Ukie response to the Internet Safety Strategy Consultation

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Introduction

UK Interactive Entertainment (Ukie) welcomes the opportunity to respond to the Government's call for evidence as part of the Internet Safety Strategy. The Government has indicated that it aims to establish Britain as the world's most dynamic digital economy, making the UK the best place to set up and run a digital business whilst ensuring that it is the safest place in the world to be online. To achieve this there is acknowledgement that this can only be achieved by bringing together groups from across society to establish a coordinated approach.

The success of the UK's games industry is reflected in the fact that we are the 5th largest video game market in 2017 in terms of consumer revenues, after China, USA, Japan and Germany. Approximately 32.4m people in the UK play games. Over a quarter of the UK's £4.33bn consumer spend is generated through digital and online sales with a further 23% generated through mobile games. With higher revenue than either video or music there is no doubting the reach and influence of the games industry which is why our approach to keeping the community safe, informed and confident is paramount. Looking at the UK's own attitude towards games, 20 million of the UK's 6-64 old population play games (or 42% of us) [1] and across Europe 44% of females play games. [2]

Ukie and the video games industry have a track record of introducing self-regulatory measures to ensure consumers are suitably protected and informed about how to play and watch games safely and sensibly. We demonstrated this through the creation of the PEGI age-rating system (as acknowledged in the Internet Safety Strategy Green Paper) and its adoption on a pan-European basis with the support of the European Commission. Ukie led the successful campaign for PEGI's adoption into UK law and continuously promotes safe and sensible game playing to parents, particularly through www.askaboutgames.com - a site providing information about age ratings, parental controls, in-games purchases and many other issues.

Additionally, in 2013, we worked closely with the then Office of Fair Trading to shape a set of Principles for Online and App based Games to ensure consumers – especially children – were not subjected to practices that were misleading, aggressive or unfair.

In accordance with the call for evidence guidelines, we've sought to make our response as evidence-based as possible and have thus included a number of case studies and examples from our members to support our answers. We remain at the Government's disposal to provide further details on these case studies and elaborate on any of the points made in our response.

About Ukie

Ukie is the trade body for the UK's games and interactive entertainment industry. It represents games businesses of all sizes from small start-ups to large multinational developers, publishers and service companies, working across online, mobile, console, PC, esports, VR and AR.

We aim to support, grow and promote member businesses and the wider UK games and interactive entertainment industry by optimising the economic, cultural, political and social environment needed for UK businesses to thrive.

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[1] GameTrack, 2015
[2] http://www.isfe.eu/sites/isfe.eu/files/attachments/ipsos_connect_gaming_feb_17.pdf

The importance of the UK's games industry

With 95%[3] of UK games businesses exporting at least some of their products overseas, the UK games industry generates over £2bn[4] of global sales and is well placed to take a greater share of what is now $100bn[5] worldwide market.

Blending technological innovation with imagination and design, we are a growing part of the UK's creative industries sector; one of the six economic sectors noted by the Government to be of particular strategic importance in the negotiations as we leave the EU and in the post-Brexit environment. Whether it is in AI, data analytics or virtual reality, we put into practice and develop some of the innovations that can and will be increasingly applied elsewhere in the economy to boost productivity and forward the ambition for the UK to be the safest place in the world to be online.

The UK games industry is a major generator of IP and a leading example of the UK's growing reputation as a home for creative, high-tech talent from across the world. By way of illustration, the globally successful Lego games series and Grand Theft Auto V, the biggest-selling entertainment product of all time (generating $1 billion in global revenues in just three days following its release), are both made in the UK.

The UK's over 2,255[6] and growing games companies are spread right across England, Scotland, Wales and Northern Ireland with economic clusters including Leamington, Sheffield, Dundee and Cardiff. Two-thirds of these companies were founded after 2010. 12,100 people are directly employed by the industry, most as developers; with the industry in all supporting the jobs of 23,900 people.[7] While most games companies employ under 10 people, the UK is also host to a high number of international and European HQs, such as those of Microsoft, Sony and Nintendo.

