

Ukie response to Department for Education consultation on Parental Internet Controls

September 2012



THE ASSOCIATION FOR UK INTERACTIVE ENTERTAINMENT



Introduction

The Association for UK Interactive Entertainment (Ukie) is the trade association that represents a wide range of businesses and organisations involved in the games and interactive entertainment industry in the UK.

Ukie exists to make the UK the best place in the world to develop and publish games and interactive entertainment. Ukie's membership includes games publishers, developers and the academic institutions that support the industry. We represent the majority of the UK video games industry; in 2011 Ukie members were responsible for 97% of the games sold as physical products in the UK. Ukie is the only trade body in the UK to represent all the major games console manufacturers (Nintendo, Microsoft and Sony).

We are an Executive Board Member of UKCCIS and sponsored the hugely successful UKCCIS Summit in 2011. The video games industry has taken a leading role in the field of child safety, both online and offline, and continues to do so, as we outline in detail below.

As a trade association, we will be answering questions from Section 5 only of the consultation.

Section 5 - Questions mainly for businesses

16 a) What are you as a business/trade association doing to ensure parents have access to a range of simple tools and information? [Please list]

The games industry has been at the forefront of providing parents with a range of tools that can be used to help consumers play games safely and sensibly, for many years. This includes the implementation of PEGI as the sole UK age rating system for games in July 2012 and the use of parental controls game consoles. Parental controls are also offered in game-related online services and marketplaces. Platforms such as the PlayStation Network and Xbox Live offer optional online functions such as playing games with other players online, accessing films, TV and music, purchasing games online, browsing the internet and chatting to friends using text, voice or video chat. Sometimes these services are offered for free, sometimes for a charge.

The PEGI (Pan-European Game Information) age rating system was established to help European parents make informed decisions on buying computer games. It was launched in spring 2003 and replaced a number of national age rating systems with a single system now used throughout most of Europe, in 30 countries including the UK.

It has also been strengthened by the introduction of PEGI Online, based around the PEGI Online Safety Code. As well as the content ratings offered by PEGI, the Online Safety Code (POSC) obliges signatories to keep the game's website free from illegal and offensive content created by users and any undesirable links, as well as to implement measures for the protection of young people and their privacy when engaging in online gameplay.



What Ukie is doing

As the industry trade body, Ukie seeks constantly to ensure that people of all ages can play games safely and sensibly, and that parents are fully informed about the different ways their children can access and play games offline (on physical media such as a Blu-Ray disc) and online in a secure way.

We are currently in a period of raised attention on this issue, thanks to the recent launch of PEGI as the sole age-rating system for games in the UK. As part of this launch, Ukie has funded a major awareness-raising campaign known as Control.Collaborate.Create, educating parents both about the PEGI system, parental controls and about wider issues around children and video games.

Our Control.Collaborate.Create. campaign covers the following key themes:

Control - ensuring that consumers have the knowledge of the tools that they can use to control games content (including PEGI, parental controls and the need to take regular breaks)

Collaborate – encouraging parents to engage with and understand the games that their children are playing

Create - promoting games as a creative, fun and worthwhile activity for everyone

At the heart of this campaign is the re-launched website www.askaboutgames.com, designed to help families understand games. This website prominently features a section linking parents to advice on setting up parental controls for all commonly-available gaming devices, including all major consoles, hand-held devices, and mobile platforms.

The askaboutgames site also plays an integral part in delivering the wider campaign's messages with information and tips for consumers, and showcases of how playing video games is a collaborative and creative experience.

Our campaign has so far had 300 significant media hits, across the BBC, ITV, C4, C5, Sky, national print, games press, regional papers and radio and national online outlets.

Askaboutgames.com has had 20,000 visitors since its re-launch in July this year. We have also distributed more than 50,000 leaflets promoting our safe and sensible gaming messages via Game and HMV store.

Within the Ukie website itself we also continue to operate the 'Playsafe' page -

<http://www.ukie.info/playsafe> – which offers information on parental controls, age ratings, and safe online gaming tips for parents and children.

