Working with Women Alliance

Modernising and Harmonising Classification Standards

Submission to the Department of Infrastructure, Transport, Regional Development, Communications Sport and the Arts

May 2026

Acknowledgment of Country

The Working with Women Alliance acknowledges the Traditional Custodians of the land on which we work and live.

We pay our respects to Aboriginal and Torres Strait Islander Elders past and present, and we value the enduring connection Aboriginal and Torres Strait Islander people have to this land.

We value Aboriginal and Torres Strait Islander histories, cultures, and knowledge.

About WwWA

The Working with Women Alliance (WwWA) represents two key portfolios: National Women's Safety (NWS) and National Women's Equality (NWE).

The WwWA connects the critical areas of gender-based violence prevention and the advancement of women's economic equality and leadership, bridging these important policy fields for greater impact.

We work with members and stakeholders, including the Australian Government, to provide expertise and advice on gender equality and women's safety.

Contact:

Executive Director: Gemma Killen

Policy Officers: Molly Jeffery, Darcie Newland

equality.policy@wwwa.org.au

Executive Summary

The Working with Women Alliance (WwWA) welcomes the opportunity to respond to the Department's consultation on updating Australia's Classification Scheme. We acknowledge the extensive consultation process that has informed the Department's proposed recommendations, and support updates to the Classification Scheme that will respond to risks associated with the contemporary media landscape.

This submission is informed by the Working with Women Alliance's expertise in gender-based violence, gender equality, and our work on digital platforms as evolving threat environments for gender-based violence, discrimination, and bullying and harassment, particularly for children and young people.

Australia's Classification Scheme has not been updated since 1995 and is no longer applicable to contemporary media. The WwWA emphasises the Classification Scheme as essential infrastructure that safeguards users' experiences by communicating the risks of engaging with certain content.

As it stands, the Classification Scheme does not account for new interactive media functions such as live-chat and live-streaming in games. As a result, games with these functions can be classified under the lowest ratings, but still have high risks of discrimination, bullying and harassment, and sexual abuse due to largely unmoderated interactive forums. Consequently, one in three children who play online games have been bullied or abused while doing so,1 and one in ten teens who play online games were asked to send nude images while gaming.2 Girls are disproportionately targets of online sexual harassment and image-based abuse.3

Additionally, Australia's Classification Scheme is failing to identify the presence of certain content which users deem "extremely important," including, sexual violence, self-harm and suicide, and content deemed "moderately important" such as discrimination and gambling.4

Updates to the Classification Scheme must emphasise media distributors' responsibility in accurately classifying sensitive content, and games with interactive functions, to ensure users and parents are aware of the risks associated with engaging with certain content.

Recommendations

1. Include gambling in classifiable themes and specify where there is in-game gambling.
2. Consider the impact of hypersexualised or non-consensual sexually degrading content as discriminatory content.
3. Establish a risk matrix for interactive functions that correlates to classification standards.
4. Do not repeal stricter classifications on interactivity.
5. Establish minimum standards for the classification of media, with specific rules for interactivity based on a risk matrix.

Disproportionate Risks

Risks associated with contemporary media are not experienced equally. The current Classification Scheme fails to identify sensitive content and interactive functions that disproportionately impact distinct groups.

Sensitive Content

Sensitive content involving sexual violence disproportionately impacts women, girls and gender-diverse people who are the primary victims of sexual violence. Equally, the LGBTIQA+SB community, and distinct groups that experience real-world discrimination, such as ableism and racism, are disproportionately affected by themes of discrimination and content that actively discriminates – for instance, through the portrayal of sexist, racist and ableist stereotypes.

Sensitive content also risks harming these cohorts by normalising gender-based violence and discrimination. Themes of gender-based violence in videogames has been proven to decrease players' empathy towards female victims of violence.[5] Videogames often portray violence as insignificant, with no consequences to the victim or perpetrator, communicating that violence is harmless, or even acceptable.[6] The Classification Scheme downplays this effect by classifying sensitive content as lower impact where it is "implied rather than depicted, short in duration, verbal not visual, incidental and not direct."[7]

Interactivity

Interactive functions in games also create disproportionate risks for distinct groups. Not only can games depict sexual violence and discrimination as a theme, or within the game narrative, but interactive functions facilitate the perpetration of real-world sexual violence and discrimination, and classifications of games do not reflect this risk.