68% of the industry's employees are under 35 years old; and the average wage is £33,900.[8] Our industry provides good jobs, right across the country.

UK Player demographics

There are several different estimations for UK player demographics available which are detailed below. Games appeal to a broad and diverse audience and whilst the largest group of players are 15 to 24 year old males this only makes up around a 6th of all players. According to latest Ofcom data [9]three in four children aged 5-15 (75%) play games at home or elsewhere on any type of device and half of them play games online.

Newzoo

- In 2017, 32.4 million people play games in the UK. Spending $4.2 billion this year, they make the UK the 5th largest games market in the world.
- The UK mobile market is very evenly represented between the genders, with a 48% female / 52% male split between those who are playing more than once a month.
- 32% of UK players play mobile, console and PC games.

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[3] TIGA, 2012
[4] TIGA, 2014
[5] Newzoo, 2014
[6] Ukie UK Games Map0, 2016
[7] BFI, 2015
[8] Creative Skillset, 2015
[9] https://www.ofcom.org.uk/__data/assets/pdf_file/0020/108182/children-parents-media-use-attitudes-2017.pdf

- In 2016, there were 31.6m players in the UK, approximately 50% of the total population. Of those that play games, 59% of them spend money on games, annually spending an average of $206 per player.

GameTrack

- There are 18m people aged between 6 and 64 playing games in the UK, or 38% of the population in that age group. (2016 Q4)
- On average, 11 to 64 year-olds in the UK spend 8.9 hours per week playing games. (2016 Q4)

**Average weekly hours of gaming
(in # hours, 11-64 year old)**
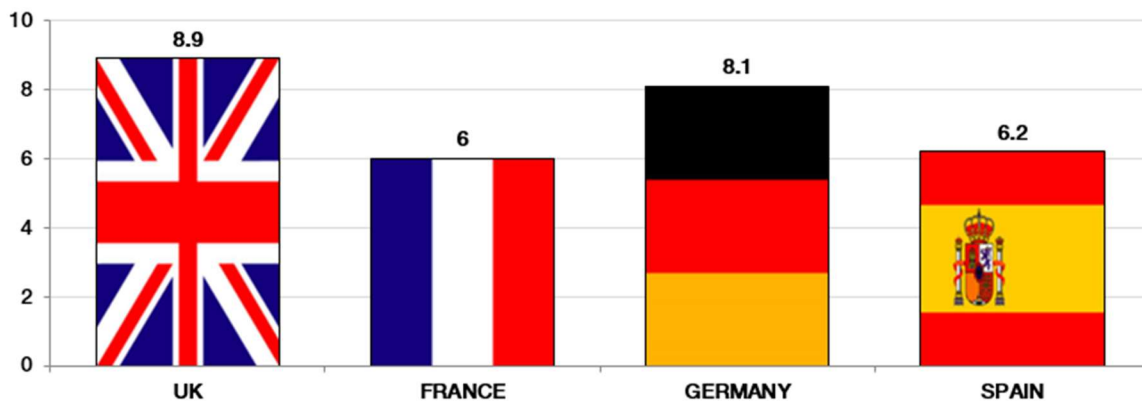
- Across all UK 6-64 year olds, 22% (10.5m) played packaged games, 18% app games (8.8m) and 21% (10.2m) online games. (2016 Q4)
- Similarly, 23% (10.9m) play on consoles, 22% (10.6m) on computers, 18% (8.8m) on smartphones, 14% (6.8m) on tablets and 9% on handhelds (4.2m). (2016 Q4)

