



department for  
**culture, media  
and sport**

# Government Response to a Consultation on options for a strengthened video games classification system

June 2009

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the quality  
of life for all

Our aim is to improve the quality of life for all through cultural and sporting activities, support the pursuit of excellence, and champion the tourism, creative and leisure industries.

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# Section 1: Introduction

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The consultation on options for a strengthened system of video games classification set out 4 possible ways to amend the current system. It took forward a recommendation outlined by clinical psychologist Professor Tanya Byron in her Review 'Safer Children in a Digital World', published on 27 March 2008. As part of the Review, Professor Byron was tasked with assessing the evidence on the risks to children's safety and wellbeing through exposure to harmful or inappropriate material on the internet or in video games. Part of her findings focussed on changes to the current video game classification system and she recommended that consideration be given to the implementation of a new "Hybrid" system of classification. However, she also recognised that there were other possible approaches and so also recommended a full public consultation to be undertaken. The consultation therefore sought views on the "Hybrid" proposal alongside other options, which were judged against criteria set out by Professor Byron as essential components of a robust and effective new system.

## Section 2: The Consultation

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The consultation set out 4 options:

### **Option 1 - Hybrid Classification System**

The BBFC would rate all games that are only suitable for players over the age of 12, with PEGI continuing to rate all 3+ and 7+ games. The BBFC logos would appear on the front of all boxes, with the PEGI logos on the back.

The BBFC would extend its statutory powers to cover games from 12+, bringing it into line with the classification system used for DVDs/videos and building on parental awareness and understanding of what those ratings mean. This system will work best if BBFC and PEGI come to an agreement on their logos and age classifications so that a more integrated approach can be adopted.

### **Option 2 - Enhanced BBFC System**

The BBFC would act as the sole statutory classifications body for all video games, applying its ratings from U to 18. It would retain its power to refuse to classify games it feels are potentially harmful based on its public consultations.

### **Option 3 - Enhanced PEGI System**

A UK-based organisation (possibly the Video Standards Council) would be the designated statutory classification body for video games, applying the PEGI ratings which would be enforceable in law. The VSC (or other UK body chosen) would need to sign up to this new role and any other legislative duties required of it. All video games would be rated using the PEGI system and the only role for the BBFC would be in classifying film content which is not integral to the game.

### **Option 4 - Voluntary Code of Practice**

There would be no changes made to the legislation so BBFC and PEGI would continue to classify games as they currently do. The current system of dual classification and labelling would continue to exist. The Government would then ask retailers and suppliers to sign up to a voluntary Code of Practice to secure adherence to the classification system when selling/supplying video games to children aged 12 or above, even though a statutory offence would not be committed if they broke the Code. This Code of Practice would focus on classification, consumer protection, and consumer education, and it would follow the

guidelines outlined in the Review. There would be no extension to the statutory basis of the classification system to 12+ games but this proposal would aim to achieve compliance by voluntary means and an agreed system of good practice.

The consultation presented these four options and asked for the key advantages and disadvantages from the perspective of relevant stakeholders, (consumers, games industry and retailers), whilst also asking for consideration of each option alongside the criteria set out by Professor Byron:

- A. There must be a trustworthy, uniform and clear set of symbols or labels to categorise the age ratings with accompanying descriptors which explain game content.
- B. There must be the power to refuse to certify certain titles so they cannot be sold (or supplied<sup>1</sup>) in the UK.
- C. There must be a statutory basis to the video game classification system from the age of 12 onwards.
- D. There should continue to be a non-statutory system up to the age of 12.
- E. Any system must be flexible and future proof.
- F. The system must work for the games industry.
- G. The system must support retailers.
- H. The system must reflect the evidence on potential harm.
- I. Government and industry must take into account how the system will translate into online gaming.

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<sup>1</sup> The words “(or supplied)” are not included in Dr Byron’s Review but are included here to reflect the wording of the Video Recordings Act

# Section 3: Summary of Responses to the Consultation

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## Children's Groups/Charities/parents

### Illustrative quotes

*"Childnet in particular agrees that there must be a trustworthy, uniform and clear set of symbols of labels to categorise the age ratings and that it is vital that government and industry take into account how the system will translate into online gaming" – Childnet*

*"Because PEGI is a Europe wide authority on video games standards and because of its experience not just in rating games and online content, but also in keeping game developers accountable within Europe, we believe that this is the best option. We also approve of the simple symbol recognition system as well as symbols that cover more than just age but include symbols for violence, sexual content, drugs, gambling content, bad language and fear" - CARE*

*"This [enhanced BBFC] is a good system, especially if the BBFC can clarify why they have given the particular rating and parents are happy with the reasons they have provided.... It will get rid of bad games...and would work because it is simple, everyone would know the ages of purchase and use and hopefully follow them" – Children and Youth Board*

*"We do not oppose a 'hybrid' model, but feel that a single regulatory approach would represent best practice in the interests of child protection. We have a neutral stance on which independent statutory body is best placed to deliver that" – CEOP*

*"We do not support Option 1 neither do we support Option 4....It is important that whichever system is approved there needs to be proactive efforts to build consumer awareness of the new system. We feel that BBFC are more likely to achieve this. However, if PEGI could be convinced to work with BBFC to find a rating system which can be developed for all British consumers, adults as well as children, so much the better....I very much hope that a single system will prove to be the popular option" – Consumer Focus*

*"We favour a hybrid system. We believe it will work as it builds on a system which is already in place, with which parents and other stakeholders are already familiar. It also creates some consistency between the game and film industry in terms of ratings" - Angus Child Protection Committee*

## Games industry

The games industry overwhelmingly supported the Enhanced PEGI option because as well as meeting the key criteria set out by the consultation it is the only system designed specifically for games and works consistently across 29 Countries and in both the on and offline environment.