What the games industry is doing

As these websites make clear, the games industry is already at the forefront of providing parental controls and other safety features to ensure that children can enjoy games safely. We published a document in October 2011, "The video games industry: a responsible attitude towards parents and children", which sets out in detail the measures our industry has taken to offer this protection, including parental controls on consoles, the PEGI age-rating system, and awareness-raising activities. This document is available here: <http://ukie.org.uk/content/ukie-policy-paper-%E2%80%93-consumer-safety>

We summarise below what parental controls the industry offers:

Games consoles and the online gameplay services and marketplaces of the console manufacturers all come with a variety of parental controls. Different manufacturers offer different degrees of control and functionality, but generally they all have the ability to:

- Block the playing of games based on their age rating
- Block the playback of nonlinear audio-visual content (i.e. films) based on their rating
- Disable or restrict access to network functionality including web browsing and messaging
- Disable voice chat

These parental controls are password protected.

The Microsoft Xbox console was the first video game and entertainment system on the market to feature built-in parental controls. Xbox supports safety at both the console and individual user level providing the flexibility to protect families as parents see fit.

The Xbox Console Safety settings apply to all users of the console, regardless of age. The settings include:

- Deciding what content users can interact with, both online and off (including movies, television shows and PEGI rated games where applicable)
- Blocking explicit and unrated content
- Setting up title exceptions: The ability to allow users to play specific games above the console's designated PEGI rating(s) if parents deem this appropriate
- Set limits on console play time using the Family Timer
- Block access to Xbox LIVE entirely

Content restrictions may be overridden on a one time basis by users who enter the console passcode, which is set when Console Safety is enabled.

In addition, when a user joins Xbox LIVE, they are automatically assigned default Online Safety settings based on the user's age. Xbox LIVE Online Safety settings may be set to Child, Teen or Adult each with progressively more permissive default settings. Xbox LIVE Online Safety settings protect the user's privacy and can be used to limit what activities the player can do in the Xbox LIVE community. This includes:

- Who the player can communicate with over text, voice or video communication
- Whether the player needs their parental approval of Xbox LIVE 'Friends'
- Player purchase of new content



- Ability to play online games
- What profile information other players on Xbox LIVE can view (inclusive of which games and /or movies have been played and who they are friends with)

An individual (or their parent, in the case of children) can change Online Safety settings at any time via the Xbox Dashboard or Xbox.com.

The Xbox LIVE Family Pack subscription also features further services to help manage families' Xbox activities. This subscription is specifically tailored for families and provides additional features to make Xbox LIVE more accessible for all members of the family including simplified management through the new Family Center, activity monitoring reports, and the ability to purchase and give Microsoft Points allowances to their children.

Xbox LIVE Family Settings allow everyone to configure their account settings to customize what information is shared and the level of online communication with others, and allows parents to manage these settings for both their and their children's accounts. When a child attempts to sign up for Xbox LIVE, their parent will be required to create a new or associate an existing Xbox LIVE account identifying them as the parent of the child. A parent has full authority and parental oversight of the child's account and can modify the Online Safety settings on the Xbox Dashboard and Xbox.com. In addition, by default the parent is required to approve any friend requests that the child has received from members of the Xbox LIVE community.

Sony takes its responsibilities just as seriously and offers the following parental controls on its PlayStation 3, PlayStation Portable and PlayStation Vita consoles:

- Prevent access to content based on its age rating.
- Prevent use of the internet browser.
- Prevent the use and collection of location data (PlayStation Vita only as it is the only console with location-based functionality).

Those controls need to be activated by the parent and are then protected by a passcode.

Sony also offers safety features in respect of its online stores and network functionality (such functionality includes chat or online gameplay with other players over the internet via the console):

- Block the purchase of, and advertising for, games rated higher than the user's registered age. For Sony's PlayStation Network (a global online platform offering content, commerce and community features via PlayStation devices), this is automatic and cannot be overridden by a parent. Once downloaded, the parental controls on the console (referred to above) can be used to prevent the play of any game by children. This means that adults can download games to their console without the risk that their children can access and play those games (a password is needed to override the parental controls)
- Disable chat. For Sony, disabling chat also disables access to user-generated content (UGC)



- Prevent or permit access to spending¹ and set a monthly spending limit on a child's sub-account (for an explanation of master and sub-accounts, see below).
- Block the online gameplay of games rated higher than the user's registered age. For Sony, this control is automatic and cannot be overridden by a parent.
- Web filtering (subject to a charge to a third party software provider).