Online gaming platforms see high rates of gender-based violence and discrimination. More than four in five (83%) female players have experienced or observed some kind of abuse while gaming.[8] Women who speak out report experiencing further harassment,[9] commenting that when players hear a female voice, they "immediately attack you for being a girl."[10]

With nine in ten children aged 8-17 playing online games and 40% playing with people they do not know,[11] children experience an especially high risk of experiencing gender-based violence, abuse and discrimination. Games such as Roblox and Minecraft have been sites for online grooming, image-based abuse and exposure to sexual content.[12] Children and young people want safer gaming experiences, with 85% of young gamers agreeing that gaming companies should do more to protect them from harm.[13]

Increasing Education

The WwWA supports the Department's proposed updates to Australia's Classification Scheme, to improve education around classifications, and support parental oversight of children's media usage. This includes proposals #C15 through #C22 which describe updates to the classification

website, enhancements of personalised preferences, quick links to classification listings, and a generational education campaign.

However, the WwWA emphasises the importance of ensuring that media distributors are primarily responsible for safeguarding measures. We note that user-generated content and interactive functions in games cannot always be moderated adequately, and classifications need to reflect this risk rather than shifting the onus onto users and parents to mitigate risks.

Identifying Sensitive Content

#C02 and #C20 – Overhaul of Classifiable Themes and Element Icons

The WwWA endorse the overhaul of classifiable themes and element icons to reflect the most requested issues. In addition to sexual violence, suicide, discrimination and scariness, we recommend the inclusion of gambling. We are especially concerned about the impacts of in-game gambling, which causes 46% of players to experience poor financial outcomes.[14] Videogames designed for children often include targeted gambling-like tactics that 'hook' children without providing any disclosures about the risks of gambling as is required in the electronic gaming industry.[15]

Recommendation 1: Include gambling in classifiable themes and specify where there is in-game gambling.

#C08 – Reconsideration of Sexual Content

The WwWA supports amendments that ensure sexual scenes involving non-heteronormative participants, or fetish/kink-related acts are not automatically classified as higher impact. We support a classification system that does not impose moral biases when classifying impact but uses evidence-based and harm-informed frameworks. The WwWA also strongly endorses the Department's caveat that sexual content involving depictions of sexual violence or non-consensual acts should remain 'higher impact' regardless of artistic style or the identities of participants.

However, we recommend that the scheme consider classification of hyper-sexualised or sexually degrading content (without explicit consent) to be assessed and classified in the context of discrimination. Videogames often depict women in a hypersexual way, for instance wearing chainmail bikinis in battle games. While the Classification Scheme must not impose moral biases, it must be responsible for identifying content that normalises discriminatory depictions of women.

Recommendation 2: Consider the impact of hypersexualised or non-consensual sexually degrading content as discriminatory content.

Addressing Interactivity

The WwWA acknowledge that classifying the risks associated with user-user interactivity in games is complex due to the unpredictable nature of user-generated content and user

interactions through live-chat functions. We recommend the Department adopt an approach to classifying interactivity that holds media distributors to account for risks associated with the interactive functions they include in their games.

We recommend the Department design a risk matrix for interactive functions, that correlates with the likelihood and severity of risks associated with functions, and a corresponding minimum classification. This would allow for more stringent classification of higher impact interactive functions such as image-exchange and live-chat functions which may introduce a higher risk of sexual violence compared to online games with minimal interactivity.

Recommendation 3: Establish a risk matrix for interactive functions that correlates to classification standards.

#C04 – Interactivity Classifications and Replications

The Department proposes that real-world replications, such as in-game gambling should be rated higher impact than non-real-world replications such as violence, as the former has a tangible impact through in-game rewards. The current scheme imposes strict classifications on both in-game gambling and violence, regardless of whether they are real-world replications or not.