Illustrative quotes:

*“The PEGI ratings System was designed for games. It is not a film rating regime which tries to adapt itself to interactive media. As such, PEGI ratings are the safest and most efficient way to rate video games and offer the best opportunity to reduce the risk of children accessing unsuitable content” - ELSPA*

*“Over recent months PEGI has undergone further significant improvements which clarify the ratings and make it easier for parents and children to understand game content. We believe these improvements add to the protection PEGI offers to children playing online. PEGI is also “future-proof”, since it has the flexibility, scalability and efficiency to allow it to cope with enormous increases in online gaming that the industry expects to see in coming years” - Ubisoft*

*“The ease with which games can be published online means that a new type of game publisher is emerging. Smaller companies and even individuals can create games relatively cheaply and can publish those games direct through channels such as MSN games, Yahoo! Games and the PlayStation@Network.....The more ratings systems a publisher has to deal with the more expensive it becomes to publish. Since many of these games are cheap to develop and may have a limited market, the cost of rating in individual territories could make the venture prohibitively expensive” – SCEE*

## Retailers

There were few responses from retailers; although the Entertainment Retailers Association spoke on behalf of their members which account for 80 – 90% of all games software sold in the UK. The response expressed an ability to work with any of the first three options though preferred either Enhanced BBFC or Enhanced PEGI as they both offer a single mandatory system which applies to games and would therefore give clarity to consumers in this regard. They expressed positive and negative comments about both systems thinking the BBFC symbols were currently better known and understood while believing that the PEGI would roll out on a Pan –European basis and via internet games in a simple way.

Illustrative quotes:

*“The BBFC system is clearly understood by consumers and retailers and implementing this system for games would require limited changes in training and less need to re-educate the consumer” – ERA*



*“Retail understands and is comfortable with the ratings. PEGI has extensive experience in rating games. PEGI is well placed to cope with the volume of product as it already rates all games” - ERA*

## **Regulators**

The opinions in this category were divided as expected, with the BBFC favouring the Enhanced BBFC option and the Video Standards Council and the PEGI advisory board favouring the Enhanced PEGI option. Other regulators also responded with mixed views.

Illustrative quotes:

*“BBFC classifications are understood and trusted by the British public because they are independent; made after a proper contextual assessment of harm and suitability in an environment free of commercial pressure; and are based on extensive consultation with the public” – BBFC*

*“The PEGI system represents a clear and distinct system for the age rating of games only and does not confuse the public into believing that games are the same as films....The PEGI system will familiarise consumers with the system that will be used for online gaming. It is estimated that within 5 years the large majority of games will only be made available online. If UK consumers are not familiar with the PEGI system this will put them at a distinct disadvantage compared to consumers in the rest of Europe. This cannot be in the best interests of child protection in the UK” - VSC*

*“This [BBFC] system operates effectively for ‘video’ works and is clearly understood by consumers both in terms of films for cinema release and purchase of over the counter products/mail order. The criteria used to determine what age rating should be attached to works is robust and understood by enforcers and the public” – LACORS*

*“Of the 4 proposals this [Enhanced PEGI] is the most forward looking” – Trading Standards South East*

## **Members of the public**

There was no consistency of views from individuals; there was support for each of the four suggested options as well as a suggestions that no action is required.

*“[Hybrid] Would work as BBFC symbols are widely understood. Doesn't see a need for the BBFC to be extended to cover non-controversial 12+ games.”*

*“Adults understand it [BBFC]. The BBFC is a tried and trusted system. There would be a standard level across cinema, DVD and games. BBFC is more inline with what most British*

*people would find appropriate. Avoids duplication/waste of resource caused by having a second body vetting potentially violent games.”*

*“I think it [PEGI] would be ideal since it allows for a more detailed pictographical description of the game's content. A parent whose child has been violent at school can avoid games where the violence level is high. Same applies with swearing.”*

*“I have not seen compelling evidence that the classification system has failed to inform consumers of content. I have also not yet seen an analysis of what impact a stricter classification system would have on consumer behaviour. In the absence of this evidence it would seem inappropriate to create new statutory offences or enforcement bodies”*

### **Other industry voices**

*“The CEA wants to put on record its support for the expertise and professionalism shown by the BBFC in its role as a classifier of film content. In the CEAs opinion the BBFC's classification system is trusted, authoritative and robust and is well understood by the public and the industry” - Cinema Exhibitors Association.*

*“Distributors consulted who have games publishing divisions (eg Warners and Disney) support the recommendation that the BBFC should classify games content for release on video titles, while interactive content released primarily as a games title continue to be classified by PEGI.” - BVA*

## Section 4: Government Response

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On careful consideration of all the evidence presented to us the Government has decided to proceed with implementation of Option 3: Enhanced PEGI system. We are confident this option balances the needs to address both concerns around child safety, the context within which the concerns initially arose, and provides for the future development of the video games market through the adoption of a robust yet responsive system.

The enhanced PEGI system will deliver a strong UK based statutory system that responds to the needs of the UK public. Separately from the consultation, we undertook our own research to ensure the opinions of parents of children who regularly play games could be fed into our decision. The consensus reached amongst the parents interviewed was that Option 3 was favoured as the parents of younger children were already familiar with and trusted the system, and all parents thought the descriptor pictures and text accompanying the age classification logos in the PEGI system were very useful in determining likely content of the game beyond just the rating.

As Professor Byron said in her Review, public awareness and understanding of a classification system is critical to its success. This is why this unique combination offers the best approach to child safety in the UK as the symbols will become widely recognised in both the on and offline environment. This means that when British children buy and play games from Europe they will see the same age ratings that they see on boxes in the UK.

In this increasingly converging online world, a consistency of symbols and approach across Europe will offer more rather than less protection for our children. It will safeguard against scenarios where the same game may obtain a different age classification in Europe and the UK, which may result in an 18 year old playing an 18 rated online game in Europe against someone they think is an adult but, as the game is rated differently in the UK, is actually a 12 year old child in the UK.

Analysis of all the responses to the consultation revealed that our initially preferred approach, recommended in Professor Byron's Review and set out in Option 1 of the consultation, would have significant disadvantages in terms of fulfilling a number of the key criteria against which the options have been considered.

Option 1 does not successfully fulfill the criteria requiring the new system to contain a uniform set of classification labels, as it necessarily involves input from 2 different classification bodies depending on the age rating of the product. This option is also not fully supported by the games industry, nor is it the option of choice for retailers as the latter would prefer the clarity of ratings given out by a single system as proposed under options 2 and 3.

Option 4 received very little support as its lack of statutory backing rendered it the weaker choice by far.

Option 2 received support from consultation respondents who valued the work the BBFC do currently and also an approach which favours a single classification option. Option 2 also successfully fulfils most of Professor Byron's key criteria and the BBFC is a trusted and long standing independent body whose work, particularly on the education of consumers, is highly valued.

However, taking all the evidence into consideration, the international dimension of the PEGI system presents an appropriate solution to an increasingly global issue and one that will be flexible enough to cope with future challenges.

