Australian Government

Department of Communications and the Arts

Pilot of the International Age Rating Coalition (IARC) Classification Tool

Final report

August 2016

Contents

1.   Background

This report is primarily intended for Commonwealth, state and territory classification ministers and officials and relevant stakeholders. It contains commercially sensitive material and is not for distribution or publication.

1.1.   Classification of mobile and online games in Australia

Currently most computer games including mobile and online games must be classified before being made available in Australia. However, the National Classification Scheme (NCS) was not designed to cater for the vast amount of mobile and online content that is now produced. For example, in 2014-2015, the Classification Board (the Board) made 3,667 commercial classification decisions, including 514 for computer games. The vast majority of the content considered by the Board was offline or physical products. On the other hand few, if any, of the hundreds of thousands and potentially millions of games available online were submitted to the Board for classification.

If applications for all mobile and online games were submitted, the Board in its present form would be unable to cope with the workload. Additionally, if compliance action were taken for all unclassified online content (such as the issuing of a 'call in notice' by the Director of the Board), it would impose a financial burden on industry which could threaten the existence of smaller operators and encourage some to withdraw or limit their Australian market presence.

1.2.   The IARC tool

The International Age Rating Coalition (IARC) classification tool (the tool) was developed by its members, comprising the industry computer games ratings authorities for the United States and Canada (ESRB), Germany (USK) and Europe (PEGI), as well as the government classification bodies responsible for Australia and Brazil (ClassInd).[1]

The tool seeks to increase mobile and online games publishers' compliance with classification requirements around the world by providing an easy to use online decision-making instrument which enables fast and cost-effective classification.

The tool requires developers releasing games on participating storefronts to complete a multiple choice online questionnaire about the content of their game. Based upon the responses, the tool generates a tailored classification decision for each member rating authority's jurisdiction (e.g. 'PG' in Australia, '12' in Europe). IARC decisions are published on the storefront and Australian classifications are uploaded to the Government's public National Classification Database (NCD) available at www.classification.gov.au.

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[1] These bodies are referred to as 'member ratings authorities' in this report.

1.3. Piloting the tool

In its 2012 report on the NCS, titled *Classification – Content Regulation and Convergent Media*, the Australian Law Reform Commission recommended the use of classification decision-making instruments such as online questionnaires.

In April 2013, Commonwealth, state and territory classification ministers agreed to a 12 month pilot of the tool. The *Classification (Publications, Films and Computer Games) Amendment (Classification Tools and Other Measures) Act 2014* received Royal Assent on 11 September 2014, enabling the Commonwealth Classification Minister to approve tools.

On 10 March 2015, the Minister for Justice announced that Australia had joined IARC and would conduct a pilot of the tool. The Australian pilot commenced on 1 July 2015 and concluded on 30 June 2016. As a result of Machinery of Government changes in September 2015, the Minister for Communications (the Minister) became the Commonwealth Classification Minister and therefore the responsible minister for the pilot.

The Classification Branch (the Branch) of the Department of Communications and the Arts administered the pilot and its evaluation. The results of the evaluation are outlined in this report.

To enable the tool to continue to be used while the pilot is evaluated, the Minister has extended the approval for use of the tool in Australia beyond the pilot period to 31 December 2016.

1.4. Evaluation of the pilot

The pilot was evaluated to assess the overall effectiveness of the tool and to inform decisions about the tool's continued use in Australia. The evaluation encompassed the accuracy and reliability of the tool in making classification decisions, as well as factors such as industry and community satisfaction, impact on industry compliance and overall efficiency.

The functions of the evaluation included:

- assessing the accuracy of the tool

- identifying any opportunities for improvement

- assessing the impacts of the tool on the community and industry

- assessing the impacts of the tool on the Government's classification function

- assessing the efficiency of the tool

- assessing user satisfaction with the tool (i.e. among industry and community members).

The objective of the evaluation was to guide the Minister's decisions about the future use of the tool and recommend areas and strategies for improvement should the tool be adopted on an ongoing basis.

The methodology for the evaluation included:

- an audit program comprising 432 random audits

- additional targeted audits as required

- analysis of data on consumer complaints and requests for 'ratings checks' from game developers

- consultation with industry, community, and government stakeholders

- an online survey of members of the community.

