eCOGRA Publicly Available Information for ISO/IEC 27001 Certification

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1. ISO/IEC 27001 CERTIFICATION PROCESS INFORMATION

1.1 Introduction

This document explains the eCOGRA publicly available process and requirements for ISO/IEC 27001 certification audits. It is intended to provide Clients and interested parties with clear information on the certification process, use of certification logos, complaints and appeals, liability, witnessed audits, and eCOGRA's commitment to impartiality. The document also follows the accreditation requirements of ISO/IEC 17021.

Details of the accredited scope held by eCOGRA are available on the website. Should additional information be needed, a request can be sent to eCOGRA (info@ecogra.org).

eCOGRA undertakes the audit, evaluation and certification of the Information Security Management System operated by the Client. The Client must agree to supply all necessary information to eCOGRA.

1.2 Personnel

All staff members of eCOGRA are required to sign confidentiality agreements relating to all confidential information to which they may be exposed at the Client's premises and remotely.

The Client has the right to object to the inclusion of any auditor on the eCOGRA Audit Team if the Client perceives a conflict of interest. The Client may raise an objection to eCOGRA, who will review the potential impartiality threat and take necessary actions.

1.3 Certification Contract

On receiving a completed application for certification from the Client, as provided by eCOGRA, eCOGRA will prepare a Proposal for Certification detailing audit cost, terms, conditions, and requirements. On acceptance of the proposal, the Client will sign the proposal and forward it to eCOGRA.

1.4 Audit Methodology

The first stage of the audit to be performed by eCOGRA is the Stage 1 Audit, comprising a review of the Client's documentation with respect to the ISO/IEC 27001 standard. This is to be performed onsite at the Client's premises and/or remotely in conjunction with the Client's management representative.

On satisfying the eCOGRA auditor of the suitability of the documentation and site requirements (if applicable), a Stage 2 Audit date will be agreed upon and an onsite audit carried out by the eCOGRA Audit Team.

During the ISO/IEC 27001 audit, the audit team will gather information relevant to the audit's objectives, scope, and criteria. This includes information about how different functions, activities, and processes interact. The information will be collected using appropriate sampling methods and then verified so it can be relied on as audit evidence.

If further onsite visits are required due to non-compliances found, these will be undertaken, and an extra charge may be incurred by the Client for work conducted outside of the previously agreed-upon scope and timetable.

1.5 Certification

On completion of the Stage 2 Audit, the Audit Team Lead reports the findings to the eCOGRA Certification Committee. Upon receiving a report stating that the Client's Information Security Management System meets the ISO/IEC 27001 requirements and after approval by the eCOGRA Certification Committee, the certificate is issued to the Client.

The certificate remains the property of eCOGRA. Providing the Client maintains the Information Security Management System to the ISO/IEC 27001 standard, the certificate is valid for three years.

Following certification, if the Client alters anything which significantly affects the presently certified scope, then eCOGRA must be informed of this by the Client. eCOGRA will determine if additional audit procedures are necessary and reserves the right to perform additional audit work in this respect.

1.6 Surveillance

After the issue of a certificate, in order to maintain the certification, Stage 3 Surveillance Audits will be carried out at the Client's premises at least once per year in years 2 and 3. If areas of concern are identified, more visits may be carried out.

The first Surveillance Audit (Stage 3) must be completed within twelve months from the date as indicated on the ISO/IEC 27001 certificate issued, after the conclusion of the Stage 2 Audit. With the second Surveillance audit following the next year. Failure to comply with the requirement may lead to the suspension of certification.

The Client must, without delay, notify eCOGRA of any changes that could affect its ability to continue meeting the requirements of ISO/IEC 27001. eCOGRA will review the information provided and take appropriate action, which may include additional assessment or audit activities where necessary.

1.7 Extension to the Scope of Certification

This may be applied for in the same way as the initial Stage 1 and Stage 2 Audits, indicating the increased scope of certification being required, and an audit will be carried out in the areas not previously audited. If successful, a new certificate indicating the new, revised scope will be issued by eCOGRA. There will be a charge for extensions to the scope and re-issue of the certificate.

1.8 Short Notice Audits

eCOGRA may, when necessary, conduct short notice audits to investigate complaints, or in response to changes, or as a follow-up to the suspension of the Client.

1.9 Reduction in Scope of Certificates Issued

eCOGRA shall, where applicable, reduce the scope of certification if, during the conduct of routine Stage 3 Surveillance Audits, it determines that the certified Client has continually failed to meet the certification requirements for particular parts of the scope of certification. The reduction in scope will be approved by the eCOGRA Certification Committee.