Detailed consideration of the strengths and weaknesses of each option against the key criteria is set out under the Benefits section of the Impact Assessment (Annex A), which also details the financial impact on costs of fees and administration for the industry.

A list of the consultation respondents is set out below.

Andrew Miller MP

Angus Child Protection

BBFC

British Psychological Society

BVA

Capcom

CARE

Celia Barlow MP

CEOP

Childnet International

Children and Youth Board

Christian Concern for Our Nation

Cinema Exhibitors Association

Consumer Focus

Disney

EA Games

Eidos

ELSPA

ERA

Film Distributors Association

Focus Multimedia

Internet Watch Foundation

ISFE  
Jagex  
LACORS  
Mastertronic  
Media Literacy Task Force  
Mediawatch  
Metropolitan Police Service  
Michael McGimpsey MLA  
Microsoft  
Mobile Broadband Group  
NC Soft  
North Ayrshire Child Protection Committee  
OneSwitch  
PEGI Advisory Board  
Rising Star Games  
Salvation Army  
Sarassin  
SEGA  
SONY  
Stirling Child Protection Committee  
The Games Factory  
TIGA  
Trading Standards South East  
Ubisoft  
USK  
VSC  
Zenimax  
Zoo Digital

A further 14 people responded as individuals. DCMS is grateful for all the responses made to the consultation. 120 people responded as part of a planned Media March campaign.

## Summary: Intervention & Options

<b>Department /Agency:</b> <b>Department for Culture, Media and Sport</b>		<b>Title:</b> <b>Impact Assessment of re-classification of Video Games</b>	
<b>Stage:</b> Policy Announcement	<b>Version:</b> 1	<b>Date:</b> June 2009	
<b>Related Publications:</b> 'Safer Children in a Digital World': Review by Dr. Tanya Byron, published 27 <sup>th</sup> March 2008; 'Digital Britain Report': Joint DCMS?BIS publication, published 16 <sup>th</sup> June 2009			

**Available to view or download at:**

<http://www.dcsf.gov.uk/byron/review>

**Contact for enquiries:** enquiries@culture.gov.uk

**Telephone:** 0207 211 6200

**What is the problem under consideration? Why is government intervention necessary?**

In September 2007 the Prime Minister asked Dr Tanya Byron to carry out a review of the risks to children of the internet and video games. Dr Byron concluded that the classification system currently applied to video games is confusing. She recommended that a consultation be carried out into a reform of the classification system so that parents and children could be clearer about the content of individual games and the existing statutory scheme be extended so that all games rated 12+ must be properly age classified and sold/supplied according to this classification.

**What are the policy objectives and the intended effects?**

To put in place a classification system that is more meaningful and effective, and that consequently affords better protection to children and young adults. This would mean an extension of the existing statutory scheme to all games rated 12+. Currently only video games containing gross violence, sexual activity, certain criminal activity and games with film content that is not integral to the game are caught under the statutory scheme.

**What policy options have been considered? Please justify any preferred option.**

\* a hybrid classification system; \*an enhanced BBFC option which would see BBFC as the statutory classifications body for all video games while retaining its right to refuse certification; \*an enhanced PEGI option giving a UK body designated statutory authority to run PEGI in the UK and the power to refuse to certify a game and; \* a voluntary Code of Practice for industry and suppliers (with no changes to the existing statutory scheme).

The enhanced PEGI option was selected because it best meets all the key criteria set out by Dr Byron in her report, will offer excellent protection to children and has the least negative impact on industry.

**When will the policy be reviewed to establish the actual costs and benefits and the achievement of the desired effects?** Three years following the implementation of the policy.

**Ministerial Sign-off** For final proposal/implementation stage Impact Assessments:

*I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.*

Signed by the responsible Minister:



..... Date: 12<sup>th</sup> June 2009

## Summary: Analysis & Evidence

<b>Policy Option: 3</b>	<b>Description: Enhanced PEGI Option</b>
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<b>COSTS</b>	<b>ANNUAL COSTS</b>	Description and scale of <b>key monetised costs</b> by 'main affected groups' The costs refer to the fees and the administrative burden of the enhanced PEGI option on video games publishers, and represents the lowest of all the options considered. The £250,000 transition cost refers to local authorities updating their guidance.
	<b>One-off</b> (Transition) <span style="float: right;">Yrs</span>	
	<b>£ 0.25m</b>	
	<b>Average Annual Cost</b> (excluding one-off)	
	<b>£ 5.44m</b> <span style="float: right;">10</span>	<b>Total Cost (PV)</b> <b>£ 45.5 m</b>
Other <b>key non-monetised costs</b> by 'main affected groups'		

<b>BENEFITS</b>	<b>ANNUAL BENEFITS</b>	Description and scale of <b>key monetised benefits</b> by 'main affected groups' Government's clear view is that the benefits of moving to a system which offers greater protection to children outweigh the costs identified. However, we were unable to monetise the benefits of any of the options.
	<b>One-off</b> <span style="float: right;">Yrs</span>	
	<b>£ 0</b>	
	<b>Average Annual Benefit</b> (excluding one-off)	
	<b>£ 0</b>	<b>Total Benefit (PV)</b> <b>£ 0</b>
Other <b>key non-monetised benefits</b> by 'main affected groups' This option best meets the range of key criteria that are required to ensure that a video games classification system is most effective. These are detailed in the evidence base but essentially this system will provide most protection to children now and in the long term.		

**Key Assumptions/Sensitivities/Risks** (i) new system will apply indefinitely: costs are based on a 10 year horizon (ii) exchange rates are sensitive and vulnerable to change.