Planned analysis and review of data from other member ratings authorities such as audit and evaluation results, market and stakeholder research, and comparison of such data with results of the Australian pilot, was not undertaken as this material was not available to the Branch.

1.5.   This report

This report provides a discussion of the outcomes, performance, lessons learnt and recommendations resulting from evaluation of the pilot. This report has been drafted with input from state and territory classification officials and the IARC Stakeholder Group (see 2.1).

2.   Pilot activities

2.1.   Governance

Management and staffing

The participation of Australia in IARC is administered through the Branch. The Assistant Secretary of the Branch leads Australia's participation in IARC as a member of the IARC Board and oversaw the implementation of the pilot.

One full time officer was assigned to the pilot (the IARC officer). The IARC officer was responsible for day-to-day oversight of the pilot, stakeholder liaison, representing the Branch at the Ratings Authority Working Group (see below), handling enquiries from industry and the public, conducting audits of decisions made by the tool, analysing audit results to identify areas for improving the tool and implementing these improvements with IARC.

The Classification Board was responsible for making decisions about the adjustment of classifications made by the tool which were carried out by revoking incorrect decisions as appropriate and making new decisions. The Board's role was primarily carried out by the Director.

The Policy and Research Section was responsible for the tool's legislative policy framework, including providing advice to the Branch and the Director, and for conducting the evaluation.

The Government's participation in IARC is designed to be cost-neutral (apart from some initial set-up costs for technical and administrative arrangements), and mechanisms exist for reasonable costs to be recovered from IARC.

IARC Board

IARC is a not-for-profit organisation incorporated in the US state of Delaware. The IARC Board consists of senior leaders from IARC's five participating member ratings authorities. The Board meets at three to six month intervals and is the peak decision-making body for the governance and operation of the tool. Three IARC Board meetings were held during the pilot.

IARC Steering Committee

During the pilot, an internal steering committee comprising members of the Branch and Board met regularly to discuss and make decisions about IARC governance, policy and procedural matters surrounding the pilot and audit results. It also discussed any feedback or information provided by other member ratings authorities who were using IARC.

Ratings Authority Working Group (RAWG)

IARC officers from member ratings authorities held weekly teleconferences[2] and exchanged correspondence to discuss day-to-day operational matters and the current and future functionality of the tool. Proposed technical changes to the tool, including changes to the underlying logic of the tool, were primarily discussed and progressed through the RAWG.

IARC Stakeholder group

An IARC Stakeholder Group was convened for the duration of the pilot, which included representatives of Family Voice Australia, the Interactive Games & Entertainment Association (IGEA), the Australian Council on Children and the Media, the Australian Christian Lobby, the Communications Alliance, the Australian Mobile Telecommunications Association, the Advertising Standards Bureau, the Classification Review Board, the International Social Games Association and the Australian Communications and Media Authority.

The Group provided a forum for representatives of these key industry and community stakeholder groups and regulators to stay informed of the progress of the pilot, ask questions, raise concerns and make suggestions. Stakeholder group members were encouraged to contact the Branch as needed and were given the opportunity to request audits of any decisions made by the tool that they had concerns about. The stakeholder group met in August 2015 and July 2016.

The stakeholder group was provided with a consultation draft of this report. Members unanimously expressed satisfaction with the achievements of the pilot and support ongoing use of the tool.

States and territories

The Commonwealth provided updates to the states and territories on the progress of the pilot via meetings of the Classification Senior Officials Working Group, which was formed to discuss classification policy and reform issues. The group met in August 2015 and February 2016 and were provided updates on the pilot.

The Minister provided a progress report to state and territory classification ministers in April 2016. A consultation draft of this report was provided to state and territory classification officials. This report incorporates the feedback received.

The pilot of IARC has been undertaken at no cost to the states and territories and its ongoing use would assist in reducing the proportion of non-actioned non-compliance for which they are responsible.

Participating storefronts

Several major providers of online, mobile and downloadable games used the tool for the classification of games distributed on their Australian storefronts. Google Play participated in the pilot from its commencement, while Microsoft and Nintendo began using the tool during the course

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[2] Australia was unable to participate in real time in most RAWG teleconferences due to time zone impracticalities, but each teleconference was recorded for Australia's benefit.

of the pilot. IARC acted as the primary liaison between the Branch and participating storefronts throughout the course of the pilot.

