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Regulation
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Validity
1 March 2026 -

Legal basis
Gambling Act (10/2026) Section 44

Amends/Repeals
-

Target groups
-

Random checks in accordance with the Gaming Act.

Contents

1 Regulatory background, scope of application and definitions

1.1 Authority of the supervisory authority to issue orders

The supervisory authority's right to issue a binding order is based on Section 44(6) of the Gaming Act (10/2026). According to the aforementioned subsection, the supervisory authority may issue more detailed orders concerning the reliability of gaming systems, lottery devices and lottery methods used in the implementation of gambling, the technical requirements for ensuring the randomness of lottery results, the more detailed form and content of the investigation and approval carried out by the inspection body, and the conditions that the inspection body must meet in order for the authority to approve it.

According to Section 57 of the Gaming Act, the supervisory authority is the Licensing and Supervisory Authority. According to Section 106 of the Act, the National Police Board shall act as the competent authority referred to in Section 57 until 31 December 2026.

1.2 Legislation

The following regulations are relevant to the subject matter of this provision:

- Gambling Act (10/2026)
- Administrative Procedure Act (434/2003)

1.3 Scope

This regulation applies to legal persons or natural persons referred to in Chapter 1, Section 2, Paragraph 1 of the Gaming Act who have been granted an exclusive licence or a gaming licence under the Gaming Act.

Exclusive licences are provided for in Section 5 of the Gaming Act and gaming licences in Section 6.

1.4 Definitions

The following definitions are used in this regulation. In this regulation, the following terms have the following meanings

- an exclusive licence means a licence granted for the forms of gambling referred to in section 5 of the Gambling Act
- a gambling licence granted for the forms of gambling referred to in section 6 of the Gambling Act
- gaming system: an electronic information system used by or on behalf of a gambling operator in the operation of gambling

2 Accreditation of the inspection body

The licence holder is responsible for the reliability of the software or other components used to implement randomness and for conducting external audits to ensure reliability. The reliability and security assessment is carried out by an external accredited inspection body. The inspection body must be accredited in accordance with Regulation (EC) No 765/2008 of the European Parliament and of the Council setting out the requirements for accreditation and repealing Regulation (EEC) No 339/93.

Accreditation for inspection bodies may be granted by the national accreditation body FINAS (Finnish Accreditation Service). A foreign accreditation body may also act as an accreditation body if it is a member of the European Accreditation Organisation's Multilateral Recognition Agreement (EA MLA) in the relevant field of competence. The licence holder is obliged to ensure that the external body conducting the audit has valid accreditation.

3 Inspection body as the auditor

The reliability and authenticity of random components may be verified by an external inspection body accredited in accordance with ISO/IEC 17025, ISO/IEC 17065 or ISO/IEC 17020, as specified in section 2 of this regulation. The accreditation of the inspection body must be valid throughout the entire audit process. The licence holder is obliged to ensure that the accreditation of the inspection body it uses is valid.

The audit body conducting the audit and its employees must be competent to perform tests of randomness reliability and any checks on software code. The competence of the personnel used to carry out the audit must be demonstrated, for example, on the basis of the statistical methods required for assessing randomness or the expertise required for assessing software code, appropriate training and experience gained from randomness assessments and audits.

The audit body that carried out the audit must have a designated person in charge who is responsible for the implementation and final approval of the audit. The audit body is obliged to ensure that the audits it performs are carried out in accordance with the Gaming Act and this provision before the audit is approved and confirmed.

3.1 Area of competence

The accredited inspection body conducting the audit must have a scope of competence for gambling granted in its ISO/IEC accreditation. The scope of competence must cover the requirements set by Finnish gambling legislation and the technical regulations of the supervisory authority.

Until 1 January 2027, the supervisory authority may approve accreditation that includes a scope assessed and granted on the basis of the technical regulations issued for the Danish or Swedish gambling systems.

4 Conducting the audit

In accordance with Section 44(2) of the Gaming Act, the licence holder must submit to the supervisory authority a report produced by an approved inspection body on the reliability of the components used to generate randomness. The randomness audit does not examine the source code of the entire gaming system, but rather the source code of the randomness components and the interfaces that call them. The supervisory authority's approval of the report submitted is a prerequisite for the commencement of the operation of games of chance that utilise randomness. The licence holder is responsible for the costs of auditing the components and software used to generate randomness.

The audit body responsible for auditing randomness must select a statistical testing method that complies with industry standards and has been proven to be reliable for the statistical analysis to be carried out in connection with the audit. The method must be widely known, proven to be reliable and verifiable by the supervisory authority after the fact. When performing the statistical analysis, the auditing body must justify why it has decided to use the statistical testing method in question.

When auditing the components and software used to generate randomness, at least the source code of the software must be audited and the number of statistical testing methods necessary to achieve a reliable result must be performed. The source code does not need to be checked if randomness is not generated programmatically. If randomness is generated in the gaming system by means other than programmatically, the inspection body shall assess and present the necessary criteria on the basis of which the reliability and randomness of the component generating randomness has been verified.

As part of the audit, the auditing body must ensure that the randomness-generating components being audited are actually used as part of the gaming system to generate randomness. The auditing body may assess the actual use of randomness by randomly sampling the games available in the licence holder's gaming system at the time of the audit, checking that the games have an interface that uses the declared source of randomness. The auditing body is not obliged to monitor the use of randomness components outside the scope of the audit.