Price Base Year 2009	Time Period Years 10	<b>Net Benefit Range (NPV)</b> <b>£ -45.5m</b>	<b>NET BENEFIT (NPV Best estimate)</b> <b>£ -45.5m</b>
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What is the geographic coverage of the policy/option?	UK				
On what date will the policy be implemented?	October 2010				
Which organisation(s) will enforce the policy?	Trading Standards				
What is the total annual cost of enforcement for these organisations?	£				
Does enforcement comply with Hampton principles?	Yes				
Will implementation go beyond minimum EU requirements?	Yes				
What is the value of the proposed offsetting measure per year?	£ Nil				
What is the value of changes in greenhouse gas emissions?	£ Nil				
Will the proposal have a significant impact on competition?	No				
Annual cost (£-£) per organisation (excluding one-off)	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%; text-align: center;">Micro</td> <td style="width: 25%; text-align: center;">Small</td> <td style="width: 25%; text-align: center;">Medium</td> <td style="width: 25%; text-align: center;">Large</td> </tr> </table>	Micro	Small	Medium	Large
Micro	Small	Medium	Large		
Are any of these organisations exempt?	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%; text-align: center;">No</td> <td style="width: 25%; text-align: center;">No</td> <td style="width: 25%; text-align: center;">N/A</td> <td style="width: 25%; text-align: center;">N/A</td> </tr> </table>	No	No	N/A	N/A
No	No	N/A	N/A		

<b>Impact on Admin Burdens Baseline</b> (2005 Prices)			(Increase - Decrease)
Increase of	£ 1.76m	Decrease of	£ 0
<b>Net Impact</b>		<b>£ 1.76m</b>	

Key: Annual costs and benefits: Constant Prices (Net) Present Value

# Evidence Base (for summary sheets)

## 1. Evidence Base

- 1.1. This document is divided into a costs analysis, including fees and administrative burdens and a benefits analysis.
- 1.2. Both sections compare the four options we put forward in our consultation against a series of criteria – the costs analysis is mainly quantitative and the benefits analysis mainly qualitative. We then reach our conclusion as to the best option going forward as outlined in the summary document above.
- 1.3. The options were:

### Option 1 – Hybrid Classification System

- 1.4. The BBFC would rate all games that are only suitable for players over the age of 12, with PEGI continuing to rate all 3+ and 7+ games. The BBFC logos would appear on the front of all boxes, with the PEGI logos on the back.
- 1.5. The Government would extend the BBFC's statutory powers to cover games from 12+, bringing it into line with the classification system used for DVDs/videos and building on parental awareness and understanding of what those ratings mean. This system will work best if BBFC and PEGI come to an agreement on their logos and age classifications so that a more integrated approach can be adopted.

### Option 2: Enhanced BBFC System

- 1.6. The BBFC would act as the sole statutory classifications body for all video games, applying its ratings from U to 18. It would retain its power to refuse to classify games it feels are potentially harmful based on its public consultations.

### Option 3: Enhanced PEGI System – This is the chosen option.

- 1.7. A UK-based organisation (possibly the Video Standards Council) would be the designated statutory classification body for video games, applying the PEGI ratings which would be enforceable in law. The VSC (or other UK body chosen) would need to sign up to this new role and any other legislative duties required of it. All video games would be rated using the PEGI system and the only role for the BBFC would be in classifying film or video content which is not integral to the game.

### Option 4: Voluntary Code of Practice

- 1.8. There would be no changes made to the legislation so BBFC and PEGI would continue to classify games as they currently do. The current system of dual classification and labelling would continue to exist. The Government would then ask retailers and suppliers to sign up to a voluntary Code of Practice to ensure that they adhered to the classification system when selling or supplying video games to children aged 12 or above, even though a statutory offence would not be committed if they broke the Code. This Code of Practice would focus on classification, consumer protection,



and consumer education and it would follow the guidelines outlined in the Review. There would be no extension to the statutory basis of the classification system to 12+ games but this proposal would aim to achieve compliance by voluntary means and an agreed system of good practice.

## 2. Costs

### Fees Analysis

- 2.1. This Section is broken down into three sections:
- Calculating the baseline (2007) figures
  - Comparing the options
  - Analysis

### Calculating the baseline (2007) figures.

#### BBFC

2.2. The fee charged by the BBFC for the classification of video games is not a flat rate and depends on the complexity and scale of the game and the breadth and depth of the classification issues. The average cost overall of classifying a game in 2007 was £1,649.22. Cost is calculated on the basis of a £300 handling charge plus £6 per minute examination time. A single BBFC classification is valid across all platforms provided the content is essentially the same.

2.3. In 2007, BBFC received 276 games for classification of which it classified 262 (the remaining 14 were either incomplete or were withdrawn by the publisher). These 262 broke down into the following categories:

**Table 1**

Classification	Number	Percentage of whole
U	28	10.7
PG	37	14.1
12	40	15.27
15	95	36.26
18	62	23.67

*(During this period BBFC also received up to ten interactive games submitted on Blu ray discs by DVD distributors rather than games publishers. 2008 saw an increase in the number of such submissions)*

2.4. Of the games BBFC classified in 2007, 21% were not straightforward original submissions and included demos, samples and ports etc while the PEGI figures do not include these.

2.5. For the six months running from December 2007 to May 2008 the average time taken by the BBFC to allocate a classification to a game submitted to them was:

**Table 2**

December 2007	6.3 calendar days
January 2008	11.1 calendar days
February 2008	7.2 calendar days
March 2008	7.5 calendar days (excluding Manhunt 2 which involved litigation)
April 2008	8 calendar days
May 2008	7 calendar days

2.6. These figures factor out any delays that were due to incomplete submissions.

2.7. The average sampling/playing time examiners spend on a game was:

**Table 3**

Category	Average sampling time, playing the game (minutes)
U	110
PG	150
12	165
15	230
18	250

2.8. The average cost per game is set out in Table 4:

**Table 4**

Classification	Average Cost (handling charge £300 plus £6 per minute)
U	£960
PG	£1,200
12	£1,290
15	£1,680
18	£1,800

Note that these figures represent the timings in minutes of non-linear game examination and do not include linear material.

## PEGI

2.9. Fees are linked to product category and rate track. A product can be categorised as:

- New Game (one that has never been rated under the PEGI system before)
- Additional Platform (a game that has already been rated under PEGI as a New Game on one platform and which is then rated on another platform)
- Local Product (This applies where a rating is requested for a limited number of countries. The maximum number of countries is four. If the group of selected countries includes either the UK or France the local product category does not apply.)

2.10. Fees will also vary according to the rate track that is selected by the games publisher:

- Fast track – this guarantees a rating within five working days of submitting a rating request for a 12+, 16+ or 18+ game. The normal period is ten working days. The rating approval period starts running after the materials required for examination have been received by the VSC / NICAM. (NICAM is the Netherlands Institute for the Classification of Audiovisual Media.) The final licence will not be awarded until the necessary payment has been transferred to ISFE (Interactive Software Federation of Europe)
- Normal Rate Track – for all 3+ and 7+ ratings (standard period of three working days after payment transferred to ISFE). 12+, 16+ and 18+ ratings for which the normal rate track has

been selected are guaranteed to be processed within ten days after all conditions have been met by the publisher although in practice this is generally quicker.