The WwWA recommends that the Department not repeal any elements of the Classification Scheme that judge interactivity more harshly. As previously mentioned in this submission, themes of gender-based violence in videogames have been proven to decrease player empathy towards female victims of violence.[16] The WwWA considers the effects of violence in videogames to be just as severe as in-game gambling. A distinction between the two would be arbitrary.

Recommendation 4: Do not repeal stricter classifications on interactivity.

#C14 – Expanding the Use of Automated Classification Tools

The WwWA recommends that where automated classification tools are used to classify media, the tools be programmed with minimum standards to safeguard classification. Minimum standards around interactive functions should be devised based on a risk matrix.[a] For example, minimum standards could include a rule that G-rated games have no interactive functions.

Recommendation 5: Establish minimum standards for the classification of media, with specific rules for interactivity based on a risk matrix.

[a] See Recommendation 3.

[1] eSafety Commissioner, 2025, *Gaming,* https://www.esafety.gov.au/parents/issues-and-advice/gaming

[2] eSafety Commissioner, 2023, *The risks and benefits of online gaming for children and young people*, https://www.esafety.gov.au/research/the-risks-and-benefits-of-online-gaming-for-children-and-young-people

[3] eSafety Commissioner, 2019, *Online abuse disproportionately impacts girls and women — what parents need to know*, https://www.esafety.gov.au/newsroom/blogs/online-abuse-disproportionately-impacts-girls-and-women-what-parents-need-to-know#:~:text=We%20have%20received%20over%20980,of%20these%20victims%20are%20female.

[4] Department of Infrastructure, Transport, Regional Development, Communications, Sports and the Arts, 2025, *Updates to modernise and harmonise the classification guidelines 2025*, https://www.infrastructure.gov.au/sites/default/files/documents/update-to-modernise-and-harmonise-the-classification-guidelines-2025.pdf

[5] Henricksen, J., and Guggisber, M., 2018, *Violence towards women in the video game Red Dead Redemption 2 evokes toxic masculinity*, https://theconversation.com/violence-towards-women-in-the-video-game-red-dead-redemption-2-evokes-toxic-masculinity-106920

[6] VG, 2025, *Violent video games and other inappropriate content*, https://www.videogames.org.au/inappropriate-content/

[7] Department of Infrastructure, Transport, Regional Development, Communications, Sports and the Arts, 2026, How a Rating is Decided, https://www.classification.gov.au/classification-ratings/how-rating-decided

[8] Dr Lucy Sparrow, 2025, *Q&A: How women and girls are changing gaming*, https://pursuit.unimelb.edu.au/articles/q-and-a-how-women-and-girls-are-changing-gaming

[9] Keza MacDonald, 2024, *The disturbing online misogyny of Gamergate has returned – if it ever went away*, https://www.theguardian.com/games/article/2024/jun/19/the-disturbing-online-misogyny-of-gamergate-has-returned-if-it-ever-went-away

[10] eSafety Commissioner, *The risks and benefits of online gaming for children and young people*, 2025, https://www.esafety.gov.au/research/the-risks-and-benefits-of-online-gaming-for-children-and-young-people

[11] eSafety Commissioner, 2025, *Gaming,* https://www.esafety.gov.au/parents/issues-and-advice/gaming

[12] Revealing Reality, 2025, *A digital playground: The real guide to Roblox*, https://think.revealingreality.co.uk/roblox-real-guide

[13] eSafety Commissioner, *The risks and benefits of online gaming for children and young people*, 2025, https://www.esafety.gov.au/research/the-risks-and-benefits-of-online-gaming-for-children-and-young-people

[14] Australian Broadcasting Corporation, 2025, Kids' video games use gambling-like tactics to trap young layers , new consumer report finds, https://www.abc.net.au/news/2025-04-17/childrens-video-games-addictive-features-gaming-report/105136744

[15] Ibid.

16 Henricksen, J., and Guggisber, M., 2018, *Violence towards women in the video game Red Dead Redemption 2 evokes toxic masculinity*, https://theconversation.com/violence-towards-women-in-the-video-game-red-dead-redemption-2-evokes-toxic-masculinity-106920