**People playing by device in UK
(in %, 6-64 year old)**
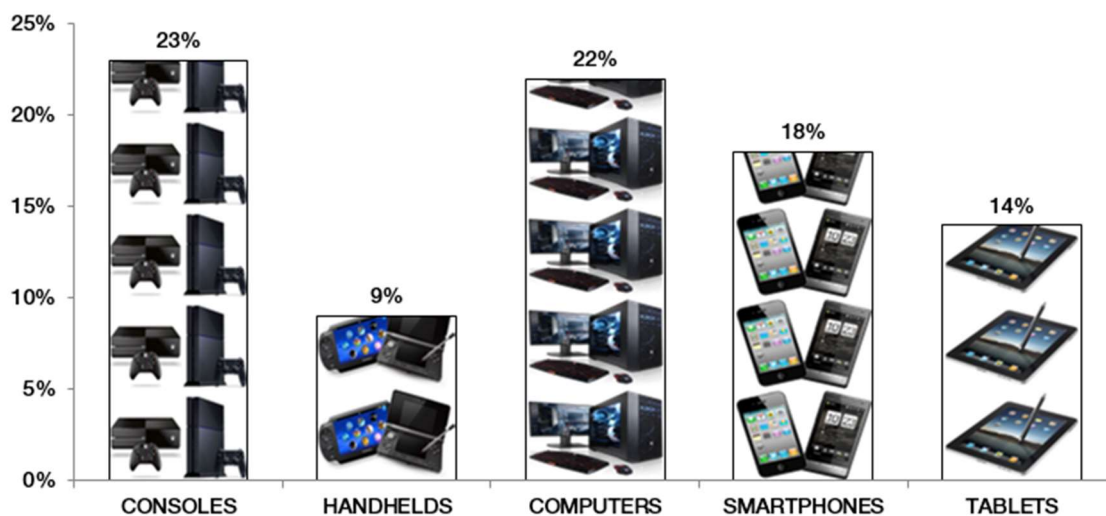
- 57% players in the UK are male and 43% female. The largest single age/gender demographic is 15-24 year-old males, making up 16% of all players. (2016 Q4)

Internet Safety Strategy Green Paper questions:

Ukie is not responding to the questionnaire published alongside the Green paper however, section 5(6) outlines a number of ways the government commits to working with the games industry. Our response to this section is detailed below.

- further promoting awareness and understanding of Pegi age ratings, parental controls and advice on safe gaming;
- sharing guidance and best practice for games businesses to help them ensure their consumers - particularly children - can have a safe and enjoyable online gaming experience;

The industry takes online safety seriously at all levels – from game and device features, employing teams of moderators, content ratings and information to developing cutting edge and innovative solutions using artificial intelligence.

Specific initiatives produced by the games industry to promote awareness and understanding include:

Askaboutgames:

Ukie and the Video Standard Council (VSC) came together in 2012 to run Askaboutgames.com, an online resource which contains a comprehensive range of advice for both parents and players about PEGI game age ratings, advice on how to play games safely and responsibly, and how parents can help children play safely online with appropriate parental controls, which are available across all consoles and devices.

AskAboutGames is a joint venture between the VSC Rating Board and Ukie, run with input and advice from across the games industry.

the Askaboutgames (AAG) website was jointly established with UKIE in order to provide an independent, non-partisan facility whereby games consumers and families in particular, could access good quality information and source advice as to the suitability of certain games for children and adolescents. This site is further reinforced by the VSC Rating Board's own website which also offers information on parental controls and an ACI (additional consumer information) function which provides detailed, descriptive information of each and every game rated by the VSC Rating Board.

Parental Controls

All of today's consoles and handheld gaming devices offer parental controls to help families keep track of the games they are playing and how long they play for. Setting these up not only offers parents a greater degree of control but provides families an opportunity to agree how they will play games. This can then be implemented on each system automatically.

Setting up these parental controls differs for each system and is often updated after a particular console has been released. Gaming platforms, online game stores and individual games include information and a variety of tools to empower players to make informed decisions, for themselves and on behalf of their children. For example, parents can control whether their child can communicate with other players or share pictures, images, videos and other content they created themselves and whether their child can shop in the console's digital store and, where they allow shopping, disabling

purchases or setting spending limits that cannot be exceeded (whether the child accesses the store from within an app or directly).

In addition, where in-game transactions are a feature of a game, developers and publishers ensure that the transaction process is clear both as a matter of law and of good practice. The industry has worked closely with bodies such as the European Commission and the UK's Office of Fair Trading (now Competition & Markets Authority) to agree voluntary standards and it is common place for the product description of games and apps to declare prior to download whether that game/app offers in-app purchases

While parental control tools are important, the industry also encourages parents to show an interest in the games played by children, to play with them and also to talk to them about responsible gaming, and their online activity, to avoid and limit unfortunate situations.