**Table 5**

Product	Standard Fee	Fast Track Fee
New Game	€1000	€1500
Additional Platform	€500	€750
Local Product	€100	€150

2.11. From 1 January 2007 to 31 December 2007 PEGI awarded the classifications in Table 6.

**Table 6**

Classification	Number	Percentage of whole
3+	604	49.1
7+	175	14.2
12+	250	20.3
16+	97	7.9
18+	4	0.3

(Figures relate to games not platforms)

2.12. In addition, VSC referred 101 games to BBFC during this period (8.2% of whole) 50 of which were referred under the Video Recordings Act 1984. (The remaining 51 were referred because they contained linear content.) Of the 50 referrals 29 were rated 18, 19 were rated 15 and 2 were rated 12 by the BBFC.

### 3. Comparing the Options

- 3.1. The pricing structures of the BBFC and PEGI differ quite considerably which makes direct comparisons of costs quite difficult to achieve. We have made some changes to our assumptions since our interim impact assessment following receipt of more detailed information.
- 3.2. To calculate the BBFC actual costs, we multiplied the total number of games rated at each level in table 1 by the average cost of rating games at the corresponding level in table 4. In order to calculate the PEGI actuals, we took the number of games rated at each level in table 6 multiplied them by €1250 (assuming half at fast track €1500 and half at standard rate €1000 in table 5) and then added the extra costs to equate to being released on two and five platforms. All figures were converted to Pounds Sterling using the average exchange rate over the last 12 months (ending March 2009) of 0.81777. This figure has risen since the interim impact assessment.
- 3.3. For the purposes of the following calculations we have assumed that:
  - the average exchange rate for the last 12 months (ending March 2009) applies to all PEGI charges so that we can compare all costs in Sterling. (Given that the PEGI charges are made in Euros, the cost figures are sensitive to changes in exchange rates.); and
  - the ratings systems broadly align so that a U rating will translate to a 3+ and a PG to a 7+. We did receive further information which showed that this is not always the case sometime the

BBFC give a higher rating and sometimes PEGI give a higher rating, but for simplicity of calculation we have kept the assumption the same.

3.4. Since the interim impact assessment we can now say that:

- 95% of games rated by PEGI were charged the standard rate fee and 5% were charged the more expensive fast track fee;
- the average number of platforms on which a video game is released is two; and
- all but 7 games released in the UK were released in at least one of the countries that apply PEGI.

#### 4. New Cost Structures

4.1. Since the interim assessment we have received information from both the BBFC and PEGI about changes to their fee structures. The new figures for the four options (although not for the 2007 baseline) reflect these changes. The PEGI system will double its fees to pay for the additional work associated with enhancing the system and carrying out the Statutory functions, while the BBFC have said that they will be able to reduce their handling charge from £300 to £200 due to economies of scale if options 1 or 2 are selected. Therefore we have amended the figures accordingly in the tables below.

4.2. Table 7 summarises the cost to Industry of the different options.

**Table 7**

	Fee Costs	Admin Costs	Total
Actual - 2007	£1,972,013	£1,531,200	£3,503,213
Hybrid	£3,738,579	£1,912,900	£5,651,479
Enhanced BBFC	£4,450,519	£2,769,800	£7,220,319
Enhanced PEGI	£3,917,433	£1,526,800	£5,444,233
Code of Practice	£1,972,013	£1,531,200	£3,503,213

4.3. This table demonstrates that option 4: Code of practice is the least expensive of the four options. However, as we will go on to demonstrate in the Benefits analysis this option performs badly against most of the key criteria. **Of the first 3 options, which all are much closer than option 4 to meeting the key criteria, option 3: enhanced PEGI generates the least additional burden to industry.** This is largely explained by the fact that currently, the majority of games are classified by the PEGI system for most of Europe; the hybrid and the Enhanced BBFC options would see a significant number of those games also being rated by the BBFC which means that not only will individual game titles have to pay two sets of fees to release across the markets, but will also incur additional marketing, administration and shipping costs as a result.

4.4. What follows is an explanation of how we reached these costs.

#### 5. Which organisation would do the ratings under each option?

5.1. This is important because currently not all games fall under the requirements for statutory regulation. In some of our options many games which are not currently rated by the BBFC would have to be. **Table 8** demonstrates the changes in who will rate which video games, using the 2007 actual figures as a baseline. The Europe column shows the additional number of titles that games companies will have to pay to be classified (over and above that which already takes place under the current classification system) if the same game is to be released in one or more of the countries covered by the PEGI system in Europe. In 2007 this happened in all but 7 cases.

**Table 8**

Number of Ratings	2007 Actual Figures		Option 1: Hybrid		Option 2: Enhanced BBFC		Option 3: Enhanced PEGI		Option 4: Code of Practice	
	UK	Europe	UK	Europe	UK	Europe	UK	Europe	UK	Europe
U	28	n/a	28		632				28	n/a
PG	37	n/a	37		212				37	n/a
12	40	n/a	290		290				40	n/a
15	95	n/a	192		192				95	n/a
18	62	n/a	62		62				62	n/a
3+	604	n/a	604			604	632		604	n/a
7+	175	n/a	175			175	212		175	n/a
12+	250	n/a		250		250	290		250	n/a
15+	97	n/a		97		97	192		97	n/a
18+	4	n/a		4		4	62		4	n/a
Total	1392		1388	351	1388	1130	1388		1392	
Combined total	1392		1739		2518		1388		1392	

**Table 9**

Costs	2007 Actual Figures		Option 1: Hybrid		Option 2: Enhanced BBFC		Option 3: Enhanced PEGI		Option 4: Code of Practice	
	UK	Europe	UK	Europe	UK	Europe	UK	Europe	UK	Europe
<b>U</b>	£26,880	£0	£24,080		£543,520				£26,880	£0
<b>PG</b>	£44,400	£0	£40,700		£233,200				£44,400	£0
<b>12</b>	£51,600	£0	£345,100		£345,100				£51,600	£0
<b>15</b>	£159,600	£0	£303,360		£303,360				£159,600	£0
<b>18</b>	£111,600	£0	£105,400		£105,400				£111,600	£0
<b>3+</b>	£843,426	£0	£1,560,746			£1,560,746	£1,633,099	£0	£843,426	£0
<b>7+</b>	£244,370	£0	£452,203			£452,203	£547,812	£0	£244,370	£0
<b>12+</b>	£349,100	£0		£646,004		£646,004	£749,365	£0	£349,100	£0
<b>15+</b>	£135,451	£0		£250,650		£250,650	£496,131	£0	£135,451	£0
<b>18+</b>	£5,586	£0		£10,336		£10,336	£416,027	£0	£5,586	£0
<b>Total</b>	£1,972,013	£0	£2,831,589	£906,990	£1,530,580	£2,919,939	£3,842,433	£0	£1,972,013	£0
<b>Additional costs</b>							BBFC charge for linear material	£75,000		
<b>Combined total</b>	<b>£1,972,013</b>		<b>£3,738,579</b>		<b>£4,450,519</b>		<b>£3,917,433</b>		<b>£1,972,013</b>	