2.2.   Developing the tool

The Branch worked closely with IARC on designing the tool so that it would be able to generate Australian classifications and consumer advice (CA) consistent with the Classification Code and Guidelines for the Classification of Computer Games 2012, Board practices and the Minister's Classification (Publications, Films and Computer Games)(Approval of Classification Tools) Guidelines 2014 (the Classification Tools Guidelines).

The tool is able to generate all Australian computer game classifications: G, PG, M, MA 15+, R 18+ and Refused Classification. The tool is also able to generate a wide range of CAs, including advices concerning all six classifiable elements - violence, sex, nudity, drug use, language and themes, as well as the corresponding impact descriptor for each category (e.g. 'very mild' for G, 'mild' for PG etc.). The tool also generates the computer game specific CAs of 'simulated gambling' and 'online interactivity'.

Testing of the tool conducted in preparation for the pilot included a number of 'test runs' on games by the Branch and by industry conducted with the assistance of the IGEA and its members.

2.3.   Implementation activities

During the pilot period the Branch:

- established the necessary internal governance structures, stakeholder networks and communication channels to support the operation of the IARC tool in Australia

- developed the necessary policies and procedures for administering the tool, including updating processes throughout the pilot to improve efficiency

- implemented upgrades to the Classification Portal which enabled all IARC classifications to be hosted on the NCD and enabled corrections of IARC decisions to be returned to IARC systems and relevant storefronts in an efficient and timely way

- developed the audit process and evaluation methodology for the pilot, including a strategy for continuous improvement

- worked with IARC to identify areas for improving the operation of the tool

- liaised with industry throughout the pilot and published a fact sheet for game developers.

2.4.   Assessing the accuracy of the tool's decisions

An audit process was designed to assess the accuracy of the classifications made by the tool in comparison to how the Board would have classified the game and to identify any areas for improvement of the tool.

Assessment methodology

Audits were conducted throughout the pilot period. Assessment of the tool's accuracy in comparison to decisions of the Board was informed by randomly sampled audits of games selected from all

participating storefronts. A target of 420 random audits was set prior to the commencement of the pilot.

Approximately equal portions of IARC decisions were randomly selected from each classification category to ensure adequate data on each classification category (i.e. G, PG, M, MA 15+, R 18+) could be collected and analysed. To accurately assess the overall accuracy of the tool, data on audit results was then weighted based on the overall proportion of games classified by the tool at each classification level.

Targeted audits

Targeted audits were also carried out as required. Targeted audits fell into the following categories: consumer complaint received, rating check requests received (from developers), audits by the Director of the Board on its own initiative, contentious and high profile games and games referred by Commonwealth and state and territory ministers and the stakeholder group.

Data from targeted audits helped to inform the evaluation of the tool more broadly. However, to preserve the integrity of the randomly sampled audit data, results of non-random audits were excluded from the accuracy assessment.

Audit process

The audit process (for both random and targeted games) used during the pilot was as follows:

Testing and rectification

1) The game to be audited was downloaded to a device and played by the IARC officer.

2) The IARC officer then recommended a classification and CA to the Director of the Board, which may or may not be different to decision of the tool.

3) The Director could then accept the recommendation or assign a different classification and/or CA to the game.

4) In cases where the recommended classification and/or CA differed from the original IARC decision, the new details were reported to IARC through an online portal, which communicated the change to the developer and storefront hosting the game. The NCD was also updated at the same time.

Continuous improvement

Where the classification and/or CA differed from the original decision generated by the tool, the IARC officer sought to identify actual or potential sources of the discrepancy by referring to the questionnaire responses provided by the developer to the tool and comparing these to the content found during the audit. The IARC officer then used this information to identify whether the tool had produced an incorrect result (ie. where the inputs to the tool were correct but an incorrect classification was generated), or if the developer had incorrectly answered a question (eg. by over-declaring or under-declaring content found in a game).

If the tool produced an incorrect result, the IARC officer would identify the underlying cause—such as the 'logic' of the IARC questionnaire providing incorrect classifications—and considered what rectification action may need to occur. If a game developer answered a question incorrectly, the IARC officer would seek to contact the developer to help understand why the question was

answered incorrectly. This feedback has assisted in identifying improvements to the questionnaire or the help text that accompanies the questionnaire.

The IARC officer also discussed potential discrepancies with the tool's outputs and rectification action with IARC, the Steering Committee and the RAWG on a regular basis.

