUMBER WLA-SCS:2016	CONTROL DESCRIPTION WLA-SCS:2016	NOTES
G.1 Organization of security						
G.1.1 Allocation of security responsibilities						
Objective: To ensure that security function responsibilities are effectively implemented.						
G.1.1.1	Security forum	A security forum or other organizational structure comprised of senior managers shall be formally established to monitor and review the ISMS to ensure its continuing suitability, adequacy and effectiveness, maintain formal minutes of meetings, and convene at least every six months.	NOT CHANGED	G.1.1.1	A security forum or other organizational structure comprised of senior managers shall be formally established to monitor and review the ISMS to ensure its continuing suitability, adequacy and effectiveness, maintain formal minutes of meetings, and convene at least every six months.	
G.1.1.2	Security function	A security function shall exist that is responsible for developing a security strategy in accordance with the overall business. The security function will subsequently work with the other business units to implement the associated action plans. It shall be involved in reviewing all tasks and processes that are necessary from the security perspective for the organization, including, but not limited to, the protection of information and data, communications, physical, virtual, personnel, and overall business operational security.	MODIFIED	G.1.1.2	A security function shall exist that will be responsible to draft and implement security strategies and action plans. It shall be involved in and review all processes regarding security aspects of the organization, including, but not be limited to, the protection of information, communications, physical infra-structure, and game processes.	
G.1.1.3	Security function reporting	The security function shall report to no lower than executive level management and shall be independent of the technology function with regard to the management of security risk.	MODIFIED	G.1.1.3	The security function shall report to no lower than executive level management and not reside within or report to the IT function.	
G.1.1.4	Security function position	It shall have the competences and be sufficiently empowered, and shall have access to all necessary resources to enable the adequate assessment, management, and reduction of risk.	NOT CHANGED	G.1.1.4	It shall have the competences and be sufficiently empowered, and shall have access to all necessary resources to enable the adequate assessment, management, and reduction of risk.	
G.1.1.5	Security function responsibility	The head of the security function shall be a full member of the security forum and be responsible for recommending security policies and changes.	NOT CHANGED	G.1.1.5	The head of the security function shall be a full member of the security forum and be responsible for recommending security policies and changes.	
G.2 Human resources security						
G.2.1 Implementation of a code of conduct						
Objective: To ensure that a suitable code of conduct is effectively implemented.						
G.2.1.1	Code of conduct	A code of conduct shall be issued to all personnel when initially employed. All personnel shall formally acknowledge acceptance of this code.	MODIFIED	G.2.1.1	A code of conduct shall be issued to all personnel when initially employed. All personnel shall formally acknowledge acceptance of this code.	Whilst the text of the control is unchanged, the WLA-SCS:2020 include a specific definition for "personnel" under the section 3.2 Definitions (page 4).
G.2.1.2	Adherence and disciplinary action	The code of conduct shall include statements that all policies and procedures are adhered to and that infringement or other breaches of the code could lead to disciplinary action.	NOT CHANGED	G.2.1.2	The code of conduct shall include statements that all policies and procedures are adhered to and that infringement or other breaches of the code could lead to disciplinary action.	
G.2.1.3	Conflict of interest	The code of conduct shall include statements that personnel are required to declare conflicts of interest on employment as and when they occur. Specific examples of conflict of interest shall be cited within the code.	MODIFIED	G.2.1.3	The code of conduct shall include statements that personnel are required to declare conflicts of interest on employment as and when they occur. Specific examples of conflict of interest shall be cited within the code.	Whilst the text of the control is unchanged, the WLA-SCS:2020 include a specific definition for "personnel" under the section 3.2 Definitions (page 4).
G.2.1.4	Hospitality or gifts	The code of conduct shall address anti-graft provisions including hospitality and gifts provided by, or given to, persons or entities with which the organization transacts business.	NOT CHANGED	G.2.1.4	The code of conduct shall address anti-graft provisions including hospitality and gifts provided by, or given to, persons or entities with which the organization transacts business.	
G.2.1.5	Corporate wagering policy	There shall be an internal policy, aligned with any legislative or regulatory requirements, that addresses the right to play of personnel and those who are financially dependent on them. Where there are roles that could impact the integrity of the games without collusion they shall be prohibited from playing. Where the policy requires a prohibition of play, those roles impacted shall be explicitly defined and the prohibition shall be enforced contractually with the personnel or their employer (if not the lottery itself).	MODIFIED	L.7.6.2	There shall be an internal policy addressing employees' rights to play.	In the WLA-SCS:2016 the control applied to sports betting only.
G.2.1.6	Personnel security	There shall be a policy and process for establishing trust in individuals that could impact the integrity of games through security vetting. There shall be an associated policy and process for implementing monitoring of the system activity of personnel to detect and investigate activity that might impact game integrity. These policies shall balance an individual's right to privacy with the obligation of the lottery to protect the integrity of the games.	NEW			

G.2.1.7	Segregation of duties	There shall be a policy to implement segregation of duties detailing the respective roles and responsibilities of the people in charge of critical processes that could impact the integrity of a game, such as, but not limited to, draw processing and prize payment. The intention is to avoid possible collusion. Furthermore no single group or team shall have overall control in a way that could impact game integrity without management oversight. In the context of a lottery technology supplier, this control shall relate to critical areas of code that could impact the integrity of a game such as, but not limited to, handling the input-to-output from random number generation used for determining the outcome of games.	CONSOLIDATED	L.2.4.4 L.7.6.1	A specific procedure shall be implemented concerning separation of duties involved in an electronic draw in order to prevent any internal fraud. Notably no one person should be allowed to perform more than one of the following types of duties: maintaining, monitoring or performing draws on electronic gaming equipment. There shall be a separation of duties to ensure that no group has overall control without oversight.	In the WLA-SCS:2016 the controls applied to electronic draws and sports betting only.