## **6. Fees Analysis**

- 6.1. **Table 9** demonstrates that the voluntary code of practice option would generate the least amount of additional burden on the video games industry because we would not be changing who classifies any of the titles. The next best option in terms of fees is the Enhanced PEGI option despite the increase in their charges. This is because it will mean only one organisation being responsible for classifying games in much of Europe. This also takes into account the additional costs of running the VSC as a statutory authority. BBFC currently operate the statutory function as relates to 18 classifications and consequently already have the internal mechanisms (for example, appeals systems) in place to support this. As indicated earlier, the BBFC have stated that they can reduce their handling charge from £300 to £200 through economies of scale if they rate all titles suitable for people aged 12 and above.
- 6.2. We make an assumption in the table that the BBFC will continue to rate the basic games that are found on many blu-ray discs. These are games that are ancillary to the main product which is generally a film or television programme. If for some reason this was not possible we would look to PEGI to provide a low cost option to reflect the simplicity of the game. The BBFC charge an average of £331 per game of this nature and the VSC are exploring how to use the pricing structure they use for casual games which is much less than full video games. This needs to be ironed out but essentially if the game (which is not being sold separately as a stand alone game) is less than 250mb it will cost no more than £250, if more than 250mb in will cost no more than £500.
- 6.3. We also assume that with the enhanced PEGI option the BBFC will continue to rate any film or video content found on video game discs that is not integral to the game, as they currently do. This costs approximately £75,000 per year.
- 6.4. As the market develops and in the situation where a video game is released separately as well as in a joint package with a film, we would expect the game to be rated by PEGI and the Film by the BBFC for their separate releases – whichever was the highest age rating would prevail, although the packaging would have to be designed so that both rating systems appeared.

## **7. Administrative Burden Analysis**

- 7.1. We have been mindful of the administrative burden placed on video games companies as a result of having to have their products classified. Table 8 showed how many actual ratings are required under each of the options and this is useful when calculating how this affects the administrative burden.
- 7.2. We held fairly detailed discussions with several representatives from different video games companies, as well as with the BBFC and the VSC, to inform this impact assessment. We were provided with evidence to show that the cost of working hours to produce the paperwork and gather together the necessary supporting evidence is approximately £500 which equates to one day per system. There didn't seem to be any evidence that this is different for each system. So the real difference between the options comes down to the duplication of effort.
- 7.3. There were two further areas of administrative burdens that could be affected by these changes; the cost of packaging including design, proofing and admin and also product assembly costs. The evidence shows that the packaging costs equate to £600 per title.



Table 10 shows the estimated administrative burdens of obtaining a classification and of

	2007 Actual Costs	Option 1: Hybrid	Option 2: Enhanced BBFC	Option 3: Enhanced PEGI	Option 4: Code of Practice
Administration costs (at £500 per games rating application)	£696,000	£869,500	£1,259,000	£694,000	£696,000
Packaging costs (at £600 per game title), including design, proofing and admin.	£835,200	£1,043,400	£1,510,800	£832,800	£835,200

packaging.

**Table 10:** Classification costs to industry across Europe.

(Admin includes 3 resources: Game Producer, to compile all the submission documentation, Game Engineer, to compile and burn correct game build for submission and Game Tester, to run a test pass on the game build to be submitted for rating.)

7.4. The industry estimate that due to economies of scale on a combination of factors concerned with product assembly, including size of print run for inlay printing, disc printing and shipping, their costs would represent an increase of up to £0.1 per Unit should Options 1 or 2 be implemented in the UK. For example the shipping costs will increase with the number of stock keeping units and there are several markets (Belgium, Greece, Luxembourg, Netherlands and Portugal) where English language discs are distributed. Therefore, having two separate ratings systems for the same product incurs additional costs.

7.5. While we accept that these factors would impact upon the cost to industry of having separate systems operating in the UK and Europe, the exact figures are difficult to calculate as they are dependent on the number of game units released for all games across Europe. The variance is too great to estimate an average number of units as, though the industry indicated that 88% of the games sell fewer than 200,000 units, there are games that sell many more, for example Grand Theft Auto IV sold 631,000 units in its first day of release and though this is an exceptional case it does demonstrate the market extremities when it comes to the bigger releases.

- 7.6. We can however use an industry example of the cost differentiation between a small and larger Game Build Run, to show the likely significant extra costs required with a UK only classification system. The example shows how dividing a Game Build Run of 130,000 (to cover the English language games shipped to the UK and a number of European countries simultaneously, under Option 3) into two smaller Runs (to cover English language games shipped just to Europe and those shipped just to the UK) creates a cost differential of £2,755, as it costs more per unit to build the smaller run. We accept that although exact figures cannot be produced the extra cost to industry, particularly affecting the smaller companies, would be a significant amount if two separate classification systems were operating in Europe and in the UK.
- 7.7. We must consider the administrative burden of the convergence of content under the Enhanced PEGI option. While the Government's preferred solution will see the BBFC continuing to rate video game content if it is an ancillary part of a linear product (such as Blu Ray discs), if this does not prove to be possible we will have to consider how the VSC can carry out that role without generating an additional administrative burden to the industry. The VSC have stated that for game content that is ancillary to a film, they would complete the PEGI questionnaire on behalf of the company submitting it – thereby keeping admin costs to an absolute minimum.
- 7.8. In addition, some PEGI-rated games would need to carry a BBFC classification (and therefore incur additional time and human resource costs) where they included video content not integral to the game. As the industry already has to provide this information for the products they produce this should not increase the administrative burden required.
- 7.9. Under option 4, the Voluntary Code of Practice option, there would be no change to the industry in terms of the number of ratings required. The retail industry told us that they already go to great lengths to share information and best practice in terms of informing consumers about the existing ratings systems and do have an existing code of practice relating to them.
- 7.10. With the statutory power extended to all games rated for people aged 12 and above, local authorities may need to amend their guidance documents for trading standards officers which could be roughly estimated to be no more than £1000 per local authority. We estimate that this would likely be £250,000 in total. This would be the case for all options except option 4.

