Is the UK's current system of age classification suitable for games?

Introduction

On the 6th of September 2007, the UK government commissioned Dr Tanya Byron to review the risks to children presented by both the internet and video games. The broad scope of this topic reflects the wide range of concerns that have been raised within public debate over recent years, such as the rapid proliferation of social networking websites, rising use and abuse of technology (such as the 'happy slapping' video fad), and whether parents can effectively moderate the internet access of their – often far more techno-literate – children.

While video games represent just one particular aspect of this rapidly-evolving digital frontier, they have been attracting controversy and criticism for a very long time. It is not entirely coincidental that, at the time of commissioning the Byron review, the Prime Minister's Office was preparing a response to an online petition to overturn the BBFC's[1] ruling that Rockstar's *Manhunt 2* was too violent to be given an age classification[2]. In the minds of many gamers, these events may not seem immediately linked – the Manhunt series has a strong reputation within the gaming community for its particularly graphic violence, and no reasonable adult would consider allowing a child access to such material – but one purpose of the review was to investigate and raise awareness of game content for the benefit of those *outside* of the gaming community.

Under current UK law, the Video Recordings Act 1984 gives video games a general exemption from standard BBFC classification, unless the game in question features lengthy video footage, or particularly graphic scenes of a violent, sexual or scatological nature. An alternative, voluntary, pan-European, game classification system operates by the name of PEGI[3], although its decisions have no legal standing within the UK. PEGI uses an online questionnaire to automatically award each game an age rating based on a general consensus across European standards, in addition to a series of icons to describe the specific content of the game. All major console manufacturers insist that games must

1 British Board of Film Classification
2 The petition, and the PMO's response can be found at http://petitions.pm.gov.uk/Manhunt2/
3 Pan European Games Information

be classified by either PEGI or the BBFC before they will allow publication on their system[4], but this is a purely voluntary business practice. Because the BBFC are only obliged to classify games featuring extreme content, it is typical for them to classify the small minority (around 4%[5]) of eligible games – usually bestowing them with a *15* or *18* rating - while PEGI handle the rest.

On the 27nth of March 2008, Dr Byron delivered her report, entitled *Safer Children in a Digital World*. Her main recommendations regarding games were as follows:

- A high-profile campaign to raise parents' understanding of age ratings and parental controls on consoles
- Extend the statutory requirement to age-classify games to include those suitable for 12+ ratings
- Make use of a 'hybrid' classification system, in which BBFC age classification logos are clearly shown on the front of every game to ease confusion, with PEGI's content icons appearing on the back of the box
- The BBFC and PEGI should work together to create a joint approach to classifying online games

Dr Byron's report has so far enjoyed a generally warm reception. Most parties agree that games are a healthy pastime but that more should be done to restrict the sale of mature titles to children. Support for her conclusions begins to wane, however, when the matter of who is to organise and pay for this expansion of the classification system arises. While the BBFC are reportedly welcoming the request to officially classify all 12+ rated games, many voices within the games industry have expressed concern that Dr Byron did not advocate PEGI for the role[6].

But what are the real differences between the BBFC and PEGI systems? Which is the most relevant approach to classifying interactive games? And what characteristics should a game classification system have, anyway? This essay aims to explore all of these questions, and determine what changes, if any, would be appropriate to the current system.

4 Byron (2008) – Paragraph 7.2
5 ELSPA (2007)
6 For example, see http://www.mcvuk.com/opinion/167/The-Industry-vs-Dr-Tanya-Byron-part-one

The Present Situation

Manhunt 2's certification problems demonstrate the full scope of action available within the BBFC rating system. Rockstar, as is required for games featuring particularly violent content, submitted to the board an asset-complete version of the game, along with video recordings of cut-scenes and gameplay highlights such as 'execution kills'. They rejected Rockstar's submission as being too violent even for an 18 certificate, and – in an unusual move – could not even propose a list of changes that could make the game acceptable. As it is illegal to sell uncertified games in the UK (outside of their usual exemption to certification), the BBFC's decision effectively banned *Manhunt 2*, driving many anguished fans to sign the aforementioned petition to overturn the ruling.