3.   Audit results

A total of 493 audits were completed between 1 July 2015 and 30 June 2016 including 432 random audits (against a target of 420).

Reason for Audit	No. of audits (as at 30 June 2016)
Random audits	432
Targeted audits	61
- *Request from Director of Classification Board*	16
- *Complaint received (from consumers)*	2
- *Rating check request (from developers)*	13
- *Contentious or high profile*	1
- *Referred by Commonwealth Minister*	29
- *Referred by Stakeholder Group members*	0
- *Referred by states and territories*	0
Total	493

3.1.   Targeted audits

Targeted audits were conducted *in response* to an anticipated set of circumstances and as such the numbers of audits in each target category were dictated by the frequency of these occurrences during the pilot.

The highest volume of targeted audits were in response to referrals by the Minister, requests by the Director of the Board and rating check requests from developers. Audits requested by the Minister are discussed below (Survival Island: Australia Story).

Audits requested by the Director of the Board were drawn from games which had been audited and had their classifications amended in overseas jurisdictions by other member ratings authorities *and* assessed as high risk the Branch (based on content, risk of under-classification, popularity of game etc.). As could be expected, 12 of the 16 audits in this category resulted in the audited game receiving a higher classification than that generated by the tool.

Only 13 ratings check requests were received from developers. During the audit process, seven games were found by the Board to warrant a lower classification than that generated by the tool, while in the remaining six cases the Board agreed with the classification generated by the tool.

Two audits were conducted relating to consumer complaints:

- *Vega Conflict* was classified by the tool as PG with CA of 'Mild violence, online interactivity'. The Board assessed the game, and found that both the classification and CA generated by the tool were appropriate.

- *Sherlock Criminal Case 1* was classified RC (Refused Classification) by the tool. The Board found that the game in fact warranted a PG classification, with CA of 'Mild themes, online interactivity'.

One game, *Clash of Clans*, was audited due to its high profile and popularity. The game was classified by the tool as M with CA of 'Violence, online interactivity'. As a result of the audit the Board downgraded the game's classification to PG with CA of 'Mild violence, online interactivity'.

Survival Island: Australia Story

The relatively high number of targeted audits conducted in response to a referral by the Minister was due to the controversy surrounding the game *Survival Island: Australia Story*. In January 2016, there were a range of media articles about the game concerning content that was reported to involve the killing of Indigenous Australians in a 'bush survival' setting.[3]

The Google Play version of *Survivor Island: Australia Story* was classified by the tool as MA 15+ (Restricted to persons over the age of 15 unless accompanied by a parent or guardian). Following public complaint the game was quickly removed from the Google Play storefront. As the game was no longer available on Google Play, the Branch was unable to obtain a copy of the game in order to conduct an audit. The Branch then audited all other available games from the same developer. Of the 29 games audited, none of those were found to include content that warranted a classification higher than that determined by the tool. 24 of the games were found to be classified correctly by the tool while five were subsequently given a lower classification.

The swift action by Google Play to remove the game from its storefront demonstrated industry's responsiveness to consumer concerns.

3.2.   Random audits

The table on the following page summarises the outcomes of the 432 random audits completed during the pilot. Audit results are broken down by the rating given by the tool in order to provide a clear picture of how the tool performed in each category.

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[3] http://www.smh.com.au/digital-life/games/survival-island-3-australia-story-3d-game-that-encourages-players-to-bludgeon-aborigines-to-death-causes-outrage-20160115-gm76mw.html

Rating	Random audits	Rating lowered	Rating raised	No change	% audits resulting in rating lowered	% audits resulting in rating raised	% no change
G	72	0	7	65	0%	10%	90%
PG	72	29	5	38	40%	7%	53%
M	72	38	2	32	53%	3%	44%
MA 15+	72	59	0	13	82%	0%	18%
R 18+	72	72	0	0	100%	0%	0%
RC	72	71	0	1	99%	0%	1%

The data shows excellent results at the G level with the tool likely to give content the same rating as the Board in approximately 90% of cases.

In the mid-range categories (PG and M) the accuracy is lower, with the tool likely to give the same classification as the Board in approximately 53% of cases for PG and approximately 44% for M. Across both categories the tool is likely to classify games either the same or higher than the Board in more than 90% of cases.