## **8. Benefits Analysis**

- 8.1. We used the key criteria as set out by Prof. Byron to measure the relative benefits of the four options. These are grouped together under the following set of six headings:
9. A trustworthy, uniform and clear set of symbols
- 9.1. Currently, two sets of symbols can be found on video games in the UK; BBFC and PEGI. Much has been made of the relative merits of both of these. A widely held view (though contested by some) is that the BBFC symbols are more recognisable and well trusted, due partly to their classification of cinema and video works. Some argue that PEGI symbols are better understood by parents with younger children while others value them both and preferred the hybrid option as it gives parents access to both information sets therefore providing more information.

- 9.2. Many respondents, including regulators, games industry, children's groups and retailers felt that while the hybrid option could work, it is quite complicated and could be more confusing than either the enhanced BBFC or the enhanced PEGI systems. There was very little support for the voluntary code of practice option.
- 9.3. There was some criticism of the PEGI logos and symbols during the Byron review process and so PEGI are redesigning their age symbols. Part of this includes adding one word descriptors to the pictograms to make their meaning clear. We held some focus groups with parents and they showed a clear preference for PEGI – parents liked the added support of the new Pictograms and found them more useful than the lines of text offered by the BBFC.
- 9.4. Generally there was more support among non industry responses to the consultation for the existing BBFC logos although some felt that "U" was not as helpful as 3+ to parents of younger children.
- 9.5. The video games industry is committed to funding an extensive public awareness and education campaign should the enhanced PEGI option be chosen as the way forward for the UK. The BBFC argue that their system would require less education because of the immediate recognisability of the symbols and the extensive media literacy work and extended consumer information that they provide to parents, children and students on their websites. There is no doubt that the work done by the BBFC in this area is excellent.
- 9.6. On balance both the enhanced BBFC and the enhanced PEGI options would provide a trustworthy, clear and uniform set of symbols.
- 10. A statutory basis for games suitable of people aged 12 and above, but not for games suitable for children under 12. The statutory power should include the ability to refuse to certify certain products**
- 10.1. Video games do not fall within the statutory classification regime set out in the Video Recordings Act 1984 unless they contain gross violence or sexual content, and if so, they must be classified by the BBFC. This means that the BBFC currently administers statutory functions for all video works (i.e. DVDs and video games).
- 10.2. Options 1 – 3 are all designed to ensure that all these criteria are met. Option 4 would retain the BBFC's power to refuse to classify certain games, but would not alter the statutory basis for selling games.
- 10.3. Under the Hybrid Classification system and the Enhanced BBFC system, the BBFC would continue to carry out the functions they currently do. Under the enhanced PEGI system we would give authority to the Video Standards Council who would oversee the PEGI system of classification for all video games in the UK. The VSC will create a mechanism to ensure an element of separation from the administration of PEGI to enact the UK specific statutory functions including the maintenance of a full archive to support law enforcement.
- 10.4. It is worth noting that Prof. Byron indicated that once a games classification system was fully understood by the public, the need to ban games may become less of an issue as people would understand that 18 rated games are not for people under that age.
- 10.5. Options 1, 2 and 3 would all offer this extension of statutory control, however option 4, the voluntary code of practice would not.

## **11. Be flexible and future proof; be able to translate into online gaming**

- 11.1. One of the key factors in making this decision is that the system we end up with not only works in the future but will continue to be used and continue to be relevant. This partly means that, in an industry that is increasingly taking advantage of the new technologies and delivery mechanisms available, it will translate easily to the online environment.
- 11.2. Both systems have the capacity to be successfully delivered in an online environment – the existing PEGI Online for video games, and BBFC.online for film content demonstrates that well.
- 11.3. There were various discussions about either system’s ability to cope with the demands of an increasingly online media. However, we concluded that either organisation would expand with increasing demand as both fee structures enable the respective organisation to cover costs.
- 11.4. Several respondents to the consultation thought that having a system that works across borders would be more effective in the online environment and we believe that to be true. The Digital Britain interim report said that online content regulation should combine effective enforcement of the law of the land, constructive use of technology and self regulation. It is this last point that is the most pertinent; the games industry developed a self regulatory regime, not just in one territory but across much of Europe. This creates an international solution to address what is an increasingly global issue and means that UK consumers will be familiar with the ratings system and symbols used across Europe. If they are buying or playing games from websites across Europe they will understand the content within them, and UK parents can look out for those trusted symbols in the games that their children play. We believe that building on this system and strengthening it with the added layer of UK statutory control creates the system that will work best for UK consumers now and in the future.
- 11.5. This system was designed for games and as the next section shows, the games industry signs up to it completely – this also means that it has a greater chance of being used in the online world. This is particularly important as more content is being generated online. As new ways of developing interactive video game content develop, we think that a system which is strongly supported by the industry will have greater flexibility to adapt.
- 11.6. The option which has the most flexibility for the future and more chances of being successfully adopted in an online self regulatory environment is option 3, Enhanced PEGI.

## **12. Work for the games industry**

- 12.1. The respondents to the consultation were very clear on this section, the Enhanced PEGI option is the one preferred by the video games industry and the one that they say works best for video games. It was designed for video games and has worked well in the UK and in much of Europe since its inception in 2003. Currently the majority of video games are rated under the PEGI system in the UK.
- 12.2. The issues mentioned earlier – about the transition to the online world formed a significant part of the reasoning but there were other factors too – not least the impact on industry in financial terms outlined in the costs section above.