If more than one randomness-generating component is used in the licence holder's gaming systems, each of these components must be audited separately by an external auditing body. Each component used to generate randomness must be audited and approved before the gambling games that utilise it can be launched.

If seed numbers are used to generate randomness, the inspection body must verify that the generation of seed numbers is truly random, that it cannot be influenced externally, and that the number space used for selecting seed numbers is sufficiently large to generate reliable randomness.

During the audit, the inspection body must calculate and document the checksums of the software used to generate randomness and the related critical files. The documentation included in the report must clearly indicate which software components have been audited and which hashes have been generated from them. The report must also indicate the algorithm used to calculate the hash value so that the authority can use the report in any separate ex post control.

During the audit conducted by the audit body, it must also be ensured that provisions have been made for error situations involving random components. With regard to the handling of error situations, it must be verified that the licence holder has a documented process for situations where the primary source of randomness is not functioning. During the audit, it must be ensured that the error situation process can be considered generally reliable and that the backup procedure used in error situations cannot affect the randomness used in normal valuations.

During the audit, the inspection body must also ensure that the licence holder has a written procedure for change management of randomness components and the interfaces that call them. Change management shall include written documentation of changes to components that generate randomness and to the interfaces that call them.

4.1 Testing methods used in conducting the audit

The inspection body conducting the audit is responsible for the statistical testing methods it selects and uses, their reliability and their suitability for testing randomness. As part of the final written report, the audit body shall present the testing methods it has used and the reasons for their selection. The following methods, for example, may be used for statistical analysis:

- NIST SP 800-22 test suite
- Diehard or Dieharder test suite
- TestU01

The statistical testing methods listed above are examples of methods that the auditing body may use as part of the audit. The list is not exhaustive, and the audit body may also use other statistical methods of a similar level that it has selected. However, the statistical testing methods used must be internationally recognised and documented methods suitable for assessing randomness.

5 Renewal of the audit

The licence holder is obliged to notify the supervisory authority of its intentions to modify, update or replace the components or software used to generate randomness. Changes to the functionality or other operation of the components used to generate randomness require a new inspection of the components by an external inspection body. New components and software used to generate randomness must be inspected in accordance with the Gaming Act and this regulation before they are used in the operation of games of chance.

If components used to generate randomness or related call interfaces are updated or modified, but the changes do not affect the generation of randomness or functionality, no re-audit is required. However, the licence holder is obliged to notify the supervisory authority of this in writing.

If the components used to generate randomness have not been modified and thus re-examined within two years, the licence holder must carry out a new, more limited inspection of the components. In connection with the more limited inspection, the components used to generate randomness and the interfaces that call them can be inspected.
During the inspection, the checks calculated and reported in the previous audit are checked and compared with the checks calculated at the time of the inspection. The inspection can be approved if the checks match.

The audit body's assessment of the randomness of the components and software used to generate randomness may be valid for a maximum of five years. If more than five years have passed since the previous full audit in accordance with this regulation, the components and software used to generate randomness and the interfaces that call them must be re-audited in accordance with this regulation.

6 Existing certificates

The inspection body selected to carry out the audit may use existing certifications or certificates as part of the licence holder's audit when assessing gaming systems subject to a gaming software licence. If the inspection body utilises existing certificates or certifications for gaming systems subject to a gaming software licence, the inspection body must assess whether the certificate granted can be considered sufficiently reliable to guarantee randomness.

7 Audit report

The licence holder is obliged to submit a written report on the randomness audit to the supervisory authority, which must include at least the following information:

- Name of the licence holder who applied for the audit
- Name of the inspection body that carried out the inspection
- Persons who carried out the audit
- Person responsible for conducting the audit
- Components inspected during the audit
- Date of the inspection
- Technical methods used to assess randomness and reasons for their selection
- Explanation of the game types in which the randomness component inspected is used
- Hash of the inspected software and critical files enabling post-inspection
- Algorithm used to calculate the hashes
- Brief description of the licence holder's change management process for randomness components
- Final result of the audit
- Reasons for possible rejection

The report produced from the inspection must be approved and signed by the person appointed to be responsible for the audit. The person responsible for the audit carried out by the audit body may not approve the report if the assessment of randomness has not complied with the requirements of the Gaming Act or this regulation. Approval must be refused if the audit reveals facts that cast doubt on the reliability and genuine randomness of the randomness components of the equipment or systems being audited.

8 Follow-up inspections

In accordance with Section 44 of the Gaming Act, the supervisory authority may require the licence holder to provide a report on the drawing equipment and procedures used in the operation of games of chance. The supervisory authority may require a report on the checksums of the software used by the licence holder to generate randomness and compare them with the checksums submitted in connection with the audit. The supervisory authority must be able to verify that the software used to generate randomness has not been modified without authorisation after the audit.

In accordance with Section 46 of the Gambling Act, the supervisory authority may verify the reliability of the systems via a remote connection if the licence holder's gaming systems or lottery equipment are located outside Finland and the supervisory authority does not have a cooperation agreement with the authority supervising gambling in that country. The supervisory authority may use a remote connection to check whether the components and critical files related to the randomness of the audited gaming system have been modified.

9 Entry into force

This regulation shall enter into force on 1 March 2026.

Ilkka Koskimäki, Chief Superintendent

Anna Hyppönen, Head of Lottery Administration

The document has been electronically signed in the case management system. Police 26 February 2026 at 13:35. The authenticity of the signature can be verified at the registry.

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