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Michael Rawlinson  
Managing Director



6 September 2008

Thank you for your letter of 11 August 2008 in relation to age rating systems for video games.

This is area of concern for many of us and I am aware of .the Department of Culture, Media and Sport's current consultation inviting responses from across the industry, retailers and consumers on this issue. Video games classification is a reserved matter and as such DCMS work here covers Scotland also.

As the consultation has yet to conclude and consider its responses, and as no final policy has been decided I am unable to meet you but I am sure that your views will be a useful contribution to the consultation.

I have asked that a copy of your letter and this response is passed to the Department for Culture, Media and Sport for their information.

DES BROWNE

Scotland office

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12 AUG 2008

RECEIVED



11<sup>th</sup> August 2008

[Redacted text]

Dear Minister

**Age rating system for video games**

I am writing to alert you to a newly-published consultation from the UK Government on reforming the video games classification system. Given your role as Secretary of State for Scotland, I am sure that this matter will be of significant interest to you.

The consultation is in response to the Byron Review in England and Wales, and will help decide which, if any, of the recommendations are implemented across the UK, or if other solutions are preferable. This is Scotland's first opportunity to comment on this important policy development.

There are currently two games ratings systems in the UK, unlike almost all other European Member States. I seek your support in moving towards a Europe-wide harmonised system for rating video games which, the industry across Europe believes, would better protect minors, give fast access to new games for Scottish constituents and support games development jobs and companies in throughout Scotland.

A decision on rating is needed now because the environment for video game playing is changing rapidly, with ever more games being purchased and/or played online over the internet and new games being released in parts, with "add-ons", across new formats and with considerable scope for customisation by users. In this rapidly-evolving online world in particular ratings systems need to be robust and must offer high levels of protection for minors along with assurance for their parents and guardians.

The choices in the UK were originally outlined in recommendations by Dr Tanya Byron in a Review for the Government. They are to create a "hybrid" classification system, drawing on parts of the ratings given by the British Board of Film Classification (BBFC) and the Pan European Games Information (PEGI) system, or to choose one or other of these ratings bodies, which would become the sole classifier for computer games in the UK.

**It is the view of the UK games industry that children would be at greater risk now and in the future if PEGI is not chosen to be the sole classifier for games both online and offline.**

Please allow me to summarise the current debate:

At present most video games are bought in store. They are rated initially by PEGI in line with other European countries. Only when a game is age-rated 16 or 18 is it passed to the BBFC,

[Redacted text]



re-examined by them and given a further BBFC age-rating and logo. This dual rating system is confusing to consumers.

In her Review of video games Dr Byron proposed that BBFC re-rate for the UK all games that PEGI had assessed as appropriate from the age of 12 upwards, and PEGI continues to rate UK-released games below this age. In our view, this is a further, wholly unwelcome, confusion which does nothing to meet the Review's stated aim of improving protection for minors playing computer games and accessing the internet.

Furthermore, the future of computer games is increasingly to be played and purchased online, and this environment is not within the jurisdiction of the UK Video Recordings Act. Scottish consumers buying and/or playing games online do so under the protection of the PEGI system, in common with their fellow game players elsewhere in Europe.

We cannot see a sensible case for dual or "hybrid" rating. It would require teaching parents and minors about two classification systems. It would see potentially different ratings in offline and online games which appeared otherwise identical. It would add confusion and undermine the Europe-wide push for child protection on the internet.

From our discussions so far, we believe that a single Europe-wide ratings system would be supported not just by games publishers but also by developers, retailers, children's charities and parent groups. It is also the case that PEGI already has the strong support of the EU Commission who concluded that PEGI should be rolled out both online and offline in all Member States.

I hope that you will look closely at the consultation and make a strong response in support of PEGI, and perhaps raise the matter directly with UK Ministers at DCMS, DCSF and BERR, who are jointly co-ordinating the responses.

Child protection is best strengthened, offline and online, by a single games-specific age ratings system with international credibility and the capacity and expertise to cope with the rapid expansion of the online environment. Only PEGI protects children online and offline, is "future proof" in the emerging online games playing environment and - importantly - has the power to prevent publishers distributing unsuitable content. It fully assesses game content, has online credibility and is supported throughout the computer games industry as the "gold standard" for protection.

If you would be grateful for the opportunity to discuss this issue with you in person and, if I may, I will ask my office to contact yours to explore opportunities for such a discussion. In the meantime, however, please do not hesitate to contact me.

With thanks, in advance, for your assistance.

Yours sincerely,

A handwritten signature in cursive script that reads "Michael Rawlinson". The signature is written in black ink and is positioned above a horizontal line.

Michael Rawlinson  
Managing Director