- 12.3. The Code of Practice option does not address this criterion as it will maintain the status quo about who rates what, and means that it is harder for the games industry to promote their messages about safe gaming as there are two systems to describe. This argument also translates to the hybrid option which also will use two systems, but with additional burden for the games industry.
- 12.4. There were more fundamental points made about the different approaches made by both systems, although we need to be clear that both systems are effective at producing appropriate ratings for video games. The main difference seems to be between the fairly clear cut set of standards set out in the PEGI questionnaire compared with the BBFC guidelines which the industry argue are less clear and so harder to judge content against. Where the latter causes problems for the industry is the expense and effort involved in making cuts to products once they have been completed. In film, cuts work very effectively. In video games, cuts are much harder, and more expensive to achieve as they involve amending the software codes.
- 12.5. Therefore games developers need a sharper sense of what is and is not appropriate at the margins of the age ratings when they are developing the game. Particularly in the current economic climate, a games company wants to feel comfortable that it is going to be able to sell a game to the market it has specified in its projections. Thus the studio wants to limit the potential for producing a game that does not then get the rating it expected; neither does it want to have to make cuts if it can be avoided. This would mean wasting coding and art that cost a great deal of money to produce in the first place. It does seem that games companies are more confident with PEGI than the BBFC in this respect although the BBFC themselves state that they carry out initial discussions with games companies when this is requested, giving advice ahead of the final submission.
- 12.6. The PEGI system has been strengthened over the last year: they are exploring new ways of providing extended advice to consumers and have improved their symbols to the point where the parents in our independent focus groups preferred them over the BBFC information. PEGI is more than just a tick box system; the first stage remains a company led questionnaire, and this is followed by a PEGI administrator playing the game and checking that the game meets the requirements of the guidelines. PEGI are working to improve this process further.
- 12.7. The Enhanced PEGI system, will build on these improvements and strengthen them further with the oversight of a robust UK statutory authority. We believe that this option, above the others works better for the games industry.

### **13. Support retailers**

- 13.1. Different people had different views as to the impact each of the options would have on retailers. Crucially the retailers themselves said that they would prefer a single system, so either Enhanced BBFC or Enhanced PEGI, as communicating to their customers would be simpler as would the provision of information about the symbols.

### **14. Reflect evidence of potential harm**

- 14.1. Prof. Byron recommended that games rated 12 and above should come within the statutory framework. She considered 12 to be the age at which games become demonstrably more violent and also the age below which children are more vulnerable to the content found within them. In that sense options 1 – 3 all equally address this point.

- 14.2. Very few respondents directly referred to this issue in their responses to the consultation but the Child Exploitation and Online Protection Centre (CEOP) favoured both Enhanced BBFC and Enhanced PEGI – though not the Hybrid or the Voluntary code of practice option.
- 14.3. The way in which the age ratings are determined differs for the BBFC and PEGI. While the BBFC take context into consideration and have an arguably more sophisticated approach to determining the right age, PEGI do not, and their guidelines are clearer cut. This has the effect of quite a few games receiving different ratings in each system, some are rated higher by PEGI, and some are rated higher by BBFC.
- 14.4. On balance we believe that the first three options all equally reflect the evidence of potential harm, while the voluntary code of practice option does not due to the lack of statutory backing for all games rated 12 or above.

## **15. Conclusion**

- 15.1. From all the available evidence, we believe that the Enhanced PEGI option is the best solution to the key criteria set out by Prof. Byron in her Report. Not only that but it combines the strength of a UK statutory body with the flexibility and consistency of approach across Europe and Online.
- 15.2. It is a close call, both the BBFC and PEGI could do this job well, and there are compelling arguments for both, but the ability to make a change now that will see parents and children better protected in the future is an important consideration.

## **16. Specific Impact Tests (see page 4 of the Summary document)**

### **17. Small Firms Impact Test**

- 17.1. In order to receive a rating in the UK, a video game publisher must pay the classification rating body a classification fee and cover related administration costs. (For a break down of all costs for each option consulted on, see Evidence Base). There are approximately 60 video games publishers ranging in size from 2 staff to over 100 and they provide for this requirement before the release of a game accordingly. From the information the industry provided, in response to the public consultation and also to specific requests for evidence, the main concerns industry have expressed are in relation to the duplication of flat rating fees and administration costs. Under the chosen option no duplication would occur as the same ratings submission process would apply across Europe with no separate system for the UK.
- 17.2. Concerns around the ratings process prior to final submission have also been raised by industry. They have experienced delays with the process and a lack of clarity on classification criteria, which they are worried may continue under some of the options. Delays to games' release dates can have a significant impact on costs, which may have a serious impact on the smaller publishers. Development companies may also be affected should the ratings body recommend changes need to be made to the game before a particular classification can be awarded. There are approximately 170 games developers in the UK, some of which are facing endemic financial challenges, and if they have to assign resource to alter the game coding after the game has been submitted for classification this would be an extra financial burden.
- 17.3. The chosen Enhanced PEGI option has the confidence of the industry that it will not unduly add to their costs, both in terms of time, resources or financially.

## **18. Equality**

- 18.1. The chosen classification system will award ratings on the basis of criteria drawn from research into national (and Europe wide) public sensibilities. In this way, the classification system will take account of the diverse viewpoints held by UK citizens and appropriately reflect cultural sensitivities.
- 18.2. The criteria the system uses also specifically consider elements of content such as racial or other discrimination, for which the highest rating can be awarded should the game contain elements of intolerance or other public offence. The new system will also have useful pictograms accompanying the age rating symbols and text content description, taking into consideration people living in the UK but who don't have English as their first language.

## **19. Human Rights**

- 19.1. The new system will make powers to ban particular games available to the statutory classification body. The Human Rights Act 1998, Article 10 sets out the right to freedom of expression, which is of relevance to the power to ban a particular cultural creation. However, as a qualified right, the law states that this right requires a balance between i) the rights of an individual to hold opinions and to receive/impart information and ideas and ii) the needs of the wider community in a democratic society to protect interests such as the prevention of crime and the protection of health/morals. The statutory classification body for video games would only exercise its power to ban a game should that game contain unacceptable content, the definition and parameters for which to be set out in the relevant legislation. The current classification body already has this power and so it would not represent a change to this particular aspect of the system other than a refinement of the banning criteria.

## Specific Impact Tests: Checklist

Use the table below to demonstrate how broadly you have considered the potential impacts of your policy options.

**Ensure that the results of any tests that impact on the cost-benefit analysis are contained within the main evidence base; other results may be annexed.**

Type of testing undertaken	<i>Results in Evidence Base?</i>	<i>Results annexed?</i>
Competition Assessment	No	No
Small Firms Impact Test	Yes	No
Legal Aid	No	No
Sustainable Development	No	No
Carbon Assessment	No	No
Other Environment	No	No
Health Impact Assessment	No	No
Race Equality	Yes	No
Disability Equality	Yes	No
Gender Equality	Yes	No
Human Rights	Yes	No
Rural Proofing	No	No





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