

Question

Question 1: Do you have any comments on our proposed approach to 'content and activity' which 'disproportionately affects women and girls'?

Your response

Ukie is the trade body for the UK's video games and interactive entertainment industry. A not-for-profit, it represents more than 700 games businesses of all sizes from start-ups to multinational developers, publishers, and service companies, working across online, mobile, console, PC, esports, virtual reality and augmented reality. Ukie aims to support, grow, and promote member businesses and the wider UK video games and interactive entertainment industry by optimising the economic, cultural, political, and social environment needed for businesses in our sector to thrive.

Our response reflects the fact that our industry considers the safety of our player community as paramount. There are over 3.4 billion players globally, and Ofcom's recent Media Use Survey found that 63% of UK adults and 61% of UK children reported playing games online. Crucially, approximately 50% of players are women and girls, making

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them a central part of the player community, not a minority group.

We welcome Ofcom's emphasis on gender-informed risk assessments, and on the need for practical, systemic responses to content and activity that undermines safety and inclusion. The industry is committed to creating a safe, fun, fair and inclusive playing experience for this large and diverse audience. That includes providing the information and tools necessary to allow players, particularly those more likely to be affected by harm, to customise their own experiences and set personal boundaries. It is also a business imperative for games companies to provide safe, welcoming places for their customers to play together online. In such a highly competitive global market, players who do not feel safe or respected have ample alternatives. Any game that develops a reputation for enabling harassment or hostility will struggle to retain users. The overwhelming majority of companies have clear terms of service and act to remove any content or interaction which breaches those terms, including any harmful content.

Our understanding is that Ofcom's proposed approach to tackling online misogyny, pile-ons and online harassment, online domestic abuse and image-based sexual abuse is to encourage in-scope service providers to proactively tackle and prevent these gender-based forms of harm. Ukie and its members appreciate Ofcom's considered approach to addressing online harms, and we strongly support the principle of creating a safe environment for women and girls online. The video games sector has a longstanding and proactive commitment to player safety, including the protection of women and girls. Over decades, the sector has developed robust frameworks such as the PEGI age rating system, strong parental controls, and sophisticated moderation tools, all underpinned by safety-by-design principles, and all of which support Ofcom's safety-by-design principles. These measures empower players, parents, and caregivers to create secure, age-appropriate game environments and reflect the sector's clear priority of user safety. While significant progress has been made, the industry acknowledges the persistent challenges in tackling gender-

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based abuse, particularly in live, fast-paced multiplayer environments where content is transient and contextually complex.

Recent data does however underscore the ongoing challenges. Bryter's Women in Games 2023 report shows that the proportion of women gamers experiencing toxicity has decreased from 72% in 2022 to 65% in 2023, reflecting the positive impact of industry-led safety initiatives. Despite the work that the video games sector has done to improve player safety to date, this figure remains far too high. Many women and girls still routinely experience hostility, avoid voice chat, or conceal their identity to reduce exposure to abuse. This stands in the way of equitable participation in gaming communities. These negative experiences can have severe consequences for player wellbeing, potentially driving women and girls away from game communities entirely. This aligns with other findings, such as those from Women in Games, a not-for-profit organisation that seeks a games industry, culture and community free of gender discrimination. They found that many female gamers avoid voice chat, conceal their identity, or disengage entirely from certain platforms to avoid harassment.

Addressing these issues presents unique challenges for the games industry. Unlike text-based social media platforms, in-game interactions are often fast-paced, real-time, and ephemeral, making it difficult to capture and assess harmful content after the fact. Identifying misogynistic behaviour also requires nuanced human moderation, which can be resource-intensive, especially for small studios with limited resources.

To continue building on this progress, proportionate and evidence-based regulation is essential. Smaller studios, which make up 95% of the UK games industry, would particularly benefit from targeted support. This could include access to updated taxonomies of harmful terms, centralised tools for moderation, joint reporting channels, and best practice guides that can help standardise responses to these harms.