Rockstar, meanwhile, made an appeal to the Video Appeals Committee and submitted a partially censored version of the game to the BBFC for re-evaluation, but this too was rejected for being too violent. The VAC function as an independent body to which authors can appeal against BBFC decisions. After Rockstar's second submission was rejected out of hand, the committee began a lengthy legal tussle with the BBFC, eventually ruling in Rockstar's favour and insisting that the game be given an age classification on the grounds that it is no more violent than many contemporary horror films (such as *Saw* or *Hostel*). The BBFC awarded *Manhunt 2* an 18 certificate later that day.

PEGI's system is less intensive. Developers must complete an online questionnaire about the content of their game, which automatically suggests an age rating and all applicable 'content descriptors' – the icons PEGI use to describe the specific content of a game. In the case of mature content (anything that would be rated 16+), they must also submit a copy of the game to the Video Standards Council (acting as agents of NICAM[7]), who will manually inspect the game using similar methods to the BBFC – watching videos of the most contentious scenes, and experiencing some typical gameplay. During the initial questionnaire, the submitter is asked a number of questions pertaining to specific national censorship laws; depending on their answers, they may be referred to submit their game to individual national rating boards (such as the BBFC).

7 The Netherlands Institute for the Classification of Audio-visual Media – a Dutch film classification body

So far, both systems sound very similar. They both classify games that include explicit content by means of a panel review of recorded gameplay footage and a brief play-test; other, less offensive titles are given an automated rating by PEGI, and are simply not regarded by the BBFC. But, before their differences are trivialised, there are two points to remember:

Firstly, they already operate within one unified system. While it may be theoretically possible to release a BBFC-certified game in the UK without a PEGI rating, the same is not true in other European countries, many of which rely on PEGI to provide statutory age classifications. To be clear: practically all games released in the UK will be classified by PEGI, although some will also be classified by the BBFC, and some of these will be sold without visible PEGI symbols. While this essay is concentrating on the UK's classification system in particular, it should not be forgotten that the games industry extends beyond its national borders.

More tellingly, if PEGI and the BBFC were as similar as they sound, there would be no cause for the games industry and Dr Byron's recommendation to disagree so strongly over which body should wield statutory powers in the UK. It could be that this is simply due to economic incentive – since PEGI will already rate all games in Europe, it could only incur additional costs for the developer to have to go through the BBFC as well – but a comparison of their classification decisions suggests that there could be significant differences between their rating criteria.

Mass Effect, for example, was rated 18+ by PEGI, but only 12+ by the BBFC. It is easy to understand why *Mass Effect* could be considered an 'adult' game: players are expected to spend around 30 hours conducting intergalactic paramilitary operations, killing hundreds of humans, aliens and androids in a universe racked by xenophobia. Should they so wish, they are also given the option to engage in a wide range of 'mature' activities such as gambling, extortion, genocide, and a bout of moody, pre-apocalyptic sex. So then, why do the BBFC take a much more lenient stance on *Mass Effect* than PEGI?

Dr Byron's report highlights three main differences between the BBFC and PEGI approaches.

1) As PEGI is a pan-European system, it must reflect a wide range of cultural sensibilities. Some issues, such as sex and blasphemy, are regarded very differently in different cultures, and the rating system must respect them all. This is, she explains, one of the reasons for PEGI's 'content descriptors' – by giving more detail as to the specific content of the game, individual buyers can look beyond the age rating and decide for themselves what is suitable.

2) The BBFC is a statutory body that is legally obliged to classify games featuring mature content, but the vast majority of games lie outside of its concern. PEGI – in so far as the UK is concerned – is a voluntary source of consumer advice that classifies all games.

3) PEGI's classification guidelines focus on the content of the game, with no regard to the context in which is is presented. The BBFC's guidelines take account of both content and context, based on established UK sensibilities.

PEGI's pan-European responsibilities are obviously not an issue for the BBFC, whose classification guidelines are established through consultation with members of the British public. Similarly, the BBFC only operate a selective classification system because they are only required to classify certain games by law. Both of these points simply result from the organisations' legal positioning, however – their main difference, from a practical perspective, are their conflicting stances on whether or not to consider context when judging content.

