



Why Australia must get a new system of classification for films and games and how

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Children worldwide are growing up in a world where highly attractive, well produced, and often age-inappropriate content is easily accessible, and is, all too often, actively marketed to them.

The potential impact of such content on children is not insignificant. Depending on the developmental stage of a child, such impacts can include sleep disturbances, the development of unnecessary fears and anxieties, poorer academic performance, an increased risk of desensitisation to the use of violence, and a willingness to use aggression to solve conflict. Such impacts may be short term or last a lifetime.

Australian children have a right to be protected from exposure to age-inappropriate content and the associated harms, and their parents have a right to state support which can assist them in providing such protection.

Australia's National Classification Scheme (NCS) is supposed to provide this protection for children, as well as to provide consumer information about films and games, and to allow adults to avoid material that they might find offensive.

The NCS has a range of deficiencies:

- it is based on concepts of “community standards”, and of offence, rather than a genuine and evidence-based concept of age-appropriateness to support child development;
- it is not effective in its stated task of providing protection from harm for children;
- the classifications of G, PG, M and MA15+ revolve around the age of 15 years, which has no real relevance to developmental stages;
- parents Australia-wide say these classifications are not useful to them, especially in assessing suitability for children under 12;
- there is demonstrated public confusion about the meaning of the M and MA15+ classifications;

- the classification criteria used require subjective judgements by assessors about impact and context; and
- the use of the NCS to determine appropriate classifications for advertising for films or games (and consequent times and venues to screen or display) has resulted in too frequent exposure of children to potential harm.

ACCM recommends a completely new approach: the implementation of a new set of classification categories, G, 5+, 9+, 12+ 16+, 18+, X18+ and RC, where each category indicates the ages for which the content is likely to be appropriate. The associated classification criteria would reflect research evidence on impacts at each developmental stage. The categories from 12+ up should have legal force. Consumer advice should incorporate symbols to indicate the main reason for the assigned category.

For reasons already discussed, the many proposals to insert an extra classification category of PG13 into a system that is not evidence based will not fix the deficiencies of the present system. Further it fails to meet the needs of parents of young children who want more information to guide their choices. In addition, it would create “classification clutter” with three classifications all purporting to provide distinguishing elements of suitability between 13 and 15 years.

ACCM’s proposals are strongly supported by our members (major national and state child-focussed organisations) and by our two national online surveys in 2017 and 2019.

ACCM also recommends that these categories be used for all professionally produced content, across all platforms, and for all media formats, to support public recognition. However, the elements and criteria to determine the classification categories of films and games should be different as the use of content that incorporates interactivity or online connectivity carries additional risks, including:

- The tracking of players, and the unauthorised gathering (and onsale) of personal data
- Intrusion into players’ privacy

- Efforts to monetise content which involve gambling and gambling-like behaviours (the inclusion of lootboxes, skins, etc)¹
- The development of problematic dependence on games resulting from features which work against easy disengagement
- The encouragement of in-app purchasing
- Interaction with unknown others online

It is likely that this review will result in the introduction of an automated classification process where publishers or distributors would answer a questionnaire about the content and a computer algorithm would decide what the correct classification category should be. Such a process would meet the need to classify the increasing amounts of content more quickly and cheaply, and there are precedents for it be done very well. However, any such system must have as its main aims supporting the public with impartial and reliable information about content, and meeting parents' needs to find age-appropriate viewing and gaming for their children.

To achieve that aim, Australia needs to develop a questionnaire (which could be used both on and offline) which is research-based, with questions designed to assess content from a child development perspective, and be capable of objective application. The current categories and criteria in the NCS do not lend themselves to such incorporation.

Classification systems with such a child development base exist in other countries, and have a much better record of public and parental satisfaction than is the case with the NCS in Australia.

The process by which a change to Australia's system is implemented is key to its success.

Australia presently has a range of codes and guides for classification used by national and commercial broadcasters, pay TV, Clearads (for commercials), Netflix, IARC, Apple store to name a few. The proposed new age-based system should replace all such classification codes, including those for the advertising of film and game material.

¹ The European PEGI games classification scheme has recently moved to require warnings of lootboxes and random paid items: <https://www.bbc.com/news/technology-52281573>.

ACCM proposes the establishment of a National Classification Commission to administer all classification matters in Australia. Its functions should include the development of the national classification tools (by a scientific committee); public education; the training of industry assessors; provision of classification where requested; assistance with complex classification issues; direct receipt and resolution of all classification-related complaints; ongoing reviews of the usefulness of the system; and the incorporation of new research and updates.

These proposals represent a big change from long standing processes. But this is no reason not to implement a change which will significantly improve information to parents and the general public. Surveys by the Australian Communications and Media Authority, the Interactive Games and Entertainment Association and ACCM show public confusion about the meanings of classification categories, and a demand from parents for more age-based categories.

We note that many industry submissions have pointed to the potential costs associated with reforms to the NCS and we imagine that some might now argue for further limitations to reform, given the change in economic conditions associated with the coronavirus crisis.

ACCM's view is that this review should still make recommendations as to the most desirable reforms, in the expectation these might need to wait until economic conditions improve before they can be implemented.

ACCM's full submission to the Review of National Classification Regulation can be found at [https://childrenandmedia.org.au/assets/files/accm-classification-submission-2020\(1\).pdf](https://childrenandmedia.org.au/assets/files/accm-classification-submission-2020(1).pdf)

The Reviewer, Mr Neville Stevens AO, is expected to report to the federal Minister for Communications at the end of May.