



Gamer's Voice & Stop Killing Games UK response to the UK Department of Science, Innovation and Technology Consultation "Growing up in the online world"

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Executive Summary

There has been much public debate around proposals to restrict social media for young people. We are concerned there has been far less of a debate around the impact of proposed restrictions to video games. Where public debate around games has existed it has focused on some very large platforms such as Roblox - which we do not believe is representative of most online games. We are responding to this consultation so that the voices of people who play games are heard by policy makers.

2. The benefits of video game access to young people

We are pleased to see DSIT recognise that video games can contribute to learning¹. We would also like to highlight that in addition to learning benefits playing online games can bring social benefits, and in particular to people with disabilities.

To support this we would draw your attention to a large systematic review covering 263 studies on social gaming. It found that multiplayer gaming environments frequently support communication, cooperation, and relationship-building between players.² There is also evidence that gaming can help to improve real-world relationships.³

Gaming is an accessible activity for young people. It can be particularly valuable for disabled people who might face barriers to participation in other activities. A 2025 accessibility study argued that gaming can enhance: Autonomy, competence, and social participation for disabled players when games are designed inclusively.⁴

3. Impact of proposed restrictions on game preservation.

Gamer's Voice is the UK Chapter of a global campaign 'Stop Killing Games'. We are concerned about the destruction and loss of video games. Games can be destroyed when a company chooses to shutdown the servers required to run a game. This could be prevented if they were required to have an end of life product plan. Such plans could help enthusiast, and preservationists keep a game alive.

There are multiple reasons why a game can be shut down. It is normally a combination of economics, technical maintenance burden, declining engagement, and increasing compliance obligations for online services. Many of the proposals in this consultation would increase those compliance obligations.

When a game is shut down the community that exists around that game loses something that brings joy to their lives. Imagine ,for example; if you could no longer watch a film from your childhood. The artists and developers who worked on it also lose something of cultural value that they have produced. We have already in the UK

¹ Tablatin et al. (2023), [Using Minecraft to cultivate student interest in STEM](#)

² David Gonçalves et al. (2023) [Social Gaming: A systematic review](#)

³ Gloria Mittman et al. (2022) [A social augmented reality game around mental health, supporting real-world connection and sense of belonging for early adolescents](#)

⁴ Minju Lee et al. (2025) [Benefits, barriers, and accessibility in video games: a focus group study of college students with disabilities](#)

seen the loss of one game 'Urban Dead'⁵ as a result of the Online Safety Act 2023 imposing obligations upon a small provider that they were unable to fulfill.

When games are killed by publishers, or abandoned, they are sometimes preserved by small hobbyist communities that try to keep the game running. These are almost all small and low risk communities, where the community moderates itself. One example of such a community is OpenRA⁶ keeps classic Westwood RTS games like Command & Conquer and Red Alert playable on modern systems with online multiplayer support.

When regulations and laws such as age restrictions, curfews, or design mandates are proposed, they often appear to be drafted with large platforms like Xbox or Roblox in mind. In doing so, policymakers do not always seem to appreciate the complexity and diversity of online gaming communities.

Alongside major commercial platforms, there are hundreds of small, community-run gaming spaces where incidents of abuse or online harms are extremely rare. Yet many regulatory proposals impose compliance obligations that small communities simply do not have the financial, technical, or administrative capacity to meet.

The resources required to implement age verification systems, moderation infrastructure, reporting mechanisms, or detailed compliance processes can be substantial. For large corporations these may be manageable operational costs; for volunteer-led or small-scale communities, they can become an existential burden that risks forcing otherwise healthy and low-risk spaces offline.

As such we urge the Government not to impose more compliance duties upon small communities that are trying to preserve video games. To do so would result in the loss of cultural works, people's memories and communities.

4. The impacts of age-gates on restricting social features

When the Online Safety Act was introduced age-gates were discussed for some of the most harmful forms of content. At Gamer's Voice we want younger players to be safe. We appreciate there is an argument for placing PEGI 16 or 18 rated games behind some kind of purchase age-check that requires a credit card or proof of age.

What we have seen in practice however is many social functions within games that are age-appropriate still end up placed behind an age-gate and restrictions. The impact of this is that every adult has to show some form of ID simply to talk or

⁵ PC Gamers (2025) [Venerable browser-based MMO Urban Dead is closing this week after a 20-year run, not with a bang but with a whimper](#)

⁶ <https://www.openra.net/>

interact with someone they meet while playing a video game on platforms such as Xbox or Playstation. This creates privacy risks for all gamers, and pushes up the cost of playing games as the cost of the age-checks gets passed onto consumers. Already one platform popular with players Discord has suffered a major data breach as a result of doing age ID checks.

More importantly, blanket restrictions on young people's access to in-game chat features disproportionately interferes with their fundamental rights to freedom of expression, participation, and association. Online games are not merely entertainment products; they are important social spaces where young people communicate, build friendships, collaborate creatively, and participate in digital culture. Removing or heavily restricting communication tools may undermine children's ability to express themselves, access supportive communities, and take part in social life on equal terms with others.