Age Ratings:

Previously, in the UK, age ratings for games sold in shops or online retailers for consoles and PCs came under two complementary systems: the voluntary European PEGI system, which stands for Pan-European Games Information, and the mandatory BBFC system, which stands for British Board of Film Classification.

Now, PEGI is the sole system used for new console and PC games. PEGI is used and recognised throughout Europe and is supported by the European Commission. Many thousands of games have been PEGI-rated since the scheme was devised and introduced in early 2003. It is important to note that in the UK, PEGI 12, 16 and 18 ratings are legally enforceable meaning that they cannot be supplied to persons below those respective age bars. There are also strict measures by the emerging esports industry in the UK to ensure that games cannot be viewed by anyone under the age rating for the game. The body responsible for applying UK PEGI ratings is the Video Standards Council (VSC).

Essentially, the PEGI rating on a game confirms that it contains content suitable for a certain age group and above. So, a 7 game is suitable for everyone who is seven or older while an 18-rated game is deemed suitable only for adults. The ratings are judged on eight descriptors, including violence, bad language, sexual content, drugs etc. It is not, however, a measure of who will enjoy the game or how difficult that game is. Only 4% of games across Europe are rated 18+, and 49% of all games are rated suitable for all.

About PEGI

PEGI helps parents to make informed decisions when buying video games. The age rating system provides age classifications for video games in 38 European countries.

There are two levels of information to guide consumers:

The PEGI age rating confirms that a game is suitable for players at certain ages. The PEGI age rating considers the age suitability of a game, not the level of difficulty. This means that a game rated PEGI 3 can be very complex and difficult to master, whereas games rated PEGI 18 may only require simple controls.

The content descriptor icons are displayed on the back of the game box and indicate, where required, the nature of the content.

PEGI has the enthusiastic support of the European Commission. **It is considered as a model of European harmonisation in the field of the protection of children.**

Pegi Online

PEGI Online was launched in 2007 as an addition to the PEGI system with the purpose to give young people in Europe better protection against inappropriate online gaming content and to help parents understand the risks within this environment. The licence to display the PEGI Online label is granted by the PEGI Online administrator to any online gameplay service provider that meets the requirements set out in the PEGI Code of Conduct. Since online games often support virtual communities, players can be exposed to the risks associated with real time interaction with unknown fellow players. Such risks include:

- ·   Content being created as a result of the game which could be unsuitable for young people and a mismatch with the rating given for the game.

·   Some players engaging in behaviour that might not be suitable for young people. For example, inappropriate or offensive language; bullying in games that allow text, voice or video communication; unsporting conduct like cheating and tampering; or aggressiveness towards others.

·   Breaches of privacy. Online players sometimes encourage children to build relationships, share personal details, or even meet unknown fellow players outside the game.

·   Links to websites where content may not be suitable for young people.

To address these topics, the main provisions of the PEGI Online are:

•   Only game content that has been appropriately rated by PEGI or another recognised European system can be included on a site.

•   Appropriate mechanisms are in place to allow game players to report the existence of undesirable content on any related websites.

•   Licence holders will use their best endeavours to ensure that online services under their control are kept free of any content which is illegal, offensive, obscene or which might permanently impair the development of young people.

•   Any PEGI Online licence holder collecting personal information from subscribers will maintain an effective and coherent privacy policy in accordance with European Union and national Data Protection laws.

•   Licence holders will maintain community standards to prohibit subscribers from introducing content or indulging in online behaviour which is illegal, offensive, obscene, or which might permanently impair the development of young people.

•   All advertising shall be conducted demonstrating a sense of responsibility towards the public.

The PEGI Online label indicates whether a game or site is under the control of an operator who cares about protecting young people.

The PEGI Online website https://pegi.info/ offers all relevant information about the nature, categories and potential risks of playing games online . It contains useful tips for safer online gameplay and offers the possibility to report complaints or abuses by consumers.