Further, you have to be over 18 to set up a master account on Sony's PlayStation Network. A master account holder may set up sub-accounts for each of their children. When doing so, the network parental controls above which restrict purchase and play of games rated higher than the child's age will be implemented automatically. The master account holder can then control all spending by the sub-account and can set the chat control should it wish to do so.

It should be noted that it is not necessary to use the online stores or network functionality offered by the console manufacturers in order to enjoy playing video games. Many users choose simply to play disc-based games on their console, and this does not require network functionality. Many games can be enjoyed without having to provide information to set up an online account and without having to engage in any internet access or communications.

It is also worth noting the controls that many PC games (ie played on home computers) have in place.

In particular, 'Massively Multiplayer Online' Games, or MMOs, which have thousands, and sometimes millions, of players playing at the same time, usually allow these players to interact and communicate in several ways. UKIE has established an 'MMO Group', of publishers and developers who create and run these game worlds, with the intention of sharing and spreading best practice amongst companies operating in the UK in ensuring the safety of children online, and the ability of parents to oversee how their children play such games.

Such best practice has been set out clearly in the requirements already captured in the PEGI Online Safety Code: for game content to be age-rated under PEGI, for clear reporting mechanisms for users, swift removal of inappropriate content, and strong community standards for online subscribers. Ukie continues to work with PEGI to keep this online code relevant to the latest market developments, and will be using the MMO Group to further spread engagement with POSC.

The largest MMO Games, particularly those aimed at children, already have stringent and usually effective controls in place. We outline some of the measures used in the answer to Question 21, below.

However, there have been some cases where similar games run by non-Ukie members have failed to properly protect children. We are hopeful that, by actively encouraging companies to share best practice and continuing to encourage online games companies to join PEGI Online, we can make these practices universal and thereby increase the protection for children interacting with online games.

¹ Sony operates a wallet system whereby the master account can load funds into the wallet using a credit card or voucher and the wallet funds are then used to make purchases. The master account can choose to allow a sub-account access to spend funds from the wallet and set a monthly limit or prevent all spending. Sub-accounts cannot have and control their own wallet.

16 b) For any products listed above, please say when these will be available in the marketplace?

NB: Any responses to this question will be treated in strict commercial confidence [Please list]

We have outlined above what the industry is currently offering by way of parental controls and awareness-raising. New consoles, which typically have five-year life cycles, tend to increase the range and sophistication of parental controls and we expect this to be the case for the so-called “next-generation” consoles. This cannot be guaranteed because of the technical difficulties and expense in developing these features, particularly so as to ensure the parental controls are accessible and easy for both parents and children to understand and use. It should be noted that the industry is under pressure from other device manufacturers and content providers who do not use PEGI or who do not necessarily offer the parental control features of games consoles (e.g. mobile devices).

The games industry believes that there is no single, final answer to protecting children. A combination of solutions, including on the console, at a services level and at an ISP level will offer the maximum protection. However, the constantly evolving nature of technology and internet based services as referenced above mean that any solution will not be permanent. Educational campaigns sponsored by industry will become even more important to continuously educate children, parents and overall users of gaming services on to protect themselves and their families.

17 What kinds of online content and activity do parents who are your customers most commonly seek to block access to? [Please tick all that apply and rank in order of frequency of blocking in box provided]

Alcohol and drugs; Anorexia/bulimia; Bullying; Gambling ; Grooming; Personal abuse of social networking sites; Political or religious radicalisation; Pornography; Self-harm; Sexual messages; Suicide; Violence; Other [please specify]

Comments:

Concern from parents about in-game content tends to focus on violence, and in the case of some games alcohol/drug use. Such content is of course one of the key indicators used in setting PEGI ratings. The broader social features that exist for many online games now, both within the games and in networks around the game, also mean that parents may have concerns around personal abuse of social networking sites, bullying and grooming. The POSC similarly has strong requirements for reporting mechanisms and removal of inappropriate comment, as well as coherent privacy policies, to offer protection against these.

18 What help do parents need to recognise the risks to their children online and to take greater responsibility for their safety? [Please write in space provided]

A survey undertaken in July 2012, for the launch of PEGI as the sole UK age rating system for games, found that 92.5 per cent of parents whose children played games were aware of the parental controls that existed for those games on the consoles on which they are played.