Separately, as we argued in our previous consultation responses, it is essential to differentiate video games from social media when developing any guidelines. Unlike social media, where communication is often open-ended, persis-

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tent, and largely unmoderated, online games typically involve more controlled, session-based interactions with limited, context-specific communication. This is a big distinction and it would therefore be unhelpful for video games to receive the same guidance as social media, as the nature of both services are too different. These environments also benefit from longstanding safeguards like age gating, robust parental controls, and real-time moderation, which significantly reduce the likelihood of harmful content. A one-size-fits-all approach to regulation risks overlooking these critical differences, potentially placing an undue burden on smaller studios and stifling innovation in the sector. Any guidance must therefore remain proportionate, flexible, and evidence-based, particularly for smaller studios, which make up 95% of the UK industry.

Ukie remains committed to working with Ofcom to ensure that its final guidance reflects both the distinctive nature of the video games industry and the vital importance of protecting women and girls across all forms of online interaction. With the right regulatory approach-grounded in partnership, proportionality and practice-we believe the video games industry can continue to lead in delivering safer, more inclusive spaces for all players.

Question 2: Do you have any comments on the nine proposed actions? Please provide evidence to support your answer.

Ukie members support Ofcom's nine proposed actions to improve the online safety of women and girls and recognise the importance of each as part of a broader, systems-based response.

Many of the recommendations outlined in Ofcom's proposed good practice steps are already reflected in existing practices across the UK video games industry. This includes long-established practices such as the PEGI age rating system, robust parental controls, and strong community guidelines. A number of games also already provide many guardrails that Ofcom has suggested as examples to make the sphere safer for women and girls. This includes allowing players to mute or block people during a game session, as well as turning off any communication feature completely and relying on communicating via pings. These self-regulatory frameworks have been developed with player safety in mind, particularly for younger users. The games industry has consistently been a leader in keeping players safe on line, implementing effective, industry-led measures over

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decades. Notably, the industry collaborates with key partners, such as the National Crime Agency and NCMEC, to combat online abuse and child sexual exploitation material (CSEA). Initiatives like Ukie's multi-year domestic Ask About Games campaign further demonstrate the sector's proactive approach to online safety by educating parents on the online safety features in games.

Examples of compliance with the 9 action steps to date:

Regarding Action 1, the industry already maintains structured governance and enforcement policies, including community standards and internal moderation teams. These policies often exceed the legal minimum and address behaviours that, while legal, may still cause harm. For example, the PEGI Code of Conduct requires online safety standards that align with societal expectations. A notable example is EA's Positive Play Charter, which explicitly prohibits harassment and abuse while promoting inclusivity within its games communities. Several companies now have explicit harassment and inclusion policies that specifically call out gender-based abuse.

For Action 2, risk assessments are routinely conducted, but it is crucial that they remain proportionate and evidence-led. Requiring an SME to conduct the same risk assessment **as a** large multinational company places a big burden on smaller companies, effectively creating high legal costs which many cannot shoulder. Many of our members regularly conduct assessments to address potential harms, including those affecting women and girls. These evaluations inform community guidelines and in-game safety tools, fostering a safer game environment.

In terms of Action 3, while detailed public reports specifically focused on gender safety are not yet standard, robust internal tracking of abuse reports and enforcement actions is commonplace. Many companies voluntarily publish transparency reports, which can serve as valuable resources for future benchmarking. We understand Ofcom's encouragement of disaggregated data in transparency reporting. However, while most services prohibit hateful conduct and harassment based on characteristics such as age, race, gender, sexuality, religion, ethnicity, nationality, disability, or health conditions, it would be challenging to provide more granular data, such as isolating gender-based harassment from racial harassment. Companies may only

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be able to report disaggregated data for reactive moderation based on categories of prohibited content and conduct, rather than by specific characteristics.

Regarding Action 4, many game companies conduct abusability evaluations and safety-by-design reviews as standard practice. This process often includes testing new features for potential misuse before launch and incorporating AI-driven filtering alongside human oversight. Community feedback and semantic analysis tools also play a role in identifying potential abuse vectors.