G.2 Human resources security G.2.2 Staff protection Objective: To ensure that the staff are receiving an adequate level of protection.						
G.2.2.1	Policy on staff protection	A policy shall be established to ensure that staff conducting lone working, those working remotely outside lottery premises, or those working inside lottery premises in areas with public access, are receiving an adequate level of protection with regard to both their safety and security.	CONSOLIDATED	G.6.2.2 L.5.1.1 L.5.2.1	Physical security measures to prevent damage of terror attacks or other threats shall be planned to protect personnel and business processes. A policy shall be established to ensure that staff working outside lottery premises are receiving and implementing an adequate level of protection. A policy shall be established to ensure that staff working in sensitive areas with public access are receiving an adequate level of protection.	
G.3 Physical and environmental security G.3.1 Secure areas Objective: To ensure that access to production gaming data centers or other systems areas important for the gaming operations are adequately secured.						
G.3.1.1	Physical entry controls	Physical access to production gaming system data centers, computer rooms, network operations centers, and other defined critical areas, shall be restricted and adequately secured or monitored by staff at all times. While this control is risk based, in practice it shall require a minimum of an auditable two-factor authentication process.	MODIFIED	G.3.1.1	Physical access to production gaming system data centers, computer rooms, network operations centers and other defined critical areas shall have a two-factor authentication process. Single-factor electronic access control methods are acceptable if the area is staffed at all times.	
G.4 Access control to gaming systems G.4.1 User access management Objective: To ensure authorized user access and to prevent unauthorized access to gaming systems. For technology suppliers G.4 controls shall be applied to the code repositories used to develop gaming systems.						
G.4.1.1	User access functions	The range of functions available to the user shall be defined in conjunction with the process owner, the IT function, and the security function.	NOT CHANGED	G.4.1.2	The range of functions available to the user shall be defined in conjunction with the process owner, the IT function and the security function.	
G.4.1.2	User access logging	All actions performed on the gaming systems by human or system accounts shall be logged and these logs shall be monitored, regularly reviewed, and acted upon as appropriate.	MODIFIED	G.4.1.3	All actions performed through remote user access shall be logged and these logs shall be regularly reviewed.	
G.5 Information systems maintenance G.5.1 Cryptographic controls Objective: To protect the confidentiality, authenticity, and integrity of cryptographic keys and important gaming, lottery, and customer related information by cryptographic means.						
G.5.1.1	Cryptographic controls for the confidentiality and integrity of data at rest on portable systems and on lottery terminals	Cryptography to protect the confidentiality of information shall be applied for sensitive information on portable computer systems (end user devices e.g. laptops, removable media e.g. USB devices, and similar) and to protect the integrity of sensitive information held at rest on lottery terminals.	MODIFIED	G.5.1.1	Encryption shall be applied for non-public organization data on portable computer systems (laptops, USB devices, etc.).	
G.5.1.2	Cryptographic controls for the confidentiality and integrity of data in transit over networks	Cryptography to protect the confidentiality and integrity of information as appropriate shall be applied for sensitive information passed over networks, which risk analysis has shown to have an inadequate level of protection. This includes, but is not limited to, validation or other important gaming information, customer data, and financial transactions.	MODIFIED	G.5.1.2	Encryption shall be applied for sensitive information passed over networks, which risk analysis has shown to have an inadequate level of protection, including validation or other important gaming information, electronic mail, etc.	
G.5.1.3	Cryptographic controls for the integrity of sensitive ticket data	Cryptographic controls for integrity shall be applied for the storage of winning ticket data and validation information. This control applies to all game types.	MODIFIED	G.5.1.3	Integrity measures shall be applied for the storage of winning information ticket data and validation information.	
G.5 Information systems maintenance G.5.2 System testing Objective: To enable and conduct system testing.						
G.5.2.1	Test methodology policy and data	The test methodology policy shall include provisions to prevent the use of data created in a live production system for the current draw period and to prevent the use of player, retailer, or staff personal information. In this context current draw period shall be defined as the period for which prizes can still be claimed.	MODIFIED	G.5.2.1	The test methodology policy shall include provisions to prevent the use of data created in a live production system for the current draw period and to prevent the use of player personal information.	
G.5.2.2	Gaming system security testing	Thorough testing of the gaming system security functionality shall be performed prior to production environment use and on any significant changes.	NEW			

G.5 Information systems maintenance					
G.5.3 Cloud security					
Objective: To ensure information security of lottery systems hosted in the cloud.					
G.5.3.1	Cloud security	Cloud environments that host gaming systems shall be compliant with ISO/IEC 27017. A cloud environment is defined as an off-site, third-party platform with a suite of applications that the organization subscribes to for services such as: Infrastructure as a Service; Platform as a Service; Software as a Service; etc.; that are required to operate its business. For technology suppliers the WLA-SCS G.5.3 controls shall be applied to the code repositories used to develop gaming systems.	NEW		
G.6.1 Availability of services and business continuity					
Objective: To ensure the protection of the organization's image and reputation and to counteract interruptions to business activities.					
G.6.1.1	Availability and resilience requirements	The organization shall have documented the list of critical services to players (both retail and digital channels) that are required for the continued operation of lottery games, as well as the availability and resilience requirements of those services. Systems shall be architected to meet those requirements.	NEW		
G.6.1.2	Business Continuity	The organization shall prepare a documented business continuity plan that covers, at minimum, the continued operation of lottery games and continued stakeholder confidence in the integrity of lottery operations. The organization shall furthermore plan, perform, and evaluate business continuity exercises in regular intervals to prepare the organization for crisis situations, covering the elements included in the business continuity plan.	MODIFIED	G.6.2.1	Continuity exercises shall be planned, performed and evaluated in regular intervals to prepare the organization on crisis situation



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L.1 Physical instant tickets	L.1.1 Instant game operation Objective: To ensure that game designs and production meet legal and regulatory requirements and to ensure game integrity and prevent fraud.					