There are also age ratings systems operating for games played on phones and tablets or played directly over the internet via a PC. These systems broadly operate in similar ways to PEGI but have slightly different age levels and/or content descriptors.

IARC

Administered by many of the world's game rating authorities, the **International Age Rating Coalition** (IARC) provides a globally streamlined age classification process for digital games and mobile apps, helping to ensure that today's digital consumers have consistent access to established and trusted age ratings across game devices. Established in 2013, IARC simplifies the process by which developers obtain age ratings from different regions around the world by reducing it to a single set of questions about their products' content and interactive elements. The IARC system was devised

through close collaboration among participating [rating authorities](#) in consultation with game makers and digital storefronts. Together they established a streamlined and automated process for assigning ratings that incorporates each territory's distinct content criteria and standards. All apps in the Google Play store including games are now rated using IARC system. https://www.globalratings.com/how-iarc-works.aspx

- considering what evidence there is of existing issues - including sexism - and also opportunities and thinking about issues that may emerge, particularly as new types of games (such as Augmented Reality) develop.

Games can help people of all ages to develop skills such as collaboration, problem solving, fairness and strategic thinking. They are a great way of encouraging creativity and imagination by engaging players with fantastic or realistic worlds. And creating games requires 21st century blend of STEAM skills (science, technology, engineering, art and maths).

Millions of people play and enjoy games safely and sensibly every day. Whilst there is currently no official medical diagnosis of video game addiction, we are aware that some individuals play games excessively and that's why, as an industry, we actively promote safe and sensible gaming practices. For example; it is widely recommended that all players of all ages should take regular breaks of at least five minutes every 45-60 minutes as a rule of thumb and enjoy playing games as part of healthy range of activities.

The games industry takes it responsibility to consumers very seriously. Safe and sensible game playing is encouraged by the industry and information is made available to parents and players, including through [askaboutgames.com](#). The parental controls available on all games consoles can also be used to restrict the amount of time spent in-game, limit internet access and control access to age appropriate content.

Games can have many benefits for the player: helping gamers of all ages to develop social skills such as collaboration and teamwork, and nurturing strategic thinking. Playing active technology and fitness games can also improve physical health, as well as games technology such as VR being used to unlock new experiences for people with disabilities across the world. Interactive entertainment is increasingly being used to improve learning outcomes in schools and playing games professionally, known as esports, is now a valid career with a regular global audience of millions.

Of course, there are many stories about the harmful impact of games. Handled responsibly, there is little reason games can have a negative impact, and there is so much positive they can bring.

- developing understanding of the various safeguards, techniques and protocols that games companies use to manage their consumers' online game experience with a view to highlighting best practice;

- exploring how the principles behind our social media code of practice should apply to the interactive elements of the games industry, with particular respect to reporting and take down of offensive user generated content.

Community managers

Community managers serve as the direct link between a company/product and its players. They relay the perceptions, expectations, trends, and any other important information about the fans

directly to the company. They also foster the community by giving them things to talk about and content to enjoy/critique. Online community managers have their origins in the games industry dating back to the original MMORPG games as early as 1995. The roles vary vastly from company to company and different specialist skill sets are needed in different companies. It goes without saying though that most companies have rules and guidelines for their social accounts and forums although there is no common standard and producing one would be unlikely to be effective.

End user license agreements are also used extensively in the games industry to establish the ways in which the software can be used. EULAs and codes of conduct are often specific to the individual game meaning the introduction of a common standard would likely be weaker than existing arrangements.

Community teams for larger games companies have introduced machine learning and semantic analysis tools to assist community mangers in identifying warning signs earlier in game play and are regularly collaborating with charities to ensure vulnerable young people are able to access the help they may require.

Technological solutions

The games industry employs a large number of tools, techniques, communities and moderators to safeguard users and maintain their games experience. Individual companies will have their own methods which will be appropriate to their own game rather than there being a generic solution or set of tools. As these tools are closely guarded by games companies we are unable to list specific examples in this paper.