For Action 5, safer defaults are increasingly the norm. Major platforms implement age-appropriate access controls, such as disabling communication features by default for younger users. PEGI and IARC systems help standardise these safeguards through rating-linked design expectations. These measures are reinforced through parental dashboards and initiatives like Ukie's Ask About Games.

Regarding Action 6, game companies proactively remove harmful content and accounts, often exceeding legal requirements. Collaboration with organisations such as the IWF, NCMEC, and the NCA ensures that illegal material, including CSAM, is quickly identified and reported.

Action 7 corresponds with the comprehensive user control tools already available within games. Many platforms provide mute, block, and report functions, alongside customisable communication settings.

For Action 8, most games feature integrated reporting tools, allowing players to flag inappropriate behaviour easily. Some companies go further by allowing users to track the status of their reports, fostering trust and transparency. Riot Games' reporting system in League of Legends exemplifies this approach, allowing players to follow the progress of their reports and receiving updates on their reporting. Our members also encourage systems that offer users clear information on what constitutes gender-based harm and provide feedback on the outcome of their reports—practices that are already being adopted by several of our members.

Lastly, for Action 9, most companies apply a graduated enforcement model, from warnings to permanent bans, including IP bans for severe offences. Activision Blizzard's

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zero-tolerance policy in Call of Duty for gender-based harassment is a great example of the sector's commitment to maintaining safe online spaces.

The UK video games industry has long prioritised safety-by-design, collaborating with a wide range of safety organisations and global initiatives, including the WePROTECT Global Alliance, Internet Watch Foundation (IWF), Fair Play Alliance, and others. Additionally, companies actively share best practices with the broader tech sector, enhancing collective efforts to address online safety challenges.

Many of Ofcom's proposed actions and good practice steps are already embedded across a wide range of services within the games sector, as set out above. Ukie members urge Ofcom to recognise these established practices and ensure that its guidance is proportionate to actual risk, flexible across diverse service types, supportive of SMEs, and aligned with global standards like PEGI and IARC. Some proposals from Ofcom, such as engaging with external assessors when conducting risk assessments, may not be proportionate for smaller developers.

The National Centre for Missing and Exploited Children's (NCMEC) 2022 Cyber Tipline report, for example, noted that less than 0.00025% of total child sexual abuse material (CSAM) reports came from games platforms, highlighting the comparatively lower risk profile of these services. Additionally, recent EU research by Jigsaw found that while 63% of adults and 70% of 12-15 year olds reported experiencing potential online harm on social media, only 3% of adults and 12% of teens reported similar harms while playing video games. These figures underscore the comparatively safer environment that games platforms can offer when effective safety measures are in place. Our members are clear that being safer than social media does not exempt the games industry in aiming to provide safer spaces for women and girls, but as we did in our previous consultation responses, the games industry will only be able to work efficiently with Ofcom if the regulator understands the distinct nature of games services.

Ukie and its members are dedicated to advancing online safety for all users and look forward to collaborating further to develop practical, sector-appropriate guidance that sup-

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Question 3: Do you have any comments about the effectiveness, applicability or risks of the good practice steps or associated case studies we have highlighted in Chapter 3, 4 and 5? Are there any additional examples of good practices we should consider? Please provide evidence to support your comment.

ports this goal. The UK video games industry has long prioritised safety-by-design, collaborating with a wide range of expert organisations and safety initiatives. However, as Ofcom rightly notes, the scale and impact of online harms, especially those targeting women and girls, require ongoing, evidence-based adaptation. We urge Ofcom to recognise the depth of existing good practice while ensuring that any guidance remains proportionate, flexible, and responsive to the diverse operational realities across the games sector.

Ukie members welcome Ofcom's recognition of good practice in improving online safety and commend the alignment of many of the proposed steps with longstanding industry efforts. We particularly value the attention paid to interventions that target the specific online harms disproportionately affecting women and girls. The video game sector has long been a leader in proactive moderation, design-level safety features, and safety partnerships with expert organisations such as the Internet Watch Foundation (IWF), the Anti-Defamation League (AOL), and the National Crime Agency (NCA). These efforts have been instrumental in building a strong foundation for online safety, particularly in relation to protecting vulnerable users. Ofcom's proposed actions should continue to build on this foundation, reinforcing the good work already being done while considering the nuances and diversity of the video game sector.