	L.1.1.1	Printer/Supplier selection	There shall be a formal approval process that involves the security function.	CONSOLIDATED	L.1.1.2 L.1.1.3	Final game design shall be formally approved through a process involving the security function. Printers/suppliers of instant tickets shall be subject to a selection and approval process. The approval process shall involve the security function.
	L.1.1.2	Integrity requirements and testing	The organization shall implement a documented procedure that covers the entire game lifecycle, from design to destruction, by specifying the integrity requirements for each instant game. The integrity requirements shall include at least, but not be limited to, the following: final visuals and text, prize structure, protection of validation/winner files, quality controls, auditable inventory to account for the distribution, location of packs, and adequate testing of the requirements before the game is accepted.	CONSOLIDATED	L.1.1.1 L.1.1.5 L.1.1.6	Formal procedures shall be established covering the design, development, production, and release of instant games. Quality control requirements for printing instant tickets shall be documented and form part of the contract with the supplier/printer. A policy shall be established describing the required audits and laboratory testing of game design and ticket printing.
	L.1.1.3	Game data integrity	There shall be controls to ensure the integrity of game data, including but not limited to the importing of game data into the gaming system and the transfer of validation data between the supplier / operator / retailers.	MODIFIED	L.1.1.4	Specific security requirements relating to the game and the physical instant ticket shall be documented and formally included as part of the contract with the supplier/printer.
	L.1.1.4	Ticket prize confidentiality	Controls shall be in place to ensure that prior to the claiming of a prize no one in the organization has access and knowledge of which instant ticket is a winning ticket and which is not; nor shall they be able to identify the location of the winning ticket and which retailer it has been assigned to.			
L.2 Lottery Draws	L.2.1 Lottery draw management Objective: To ensure that draws are conducted at times required by regulation and in accordance with the rules of the applicable lottery game.					
	L.2.1.1	Draw event	A policy shall be established to ensure that lottery draws are conducted as a planned and controlled event and in accordance with a clear working instruction.	NOT CHANGED	L.2.1.1	A policy shall be established to ensure that lottery draws are conducted as a planned and controlled event and in accordance with a clear working instruction.
	L.2.1.2	Draw working instructions	The organization shall publish a working instruction prior to any draw including special instructions with respect to the draw.	NOT CHANGED	L.2.1.2	The organization shall publish a working instruction prior to any draw including special instructions with respect to the draw.
	L.2.1.3	Draw team members	The working instruction shall include the composition of a draw team including their contact telephone numbers.	NOT CHANGED	L.2.1.3	The working instruction shall include the composition of a draw team including their contact telephone numbers.
	L.2.1.4	Draw team duties	The working instruction shall include the duties of the identified members of the draw team.	NOT CHANGED	L.2.1.4	The working instruction shall include the duties of the identified members of the draw team.
	L.2.1.5	Reserve draw team	The working instruction shall nominate persons as reserves and detail how the reserve team are deployed.	NOT CHANGED	L.2.1.5	The working instruction shall nominate persons as reserves and detail how the reserve team are deployed.
	L.2.1.6	Draw timing	The working instruction shall include the detailed timings of the draw operation from the opening of the draw location to the closing of that location.	NOT CHANGED	L.2.1.6	The working instruction shall include the detailed timings of the draw operation from the opening of the draw location to the closing of that location.
	L.2.1.7	Draw observers	The working instruction shall include details of any requirement under the lottery rules for independent observers to be present during a draw.	NOT CHANGED	L.2.1.7	The working instruction shall include details of any requirement under the lottery rules for independent observers to be present during a draw.
	L.2.2 Conduct of the draw Objective: To ensure that the conduct of draws is within regulatory requirements and the rules of the applicable lottery game.					
	L.2.2.1	Draw procedure	The organization shall establish a detailed draw procedure to ensure that all draw functions are conducted in compliance with the rules of the applicable lottery game and regulatory requirements.	NOT CHANGED	L.2.2.1	The organization shall establish a detailed draw procedure to ensure that all draw functions are conducted in compliance with the rules of the applicable lottery game and regulatory requirements.
	L.2.2.2	Draw step-by-step guide	The draw procedure shall include a step-by-step guide of the draw process.	NOT CHANGED	L.2.2.2	The draw procedure shall include a step-by-step guide of the draw process.
	L.2.2.3	Draw location	The draw procedure shall include the definition of the draw location.	NOT CHANGED	L.2.2.3	The draw procedure shall include the definition of the draw location.
	L.2.2.4	Draw attendance and responsibilities	The draw procedure shall include a definition of the attendance at the draw and the responsibilities and actions of all participants.	NOT CHANGED	L.2.2.4	The draw procedure shall include a definition of the attendance at the draw and the responsibilities and actions of all participants.
	L.2.2.5	Draw supervision	The draw procedure shall define the policy regarding the attendance of an (independent) compliance officer or an auditor.	NOT CHANGED	L.2.2.5	The draw procedure shall define the policy regarding the attendance of an (independent) compliance officer or an auditor.
	L.2.2.6	Draw operation security	The draw procedure shall include adequate security measures for the draw operation and all equipment used during the draw process.	NOT CHANGED	L.2.2.6	The draw procedure shall include adequate security measures for the draw operation and all equipment used during the draw process.
	L.2.2.7	Draw emergency	The draw procedure shall include actions in the event of an emergency occurring at any time during the course of the draw.	NOT CHANGED	L.2.2.7	The draw procedure shall include actions in the event of an emergency occurring at any time during the course of the draw.
