



Response to the call for evidence on the Action Plan against Cyberbullying.

1. Video Games Europe welcomes the opportunity to respond to the call for evidence on the Action Plan against Cyberbullying. We agree with the Commission that there is a need for a consistent and harmonised approach to the pervasive issue of cyberbullying across all Member States. The protection of the rights and well-being of minors is a joint effort, which requires the involvement of national authorities, education institutions, industry, parents and civil society.
2. Industry has a particularly important role to play. While the majority of players are adults (76%), a large part of the younger age group play games just as they engage with other digital activities. Because of the popularity of video games among children, the sector committed early on to a safety by design approach, in particular where communication features within the game are concerned. We will explain this approach in further detail below.

Cyberbullying is not widespread in the video games industry.

3. Video Games Europe commissioned earlier this year market research company “Jigsaw” to quantify experiences and potential sources of online harm in relation to online content and interactions with other users, as well as in relation to concerns about privacy and security. The research surveyed 2500 teens between the age of 12 and 15 and 2500 adults across 5 European markets: France, Germany, Italy, Spain and UK.
4. Overall, while social media is cited as the source of most online harms by teens (70%) and adults (63%), playing video games was mentioned the least (12% by teens and 3% by adults). Furthermore, 63% of adults and 70% of children said to have recently experienced a potential online harm using social media, compared to 3% of adults and 12% of teens reporting such a recent experience whilst playing video games. In relation to the type of harm, bullying was cited the most on social media platforms by teens (67%), compared to only 5% for video game platforms. For adults, this difference is even bigger with 69% reporting bullying on social media platforms against 1% during video game play.
5. These numbers are consistent with earlier research by Jigsaw, this time commissioned by OFCOM and the Information Commissioner’s Office for the UK only. The survey was conducted between January and February 2022 and consists of 2,080 adults and 2,001 children aged between 12 and 15. Compared to other sources such as social media, instant messaging and video sharing, gaming sites or platforms were the least cited by respondents as having various forms of potential harms, with only 2% of adults and 3% of children experiencing such harms via online gameplay. 48% of children cited social media as a place where bullying and abusive behaviour would be encountered while only 5% of them pointed to video game services. Adults did not point to video game sites and platforms at all in relation to bullying.



6. The [latest quarterly report of the BIK+ Bulletin](#) on data collected by the Insafe network of helplines also confirms this trend. Insafe helplines capture, where possible, information about where a particular problem occurred. During Q1 2025, 68 per cent of issues occurred on social media, 20 per cent on messaging services, and 8 per cent on gaming platforms.

What does our safety by design approach consist of?

7. The video game sector has been working for more than 20 years to build a solid framework that helps ensure safe online gameplay. Because of low market entry barriers and wide availability of many popular online games, our sector needs to commit to an approach that strives to keep online gameplay interaction free from inappropriate content and behaviour for children. This approach is based on the following 5 pillars:
 - 7.1 **Age-appropriate standards against which suitability of video game content or gameplay interaction can be assessed:** In 2003, the video game industry established the PEGI system which operates through a set of scientifically backed ethical standards in the form of a Code of Conduct. It ensures a high level of transparency for consumers as regards video games through its labelling system, allowing the consumer and the player to make an informed choice about the video game he/she would like to play or to buy, by displaying the appropriate age for playing the game and the type of content featured in the game. The rating criteria, which are developed and regularly reviewed with the involvement of experts and academia, provide for a framework against which the age-appropriateness of certain types of content or gameplay activities is assessed. While developing video games, companies will aim for a certain age band and adapt the content, narrative and gameplay experience to meet this age band. The game is assessed through the PEGI age rating process, independently from industry by administrators in the UK and the Netherlands.
 - 7.2 **Strict online safety requirements based on an enforceable Code of Conduct:** PEGI signatories are contractually bound by its Code of Conduct. They must ensure that community standards are implemented to prohibit players from introducing content or indulging in online behaviour which is illegal and/or harmful, including in chatrooms. Signatories are also required to put in place appropriate reporting mechanisms to allow players to notify such content or conduct to them and to ensure that it is always taken down or addressed.
 - 7.3 **Community tools and safeguards:** Companies use a range of tools and safeguards to adhere to these requirements. These include technology to detect and sanction toxic players (including permanent banning), human monitoring and moderation of in-game chats, including muting and blocking tools, as well as the development of education programs and hiring of community managers to build self-sustaining, healthy, positive player communities that moderate themselves.



7.4 Active involvement of parents and caregivers through parental controls: Parents and caregivers can help children address the risk of bullying and harassment in online communities. Parental control tools offer the possibility to restrict communication with others in a game. These tools allow parents to start a dialogue with their children on whether such rules are appropriate, taking into account their age, maturity and previous experiences. Parents and caregivers should be supported in acquiring digital literacy and awareness of how parental control tools work. The video game industry has therefore launched public awareness campaigns in 14 countries in local languages to inform parents about the tools they have access to in order to set fair rules. The video games sector partners with relevant institutions such as family organisations, media literacy organisations, and public authorities, to ensure that the right audience is reached, and that the information is relevant.

7.5 Independent consumer redress and enforcement of sanctions: The PEGI system is committed to ensuring that players always have access to appropriate reporting mechanisms that allow them to submit complaints which can be heard by an independent complaints board. The Complaints Board deals with complaints that are submitted by consumers or by publishers over a rating attributed to a product, while the Enforcement Committee oversees compliance with the provisions of the PEGI Code of Conduct. Publishers using the PEGI system are bound by the decisions of the Complaints Board and the Enforcement Committee. Consequently, they are obliged to carry out any corrective actions required and, in cases of non-compliance, are subject to sanctions as laid down by the Code.

Lessons learned: our recommendations to policy makers

8. An EU-wide strategy to tackle the issue of cyberbullying requires a comprehensive approach and a strong commitment to minor protection. This issue is complex and far from being solved. Our industry is determined to continue its efforts and share our learnings with others. Based on our experience, we have prepared following recommendations.

An efficient action plan against cyberbullying should:

- 8.1 acknowledge the differences that exist between the digital sectors in terms of the level of prevention and protection offered to consumers
- 8.2 acknowledge that how the issue can be addressed strongly depends on the type of service, product and/or technology that is being used.
- 8.3 be grounded on evidence and data collection, such as the research that was commissioned by Video Games Europe and mentioned above.
- 8.4 recognise the role of self- and co-regulation as an essential part of the legal and policy framework that can address online issues in specific sectors in a faster and more flexible way than legislation.
- 8.5 recognise the role of parents and caregivers in addressing the risk of bullying and harassment in online communities.
- 8.6 support the uptake of parental control tools and prevent any national initiatives that would hinder their roll-out across borders



8.7 support industry activities to raise awareness and information campaigns targeting children, teachers, parents and carers.

About Video Games Europe

Since 1998, Video Games Europe has ensured that the voice of a responsible video games ecosystem is heard and understood. Its mission is to support and celebrate the sector's creative and economic potential and to ensure that players around the world enjoy the benefits of great video game playing experiences. Europe's video games sector is worth €26.8bn and accounts for 116,419 jobs. 54% of Europeans are video game players. We publish a yearly [Key Facts](#) report with the latest data on Europe's video games sector.

www.videogameseurope.eu