There is a low level of accuracy at the higher end of the classification spectrum (particularly R 18+ and RC), although this lower accuracy level is entirely due to the tool placing games in a higher category than the Board. There were no instances of games rated MA 15+ or R 18+ by the tool having a lower classification than what the Board would have determined. The low level of accuracy in these higher categories appears to be in large part due to game developers over-declaring the level of content in a game (see discussion at 4 below).

3.3.   Accuracy of the tool

As noted above, to obtain a true picture of the overall accuracy of the tool when compared to decisions of the Board, the audit results for each category must be weighted for the incidence of games classified by the tool at each category.

The table on the following page shows the total number of games classified by the tool in each category and the approximate proportion of games that are likely to have been given a rating higher, lower or the same as that which the Board would have given (based on the audit results outlined above).

For example, the tool classified a total of 404,985 games in the G category for the pilot period. The audits found that approximately 90% of games classified G by the tool would have been classified by the Board in the same category. Therefore, a total of approximately 365,600 games classified G by the tool are likely to have been given the same rating as the Board.

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IARC Rating	Number of decisions	Rating higher than Board (approx.)	Rating lower than Board (approx.)	Rating same as Board (approx.)
G	404,985	0	39,374	365,611
PG	27,270	10,984	1,894	14,392
M	50,135	26,460	1,393	22,282
MA 15+	11,866	9,723	0	2,143
R 18+	1,514	1,514	0	0
RC	541	533	0	8
Total	496,311	49,215	42,660	404,437
Total %	100%	10%	9%	81%

The data shows that the general accuracy of the tool is high, at approximately 81%. Overall, the tool is about as likely to classify content in a higher category as the Board as it is to classify content in a lower category (in approximately 10% and 9% of cases respectively). However, the incidence of under-classified content is almost entirely related to decisions by the tool at the G level, while the incidence of over-classified content occurred throughout the categories (excluding the G level where over-classification is not possible).

Prior to the commencement of the pilot, one of the key risks identified in using a classification tool was that content at the restricted classification categories (i.e. MA 15+ or R 18+) and RC content may be under-classified. The data shows that this risk was not realised.

Excluding games for which the tool produced a G rating, the data shows that the tool has a strong tendency to over-classify content, particularly in the restricted classification categories. No game classified PG by the tool was found by the Board to warrant a classification higher than M, and only a very small proportion of games classified M by the tool were found to warrant a higher classification (none were found to be RC). As previously mentioned, no game classified MA 15+ or higher by the tool was found by the Board to warrant a higher classification.

Approximately 10% of the games classified G by the tool were found to be under-classified. Based on the data, of the games classified G by the tool approximately 4.2% and 5.6% of these games could be expected to be classified as PG and M respectively by the Board (with negligible risks for anything higher). Analysis of the audit results shows that the majority of the games classified G by the tool which were found to be under-classified were the result of advertising integrated within the game's content and the fluidity of integrated advertising, rather than the actual content of the games themselves. Further discussion of advertising in games is at 4.1 below.

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4.   Reasons for incorrect classifications

4.1.   Classification decisions

Factors that contribute to incorrect classifications by the tool which have been identified during the audit process are discussed below. Please note that the following reasons are discussed generally and some may apply more to certain types of games or specific storefronts than others.

Developers declared non-existent content

In many instances, developers declared content that was not found during the audit, leading to over-classified decisions of the tool. For example, the game *Whack a Mole* was declared by the developer to contain blood and gore, which was not found during testing.

The IARC officer attempted to contact developers to discern why they were declaring non-existent content, but this process has been unable to uncover the precise reasons for this practice. It is possible that over-cautiousness, advertising and language/cultural differences may play a part (discussed below).

Developers over-declared the impact of content

It was identified that developers frequently over-declared the impact of content in their games. For example, the developer of *Train War Sniper 3D* declared that the game contained a high level of blood/gore, and the game was classified by the tool as R 18+ with CA of 'High Impact Violence, Blood and Gore'. However, the Board found that the game contained only moderate level violence and classified the game M with CA of 'Mature themes and violence, online interactivity'.

Noting that answering the questionnaire will necessarily involve a degree of subjective judgement and that differences with Board decisions are to be expected, particularly given that game developers are not trained in Australian standards like Board members, it is interesting to note that in almost all examples the developer has answered conservatively. This result is consistent with feedback from IARC that game developers have a tendency to take an overly-cautious approach to using the tool.