	L.2.2.8	Draw integrity, alerting and reporting	The lottery shall put a system or process in place to ensure that no individual or individuals with access to the Central Gaming System can manipulate the transactions within, prior to, or post draw, and that a clear audit trail tracking of the user access and transaction audit is established.	NEW		
	L.2.3 Physical drawing appliances and ball sets Objective: To ensure that physical draw appliances and ball sets meet agreed security requirements and/or regulatory specifications.					
	L.2.3.1	Inspection procedure	A procedure for the inspection of draw appliances and ball sets on delivery and thereafter in consultation with an independent authority (to ensure compliance with technical specifications and standards) on a regular basis shall be established.	NOT CHANGED	L.2.3.1	A procedure for the inspection of draw appliances and ball sets on delivery and thereafter in consultation with an independent authority (to ensure compliance with technical specifications and standards) on a regular basis shall be established.
	L.2.3.2	Regular inspection and maintenance	Inspections and maintenance of the draw appliances shall be carried out and documented at least annually to retain the specified standards throughout the machine's working life.	NOT CHANGED	L.2.3.2	Inspections and maintenance of the draw appliances shall be carried out and documented at least annually to retain the specified standards throughout the machine's working life.

L.2.3.3	Compatible ball sets	The organization shall establish a procedure that provides for the use of ball sets manufactured to those measurements and weight tolerances compatible with the drawing machine to be used.	NOT CHANGED	L.2.3.3	The organization shall establish a procedure that provides for the use of ball sets manufactured to those measurements and weight tolerances compatible with the drawing machine to be used.
L.2.3.4	Replacement draw appliance	The organization shall establish a procedure that provides for the availability of a substitute draw appliance and ball set(s) for use in the event of mechanical problems or failure of any kind, if drawings are broadcast live.	NOT CHANGED	L.2.3.4	The organization shall establish a procedure that provides for the availability of a substitute draw appliance and ball set(s) for use in the event of mechanical problems or failure of any kind, if drawings are broadcast live.
L.2.3.5	Draw appliance and ball set handling, storage and movement	The organization shall establish a procedure that provides for the secure storage, movement, and handling of draw appliances and ball sets.	NOT CHANGED	L.2.3.5	The organization shall establish a procedure that provides for the secure storage, movement, and handling of draw appliances and ball sets.
L.2.3.6	Broadcast/streaming of the draw	When the draw is broadcast or live streamed over the Internet, there shall be a procedure in place that minimizes the risks associated with data corruption, time delay to the audio and/or video, mistakes in graphic generation or similar resulting in the public perception that there is an issue with the draw integrity.	NEW		
L.2.4 Electronic lottery draws and instants Objective: To ensure electronic drawing system integrity by physical and logical protection. L.2.4 covers both electronic draw based games and electronic instant win games.					
L.2.4.1	Physical and logical protection of the technical system	Measures shall be taken in order to ensure only those authorized have physical access to, and logical protection of, both the Random Number Generator (RNG) (entropy source) and the drawing algorithm in order to prevent any modification of the algorithm and the entropy source settings. The physical system(s) shall be protected against theft, unauthorized modifications, and interference.	NOT CHANGED	L.2.4.1	Measures shall be taken in order to ensure only those authorized have physical access to, and logical protection of, both the Random Number Generator (entropy source) and the drawing algorithm in order to prevent any modification of the algorithm and the entropy source settings. The physical system(s) must be protected against theft, unauthorized modifications, and interference.
L.2.4.2	Secured transmissions	Measures shall be taken in order to ensure integrity and authenticity of the data transmitted between the RNG (entropy source) and the drawing algorithm.	NOT CHANGED	L.2.4.2	Measures shall be taken in order to ensure integrity and authenticity of the data transmitted between the RNG (entropy source) and the drawing algorithm.
L.2.4.3	Electronic draw randomness and integrity verification	Before deployment, tests and verifications shall be performed by independent parties in order to verify that the electronic drawing system is random. The organization shall document its policy related to after-deployment tests and verifications in order to verify that the random number generator and drawing algorithm is performing as specified.	NOT CHANGED	L.2.4.3	Before deployment, tests and verifications shall be performed by independent parties in order to verify that the electronic drawing system is random. The organization shall document its policy related to after-deployment tests and verifications in order to verify that the random number generator and drawing algorithm is performing as specified.
L.2.4.4	Segregation of duties	In addition to the control G.2.1.7, a specific procedure shall be implemented for the segregation of duties involved in an electronic draw in order to prevent internal fraud. Notably, no one person shall be allowed to perform more than one of the following types of duties: maintaining, monitoring, or performing draws on electronic gaming equipment.	MODIFIED	L.2.4.4	A specific procedure shall be implemented concerning separation of duties involved in an electronic draw in order to prevent any internal fraud. Notably no one person should be allowed to perform more than one of the following types of duties; maintaining, monitoring or performing draws on electronic gaming equipment.
L.3 Retailer security L.3.1 Retailer operations Objective: To ensure that retailer operations, whether on or off-line, conform to the organization's security requirements.					
L.3.1.1	Retailer security	To ensure retailers meet the organizational security requirements, the organization shall specify the obligations of a retailer and the security environment the retailer is required to operate in within an agreed contract.	CONSOLIDATED	L.3.1.1 L.3.2.1	Retailers shall be engaged under the terms of an agreed contract. To enable retailers to conform to organizational security requirements, the organization shall specify a security environment the retailer is required to operate.
L.3.2 Gaming terminal security Objective: To ensure the adequacy of the gaming terminal security.					
L.3.2.1	Transaction security	The data traffic between the gaming terminals and the central gaming system shall be protected and measures to ensure the integrity of the transactions shall be implemented. Where a retailer point of sale device is used instead of a dedicated lottery terminal, the data traffic from the lottery application on the point of sale device to the central gaming system must be protected and not be reliant on the security of the retailer point of sale device for the integrity of lottery games.	CONSOLIDATED	L.3.3.1 L.3.3.2 L.3.3.3	The data traffic between the gaming terminals and the central computer gaming system shall be protected. Thorough testing of terminal security functionality shall be performed prior to production environment use. This testing shall include provisions that the correct version of software is in place. Self-service terminals shall have security mechanisms in place to protect game integrity.
