Childnet International response to DCMS consultation document on video games classification

GAMING

CHILDNET INTERNATIONAL

Childnet International is a UK-based charity[1] working with others around the world to help make the Internet a great and safe place for children. A child focused organisation, Childnet works directly with children, those responsible for children and other organisations and service providers operating around them. In particular, Childnet works actively in the area of education and awareness in promoting the potential and opportunities that the Internet and new technologies offer by providing quality advice to children, young people, parents, teachers and caregivers, to enable children to use the technology safely and responsibly.

Childnet's award-winning educational resources have been used and distributed throughout the UK (for example, over 1 million copies of Childnet's Know IT All for Parents[2] CDRom was distributed in less than 6 months in 2007-8), and adapted for use and distribution in other countries. Childnet is also active in carrying out research[3] in this area as well as working in key policy fora, such as the UK Council for Child Internet Safety (UKCCIS)[4] and the Department for Children Schools and Families (DCSF) cyberbullying taskforce for example.

CURRENT CONTEXT

Childnet is pleased to respond to this DCMS consultation on the classification of video games. With the increasing transition of games into the online environment, it is particularly pertinent for Childnet to respond to this consultation document alongside Childnet's regular work in schools, previous advice on the area of gaming[5] and on addiction[6].

Childnet's response to this consultation begins with the recognition that increasingly games are a mainstream part of culture and a mainstream part of children's culture. Since the publication of the Report of the Byron Review and the report issued following the Culture Media and Sport Committee's inquiry into harmful content on the Internet, video games have come under amplified scrutiny.

As an organisation committed to promoting the positive about technology, particularly Internet technology, Childnet has been pleased to note the balanced approach that has been taken with regards to this subject matter. Childnet welcomed the publication of the Byron Report and its recognition that game playing can be a social experience and an opportunity to learn important social skills, which can be transferred into other areas of life, as well as enabling children to explore their identity and make new contacts.[7]

Schools have often been seen as safe places for children to use ICT. Along with classroom staff supervision, the use of filters, monitoring software as well as rules and procedures for using technology has meant that the likelihood of children coming across harmful material, playing inappropriate games or making unsuitable contacts is greatly reduced, and many schools do use educational games as part of lessons. Moreover, Childnet also believes that children's informal learning with digital technology outside of school is important and can demonstrate and foster good principles and life qualities. In multiplayer games, most of which include an Internet element, users must work together to solve puzzles, manage resources, think about tactics and work collaboratively. Active participation can motivate children and young people and encourage the

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[1] See www.childnet.com for more information. Charity Registration no: 1080173
[2] http://www.childnet.com/kia/
[3] For example see Childnet's report with the National Consumer Council (now Consumer Focus): '*Fair game?* Assessing commercial activity on children's favourite websites and online environments', http://www.childnet.com/publications/policy.aspx
[4] Childnet was an original member of the Home Office Task Force on Child Protection on the Internet at its inception in 2001.
[5] http://www.chatdanger.com/games/
[6] http://www.childnet.com/downloads/factsheet_addiction.pdf
[7] Byron Report, paragraph 6.46, p.153 and paragraph 8.11, p.194

development of strategic thinking. The DCSF have recognized that games are a powerful means to engage with children and have recently commissioned Childnet to produce an interactive game to further support the Let's Fight It Together[8] cyberbullying resource and to engage with children and young people on this important topic.

While Dr Byron suggested that it was currently a significant minority of children and young people who were playing games online, she recognised that there was significant projected growth in both the online and the mobile market.[9] It is not unreasonable to expect that looking ahead to the future games will mainly be accessed online. It is because children and young people are active participants in this media rich world that it is important to think in terms of the cultural, critical and creative benefits that they receive from participation in video games, in particular those accessed online. In her report, Dr Byron sought concrete evidence that there is real educational development in gaming and called for the identification of opportunities for the benefits of game-based learning to be evaluated in different educational environments. Similarly, Childnet would welcome more research in this area. In particular, Childnet would call for research targeted at children including more than the issue of the potential influence the game has on violent behaviour and incorporating a wider focus.