This suggests that parents are already very aware both of the risks that internet-connected games consoles pose and of the controls that already exist to tackle this.



We believe that education and awareness is a vital tool, and are funding a major awareness campaign around the PEGI launch (see answer to question 16a). The evidence around games consoles, however, suggests that parents are already aware of the risks that exist in this area.

19 What current activities with parents and children is your organisation involved with to educate and raise awareness about children's online safety? [Please write in space provided]

As stated above, we have re-launched the website www.askaboutgames.com, as part of our campaign to raise awareness of the PEGI age-ratings system and, more broadly, safe and sensible gaming. We are holding a wide range of online and offline events during this campaign, including Family Gaming Surgeries in-store, online videos and FAQs, as detailed on the website.

20 How could we better protect those children most at risk of harm on the internet (for example, the very young, the emotionally vulnerable, children with learning difficulties, children without responsible parents)? [Please write in space provided]

The key is to engage parents. Without parental oversight, children may be liable to access games and online services that are not appropriate for their age, in some cases by lying about their age. Effective age verification systems may be of use in protecting children whose parents choose not to apply parental controls.

Console manufacturers are constantly reviewing the age verification services offered by third parties, but the technology is not yet robust enough to provide a strong additional safeguard. The age verification systems that are currently available are expensive, provide inconsistent results, and cannot give global or even Europe-wide solutions. Online game-related services and marketplaces are typically available in a number of countries. It would simply not be economically feasible to implement different age verification systems in each country even if such systems existed. They may also only be able to verify whether someone is over 18; they may not be able to verify the age of a child. Age verification systems also carry an attendant risk of sensitive age verification data being misused, lost or compromised.

Requiring the input of credit card details can be a means of verifying age, so that there are less dangers with paid for content which may be appropriate for adults only, as opposed to content which is free. Where a credit card is required, it seems more likely that an adult will be involved in the purchase. Xbox LIVE requires input of credit card details as proof of age when setting up an Xbox LIVE account(s) for a child. However, it is a system that could be abused by underage users making fraudulent use of someone else's credit card.

In the meantime, there are other ways in which age controls can be strengthened. For example, if a child tries to change their date of birth during registration process on a PlayStation console, they may be forced to restart the process with another email address (although this would depend on how far they have progressed through the registration process). Otherwise, cookies are used on Sony online registration forms (on marketing websites e.g. playstation.com) to stop a child from re-registering when they realise that access is only available to adults for certain content or a website.

21 In addition to education (for parents, children, those who work with children), what other things can be done to protect children from negative online behaviours such as cyberbullying, inappropriate texting and grooming? [Please write in space provided]

We have outlined above the steps Microsoft and Sony take to control use of the web, online communications and location data when using online game-related services.

Further, as stated above, the providers of MMO games have built up significant experience in dealing with many of these issues. These are summarised in the PEGI Online Safety Code (POSC), which includes requirements for appropriate reporting mechanisms, removal of inappropriate content, community standards for online subscribers, and a coherent privacy policy.

An excellent example of the robust parental controls many online games now have in place can be found in Blizzard's 'Battle.net', through which global smash-hit games such as World of Warcraft and Diablo III can be played online.

These controls include play-time limits, play schedules, activity reports emailed to parents, and other features, as seen here - <https://eu.battle.net/account/parental-controls/index.html>. These controls, combined with robust chat filters and a clear code of conduct for players, help to control interactions between players and protect children.

Game worlds aimed at younger children, meanwhile, should have even more careful controls in place. An excellent example is Moshi Monsters, the global success created by UK developers Mind Candy.

Children playing Moshi Monsters can post content on pin-boards, which is automatically filtered for inappropriate content. Furthermore, children can only see the pin-boards of the people they invite into their network, which can only be done if the other child's username is known. This helps to ensure that children are only in contact with people they already know.

These are just two of many examples of MMO game providers who are leading the way in allowing children and young adults to interact safely online, whilst having lots of fun.

22 What is your business or organisation doing to help people understand and address these problems? [Please write in space provided]

As detailed above, we are running a major public awareness campaign around age ratings for games, and more widely how children can play online games in a safe and sensible way.