L.4 Prize payment L.4.1 Validation and payout of prizes Objective: To ensure that the organization has the necessary controls in place for validation and payment of prizes and to prevent fraud related to unclaimed prizes.					
L.4.1.1	Validation process	The organization shall define and implement procedures to ensure the validity of winning transactions, claims and/or tickets for different prize levels and types of games, and process prize payouts thereof.	CONSOLIDATED	L.4.1.1 L.4.1.2 L.4.1.3	The organization shall implement procedures to ensure the validity of winning transactions, claims and/or tickets. The organization shall define and document validation processes for different prize levels and types of game. The organization shall establish a process for payment or transfer of prizes.
L.4.1.2	Unique ticket reference	Each ticket for each game shall have a unique reference number.	MODIFIED	L.4.2.1	Provisions shall be made in the on-line production system for each ticket issued to have a unique reference number.
L.4.1.3	Security of unclaimed prize data	The organization shall implement technical and procedural controls to ensure the confidentiality, integrity, and availability of unclaimed prize data. This includes as a minimum, but is not limited to, files containing information on specific transactions yet to be claimed and any validation files. Specific consideration shall be given to access control to restrict access to the data, monitoring of user interaction with the data, and a process for dealing with unauthorized access or export of the data.	CONSOLIDATED	L.4.2.2 L.4.2.5	The organization shall establish a procedure specifically related to the protection of unclaimed prize money and data files containing information relating to the payout status of each game, the specific transactions yet to be claimed and the validation files. The procedure shall confirm that access control be strict and limited to that required in respect of records of unclaimed prizes.
L.4.1.4	Prize payout procedure	There shall be a prize payout procedure that defines a maximum prize claim period; includes a process to audit final transfers upon game settlement; details the rules and due diligence required prior to making a decision on payout for a lost, stolen or damaged ticket; details the procedure with regard to inquiries into the validity of claims; and a procedure with regard to late or last minute payouts.	CONSOLIDATED	L.4.2.3 L.4.2.4	The procedure shall cover the entire prize payout period as well as the auditing of the final transfers upon game settlement. The procedure shall confirm the rules covering ticket validity time, payout on lost and defaced tickets, inquiries into the validity of claims and late or last minute payouts.

	L.4.1.5	Fraud detection	There shall be adequate audit records kept and reviewed as part of the prize payout procedure to identify unusual patterns of late payouts and any claims made by retailers or personnel that might require investigation.	CONSOLIDATED	L.4.2.6 L.4.2.7 L.4.2.8 L.4.2.9	The procedure shall confirm a reporting process in case of unauthorized access attempts. The procedure shall confirm an escalation process for any incident or suspicious activity. The procedure shall confirm that unclaimed prize money is secured. The procedure shall confirm audit trails are able to identify unusual patterns of late payouts.
	L.5.1 Digital gaming systems Objective: To protect the confidentiality, integrity and availability of digital gaming systems in order to protect gaming and player data.					
	L.5.1.1	Layered systems architecture	The organization shall provide a layered approach to security within the digital gaming systems architecture to ensure secure storage and processing of data.	NOT CHANGED	L.6.1.1	The organization shall provide a layered approach to security within the digital gaming systems architecture to ensure secure storage and processing of data.
	L.5.1.2	Active and passive attacks	Appropriate measures shall be in place to detect, prevent, mitigate and respond to common active and passive technical attacks. The organization shall also have agreed patching policies for digital gaming systems, whether developed and supported in house or by a third party.	MODIFIED	L.6.1.2	Appropriate measures shall be in place to detect, prevent, mitigate and respond to common active and passive technical attacks. The organization shall have established procedure to gather cyber threat intelligence and act on it appropriately. The organisation shall also have agreed patching policies for digital gaming systems, whether developed and supported in house or by a third party.
	L.5.1.3	Network segregation	Production databases containing player or transaction data shall reside on networks separated from the servers hosting the web pages.	NOT CHANGED	L.6.1.3	Production databases containing player or transaction data shall reside on networks separated from the servers hosting the web pages.
	L.5.1.4	Session information	The user session identifier shall always be created randomly, in memory, and shall be removed after the user's session has ended.	NOT CHANGED	L.6.1.4	The user session identifier shall always be created randomly, in memory, and shall be removed after the user's session has ended.
	L.5.1.5	Identify points of ingress and egress	All entry and exit points to open public network systems shall be identified, managed, monitored and controlled. The organization shall monitor all its digital gaming systems in order to prevent, detect, mitigate, and respond to cyberattacks.	NOT CHANGED	L.6.1.5	All entry and exit points to open public network systems shall be identified, managed, monitored and controlled. The organization shall monitor all its digital gaming systems in order to prevent, detect, mitigate and respond to cyber-attacks.
	L.5.1.6	Generation and storage of logs	Predefined security logs shall be generated and retained for a predefined period of time on each sensible system component in order to monitor and rectify anomalies, flaws, and alerts.	MODIFIED	L.6.1.6	Logs shall be generated on each sensible system component in order to monitor and rectify anomalies, flaws and alerts. All logs shall be stored in order to be presented as evidence in the jurisdiction the lottery operates.
	L.5.1.7	Security testing	There shall be appropriate security testing on major system changes. Regular intrusion testing that attempts to identify and exploit vulnerabilities or other system weaknesses shall be performed at minimum on an annual basis.	MODIFIED	L.6.1.7	There shall be appropriate security testing on major system changes. Regular intrusion testing that attempts to identify and exploit vulnerabilities or other system weaknesses shall be performed.
