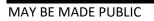# Submission to the Review of Australian classification regulation

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Making the first English full-length fully-interactive fully-voiced visual novel for children.
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MAY BE MADE PUBLIC

## 1. Classification categories: C classification

Many infants are given their parents' phones or iPads to amuse them while they are strapped in their strollers.

Some G rates games scare children.  A C classification would be very helpful to identify those games/videos which are completely harmless.

## 2. Classifiable elements

a. I find the general catch-all 'Themes' to be mixed and confusing.  The ones listed seem to fall into three categories:

    1.1.1. Societal aggression by the player: crime, racism, other discrimination.  Could be expanded to include bullying and harassment.

    1.1.2. Self-harm by the player: suicide, drug dependency – it was only after reading e) that I realised this also includes underage drinking, binge drinking, underage smoking and abuse of legal medications

    1.1.3. Societal ills affecting the player: death, serious illness, family breakdown

    1.1.4. Minecraft involves environment devastation and animal slaughter.  Obviously these do not take it out of the children's category but more egregious examples might.

b. Violence should include speeding.  Games like Grand Theft Auto encourage players to speed recklessly or deliberately run over pedestrians.  Speeding should be recognised as a violent activity.

As well as the traditional classifiable elements, classifiable elements could include:

g. requirement to list:

- In-game monetary transactions
- In-game links to other sites

These are vexed areas for parents who find their children making purchases when they thought they had installed a free game or a premium game (a game for which they paid up front).

They are also for adult players who should not have to read the fine print to find out whether or not a game is premium, freemium, or free.  Reputable on-line stores already show this information.

## h. MMOs - Capacity for assault by other players

Classification needs to take into account the capacity for stalking, insulting, harassing, stealing from and groping other players in-game.

Last year, a woman player got groped in VR and it was a shocking experience for her. She was standing in a group of avatars, feeling happy to be 'talking' to them, and a man approached and dipped his head in a friendly way. She didn't move away and he put his hand to her private parts. She didn't know what to do and she just stood there and let him talk to her, still holding her, in the middle of the crowd. Other players made lewd comments.

The perpetrator was probably just some teenager who thought he was being funny, but the woman was traumatized. If it happened to a young teenager they would never forget it, even though it was their avatar and not their physical body that was assaulted. The risk needs to be made clear.

Another example. Roblox is hugely popular, as big as Minecraft. All Roblox games are user generated content. While they censor overt sexual content, the player interactions often involve subversive sexual undertones through role play servers.

Studios who don't bother to police their servers shouldn't be able to obtain the same classification as studios who do.

Nintendo may have taken the only wise move for PG games, by restricting player interactions to no-discourse and to in-game sanctioned movement.


# 3. Other comments

Classification is not only for prohibition. It can be a positive force. Games should be classified as to whether they can be played by people with different types of abilities, as described in Able Gamers https://accessible.games/accessible-player-experiences/

The 21st Century Communications and Video Accessibility Act (CVAA) of the United States requires advanced communications services and products to be accessible by people with disabilities. Australia can go one further and require games to be classified for their suitability for players of different abilities.

Classification can be most useful for buyers.

1. Playable by players who have a vision impairment
2. Playable by players who have a hearing impairment
3. Playable by players who have colour vision deficiency
4. Playable by players with intellectual disability
5. Playable by players with muscle weakness

## 5.      Applying the same classification standards across delivery formats

Games, being more interactive and therefore involving players in the action, have more impact even when the level of classifiable elements is superficially the same.  VR has greater impact again.

Things viewed in games should have same classification as in movies.

Things interacted with in games should have a higher classification.

Things interacted with in AR/VR should be higher again.

That is, the amount of interactivity should be a factor in classification.

Definitely use the same classification standards, but include an additional measure of interactivity, so that interactivity raises the impact of the classifiable element.  For example:

- a movie depicting a gruesome murder = M
- a game depicting a gruesome murder = M
- a game where the player does the gruesome murder = MA
- a game where the player does the gruesome murder of another player = R
- a VR game where the player does the gruesome murder = R (e.g. Blade and Sorcery https://www.youtube.com/watch?v=0kx3SXQbw88)
- a VR game where the player does the gruesome murder of another player = RC

## 6. IARC formula

I think the IARC Australian formula should have been listed here for comment.  Otherwise we are delegating the classification without review.

## 7. Reviews

One disaffected parent might complain about a G rating for a fairy tale story.

There needs to be a system for making a complaint, having a timely review, guidelines about what to do during the review process, fair payment for the review, the review and reasoning made public, and guidelines changed as a result of the review.

The reviewee should not have to pay for judges to fly to meet as they can meet online using Skye, Zoom, Discord or other online meeting methods.  The judges should be appointed and paid publicly.

Review decisions should feed back into the Australian IARC formula, which should be publicly available.

## 9.      Other comments

This review is appropriate and has been well promoted among game developers, in Adelaide at least.