1.10 Publicity and Certificate Misuse

Once a certificate has been issued, the Client has the right to publish the fact that it is ISO/IEC 27001 certified. The relevant certification marks and logos may be used on the Client’s stationery relating only to the audited scope of certification and the relevant part of the standard. All rules for the use of the certification mark and logo need to be followed. (Refer to Section 3 of this document)

eCOGRA will take all reasonable steps to ensure that there is no misuse of the certificate in Client advertising, etc.

Certification of the Information Security Management System is not a statement by the certification body guaranteeing that the product or services actually meet any specific requirements. Certification also does not imply a view on the specification of a product or service. It does not guarantee a good product or service.

1.11 Appeals Procedure

If, for any reason, a Client is not in agreement with the Audit Team Lead's recommendation following an audit, including suspension or withdrawal of a certificate, the Client may lodge an appeal with eCOGRA through the contact email channel designated by eCOGRA for ISO/IEC 27001 certification appeals (27001certificationcommittee@ecogra.org).

All appeals will be held in the presence of the eCOGRA Certification Committee, excluding any certification committee members involved in the decision process. The eCOGRA Certification Committee will hear evidence from the Client's representative and the relevant Audit Team Lead. The decision of the eCOGRA Certification Committee is final and binding on both the Client and eCOGRA. No counterclaims will be allowed by either party. No costs, for whatever reason, will be allowed for either party as a result of an appeal. Expenses of the appeal will be met in full by the party who has the decision against them.

1.12 Complaints against eCOGRA Personnel

If a Client has a complaint regarding any employee of eCOGRA, this should be addressed through an email to eCOGRA (27001certificationcommittee@ecogra.org). The outcome communicated to the complainant must be decided by, or reviewed and approved by, an individual or individuals who were not previously involved in the matter being complained about. The complaint shall be handled according to eCOGRA's defined complaint handling process.

1.13 Complaints against eCOGRA Certified Clients

If any interested party has a complaint against an eCOGRA-certified entity, this should be sent to eCOGRA via mail to the company's Head Office or via email (27001certificationcommittee@ecogra.org). The complaint shall be handled according to eCOGRA's defined complaint handling process.

1.14 Liability

To the extent permitted by applicable law, neither eCOGRA nor any of its servants or agents warrants the accuracy of any audit, review, information, certification, service or advice supplied. Except as stated in this document, neither eCOGRA nor any of its servants or agents shall be liable for any loss, expense or damage, however so sustained by any company, Client, or person, due to any act whatsoever taken by eCOGRA or its servants or agents, save to the extent that any attempted exclusion of liability would be contrary to law.

1.15 Accreditation Body (UKAS) Witnessed Audits

It is a condition of the rules of certification that all eCOGRA certificated entities should, if requested, allow Accreditation Body (UKAS) auditors to visit the Client premises and/or witness eCOGRA staff performing audits. Failure to allow this may jeopardise the Client's certification.

eCOGRA reserves the right to change the certification process where necessary, including to reflect changes in applicable standards, accreditation requirements, or eCOGRA procedures without prior notification.

2. ISO/IEC 27001 AUDIT PROCESS

2.1 Initial Certification - Stage 1 Audit

The Stage 1 Audit is conducted by the eCOGRA Auditor(s) on site to determine if the Client's Information Security Management System has met the minimum requirements of Clauses 4 to 10 of the ISO/IEC 27001 standard and is capable of proceeding to the Stage 2 Audit for the main certification assessment.

The Stage 1 Audit is an assessment of the Client's Information Security Management System documentation and identification of key procedures and processes to determine the level of implementation of the Information Security Management System.

The scope of the Stage 2 Audit will be finalised following completion of Stage 1 and may be subject to change and differ from the initial planning and preparation communicated to the Client for Stage 2. The scope of Stage 2 will be based on the Stage 1 results obtained by the eCOGRA Audit Team, as further information may have been acquired during Stage 1 that was not evident from the certification application initially submitted by the Client to eCOGRA.

A written report based upon the findings of the Stage 1 Audit will be produced by eCOGRA. The report shall include a recommendation from the Audit Team Lead for proceeding to the Stage 2 Audit. If the Audit Team Lead recommends that the Client does not progress to Stage 2 due to major non-conformities being identified, as agreed with the Client, the Audit Team will be required to conduct a follow-up Stage 1 Audit. In the event of this scenario, eCOGRA may also charge separately at eCOGRA's standard hourly rate due to the increased workload.

Should the recommendation to proceed to the Stage 2 Audit be positive, a date for Stage 2 will be mutually agreed in writing between the Client and eCOGRA

2.2 Initial Certification - Stage 2 Audit

On the date agreed between the parties for the start of Stage 2, an audit of the operating effectiveness of Clauses 4 to 10, as well as the design, implementation, and operating effectiveness of the Annex A controls selected by the Client, shall be performed by the eCOGRA Audit Team.