Additionally, it is important to recognise the capacity constraints faced by smaller studios in implementing industry-wide safety measures. While larger video games services, such as AAA studios often have dedicated policy and legal teams, smaller studios such as Double A, Co-Dev, and indie developers often do not have the same resources to dedicate full-time employees to trust and safety. Ukie's role is to support our members, especially those in the indie and SME space, by providing tools, resources, and guidance to help them implement effective safety measures.

The lack of considered evidence can be found in the case studies Ofcom provided, which are mostly geared towards social media providers and are less relevant to video game companies. Only 2 of the 25 case studies in the draft guid-

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ance refer to game services. We strongly suggest Ofcom review, or at least engage with Ukie and its members to review these policies for a better idea of the landscape in the industry.

Examples of the games industry aligning with the proposed good practice steps to consider:

- The PEGI system includes conduct guidelines, moderation expectations, and reporting requirements that are independently monitored, ensuring consistent safety practices across the industry. The PEGI system has been a cornerstone of the video game sector's commitment to ensuring content is suitable for players of all ages.
- Ukie's Ask About Games campaign educates parents on how to use parental controls effectively and how to engage with their children's online play, helping families create safer video games experiences. This initiative aligns with Ofcom's proposed actions around supporting parents and guardians to manage their children's games experiences in a way that is safe and informed.
- The use of non-verbal communication tools like ping systems in games provides players, particularly those vulnerable to abuse, with safe ways to communicate without the need for potentially harmful text or voice interactions. These tools allow for effective in-game communication while reducing the risk of harmful content or harassment.

These examples show how game platforms are already supporting safer environments, especially for more vulnerable users, including younger girls and women.

We propose that Ofcom also consider the following industry-led initiatives as exemplary practices:

1. Sony Interactive Entertainment was the first platform to introduce a Voice Chat moderation solution in 2018. One of the drivers of this solution was an awareness that voice-based cooperative gaming experiences disproportionately affected women and girls, given their experience of misogynistic abuse after revealing their gender by speaking. Since launch, Sony Interactive Entertainment has built on this with additional tooling and features,

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and other companies such as Xbox, Epic, Activision have also followed suit.

2. ToxMod in Call of Duty: Activision has integrated Modulate's ToxMod, an AI-powered voice moderation tool, into its Call of Duty titles. This system proactively identifies and addresses toxic behaviour in real-time voice chats, focusing on context and intent rather than specific keywords. Since its implementation, ToxMod has led to a 67% reduction in repeat offenders and a 43% decrease in exposure to disruptive voice chat, with 80% of disciplined players not reoffending. The use of AI in moderating voice chat is a powerful example of how the video game industry is leveraging cutting-edge technology to address issues that disproportionately affect women and marginalised groups, particularly in online multiplayer environments. This innovation has the potential to greatly reduce toxic behaviour and enhance player safety. ToxMod's context-aware moderation directly addresses misogynistic voice abuse, which remains one of the most persistent and underreported harms in online gaming.
3. Fortnite's Voice Chat Abuse Reporting and Cabined Accounts: Epic Games has introduced a voice reporting feature in Fortnite, which captures the last five minutes of voice chat to be reviewed upon report submission. This system is always active for players under 18, ensuring a safer environment for younger users. Additionally, Epic Games' Cabined Accounts restrict certain features, such as voice and text chat, for players under 13 until parental consent is obtained. These features help to create a safer space for young players by preventing exposure to harmful communication and giving parents greater control over their children's online experiences. These measures offer strong examples of how platform-level safety design can align with age and gender considerations, ensuring young girls in particular are protected from exposure to inappropriate or "harmful communication."