23 If your company/organisation has committed to delivering active choice internet safety solutions, what are the principle features of that solution? NB: Any responses to this question will be treated in strict commercial confidence. [Please list]

Ukie and its members support the use of active choice, as opposed to default on, for internet-enabled devices.

As Tanya Byron argued in her 2008 report, it is more effective to ask parents to make a series of choices as to the level of parental control and filtering on a device, making them mentally engage

with what is appropriate for their family, than to simply have all such controls switched on automatically when they first use the device.

This is our perception of active choice, and the route we believe should be taken by ISPs (as we recognise is happening) and by internet-enabled devices such as games consoles: the user should be told what the available controls are and given the choice to use them – a choice they are actively required to make in order to use the device for the first time, either by means of warnings/notices or by options presented during device set-up or registration process.

Whilst most games consoles already offer active choice parental controls by highlighting parental controls before a device is first used, we would prefer active choice parental control systems to be implemented on a voluntary basis, as part of a code of conduct, as it has been for ISPs. This is for two reasons in particular: the principle of active choice already has a consensus of support amongst console-makers; and any changes they are required to make should be given a long lead-in, due to the large gaps there now are between generations of consoles. Such a code should define active choice by reference to the principle highlighted above, namely, that parental controls should not be on by default.

We would, however, discourage reliance on one sole solution to this problem; active choice should not be mandated as the only solution available. Rather, a combination of constantly updated solutions, as evidenced by development in technologies over the past years, should provide a safety net for vulnerable children.

24 If you have not committed to delivering active choice, why not? [Please list]

N/A

25 a) Is demand for parental controls, whether on internet services, devices, software etc. growing?

Yes

No

Not Sure

Comments:

As mentioned above, a survey of over a thousand parents, conducted in July 2012 for the launch of PEGI as the sole UK age-rating system for games, found that 40% of parents know that parental controls existed for video games but did not use them because they already supervised their children's game-playing and did not allow their children to own or play inappropriate games.

This compared to 35.9% who do use parental controls, either regularly or occasionally.

We do not have previous data on these questions, so we cannot claim to know any trends. However, it is clear that at least three quarters of parents know about the availability of parental controls for games and feel informed enough to have confidence in deciding whether to use them.

This makes intuitive sense – many of today's parents themselves grew up playing games, and have a strong understanding of the medium itself. It also indicates that, although education efforts should of course continue, there is already a strong understanding of the dangers of games both online and



offline. This suggests that demand for parental internet controls, on devices at least, is not growing particularly strongly.

25 b) If No, how could demand be encouraged?

N/A

26 What examples do you have of regulatory best practice, from the UK or other countries, of online child protection? [Please write in space provided]

N/A

27 What models of regulation are used in other industry sectors that could be used as the basis for an effective regulatory system for the internet industries? [Please write in space provided]

For content, the strongest protection is offered by parental controls which can recognise the age rating of the content concerned.

Ukie believe that PEGI represents a highly effectively regulatory system. It was developed over many years in a highly collaborative fashion with the industry. As such it reflects the real working practices of the industry and the likely content of games, whilst being clear and simple for users to understand. PEGI is also constantly developing to meet the needs of a changing industry, having recently launch PEGI Express and PEGI for Apps to enable a simple and free means of age rating which will apply in all PEGI countries be means of a single online application. These systems are currently supported by the games console manufacturers, Sony and Microsoft.

Our view is that, were PEGI to be adopted by other providers of game and non-game content, backed up by a requirement for the use of PEGI from the device manufacturers on which such content can be accessed, played or used, we would have a uniform system for content rating, which would enhance consumer awareness and, as such, increase the safety of children engaging in gameplay both offline and online.

28 What would most encourage your organisation to ensure parents are provided with effective parental controls? [Please write in space provided]

As stated above, we believe that self-regulation for both internet-enabled device makers and for the providers of online games is the best way to ensure that realistic and achievable, but effective, protections for children can be put in place.

Effective parental controls are ones that encourage the parents to engage in the issue of their child's safety online, but that do not decrease the functionality or enjoyment of the device or service they are using. These are most likely to result from a self-regulatory system that is developed carefully in concert with the industry that would have to provide them.

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