Content vs Context

The issue of context is described by the BBFC's classification guidelines (2005) as being “central to the question of [...] acceptability”. The following quote, taken from a BBFC report into children's interpretations of screen violence, illustrates this point:

> *“If the violent action is considered either unjust or unfair, then the scene is considered more violent. Important within this was consideration of the relationship between protagonist and victim.”*

There are many other contextual factors that can affect the perceived violence of a scene, such as how closely the child can identify with the location or characters involved. The general rule is that children will be more affected by screen violence when they can relate it to their own lives, projecting themselves into the role of the victim and imagining how they would feel if the violence was targeted at them. For example, a gang of school bullies would represent a very realistic threat in a typical child's world view, whereas *Mass Effect*'s primary antagonists – a race of sentient androids – would be much more reassuringly distant from reality.

But while this may be an appropriate model for classifying film violence, does that necessarily make it an appropriate model for classifying games? Research into the differences between watching films and playing games has led to a number of different, often conflicting, conclusions. Many psychologically-led studies focused on the learning aspect of gameplay, as illustrated in the following excerpt from Dill and Dill (1998):

> *"In violent video games, aggression is often the main goal, and killing adversaries means winning the game and reaping the benefits. While in real life, murder is a crime, in a violent video game, murder is the most reinforced behavior…. The violent video game player is an active aggressor and the players' behavioral repertoire is expanded to include new and varied aggressive alternatives."*

Dr Byron's review of existing literature on the subject of violent games' effect on children, however, makes it very clear that this proposed causal link is far from an accepted theory. Many modern cultural theorists – such as Goldstein (2001) – have objected to the conclusions of these studies however, claiming that the artificial settings of these experiments, in which subjects are forced to play violent games rather than engaging in play by choice, invalidates the results. Dr Byron herself cites a BBFC study of video games by Cragg, Taylor and Toombs (2007), which yielded the following observation:

> *"Gamers appear to forget they are playing games less readily than film goers forget they are watching a film because they*

have to participate in the game for it to proceed. They appear to non-games players to be engrossed in what they are doing, but, they are concentrating on making progress, and are unlikely to be emotionally involved."

The study suggests that video game violence is less emotionally affecting than film violence. It is useful here to recall the earlier quote from their screen violence study: *Important within [consideration of violence] was consideration of the relationship between protagonist and victim.* Clearly, when considering games, there is a relationship between 'player' and 'opponent' that underpins any given context such as 'hero' and 'villain' – typical *Shenmue* players do not spend traipse around Yokosuka asking about sailors because they want to avenge their father's death, but rather because they know they must do so in order to advance the game.

This can be recognised as the principle that *Shadow of the Colossus* uses to manipulate its players' emotions: Once they understand that they must kill the giant colossi to progress, players will continue their brutal hunt no matter how many much doubt is planted in their minds. The reality of playing to win takes precedence over the fictional context of monster-hunting, so that players will often feel strangely guilty after each kill, but won't let it put them off their quest.

What does this mean for the UK's game rating system? It seems prudent to return to the BBFC's own findings on screen violence – that the context in which violence occurs is central to the question of acceptability. Within this new approach, where the context is that the player must complete certain tasks to complete their game, we find that many of the existing perspectives on screen violence are somewhat turned on their head. As we have learned, children interpret film violence in terms of how closely they can identify with the victim but, in almost all cases, video game violence regards the player-character killing computer-controlled characters; players identify with the character they control, rather than their victims.

For example, studies have shown that the perceived violence of a scene is affected by the perceived balance of power between its participants[8]. But in many games, the balance of

8 See, for example, the discussion on *Behind Closed Doors*, on page 65 of Hargrave (2003)

power is tipped so far in the player's favour that it seems unfair on the non-player characters! When players can kill their enemies with an effortless sweep of brightly coloured bullets, their defeated foes simply vanishing into thin air, it suggests a far less 'violent' perception of the scene than could be expected. Conversely, in a game such as *Hitman: Blood Money*, killing an enemy often involves careful planning, using realistic murder methods. That the bodies of victims in *Hitman* do not simply fade away, but become an important part of the game mechanics, makes their deaths seem all the more 'real', and consequently much more violent.

Non-Linearity

Of course, there is more to this debate than discussing the acceptable limits of game content. For example, it is worth questioning the assessment methods employed by these organisations – both NICAM and the BBFC have a great deal of experience in classifying films, but far less experience in classifying games. Should their methods be adapted to reflect the audience experience?