Issues regarding the treatment of advertising

Many games classified by the tool included integrated advertising for other games. Such advertising is problematic for classification generally, because it can contain material of a higher level than the game itself and, rather than being a constant feature of the game being classified, the advertising can be different each time the game is played.

The IARC tool is not currently designed to consider integrated advertising as part of the game and as a result, does not have the capacity to determine the impact of advertising on a rating. When declaring content in their games, many developers would not consider (or be able to consider) the potential impact of integrated advertising content. However, when the Board considers a game, it *must* treat the content of any specific advertising encountered during testing as part of the game itself.

Of the randomly audited games classified G by the tool which were found by the Board to warrant a higher classification, the majority were due to content in advertisements that was at a higher level than the content of the game itself. For example, if the game contained an advertisement for a third

party simulated gambling game, the game was given an M rating, even if the content of the game itself was G.

Of the randomly audited games classified PG or higher by the tool which were found by the Board to warrant a lower classification, it is possible some game developers *did* consider actual or potential advertisement content in a game which did not appear during the auditing process. This situation would potentially contribute to the over-classification of content.

Programming logic issues/lack of nuance

In some instances, the programming logic used by the tool (which determines how responses to each question will affect the classification given) caused the tool to output unexpected decisions. In other cases, the tool was found to lack the nuance required to assign the appropriate classification, given the complexities of classification and the difficulty of replicating 'borderline' decisions made by the Board. At the time of writing, work is underway to rectify these issues (see 4.3 below).

Language barriers and cultural differences

Language and culture also appears to play a role in how some game developers are answering questions. On Google Play, the IARC questionnaire is translated into several languages. To help establish consistent standards, the questionnaire and accompanying help text provides examples and screenshots of various levels of content.

However, nuances in interpretation appear to lead to some game developers answering the questionnaire slightly different to others. Furthermore, different cultural standards or norms (eg. differences in regional standards with respect to violence, sex, language, nudity etc.) may also result in differences in how the questionnaire is interpreted.

Developers did not declare content

In a very small number of instances, developers did not identify in the questionnaire classifiable elements (e.g. themes or violence) that were contained in the game. The audit process found only three cases in which the game developer failed to declare content that would have resulted in a higher classification of the game. Given that the non-declaration of classifiable content by developers was one of the key risks of using the tool identified prior to the pilot, this low volume is an excellent outcome and demonstrates game developers' support for the tool.

4.2.   Consumer Advice

Section 20 of the *Classification (Publications, Films and Computer Games) Act 1995* requires that the Board determine CA giving information about the content of a classified game. Similarly, classification tools must determine a CA under the Classification Tools Guidelines. Decisions made by a tool may be revoked if the Board is of the opinion that it would have determined a different CA for the material. However, there is no legislative guidance as to how CA should be formulated and for this reason instances where the Board changed the CA determined by the tool have not been incorporated into analysis around the accuracy of the tool outlined at 3.3.

The tool can generate around 43 descriptors for CA, including key CAs addressing each classifiable element and relevant impact level, as well as 'simulated gambling' and 'online interactivity'. However, more detailed descriptors sometimes used by the Board such as 'fantasy violence' or 'science fiction violence' are not currently able to be generated. Specific kinds of online interactivity are also not currently addressed in the questionnaire.

In approximately two thirds of the random audits in which the Board agreed with the classification generated by the tool, the Board determined a different CA. However, only in a small minority of cases was the CA generated by the tool found to be grossly incorrect or misleading about the content of the game itself. In the majority of cases, the CA was amended due to the limitations of the tool in relation to the range and level of nuance in CA it can currently produce. In a few cases, additional CA was deemed to be warranted due to content present in advertisements rather than the game itself.

Further consideration should be given to the appropriate level of expectations placed on classification tools in relation to CA. The Branch and IARC are working together to increase the number of CAs that are able to be generated by the tool and to make improvements to the way that CAs is generated. However, given current technological limitations and the inherent subjectivity and discretion involved in the formulation of CA, it cannot be expected that a tool will formulate CA in exactly the same manner as the Board.