Increasingly, Artificial Intelligence is being used to enhance and improve moderation of in game communication and is now able to cover pictures, text, video and audio. As AI and machine learning become increasingly more sophisticated, games companies are able to provide richer and enhanced monitoring to support the human moderators not only to cover more content but to identify new and emerging threats.

Auto-moderation and the use of AI and machine learning to monitor online spaces does not replace the role of highly trained and specialist moderation teams play however, but, instead enhance the capacity and effectiveness of safeguarding. Through machine learning and natural language processing algorithms games companies are able to identify and hold potentially problematic content from player interactions such as chat functions in order for them to be reviewed by a moderator before appearing to other viewers.

Part 2 Section 3 – Digital Skills

Digital Skills will continue to play a fundamental role in society and the internet safety strategy rightly highlights this. However, the emphasis on equipping parents with the knowledge and understanding to effectively use parental controls and filters risks missing a more fundamental point about digital literacy. As acknowledged in the annex of the green paper, it is essential to equip children with the critical thinking skills that will enable them to fully experience online experiences safely.

Within the wider digital creative economy, games developers play a leading role in the emergence and use of technologies such as artificial intelligence, data analytics, and Augmented and Virtual Reality. These are increasingly being used in the wider world of work. The video games and wider

digital industries are a constant source of innovation, solving problems that have never been solved before and creating jobs that have never existed before. The need for creative thinkers and problem solvers has never been greater; the World Economic Forum places these as the top three skills needed in the jobs of tomorrow.

Computational thinking and creativity are key skills with an essential role to play in the world around us. Both are a key feature in the computing curriculum, yet its these very things that teachers are struggling to teach. Effectively delivering creativity and computational thinking in the classroom is a challenge, preparing students for the future world of work and motivating them to engage with digital skills requires teachers to change the way they teach.

Video games provide a unique platform. They engage all students, crossing all diversity barriers in a way that few other mediums can. In turn they inspire creativity and problem solving, they utilise computational thinking skills, and they effectively fuse the sciences and arts together in a unique combination. The Digital Schoolhouse programme recognises this and builds upon it not just to engage students but also to inspire and motivate learners and educators alike. Humans are by their very nature curious, and is what drives human innovation. Play based learning builds upon this innate part of human nature. The Digital Schoolhouse programme harnesses that learning model to encourage all students, regardless of age and experience, to develop not just their practical programming skills but also their conceptual knowledge, creativity and computational thinking skills.

SPIRIT AI

Ally http://spiritai.com/product/ally/ :

Spirit AI's Ally helps protect and cultivate online spaces through nuanced detection and intervention. In-game player communities, chatrooms and online social platforms are made safer and more inclusive environments using the power of machine learning and predictive analytics. Ally detects potentially abusive language and behaviours by monitoring all chat.

The system takes a player-centric approach – after all, our interactions are nuanced. We may be fine with playful taunts and language when used by our friends, but when it's a stranger, the context is totally changed. With this combination of both player and community preferences, Ally can take quick action when needed.

Ally investigates abuse incidents further through a multi-stage triage process of analysis. We look at the deeper context of the whole conversation and of the history of interactions between the players. Ally highlights repeat perpetrators who display similar abusive behaviours on multiple occasions automatically compile a dossier of evidence for your safeguarding team to act upon.

NINTENDO SWITCH
Parental Controls

Supporting a safe and fun environment for children's gaming experiences

It's not always easy for parents to keep an eye on children's time spent with entertainment devices. So, when designing Nintendo Switch, parental controls were an important consideration.

Nintendo set out to tackle three common questions from parents:

"Is my child playing video games too much?"

"What kind of games are they playing?"

"Can I restrict games according to my child's age?"

Nintendo Switch Parental Controls consist of a free smart device app which links with Nintendo Switch, allowing parents to easily monitor what children are playing – and for how long – and to set restrictions if necessary.

Restrictions can also be set on the Nintendo Switch directly, but the smart device app allows parents to be hands-on, even when they're away.

"Is my child playing video games too much?"