Such restrictions may affect rights protected under the United Nations Convention on the Rights of the Child, including:

- Article 13 — freedom of expression
- Article 15 — freedom of association
- Article 12 — the right of children to participate in matters affecting them
- and Article 31 — the right to play and participate in cultural life

5. Social media restrictions would impact gamer's ability to learn about games

Social media is one of the main ways people who play computer games learn about the games they are playing and connect with other players. Unlike many other pastimes or cultural activities there are few if any offline alternatives to some of the online gaming community forums, wikis, steam communities, subreddits or Discord channels. Having access to social media enables young people to form connections and friendships with people they want to play games with online. It also enables them to learn about how to play some of the more complicated games.

If restrictions are to be made to social media, they should avoid restricting low-risk information boards where people are simply talking about how to play a video game, or discussing different strategies or tactics within a game.

6. Curfews for online games

Contained within the consultation is the idea that certain online services, which might include online video games should be placed behind a curfew. We would strongly

oppose this measure. It would mean every adult would have to pass through an intrusive, privacy harming check simply to play a game when they wanted.

We believe that families should have control over when a game can be played. There will be occasions such as late car journeys, school holidays, birthdays where families might want to permit their children to stay up later playing games. Looking at other countries a few attempts to restrict access to games have been attempted. Many were subsequently abandoned.

South Korea introduced such a curfew in 2011. It was deemed ineffective, and unpopular and it was later scrapped in 2021⁷. In 2007, China introduced an Online Game Addiction Prevention System (Fatigue System). A complicated system of imposing design decisions upon games and time limits that was later scrapped. The CCP however did not abandon their attempts to control their populace and in 2021 introduced plans to restrict all under 18s to just three hours of gaming a week.⁸

7. The impact of restricting design choices such as live streaming

While there is a case of restricting live cameras for young people, streaming of gaming is a common way in which people play games together and with each other. Streaming is also one way in which professional players supplement their income from competition earnings and winnings.

For example Tobias James Smith (Tubbo) the British Minecraft streamer began streaming on Twitch in 2018. Born in 2003, he started building his audience at around 14–15 years old.

If young people had been prohibited from streaming or building gaming audiences until they turned 18, it likely would have had significant cultural, economic, and expressive consequences for many successful UK gaming creators and for the wider creator economy.

8. Alternative policy approaches

Better parental controls, education and privacy defaults

Rather than banning communication features outright, platforms could:

- make child accounts setup by adults private by default
- restrict unsolicited adult contact

⁷ ["South Korea to end its controversial gaming curfew". Engadget.](#)

⁸ ["China to ban kids from playing online games for more than three hours per week". 2021-08-30.](#)

- restrict aggressive data-tracking
- disable access to lootboxes
- restrict games obscuring cost of in-game purchases with token system
- improve blocking/reporting systems
- and provide clearer moderation tools
- limiting DMs to friends only
- configurable voice chat settings
- time management tools
- and age-appropriate safety settings

This approach is already being implemented by many platforms, and gaming is arguably the safest it has been. These measures target harmful behaviour directly while preserving young people's ability to socialise, create, and participate in gaming culture.

All of these child account defaults could be implemented through parental controls set up by a parent when purchasing access to a gaming platform for a child. There is no need for highly intrusive age-verification checks. This approach promotes safety without assuming that all communication is inherently dangerous.

Education

⁹Currently there are some excellent resources for families such as the Family Gaming Database¹⁰, and the PEGI system setup by the Digital Economy Act 2010. More resources could go into providing parents with information and support around how they can game safely and responsibly with their children. Encouraging gaming as a family activity, rather than leaving a child to game alone online will create more positive outcomes for everyone. If local authorities treated gaming alongside other cultural and sporting activities then events and cultural activities could help to promote a positive gaming culture.

It must be said though most gaming platforms already have extensive controls for parents to setup children's accounts and give them access to the type of games they want them to have access to. For example Steam's family mode.

Risk-based regulator model

A further proportionate approach would be a risk-based regulatory model under the OFCOM framework, where smaller, low-risk gaming or community services could be exempted from the most requirements of the UK Online Safety Act by default. This would help avoid creating barriers for indie developers, niche gaming communities, and start-up platforms that pose limited systemic risk.

⁹ <https://help.steampowered.com/en/faqs/view/054C-3167-DD7F-49D4>

¹⁰ <https://www.familygamingdatabase.com/en-gb/home>

However, OFCOM could retain the power to bring services back into scope where there is evidence of serious harm, repeated safeguarding failures, or elevated risk. This would create a more proportionate and innovation-friendly system that:

- focuses enforcement on genuinely high-risk platforms,
- protects smaller community spaces from excessive compliance burdens,
- and still preserves regulatory accountability where problems emerge.

Such an approach would better balance child safety with:

- freedom of expression
- participation rights privacy
- and the long-term health of diverse gaming communities and independent online services

Gamers Voice is a consumer advocacy group for gamers and the UK chapter of Stop Killing Games. We are a not-for-profit company, limited by guarantee without share capital. We are registered in England and Wales 16986530. Registered address 4 Station View, Hebden

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