

Consultation response form

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| Consultation title | Protecting children from harms online Volume 6: Illegal harms further consultation: User Controls |
| Full name | Dominic Murphy |
| Contact phone number | (+44) 7834 098692 |
| Representing (delete as appropriate) | Organisation |
| Organisation name | Ukie |
| Email address | dominic@ukie.org.uk |

Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see [Ofcom's General Privacy Statement](#).

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| For confidential responses, can Ofcom publish a reference to the contents of your response? | Yes |

Your response

| Question | Your response |
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| Question 1: Do you agree with our proposal? Provide any evidence to support your answer. | <p>Ukie's members remain committed to the shared goal of enhancing online safety, particularly for children and young people. The UK video games industry takes this responsibility seriously and has a long-standing track record of embedding user safety into the design and operation of its products and services. However, we are concerned that Ofcom's current approach introduces uncertainty and new compliance burdens, particularly for smaller providers, without offering sufficient consistency for regulated services.</p> <p>Ukie members have long embedded functionalities such as muting, blocking and, where relevant, disabling comments as standard safety features across their platforms and services. These tools are not novel innovations in the video games space; rather, they represent deeply rooted industry best practices, developed over decades of user-focused design. They are part of a broader safety-by-design approach that is central to how games are developed and maintained. In this context, we support the general principle that all users, especially children, should have access to these types of safety tools.</p> <p>Nonetheless, we are concerned by the recent shift to extend the requirements set out in ICU J1 and ICU J2 more broadly to smaller user to user services based primarily on the likelihood of child access. This represents a departure from Ofcom's December 2024 Illegal Harms Code of Practice, which focused these obligations on larger, higher risk services with relevant functionalities. That earlier Code provided essential clarity, enabling companies to begin aligning their systems and compliance processes. This subsequent consultation on User Controls and the recently announced consultation on Additional Safety Measures appear to have altered this position, expanding the scope of regulation without clear forewarning or sufficient engagement.</p> <p>This change was not indicated during prior consultations or in accompanying guidance, and it comes at a time when many services are still aligning their systems and compliance processes with the Illegal Harms Code of Practice published in December and the Child Safety Code of Practice published in April. For Ukie members,</p> |

| Question | Your response |
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| | <p>particularly smaller studios or those with numerous user-to-user services in their portfolio, this creates significant operational and strategic challenges. It introduces uncertainty, disrupts existing planning, and demands reallocation of compliance resources to keep pace with evolving regulatory expectations.</p> <p>The UK games industry comprises more than 2,600 active companies, the majority of which are small or micro businesses. Despite limited resources, developers have introduced robust moderation systems, communication filters, age-based restrictions, parental controls, and non-verbal interaction systems. Many games use contextual signals such as pings, emotes or preset commands to manage player interactions safely, particularly in titles designed for children or younger audiences. Where verbal or text-based communications exist, layered moderation tools supported by AI help manage risk, often backed by real-time human moderation and enforcement teams.</p> <p>Larger publishers and platforms have also made significant investments in bespoke safety infrastructures. For example, Epic Games' Cabined Accounts restrict chat and other features until verified parental consent is obtained, while voice reporting is enabled by default for users under 18. Activision's deployment of Modulate's Tox-Mod in Call of Duty has led to a 67 percent reduction in repeat offenders. The PEGI age rating system also embeds enforceable content and interaction standards, and compliance is independently audited. These systems are complemented by company-level investments in user education, through initiatives such as Ask About Games, which support families in understanding safe play. Industry members also work with law enforcement and expert organisations such as the National Crime Agency, Internet Watch Foundation and WePROTECT Global Alliance to help reduce risk and respond to emerging threats.</p> <p>This track record should be taken into account in Ofcom's regulatory model. We believe the current proposals do not yet fully reflect the diversity of the video games sector or recognise the effective systems and tools already in place across many services. We are particularly concerned that smaller studios, which have lim-</p> |

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| | <p>ited technical and legal resources, may struggle to interpret and implement overlapping and evolving expectations in the absence of a stable, clearly defined framework.</p> <p>We welcome Ofcom's stated commitment to proportionality, but believe this principle must be more effectively reflected in both the scope and pace of regulatory development. Services with lower risk profiles, limited communication functionality or well-established safety tools should not be asked to retrofit compliance mechanisms unnecessarily or with insufficient lead time. Similarly, frequent or unanticipated changes to expectations risk undermining confidence in the process, particularly for companies that have already made good faith investments in safety aligned with earlier guidance.</p> <p>Content moderation in games is already sophisticated and continues to evolve. Techniques such as automated detection, user flagging, graduated enforcement, device bans and semantic analysis all contribute to reducing harmful content and behaviour. Community management teams play a key role in maintaining positive online environments, and partnerships with mental health charities and support organisations help ensure that vulnerable players can access appropriate help when needed. These systems are tailored to the types of interaction specific to games and are already delivering strong safety outcomes.</p> <p>We agree that all services accessed by children should provide accessible and effective user safety tools. But we urge Ofcom to ensure that any new obligations are introduced in a way that complements existing measures and does not place unnecessary additional burdens on services already delivering effective protections. Phasing new expectations over time and allowing for meaningful evaluation of current measures would help companies of all sizes plan for implementation and maintain compliance without sacrificing innovation or quality of service.</p> <p>The UK video games industry remains committed to protecting players and contributing to a safer online environment. We believe that well-designed regulation can support this goal and enhance outcomes for users, but this depends on a regulatory model that is stable, proportionate and responsive to the realities of each sector.</p> |

| Question | Your response |
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| | We therefore welcome continued engagement with Ofcom and are ready to support the development of effective and practical guidance that works for both services and the players they serve. |

Please tell us how you came across about this consultation:

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