A report will be produced by eCOGRA, based on evidence obtained and evaluated from discussions, samples of information/evidence made available, and walk-through procedures performed by the eCOGRA Audit Team.

Following the completion of both Stages 1 and 2, the Client may be certified for compliance with the ISO/IEC 27001 standard or will be required to remediate non-conformities to achieve compliance. Subsequent to the non-conformities being remediated (if applicable), eCOGRA's ISO/IEC 27001 Certification Committee will make a decision on granting certification to the Client, and if positive, issue the certification to the Client.

2.3 Surveillance Audits (First and Second Years)

In order to ensure continued compliance with the ISO/IEC 27001 standard, until expiry of the certification at the end of the three-year certification cycle, the Client will be required to have annual Surveillance Audits performed by the eCOGRA Audit Team during the first and second years post certification. The timing of the Surveillance Audits will be mutually agreed prior to the anniversary of the Client's initial certification award date.

On completion of the audit work in each of the abovementioned audits, the eCOGRA Audit Team Lead will prepare and deliver a comprehensive audit report detailing the findings of the relevant audit work conducted for each audit.

Prior to the expiry of the certification at the end of the three-year certification cycle, the Client shall undergo a full Recertification Audit and will be required to sign a new proposal with eCOGRA for such re-certification (unless the Client elects to discontinue using eCOGRA as its certification body).

The purpose of the Recertification Audit is to confirm the continued conformity and effectiveness of the Information Security Management System as a whole, and its continued relevance and applicability for the scope of certification.

Recertification will take into consideration the performance of the Information Security Management System over the period of prior certification, including the results of previous Surveillance Audits.

3. USE OF CERTIFICATION LOGOS

eCOGRA has defined rules governing the use of certification logos and statement that the certified Client has a certified management system. All statements shall include reference to:

- identification (e.g. brand or name) of the certified Client;
- the type of management system (i.e. information security) and the applicable standard (i.e. ISO/IEC 27001); and
- the certification body issuing the certificate (i.e. eCOGRA).

eCOGRA requires, through its agreement (legally) and rules, that the certified Client organisation shall:

- Conform to the requirements of eCOGRA when referring to its certification status in communication media such as the internet, brochure, advertising or other documents;
- Ensure that there is no ambiguity in the certification logo or accompanying text as to what has been certified and that eCOGRA has granted the certificate;
- Not modify the form or colour of the certification logo provided by eCOGRA;
- Ensure that reproduction of the certification logos is based on master versions supplied at the time of certification by eCOGRA;
- Ensure that certification logos have a minimum height of 20 mm. Any enlargement or reduction shall retain the same proportions as those of the master versions. In exceptional circumstances, which are usually dictated by reasons of space limitation or cost, the logos may be reproduced at a reduced height, provided that, irrespective of the height of reproduction, the certification logos must be legible, with no infilling.
- Ensure that when electronic certification logos are reproduced (including internet websites), the requirements of this document are met and the certification logos link through to the electronic certificate hosted on the eCOGRA servers;
- Utilise the appropriate logos in the manner prescribed in this document on stationery, publicity material or other items relevant to the certification;
- Ensure that the requirements of this document are met when displaying certification logos on internal walls and on exhibition stands;
- Utilise the correct terminology in marketing material in order to add credibility. Do not use the term “ISO certification” in marketing materials; instead, use the actual standard and correct publication date of the standard: “ISO/IEC 27001:*2022*”;
- Specify the scope of certification in press releases or other marketing materials (for example, “*[Client name]* announces that its *[site name]* facility is now certified to [*ISO/IEC 27001:2022*] for the systems and processes supporting the provision of online gambling products and services”). If all sites or processes are not covered by your certification, don’t mislead the public into thinking it applies to all of them;
- Inform eCOGRA prior to publishing if you wish to mention eCOGRA by name in a press release (for example, “*[Client name]* announces it has received ISO/IEC 27001*:2022* certification from eCOGRA”). eCOGRA may want to review the content for technical accuracy.
- Not apply the certification logo to any laboratory test, calibration, inspection reports or certificates;
- Not make or permit any misleading statement regarding its certification;
- Not use or permit the use of a certification document or any part thereof in a misleading manner;
- Not utilise certification logos in any way that might mislead the reader about the certification status;
- Not utilise certification logos in such a way as to suggest that eCOGRA has certified, or approved, any service supplied, or in any other misleading manner;
- Not utilise certification logos in such a way as to imply responsibility for activities carried out under the scope of certification;
- Not imply that the certification applies to activities and sites that are outside the scope of certification;
- Discontinue the use of all advertising materials, stationery, websites, etc. that contain a reference to certification upon suspension or withdrawal of its certification, as directed by eCOGRA;
- Amend all advertising matter and the use of certification logos when the scope of certification has been reduced or changed;

- Not allow reference to its management system certification to be used in such a way as to imply that eCOGRA certifies a product (including services). eCOGRA certifies your management system, not your product. When in doubt, ask eCOGRA to review your proposed application of the certification logo; and
- Not use its certification in such a manner that would bring eCOGRA and/or the certification system into disrepute and cause loss of public trust.