With the Play Time Limit feature, parents can choose an alarm that sounds when an agreed play time is reached, or the game can turn off automatically after a set time each day.

"What kind of games are they playing?"

Parents receive daily reports of which games their children have been playing, and for how long. A monthly summary also gives a handy overview.

"Can I restrict games according to my child's age?"

Parents can set an age limit based on the game's PEGI age rating. Plus, communication with other players, and posting of images/videos on social media, can also be restricted.

More information is available at:
http://www.nintendo.co.uk/Nintendo-Switch/Nintendo-Switch-Parental-Controls

Case study: Jagex Semantic Analysis

Top line:

We work very closely with the Internet Watch Foundation who say ""Jagex is a leader across its sector in online safety initiatives. Their commitment to the safety of their gaming community is clear." – full quote below.

Summary:

RuneScape has a minimum player age of 13. We have a robust set of player rules and sanctions in place and any player can report any behaviour of any other player directly. In addition, we have over 1,500 players who act as in-game moderators.

We screen all in-game chat between players 24/7 against a series of trigger words and phrases and potential actions in a proprietary system, developed with the assistance of the Internet Watch Foundation and our own empirical learning with over 16 years of running online communities.

Detail:

Millions of people play RuneScape games every month. All player chat is monitored – over a course of a year, that's around 4.8billion lines of chat. Our proprietary monitoring technology, called Player Watch, is considered best-in-class and checks all player interactions and can spot unusual behaviour and identify inappropriate or concerning key words and phrases.

In addition to a customer service team that operates 24/7, 365 days a year, we have a volunteer group of 1,500 players who act as live moderators; each moderator has a mature outlook and approach and a track record of accurate reporting.

Players can personally set filters to automatically remove highly offensive language, allowing each player to customise the chat they see in line with their personal tolerances.

We moderate all chat through a combination of reports from players, our Player Watch system, our moderators' escalation system and monitoring and manual review.

The following behaviour types can be dealt with by means of delivering in game pop up warnings to players, or short 'time out' mutes from our volunteers. If this type of behaviour persists we automatically issue a warning, and if that warning is ignored, we permanently mute the player:

- Hate Language
- Bullying or Harassment
- Scamming
- Inappropriate websites
- Discussion of sexual deviancy
- Language intended to shock and trolling type behaviour
- Discussion of recreational drugs etc.

We use IWF key words and our own historical knowledge, to scan any incoming reports for content likely to relate to a 'risk to life' – these reports are then prioritised and reviewed manually quickly, with 24/7 cover including external escalation for law enforcement intervention if required:

- Suicide
- Self-harm

- Real life threats
- Depression

We log and review all chat (not just reported) to identify high risk behaviour relating to child abuse, or to identify players who may be under 13. This approach also ensures that if a young person is being blackmailed or feels too afraid to submit a report to us, we will still see the chat logs and can escalate if required. We escalate any issue where we feel a genuine risk is present in relation to:

- Sexual conversations with or about minors
- Discussion, claimed possession or distribution of child abuse media and grooming behaviour

As well as escalation to law enforcement, internally taken actions against any player can include: locking their account, blocking their IP for current or future access, limiting their account, muting their account, or a complete ban on playing.

The external agencies we primarily work with when we identify high risk behaviour are:

- Cyber Tipline
- Internet Watch Foundation
- Local Police of the players concerned
- UK Council for Child Internet Safety
- Cambridge Police
- Child Exploitation and Online Protection Centre (CEOP)

Thankfully just 0.16% of "offences" are related to online safety.

"Jagex is a leader across its sector in online safety initiatives. Their commitment to the safety of their gaming community is clear. They implement such a vast portfolio of safety feature, we have asked Jagex to talk to others within IWF membership to share their knowledge in this area. Jagex is a valued partner of IWF since 2008." - Emma Hardy, director of External Relations, Internet Watch Foundation.

In addition, we have extensive anti-cheating measures, also within Playerwatch, as well as hijack detection systems, continually identifying compromised accounts and ensuring that the account owners can recover them – all online communities experience problems with account take-overs/hijacking, and we know this can also be a cause of harassment and bullying.