	L.5.1.8	Responsible disclosure	The lottery operator shall have in place a Responsible Disclosure Policy for the disclosure of security vulnerabilities by the public to the lottery.	NEW		
	L.5.2 Player account Objective: To protect the player and to manage the risk of fraud and money laundering.					
L.5 Digital sales channels and interactive services	L.5.2.1	Player account	There shall be a formal process for identification, authentication and authorization of a player. Both player data and the wallet shall be considered as critical assets for the purposes of risk assessment.	NOT CHANGED	L.6.2.1	There shall be a formal process for identification, authentication and authorization of a player. Both player data and the wallet shall be considered as critical assets for the purposes of risk assessment.
	L.5.2.2	Multiple player accounts	There shall be reasonable measures put in place to ensure each player only holds one active account.	MODIFIED	L.6.2.2	There shall be an established procedure for the use of multiple player accounts whenever this does not exist only one account per player shall be allowed.
	L.5.2.3	Player exclusion	There shall be an established process for excluding players in accordance with local applicable laws and/or internal procedures.	NOT CHANGED	L.6.2.3	There shall be an established process for excluding players in accordance with local applicable laws and/or internal procedures.
	L.5.2.4	Multiple payment instrument holder	There shall be an established procedure, in accordance with local applicable laws, for assuring the ownership of the payment instrument with the identity of the player so as to avoid fraud and money laundering.	MODIFIED	L.6.2.4	There shall be an established procedure for assuring the match of ownership between the payment type holder and the payer account holder
	L.5.3 Game design and approval Objective: To ensure that game designs meet legal and regulatory requirements and are authorized at the appropriate level before going live.					
	L.5.3.1	Documented game procedures	Established rules shall cover design and development. In addition, game rules shall be accessible by players.	NOT CHANGED	L.6.3.1	Established rules shall cover design and development. In addition, game rules shall be accessible by players.
	L.5.3.2	Game approval and modification	An approval procedure shall be defined to validate that every new game and relevant modifications on the digital gaming systems are controlled. Final game design shall be formally approved through a process involving the Security Function.	NOT CHANGED	L.6.3.2	An approval procedure shall be defined to validate that every new game and relevant modifications on the digital gaming systems are controlled. Final game design shall be formally approved through a process involving the Security Function.
	L.5.4 Securing payment methods Objective: To protect payments methods against fraudulent uses.					
	L.5.4.1	Data collection	Collection of sensitive data directly related to payment shall be limited to only the data strictly needed for the transaction.	NOT CHANGED	L.6.4.1	Collection of sensitive data directly related to payment shall be limited to only the data strictly needed for the transaction.
	L.5.4.2	Payment method protection	Adequate measures shall be taken in order to protect any type of payment used in the system from fraudulent use.	NOT CHANGED	L.6.4.2	Adequate measures shall be taken in order to protect any type of payment used in the system from fraudulent use.
	L.5.4.3	Payment service approval	The organization shall verify that the payment service ensures the protection of the player data, including any personally identifiable information given by the player or payment related data.	NOT CHANGED	L.6.4.3	The organization shall verify that the payment service ensures the protection of the player data, including any personally identifiable information given by the player or payment related data.
	L.5.4.4	Transactional records related to payments	The organization shall generate all transactional records of player accounts. The data recorded shall allow the organization to trace a single financial activity of a player from another transaction.	NOT CHANGED	L.6.4.4	The organization shall generate all transactional records of player accounts. The data recorded shall allow the organization to trace a single financial activity of a player from another transaction.
	L.6.1 Selecting the offer Objective: To ensure the integrity of a betting offer.					

L.6 Sports betting	L.6.1.1	Betting framework	The framework in which the organization offers sports betting and the according rules shall be defined, maintained, and published, including but not limited to, all authorized sporting event types and betting types for each sport.	CONSOLIDATED	L.7.1.1 L.7.1.2 L.7.1.3 L.7.1.4	A list shall be maintained of authorized sporting event types offered for betting. Maintain a list of authorized betting types for each sport offered. Maintain a list of betting types per game type. Specific procedures shall be implemented in the case of nonprofessional events. Maintain and make publicly available: 1) The terms of the betting offer. 2) The principles of how events are selected, how odds are set and revised based on published information and ethical rules and criteria.	
	L.6.2 Events, odds and result management Objective: To assure the integrity of events and their corresponding odds.						
	L.6.2.1	Events, odds and result management	Procedures regarding the selection of the events and for setting and updating the odds, betting margins and/or blocking events as well as for receiving the results from reliable sources shall be established. A process shall exist for validating accuracy and preventing fraudulent activities. The procedures shall be based on the respect of integrity, responsible gaming, and ensuring transparency.	CONSOLIDATED	L.7.2.1 L.7.2.2 L.7.2.3 L.7.3.1 L.7.3.2	A procedure to select events based on the authorized events list shall be established to assure the integrity of the offering. There shall be established procedures for setting and updating the odds and/or blocking events, taking into account market forces. A process shall exist for validating accuracy and preventing fraudulent activities. The procedures shall be based on respect of integrity, responsible gaming, and ensuring transparency. Authorized levels for the margin of each bet type shall be documented and approved. There shall be a policy for the confirmation of results based on qualified and approved sources, before publicly announcing results and declaring winners. A backup record of all results shall be kept and identified as a critical asset.	
	L.6.2.2	Live betting	There shall be documented procedures to assure and monitor the integrity of the live bet offering, the results handling and customer protection. Indicative areas for consideration in the procedure for results handling shall include, but not be limited to, time delays, sources of results, and reversal of results. The procedures shall also account for courtsiding prevention mechanisms including but not limited to a delay in live pictures.	CONSOLIDATED	L.7.5.1 L.7.5.2 L.7.5.3	There shall be established procedures to assure and document the integrity of the live bet offering. There shall be established procedures to assure and document the integrity of results during the live bet offering. Indicative areas for consideration are time delay, sources for results, reversal of results, etc. Ensure customer protection and fraud/integrity protection through the provision of a safety mechanism to account for delay in live pictures.	