4.3.   Anticipated improvements to functioning of the tool

A number of specific improvements are planned which are expected to increase the accuracy of the tool. The Branch has identified a number of questions that could lead a developer to over-declare content, and has identified changes that can be made to the questions and/or the accompanying help text. For example, a clearer explanation of what constitutes 'Blood and gore' may be necessary, as developers tended to select 'yes' to this item when even only a few spots of blood were visible.

The Department also proposes to build more questions into the tool about the nature of online interactivity involved in the game, which is anticipated to improve the accuracy of both classifications and CA produced by the tool. The Branch has further compiled a list of programming fixes that will help calibrate the logic of the tool. Options for how to better to deal with the issue of advertising in games classified by IARC are also being considered.

The Branch does not have the ability to make changes to the tool unilaterally due to the international nature of the IARC partnership. Instead, IARC will implement periodic tranches of revision of the tool's logic based on feedback from all members. The detailed records maintained as part of the audit process (along with similar reporting from other member ratings authorities), will inform the next revision of the tool's logic expected to be implemented in late 2016.

If the ongoing Australian use of the tool is approved, Australia and other member ratings authorities should continue to work to identify specific patterns and potential improvements to the questionnaire and the tool's logic.

Participation in global overrides

The 'Global Overrides' function of the tool allows member ratings authorities to leverage each other's auditing resources by providing for one ratings authority to alert other members when they identify an erroneous decision of the tool (e.g. due to an error in a developer response to a questionnaire). Other ratings authorities have the option to accept these changes for their jurisdiction without the need for auditing.

Due to administrative challenges posed by the legislative framework of the classification tool scheme, Australia did not participate in Global Overrides during the pilot. Options will be explored to see whether Australia can use the Global Overrides function in future.

5.   Stakeholder feedback on the tool

The key stakeholders in the pilot are identified as consumers, developers and the games industry more broadly, state and territory ministers responsible for classification and their departments.

The nature of feedback on the pilot from stakeholders over the twelve months of its operation has been almost entirely positive. The overall positive industry, stakeholder and public response in Australia is consistent with the feedback received by other member ratings authorities and overseas media reporting on the tool more generally.

Ratings check requests

Out of the total 496,311 decisions made by the tool, only 13 rating check requests have been received from developers during the pilot.[4]

The very low number of ratings check requests in relation to overall decisions made indicates that game developers generally agree with, or are satisfied with, the classifications they receive from the tool.

Feedback on audit outcomes

It is the protocol for the IARC officer to contact the developers of games whose classifications have been amended by the Board, seeking not only to inform them of the nature of the discrepancy but also in an attempt to engage them in discussion to assist with identifying barriers to accurate completion of the questionnaire. However, minimal responses were received.

Consumer complaints

Since the tool has been operational just five public complaints about the tool's decisions have been received by the Branch. The very low number of public complaints in relation to overall decisions made suggests that consumers are generally satisfied with the classification information provided by the tool.

Only two games that were subject to complaint (*Vega Conflict* and *Sherlock Criminal Case 1)* were available for download at the time of auditing. These audits are discussed at 3.1.

Community views

A national online survey recently conducted by the Branch sought public views on the tool. The survey results found that public awareness of the tool was low (19% of respondents were aware of the tool), although this is not surprising given that not all members of the community are exposed to computer games and that the tool has only been operating for around a year and is still being rolled out across storefronts.

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[4] When a game developer receives an IARC classification, he or she may immediately request a Ratings Check Requests from any or all ratings authorities. There is no associated cost.

When asked whether the availability of Australian classifications on participating storefronts was a positive, neutral or negative outcome, approximately half said it was positive (49%) and a similar proportion held a neutral view (47%). Parents and non-parent caregivers were more likely to consider the availability of Australian classifications on participating storefronts a positive outcome at 56% and 66% respectively.

IARC Stakeholder Group

At the beginning of the pilot the IARC Stakeholder Group members generally expressed satisfaction that the tool could now enable mobile and online games to be classified in Australia for the first time, thus providing valuable information to consumers and enabling parents to better protect their children from disturbing or harmful material. Members also sought assurance that steps would be taken to ensure the decisions made by the tool would be robust and consistent with the Board.

Members were invited to provide feedback or referrals for audits on an *ad hoc* basis outside scheduled meetings. No feedback or referrals for audits from members were provided to the Branch during the pilot period.

As previously discussed, IARC Stakeholder Group members were briefed on the results of the pilot and unanimously support the ongoing use of the tool.