There is an obvious practical problem with asking the PEGI or the BBFC to play every game to completion before they rate it, in that some games take many days to complete, and many allow multiple routes that would increase the length of testing time exponentially. In addition, it must be asked what real benefit there is to be found in playing games through, when the game developers (who should already be aware of all potential gameplay paths) could just summarise what takes place. Should classification take into account the evitability of experiencing a particular piece of content?

The sex scene in *Mass Effect*, for example, is purely optional, and requires to the player to have invested a great deal of time exploring a romantic relationship with one of the main characters, which many players may choose not to pursue. However, if age classifications are supposed to function to prevent adult material from falling into under-age hands, it is clear that they must reflect the most mature content accessible within the game. In the same way that players may have the option to skip a portion of a game, film viewers may have the option of covering their eyes and ears during the screening. The BBFC's role is to evaluate the content available to the audience, not to second-guess how the audience will choose to read it.

Ergodic Suitability?

One common response to the current combined system approach is for parents to mistake PEGI's age classifications as relating to the difficulty of the game[9]. There are two common reasons for this. Their children may have given them this explanation so as to trick them into buying unsuitable games, which represents an obvious breakdown in the rating system. Alternatively, they may have assumed that video games follow a similar age recommendation scheme as board games, which often include a suggested player age range on the box.

Partly, this latter explanation is the result of having two different sets of rating symbols on display; parents recognise and understand the BBFC symbols, and assume that the unfamiliar PEGI symbols must have some other meaning. This highlights one of PEGI's weaknesses within the UK - that it is largely unknown, and not very intuitive to a consumer base who are used to BBFC ratings - but it also reveals an important consideration that is currently overlooked in game classification. Gameplay difficulty is a crucial factor in determining how suitable a game is for a particular player, and yet no system has yet been implemented to express this to consumers.

This is obviously a very different approach to game classification than the usual concerns about inappropriate content, but it addresses a very unique problem for the audience. For example, PEGI awarded *Victoria: An Empire Under the Sun* a 3+ rating, although it is far too complicated for any pre-school child to understand.

But game difficulty cannot simply be expressed as a suggested age range. Due to the computer's function as a tireless, omnipotent umpire, digital games are generally far more rapid and complex than board games, and require a far greater degree of manual skill. As this is something that improves with the length of time spent playing, it is quite common to find teenage players – who have fewer other commitments to 'distract' them from gaming – who are much more skilled than their older counterparts.

There has been little research done into how game difficulty should be quantified, but

9 See *Classifying Games: Qualitative Research Findings* (2008)

perhaps the most feasible solution currently available would be for game developers to simply make a broad, realistic indication on the back of the game box? This would similar to the practice of board game publishers defining a suitable age range on their products, but without tying the measurement to age. However, there are a number of practical problems with this solution, chiefly that games developers – and consumers – would need to agree on some measurement of difficulty; there is no point in describing a game as “very complex” if the consumer has no point of reference as to what would be 'typical' complexity.

Moving Forward

It is clear that the current ratings system is too complicated for many people to understand; the mixture of BBFC and PEGI age ratings, and PEGI's somewhat ambiguous content descriptors, leave many people confused. However, Dr Byron's recommendation to use BBFC classification symbols on the front of game boxes, and PEGI symbols on the back, would only increase this confusion.

There would clear be improvements in clarity associated with operating a single system in the UK, although there is a decision to make in which system to institute. Once the relative strengths and weaknesses are weighed up, however, there is a definite advantage towards the BBFC:

- PEGI give age ratings to *all* games, but this is only an advantage because the BBFC are not currently required to do so.
- PEGI publish content descriptor icons on game boxes, although many parents do not understand what they mean.
- PEGI do not consider context when classifying game content. This, as has been discussed, is a critically important factor in how children relate to games.
- PEGI have a responsibility to uphold standards across Europe, and so cannot tailor their ratings to specifically suit UK sensibilities.
- The games industry will continue submit all of their games to PEGI regardless of the BBFCs statutory status, as they need to seek ratings for other countries.
- The BBFC's age classification icons are already very well known to people in the UK, as they are the same icons used to classify films.