	L.6.2.3	Sareguarding payout levels	The organization shall establish a set of measures to ensure authorized payout levels are not exceeded.	NOT CHANGED	L.7.2.4	The organization shall establish a set of measures to ensure authorized payout levels are not exceeded.	
	L.6.3 Monitoring for fraud and money laundering Objective: To ensure actions to minimize the risk of fraud and/or money laundering.						
	L.6.3.1	Monitoring the sports betting activities	Procedures shall be established to monitor all changes to odds and/or blocking throughout a sports event, monitoring of the market, events and customer transactions for the detection of irregularities, monitoring of winners over a certain amount of gains, and deposits over a certain size. The procedures shall also specify thresholds of payment and methods of collection. The established procedures must be in compliance with the laws of the jurisdiction within which the certifying member is domiciled.	CONSOLIDATED	L.7.4.1 L.7.4.2 L.7.4.3 L.7.4.4 L.7.4.5 L.7.4.6	A procedure shall be established to monitor all changes to odds and/or blocking throughout a sports event. A procedure shall be established to monitor the market and detect events and/or odds irregularities. There shall be procedures in place to detect betting irregularities, including regional patterns. In case of detection a process shall be in place to notify the regulatory authority and if necessary the relevant sport governing body. A procedure shall be established specifying thresholds of payment and methods of collection Subject to applicable laws, a procedure shall be established to monitor winners over a certain amount of gains. Establish a level above which deposits of a certain size are monitored.	
	L.7.1 Video Lottery Terminals (VLT) Objective: To ensure secure operation of all VLT terminals no matter which system design or operating models.						
	L.7 Interactive Video Lottery Terminals	L.7.1.1	VLT terminals	VLT terminals shall be monitored concerning security and prize payout percentage.	NOT CHANGED	L.8.1.1	VLT terminals shall be monitored concerning security and prize payout percentage.
		L.7.1.2	VLT games	The game-rules and overall prize-payout percentage shall be available to the customer.	NOT CHANGED	L.8.1.2	The game-rules and overall prize-payout percentage shall be available to the customer.
L.7.1.3		VLT game certificate	Dedicated games for VLT shall be tested and a certificate to provide evidence of integrity and prize-payout has to be maintained/issued.	NOT CHANGED	L.8.1.3	Dedicated games for VLT shall be tested and a certificate to provide evidence of integrity and prize-payout has to be maintained/issued.	
L.7.1.4		VLT incidents	There shall be documented procedures to handle dispute or protest from customer regarding a win or loss.	NOT CHANGED	L.8.1.4	There shall be documented procedures to handle dispute or protest from customer regarding a win or loss.	
L.7.1.5		VLT system architecture	The organization shall maintain a description of the overall VLT system architecture, including security measures, to ensure the integrity of the VLT game, secure storage and processing of data.	NEW			



REF. NUMBER WLA-SCS:2020	CONTROL NAME	CONTROL DESCRIPTION WLA-SCS:2020	STATUS	WLA-SCS:2016
S.1.1 Gaming system application security development Objective: To ensure lottery systems are secure by design.				
S.1.1.1	Application development security policy	The lottery technology supplier shall have a policy on application security across the software development lifecycle.	NEW	
S.1.1.2	Static and dynamic code analysis	The lottery technology supplier shall perform static and dynamic code analysis and provide a summary of the output to the operator along with the release notes for their product for the first release and any subsequent significant release into a production environment.	NEW	
S.1.1.3	Security testing	The lottery technology supplier shall perform security testing of their products and/or services, hosted and configured in a way that is representative of how it will be deployed in a production environment by the operator. It shall provide a summary of the output to the operator along with the release notes for their product for the first release, and any subsequent significant release into a production environment.	NEW	
S.1.1.4	Secure coding practices	The lottery technology supplier shall define and require its developers to follow a set of secure coding practices and put in place measures to audit the effectiveness and compliance of those practices.	NEW	
S.1.1.5	Secure coding training and awareness	The lottery technology supplier shall have a training and awareness program on secure coding practices for all developers that write code for gaming systems (as defined in this standard).	NEW	
S.1.2 Integrity measures related to the development of gaming system hardware, software, and firmware Objective: To ensure integrity of lottery technologies.				
S.1.2.1	Release process integrity checks	The lottery technology supplier shall provide assurance over the integrity of their developed software / firmware at each stage of the development process, including as a minimum but not limited to, during the quality assurance process and also as the software / firmware is deployed into the production environment.	NEW	
S.1.2.2	Security logging	The lottery technology supplier shall ensure adequate security logging is provided from their developed software / firmware that can be integrated by a security team into their security toolsets to ensure the integrity of the lottery software/firmware. The lottery technology supplier shall provide the security team with a document that details how to interpret and understand the security logging.	NEW	
S.1.2.3	File integrity	The lottery technology supplier shall identify and document critical files in their product in order for the lottery operator to verify the integrity of the production environment.	NEW	
S.1.2.4	Hardware integrity	The lottery technology supplier shall put in place measures to allow for the identification of unauthorized attempts to add or modify the gaming system hardware that could impact the integrity of the lottery system. In this context hardware includes as a minimum, but is not limited to, video lottery terminals, lottery point of sale equipment, and random number generators. The exact list of hardware to which this control applies is to be determined through risk assessment. Hardware provisioned and hosted by an infrastructure as a Service provider will be exempt from this control requirement.	NEW	
S.1.2.5	Vulnerability and patch management	The lottery technology supplier shall ensure there is a process through which updates to software / firmware and any third-party code libraries used can be applied in a timely manner. Whether or not patches are pushed to production gaming systems is a decision to be determined via risk assessment, with consideration of the lottery operator's vulnerability and patch management policy and taking into account any commercial considerations.	NEW	
S.1.2.6	Responsible disclosure	The lottery technology supplier shall have a Responsible Disclosure Policy that is available to all those who have purchased their products or services, for the disclosure of security vulnerabilities in their gaming system products.	NEW	
S.1.3.1 Physical instant game requirements Objective: To align lottery requirements to supplier specification.				