States and territories

States and territories have supported the implementation of the pilot as a method of examining the potential for classification tools to successfully apply Australian classifications to large volumes of online content. No referrals for audits were received from the states and territories during the pilot period. A consultation draft of this report was circulated to state and territory officers and feedback received was supportive of the ongoing use of the tool.

Media

At the launch of the pilot, there was some media attention around the Australian implementation of the tool, all of which supported the initiative as 'a step in the right direction' in providing for a more efficient and modern classification scheme and an innovative method to classify games that are not being classified by the Board.[5] There was also a level of interest (but very little criticism) in the number of games that had been classified Refused Classification by the tool.[6]

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[5] See for example: http://www.smh.com.au/digital-life/games/australian-game-classification-gets-muchneeded-streamlining-with-international-rating-tool-20150319-1m2q4w.html
[6] See for example: http://www.abc.net.au/news/2015-06-30/australia-bans-220-video-games-in-four-months/6582100

6.   Conclusion and recommendations

Key achievements of the pilot included:

- Use of the IARC tool has resulted in the classification of more than 496,300 online, mobile and downloadable games that would otherwise not have been classified and would therefore have been non-compliant with state and territory classification enforcement laws.

- Several major providers of online and mobile games, including Google, Nintendo and Microsoft, are now using the tool for the classification of games distributed on their storefronts in Australia.

- A substantial proportion of Australian consumers now have access to classification information for online and mobile games (based on the market penetration of the above storefronts).

- Overall, the tool classified games in the same category as the Board approximately 81% of the time.

- Game developers have taken their responsibilities with using the tool very seriously and, rather than being lax, are often being overly cautious when declaring content.

- Stakeholders are satisfied with the tool's performance, with very few complaints from consumers or developers.

- The vast increase in the amount of classification information available to the public has been achieved without cost to game developers.

- Games have been successfully 'Refused Classification' by the tool as required under the Classification Tools Guidelines (notwithstanding the high levels of RC decisions that are likely to be over-classifications based on developer inputs).

Piloting of the tool has enabled the Branch to identify:

- Similarities and differences in classification decisions made by the tool and by the Board, noting that an automated tool cannot be expected to classify content in exactly the same way as humans[7]

- Adjustments that can be made to improve the programming logic of the tool

- Trends in developer responses to the tool questionnaire, such as specific questions where there is a greater tendency for incorrect answers or the over-declaration of content

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[7] It should also be noted that Board decisions themselves have subjective elements and involve different interpretations of the Classification Code and Guidelines against community standards between Board members (many Board decisions are not unanimous and are reached by compromise or majority view).

- Potential areas of confusion within the tool questionnaire and questions that are more difficult to answer

- Challenges in relation to the appropriate level of expectations placed on classification tools to formulate CA in exactly the same manner as the Board.

The key results of the audit process are that: a) the tool has a generally high accuracy rate; and b) where there are discrepancies between decisions of the tool and Board decisions, the tool is generally more conservative than the Board in relation to high impact content. These findings indicate that the primary objective of the tool, to protect children and the broader community from inappropriate content, is currently being met.

However, further work is required to improve the tool's accuracy, particularly at the higher categories. It was expected that implementation of the first iteration of the tool would identify areas where further calibration would be needed, which has been achieved. Australia will continue to work with other IARC members on improvements to the functionality of the tool. The data gathered from audits has already been used to inform strategies to help improve the accuracy of classifications made by the tool, including educating developers, amending the questionnaire and accompanying help text and making adjustments to the programming logic of the tool. Further work will also be undertaken by the Branch and IARC to determine the best method for dealing with advertising in apps. Planned changes to the questionnaire and the program logic of the tool are expected to be implemented in the second half of 2016.

Recommendations

1. Given the overall high accuracy rate of the tool, the efficiency and cost-effectiveness with which the tool is able to provide classification information to consumers and the significant volume of game classified that would otherwise be non-complaint with classification laws—use of the tool in Australia should be ongoing.

2. The Branch should continue to monitor the performance and accuracy of the tool, and all ratings check requests and consumer complaints received by the Branch should also continue to be actioned.

3. The Branch should continue to work with IARC on the continuous improvement of the functioning and accuracy of the tool, including monitoring and adjusting the questionnaire and logic of the tool as needed.