Many of the points on which PEGI have the advantage could be undone quite easily by changes to UK law. For example, the exemption that video games currently enjoy from mandatory classification was established almost a quarter of a century ago in the Video Recordings Act 1984, when games featured far less realistic graphics, enjoyed a much smaller market penetration, and were often much more abstract in design. It seems like a very anachronistic law to maintain to this day, given the huge advances we have seen in both graphical quality and audience size.

It seems that, if we are to keep the UK's best interests at heart, we should simply revoke the exemption and have the BBFC classify all games released within the country. Around half of all games would still be rated U or PG[10], often on grounds of being abstract. This 'unrealism' is the main reason why games are currently exempted from rating at present, but to place a formal certification on them would create a complete, reliable system that mirrors that of films, which would obviously be much more easily understood by parents. Dr Byron's recommendation to introduce a 12+ rating makes good sense, but it seems a little illogical to stop there, when supposedly around 44% of games released in the UK would be rated as a U anyway – simply putting the U icon on the box would reassure some parents.

The one unique strength of the PEGI scheme is that is describes the particular content of a game, so that consumers can understand what they are buying; that said, it seems that this is largely done as a concession to the fact that they must use the same age rating across a range of cultures. In addition, the 'content descriptors' scheme suffers from the problem that its icons are quite easily misunderstood by consumers. One way to adopt the best aspects of this scheme, while overcoming its main problems, would be to simply write a short, written description of content on the back of the box – 'Contains mild violence, strong language, and psychological horror', for example. This is an approach used sporadically by the BBFC, who will describe these classification factors on their website, but not always on the game boxes themselves, and that many parents prefer over PEGI's symbolic system[11].

10 According to data on page 143 of Byron (2008)
11 *Classifying Games – Qualitative Research Findings* (2008)

Conclusion

The current UK system of classifying games is inadequate, largely because it exempts games from formal classification by default. This may have made sense back in 1984, but seems totally inconsistent with the UK's attitude to film classification, given the current level of audio-visual realism in games. As a result of this exemption, the UK operates on an unusual split system, in which two ratings bodies use two different guidance systems to grade the same games. While the games industry in general prefers PEGI's rating system, the BBFC make use of a much more academically-informed model of how audiences interact with their texts and, unlike PEGI, can work within a specialised UK cultural framework.

Ideally, the exemption of games from classification should be lifted, and then all games should be classified under BBFC guidelines. However, these guidelines should take into account the ludic relationship between players and game – to make an allowance for the player's role as instigator of much of the game's content. In addition, clear, brief descriptions of content should be included, so that consumers can make more informed choices as to what they are buying. Classifying all games would increase the BBFC's workload – even after implementing Dr Byron's recommendations, they would still currently be required to classify only around half of all released games – but would remove parents' uncertainty over the lower end of the rating spectrum, and could help reinforce the point that age ratings on games should be taken just as seriously as on films.

Aside from content, there are other considerations to be made regarding games, such as the difficulty of the game, and the social nature of online games. But these cannot simply be expressed in terms of suitable ages, and would require a more detailed description on the game box to truly clarify them for consumers.

The problem of unknown game difficulty can be assuaged by making it easier for consumers to return unsuitable games for a refund – an act that many games retailers try to discourage, particularly for PC titles. Clearer guidelines on consumer rights in this area could be a step forward in this regard. It should be noted, however, that this represents compensation for an inadequate rating system, rather than an improvement to the rating system itself.

Regarding online games, the dangers children face by mixing with strangers is not so different to the dangers they face by socialising in real life, or on the internet in general. The suitability of an online game for younger players should be measured in terms such as parental controls, and freedom of speech. Child-orientated games such as *Toontown Online*, for example, are very focused on protecting young players, and tightly restrict social conversation to a list of simple sentence constructions. Clearly, this is much more appropriate for children than a game like *EVE Online*, but there is no clear way to express this to uninformed consumers.

To surmise, Dr Byron's report is an accurate account of the UK's problems in game classification, and her recommendations go some way towards improving the system, but as many of the problems come from consumers' confusion over having both BBFC and PEGI systems in operation, it seems that her recommendations simply do not go far enough. Her concessions to PEGI – such as putting their content descriptors on the back of game boxes – are not really necessary, when the BBFC could quite easily provide a recognisable alternative that is tailored to UK sensibilities.

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