CLASSIFYING GAMES

Throughout chapters 6, 7 and 8 of the Byron Review (which focused on gaming) there appeared to be disparity in the suggestion for a hybrid approach to rating games with the two classification bodies featuring on the front and the back of the box, and also the recognition of the confusion that had been caused by the dual classification system currently in operation in the UK.   Dr Byron stated, 'very early on in my Review, it became clear that having a dual classification system and two sets of symbols often made things confusing for the consumer, especially for parents and children.'[10]   This confusion was further mentioned in the section of the report dealing with online gaming,[11] and Childnet understands that it is the purpose of this consultation to try and come up with a workable solution and to address the problems which have been identified.

Childnet's position on the classification of video games is that whichever system is implemented it must be clear, understandable and accessible to all users and its relevance clearly explained. Further, the information provided would need to be placed in a prominent location and should be supported by an education campaign to raise awareness for all users.

In light of this, Childnet would like to make the following specific points regarding the proposed options based on Childnet's expertise and experience:

There is a risk that a hybrid system could be potentially confusing. We know that parents already find gaming, particularly online gaming, a challenge. Indeed both the Byron Report[12] and similarly the recent Culture Media and Sport Committee's enquiry on harmful content highlighted parental lack of knowledge, confirming Childnet's experience that there are still high levels of parental lack of knowledge with regards to gaming. In particular, the Culture Media and Sport Committee recommended that parents need to engage more in their children's gaming activities,

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[8] Let's Fight it Together' is a powerful film produced by Childnet for the Department for Children Schools and Families to help sensitize young people to the pain and hurt which can be caused through cyberbullying. http://www.digizen.org/cyberbullying/film.aspx

[9] Byron Review, paragraph 6.6, p.143

[10] Byron Review , paragraph 7.25, p.166

[11] Byron Review, paragraph 8.25, p.198

[12] Dr Byron recognised that there were high levels of confusion about how online gaming worked and the implications for children's safety (paragraph 6.17, p.145). She also recognised that gaming is an area where parents feel a high degree of inefficiency (paragraph 8.23, p.198) alongside further evidence that parents and children and young people are confused about online ratings

and this must be factored into the decisions that the DCMS consultation team make in responding to this consultation. Thinking about proposed Option 1, it is vital that the resulting system is workable and does not cause confusion. It is easy to understand the confusion that may result from having different ratings on the front and back of a game, and any education campaign would have to be thoroughly comprehensive and address this point. If a hybrid system were to be adopted, the two ratings system should be used in a way that gives added value to the user and so that the systems would complement each other. Additionally, Childnet would envisage that if Option 1 were to be chosen there would need to be high levels of accountability to ensure that both players work together to bring forward an integrated approach, with targets and dates for achievement set.

It is right to recognise the risks that children and young people might encounter in playing online games and the subsequent need for clear labelling. Next generation games are producing images of the quality that has previously been experienced in films and there is increasingly a blurring between reality and fantasy. There is a need to ensure that there is transparency over what people can expect in a game, for both parents and children and young people alike and that this is communicated through appropriate and accessible ratings. Alongside this need for clear ratings, an education campaign on this area must make sure to promote a balanced and proportionate response also highlighting the positive aspects of online gaming. It is crucial that parents and carers, and anyone giving a game to a child is aware that there could be content that could be potentially harmful on a game just as on a film. It is also important for younger users to be able to discern for themselves what content they could expect in a game.