This is a non-exhaustive list which may be updated from time to time.

The use of certification logos shall be checked during each surveillance audit. Any incorrect references to certification status or misleading use of certification documents, logos or audit reports shall be referred to eCOGRA's Certification Committee for further action. The action may include requests for correction and corrective action, suspension, withdrawal of certification, publication of the transgression and, if necessary, legal action. Clients are notified of the actions that may be taken should the Client transgress the rules of certification outlined in this document. Any reported transgression of the use of certification logos will be treated as a complaint as per the eCOGRA Complaint and Feedback Handling Procedure.

4. POLICY ON IMPARTIALITY

Regulations and quality standards such as ISO/IEC 17020, ISO/IEC 17021-1, ISO/IEC 17025 and ISO/IEC 17065 require eCOGRA and its staff to act and conduct themselves in an independent and impartial manner while conducting Audits.

eCOGRA prides itself on its independence and integrity. eCOGRA's Chief Executive Officer (CEO), Senior Management and Staff are fully committed to ensuring that all assessment activities are impartial. It has a responsibility in ensuring that the work conducted by its employees demonstrates the highest possible standards of professionalism and is conducted impartially.

eCOGRA will ensure that employees are free from any undue internal and external commercial, financial, and other pressures and influences that may adversely affect the quality of their work; and to have policies and procedures to avoid involvement in any activities that would diminish confidence in eCOGRA's competence, impartiality, judgment, or operational integrity.

4.1 Objective Approach

Employees shall review and interpret data on Clients honestly, impartially, and in accordance with the approved eCOGRA audit principles and methodology. Employees shall not accept any inducement nor succumb to any pressure or manipulation from any source to assess Clients in any way other than objectively.

4.2 Equal Treatment of Clients

All Clients shall be reviewed in the same way following eCOGRA's review methodology and associated guidelines. Clients shall not be treated in a more favourable fashion due to any kind of special relationship with that Client.

4.3 Conformity Assessments

eCOGRA shall not provide conformity assessment services on an object where eCOGRA provides the object or has a user interest in the object. eCOGRA and its personnel shall not engage in any activities that may conflict with their independence of judgement and integrity in relation to conformity assessment activities[1]. In particular, eCOGRA and its employees shall not be engaged in, or be part of a legal entity that is engaged in or be linked to a separate legal entity engaged in, the design, manufacture, supply, installation, purchase, ownership, use or maintenance of the conformity assessment items.[2]

Conformity assessment activities are undertaken impartially and structured and managed in a way to safeguard impartiality. eCOGRA ensures that all staff and committees who are involved in the assessment activities are not exposed to commercial, financial, or other pressures that could compromise their impartiality and independence. To obtain and maintain independence, eCOGRA's decisions are based on objective evidence of conformity (or nonconformity) obtained, and its decisions are not influenced by other interests or by other parties.

eCOGRA does not offer or provide consultancy or internal audits to its Clients and is not marketed or offered as linked with the activities of an organisation that provides consultancy. eCOGRA shall not state or imply that conformity assessments would be simpler, easier, faster, or less expensive if a specified consultancy organisation were used.

[1] This does not preclude exchanging technical information between the Client and eCOGRA (e.g. explanation of findings or clarifying requirements or training).

[2] This does not preclude the purchase, ownership or use of conformity assessment items that are necessary for the operations of eCOGRA, or the purchase, ownership or use of the items for personal purposes by the personnel.

4.4 Additional guidelines specific to certification body assessments

eCOGRA shall not certify another certification body for its management system.

eCOGRA shall not certify a management system on which it, or any of its employees, provided an internal audit and/or management system consultancy for a minimum of 2 years following the completion of the internal audit and/or management system consultancy. Note that this does not preclude the possibility of exchange of information (e.g., explanation of findings or clarification of requirements) between eCOGRA and the Client.

eCOGRA shall not outsource audits or certification activities to any other external organisation or allow its certification activities to be marketed or offered as linked with the consultancy activities of any other organisation.

eCOGRA shall not pay any referral fees to any management system consultancy organisation.

The use of an individual or employee of another organisation, individually contracted to serve as an auditor or technical expert, does not constitute outsourcing. Individuals engaged by eCOGRA in this capacity shall be required to confirm in writing that they agree to comply with eCOGRA's Confidentiality, Independence and Integrity Policies