S.1.3.1.1	Instant game requirements	The supplier shall formally validate requirements with the lottery and translate those requirements into specifications; any change in the specifications shall follow both supplier's and lottery's change management process.	CONSOLIDATED	L.1.2 Instant ticket printing L.1.2.1: The organization shall provide the printer/supplier with a detailed game specification and detailed security requirements. L.1.2.2: Security requirements shall include a requirement for the supplier/printer's internal quality assurance function. L.1.2.3: Security requirements shall include validation numbers that employ encryption techniques. L.1.2.4: Security requirements shall include validation files and winner information to be stored using encryption techniques. L.1.2.5: Checks of random samples of ticket packs for each game shall be carried out to ensure that games conform to the tolerances set out in the organization's specification. L.1.2.6: Security requirements shall include that after the first print run and before launch, inventory and validation data is provided to the appointed organization's security or quality assurance function for acceptance testing.
S.1.3.2 Creating and validating the data Objective: To ensure that instant game programming matches requirements and is kept secured.				
S.1.3.2.1	Instant game data generation	The randomization process used for the generation of instant game data is subject to the application of WLA-SCS L.2.4 electronic lottery draws and instants controls and the requirements agreed between the operator and supplier.	CONSOLIDATED	L.1.3 Shipment of instant tickets L.1.3.1: Shipping requirements shall specify that a complete shipping manifest shall be sent to the organization before a consignment is dispatched. L.1.3.2: The organization shall ensure that the shipment process in accordance with an agreed (either through a direct agreement or through an agreement with the supplier) method of transportation that is not to be varied without the authority of the organization. L.1.3.3: Shipping containers shall be sealed and seal numbers recorded on manifests.
S.1.3.2.2	Game data validation	The supplier shall ensure that an independent team validates logical game data against lottery requirements. Reports with results shall be made available to the lottery.	CONSOLIDATED	L.1.4 Storage and distribution of instant tickets L.1.4.1: A procedure shall be established to provide for authorized personnel to inspect instant ticket storage facilities at least annually. L.1.4.2: Each consignment of instant tickets shall be formally verified on arrival. L.1.4.3: An arrival verification procedure shall ensure that seal numbers are correct and that the security of the container has been maintained. L.1.4.4: The verification outcome shall be documented and in case of non-conformities and/or irregularities action shall be taken to determine whether the security of a consignment has been compromised. L.1.4.5: A control system shall be in place to account for packs of instant tickets from the time they arrive at the organization's storage facilities to the time they arrive at the retailer.
S.1.3.2.3	Data confidentiality	The supplier shall ensure that access to validation data is restricted at all times, even after instant game delivery, in conformity with the principle of least privilege.	CONSOLIDATED	L.1.5 Retailer security – instant tickets L.1.5.1: The organization shall require retailers, either via contract or other means, to validate the integrity of packages of instant tickets on receipt and to confirm that they have received a particular consignment of tickets. L.1.5.2: Upon receipt confirmation, the tickets shall be formally recorded as having been issued to that retailer. L.1.5.3: The organization shall provide retailers with instructions regarding prize claim payout, ticket validation, instant ticket handling and storage, reporting of security issues, and the handling of lost and stolen tickets. L.1.5.4: The organization shall provide and document training for retailers to enable them to meet the security requirements for handling instant tickets.
S.1.3.3 Printing Objective: To ensure integrity features in the printing process.				
S.1.3.3.1	Validation before printing	The supplier shall formally validate the final visuals and texts with the lottery before printing tickets.	CONSOLIDATED	
S.1.3.3.2	Integrity checks	The supplier shall perform integrity audits on tickets on a regular basis.	CONSOLIDATED	
S.1.3.4 Finishing Objective: To ensure conformity with prize structure and to guarantee ticket integrity during shipment.				
S.1.3.4.1	Unique ticket reference number	Provisions shall be made for each ticket delivered to have a unique reference number.	CONSOLIDATED	L.1.6 Instant game closures L.1.6.1: The organization shall establish a game closure procedure to be used in the closing of an instant game. L.1.6.2: The method and timing of informing retailers of a game closure and the collection of unused tickets shall be established and documented. L.1.6.3: A procedure to be used to balance game tickets held in storage and by retailers shall be established. L.1.6.4: Requirements for audit checks of instant ticket stock shall be established and documented. L.1.6.5: Parties authorized to close a game and/or destroy tickets shall be formally defined.
S.1.3.4.2	Prize structure conformity	The supplier shall provide evidence that in each printing lot they have supplied the correct number of tickets in accordance with the required prize structure.	CONSOLIDATED	
S.1.3.4.3	Scrapped tickets	There shall be a documented procedure to ensure that undelivered printed tickets are securely destroyed.	CONSOLIDATED	

S.1.3.4.4	Shipping security	The supplier shall ensure that ticket delivery between the supplier and the lottery is secured.	CONSOLIDATED	The supplier shall ensure that ticket delivery between the supplier and the lottery is secured. L1.6.6: The method and control of ticket destruction shall be established.
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STATUS	DESCRIPTION
NOT CHANGED	The control has not been changed compared to the WLA-SCS:2016
MODIFIED	The control has been changed compared to the WLA-SCS-2016
CONSOLIDATED	The control combines two or more controls from the WLA-SCS:2016. In some cases it includes also some adaptations/changes
NEW	The control was not present in the WLA-SCS:2016