Flexibility and future proofing, the need for a consideration of how the system would translate into online gaming, and uniformity (as outlined in the essential elements of a new classification system at point E, J and A respectively) are absolutely essential. In considering the essential elements of a new classification system laid out at paragraph 1.22 in the consultation document, Childnet in particular agrees that there must be a trustworthy, uniform and clear set of symbols or labels to categorise the age ratings and that it is vital that government and industry take into account how the system will translate into online gaming. Methods of enforcement will of course be different online and this is something that the gaming industry will need to consider as more games are played online. There will also be the necessity to consider the convergence between film and game content and also modes of distribution as more games move online - not in the traditional sense of games that are played offline being purchased online – but a consideration of games that are purchased and played online where there is no physical human interaction and the associated checks or balances that this may bring to the process of age verification. Childnet is pleased to see that the consultation document recognises the difficulties where an online gaming environment could extend beyond those utilising the system agreed on following this consultation document.

CONCLUSION

A fully comprehensive approach to addressing the issue of video games classification is needed. For example, existing 'Good Practice' guidance has been produced with the industry on a range of issues such as Safe Search, Interactive and Chat services, and Social Networking services. It is important that the best practice advice contained within these guides is applied to online gaming, and that this topic is not merely considered in isolation. For example this guide recommends clear personal safety advice on the service for the user and reporting buttons which could also be utilized in gaming.[13]

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[13] List of Home Office Task Force Good Practice Guides:
Good Practice models and guidance for the internet industry on chat services, instant messaging and Web-based services
http://police.homeoffice.gov.uk/news-and-publications/publication/operational-policing/ho_model.pdf?view=Binary
Good practice guidance for the moderation of interactive services for children
http://police.homeoffice.gov.uk/news-and-publications/publication/operational-policing/moderation.pdf?view=Binary
Good practice guidance for search service providers and advice to the public on how to search safely
http://police.homeoffice.gov.uk/news-and-publications/publication/operational-policing/search-and-advice-public.pdf?view=Binary

Other issues that need considering in a study of online games, include not just *content* type issues, such as violent and undesirable content, but also *contact* related issues. Just as when children are 'chatting' online, so as users chat with other players within a game, issues such as grooming and cyberbullying need to be considered in the context of games, and this could be reflected and made clear through the classification a game receives. Copyright is also a key issue in this space, as it not only applies to downloading music, but also to downloading games which can, like music, be downloaded through the use of file-sharing services. In addressing the lack of knowledge around the classification of video games, there is an important opportunity for the promotion of wider education messages with the context of online gaming.[14] Indeed we would argue that for the campaign to be effective there needs to be a holistic approach to this topic.

As in our other areas of work, it is Childnet's aim to seek the widest possible protections for children and young people online. This means not just reaching out to children and young people but also to the adults in positions of responsibility around them, be it parents, carers or teachers. In thinking about which ratings system to adopt, it is important to capitalise on whatever parental awareness already exists, but not to be blinded by it. The solution must be formulated to properly address the need for ratings of video games, particularly online games, and must not be dictated by commercial pressures.

It is crucially important that the advice provided through an education and awareness campaign is impartial and provided by an expert, and in this case thinking about one of the main audiences, an organisation that parents, carers and teachers can trust. Childnet would bring Childnet's experience, independence and reputation it has gained, alongside the trust of schools and parents to any potential campaign. Indeed we believe that any education initiative in this area would be strengthened by the inclusion of a respected, independent non-profit organisation.

Childnet would be keen to work with the agreed body responsible for rating games in ensuring that parents, children and other users are kept aware of the classifications and the protections that are in place. Indeed, Childnet is committed to providing education on this topic, and believes that such education is needed currently. Accordingly Childnet has already held meetings with the BBFC and ELSPA to discuss possible synergies and how such an initiative could work and would be pleased to meet with the DCMS to discuss this topic further.

Whatever the outcome that the DCMS determine following this consultation, Childnet believes that a clearly communicated user education programme is a vital part of the solution and strategy moving forwards and would welcome being part of this process.

Good practice guidance for the providers of social networking and other user interactive services 2008
http://police.homeoffice.gov.uk/news-and-publications/publication/operational-policing/social-networking-guidance
[14] An example of a fully comprehensive resource is the Childnet Young People Music and the Internet leaflet. This resource has individual features tailored for parents, teachers and young people including security advice, tips on plagiarism and different technologies.

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