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Moreover, Women in Games and similar initiatives play a key role in fostering inclusive design, advocacy, and policy guidance across the sector. We strongly encourage Ofcom to recognise these expert voices not only as case studies but as stakeholders in future implementation strategies.. Some key initiatives include:

- **Support for Smaller Studios:** Ukie and Women in Games are working to provide support for indie developers by developing shared moderation tools, training resources, and harm taxonomies. These resources are designed to help smaller studios, which often lack dedicated trust and safety teams, implement effective safety measures. This initiative highlights the need for Ofcom's guidance to be flexible and scalable to accommodate different levels of capacity and resources within the video game sector.
- **Women-Led Communities:** Women in Games has been instrumental in creating women-led communities that provide support, share resources, and foster solidarity. These communities help combat isolation, reduce the harmful impact of harassment, and offer a platform for positive experiences and advocacy.
- **The Guide - Building A Fair Playing Field:** Women in Games has developed the Guide - Building A Fair Playing Field, which outlines actionable steps for fostering gender equality, safety, and inclusive design in the games industry. This guide is a practical resource for developers and companies looking to implement measures that protect women and girls in the game space.

While the video game industry has made significant strides in enhancing player safety, Ukie and our members acknowledge that there is still much work to be done to further understand and mitigate the harms faced by women and girls in video games. In particular, further research is needed to understand the specific dynamics of gender-based harassment in video games, and more targeted mitigations should be developed to address these issues, ones which recognise the nature of online interaction in games and understands the safe guarding already in place.

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For the broadest application of good practice steps across the sector, Ofcom should take into consideration the different operational models of video game services, particularly the needs of smaller studios. Guidance should be flexible and scalable to support the diverse operational structures of our sector, ensuring that small studios are not burdened with compliance requirements that exceed their capacity. It is crucial that any regulation implemented is proportionate, contextual, and evidence-based to avoid unnecessary harm to smaller studios, while still addressing the needs of vulnerable groups, including women and girls.

Finally, we urge Ofcom to consider how its final guidance can actively support new research and innovation around gender-based harms in games. This includes funding, shared infrastructure, and fostering partnerships that accelerate inclusion and safety innovation across the industry.

Question 4: Do you have any feedback on our approach to encouraging providers to follow this guidance, including our proposal to publishing an assessment of how providers are addressing women and girls' safety? Do you have any examples or suggestions of other ways we could encourage providers to take up the 'good practice' recommendations?

Ukie welcomes Ofcom's recognition of the importance of addressing the online safety of women and girls and acknowledges the role that the video games industry plays in tackling these issues. The industry has been proactively working to create safer environments for all players, including women and girls, for many years. Video game services have implemented a range of protective measures, including age-appropriate content controls, robust moderation systems, and safety partnerships with expert organisations like the Internet Watch Foundation and the Anti-Defamation League.

We believe that the industry has already made significant strides in creating safe spaces for all users, particularly for women and girls. Many major video game platforms, such as those using the PEGI system, already incorporate strict conduct guidelines, moderation expectations, and reporting requirements that are independently monitored. Initiatives such as Ukie's Ask About Games campaign educate parents on how to use parental controls and guide them in managing their children's online play including features such as muting, blocking and report tools, which are especially important for protecting young girls from unsolicited interactions, which provide safer alternatives to voice or

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text chat, helping to protect women and girls from gendered abuse in multiplayer environments

The video games industry also uses innovative tools like non-verbal communication systems, such as ping systems in multiplayer games, which provide players, particularly those who may be vulnerable to abuse, with safe alternatives for communication. These features have been crucial in reducing exposure to harmful interactions and improving player experience.

Furthermore, the industry is continuously advancing its approaches to tackle harassment and abuse through various innovative systems. For example, and as mentioned previously, Activision has implemented Modulate's ToxMod in Call of Duty, an AI-powered voice moderation tool that proactively identifies toxic behaviour based on context and intent. This system has resulted in a significant reduction in repeat offenders and exposure to disruptive voice chat. ToxMod's ability to detect nuanced, identity-targeted abuse, including misogynistic speech, makes it particularly valuable in addressing harms that disproportionately affect women players. Similarly, Epic Games' introduction of voice reporting and cabined accounts in Fortnite provides real-time moderation and additional safety features for younger players, including those under 18. These features provide a strong example of default settings that prioritise child and teen protection-especially critical for girls entering online spaces for the first time.

Women in Games, along with other advocacy organisations, has also played an essential role in promoting safety and inclusion. Women-led communities, guides for fostering gender equality, and initiatives like the creation of a neutral hotline for women and girls facing harm in video games, further contribute to creating a safer environment for players.

Overall, we understand that while there is always room for improvement, the video games industry is already taking significant steps to ensure the safety of women and girls. By prioritising proactive moderation, integrating safety features at the design level, and fostering partnerships with external safety organisations, the sector is actively working to create an environment that reduces online harm. We urge Ofcom to recognise the comprehensive efforts already

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underway and to focus on supporting and enhancing these existing practices rather than imposing additional burdens.

Question 5: Do you have any comments on our impact assessment, rights assessment, or equality impact assessment? Please provide any information or evidence in support of your views.

We understand the importance of ensuring that regulatory measures are not only effective but also proportionate, fair, and mindful of the diverse needs of all stakeholders, including those in the video games industry. We support the framing of gender-based online harm as both a safety and equality issue, and agree that platform responsibilities must align with users' rights to equitable participation in digital spaces. However, we urge Ofcom to continue recognising the good practices already in place and ensure that any new guidance or measures are both proportionate and supportive, particularly for smaller studios. The industry's collective experience and capacity to implement these measures demonstrate a strong foundation on which to build further improvements, ensuring that the rights and equality of all players are respected and safeguarded.

We do not think the draft Guidance will impose any significant burdens on service providers because the draft Guidance does not mandate any new requirements.

From a rights assessment perspective, we note that the video games industry has consistently prioritised the safety of its users, integrating robust moderation systems and safety tools that align with industry best practices. These efforts already support a significant reduction in harmful content and protect users, especially women and girls, from online abuse. The rights of players to have a safe, enjoyable experience are central to the video game sector's approach, with ongoing efforts to ensure privacy, security, and safe participation in online spaces. The video games industry has consistently prioritised user safety through moderation tools, real-time enforcement systems, and trusted reporting pathways. These mechanisms aim to safeguard the rights of women and girls to access and enjoy online spaces free from abuse or exclusion.

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Regarding the equality impact assessment, it is crucial to acknowledge the unique challenges faced by marginalised groups, including women and girls. The video games industry has worked diligently to address these challenges by embedding gender-specific risk assessments, ensuring moderation systems cater to diverse needs, and implementing design-level features that prevent abuse and harassment. The industry's work with advocacy organisations like Women in Games also highlights a continued focus on creating equitable experiences for all users. These initiatives are part of an ongoing commitment to understanding and mitigating the specific harms faced by marginalised groups. We recognise that women and girls-particularly from intersecting marginalised groups-face specific risks online, and that safety systems must account for this to be effective."

The industry's partnerships with advocacy organisations like Women in Games also reflect a proactive effort to include lived experience and gender-specific insight into the design of safer services.

Overall, Ukie believes that the video games industry, through its collaborative efforts, innovation, and commitment to user safety, is already achieving significant progress in creating safer online environments for women and girls. We encourage Ofcom to ensure that any future impact and rights evaluations consider measurable outcomes around reducing gendered abuse, improving inclusion, and supporting under-resourced studios to meet these standards effectively.

In summary, Ukie acknowledges Ofcom's efforts to address on line safety for women and girls and supports many of the proposals, particularly those focusing on transparency and shared learning. However, we urge a balanced approach that recognises the substantial work already undertaken by the video games industry. With continued collaboration, sector-specific guidance, and tailored support for smaller companies, we believe that further progress can be made while ensuring fairness and proportionality across the sector.

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Question 6: Do you agree that our draft Guidance is likely to have positive effects on opportunities to use Welsh and treating Welsh no less favourably than English? If you disagree, please explain why, including how you consider the draft Guidance could be revised to have positive effects or more positive effects, or no adverse effects or fewer adverse effects on opportunities to use Welsh and treating Welsh no less favourably than English.

Yes. Ukie supports inclusive and accessible design.