ekip Policy Lab

Inclusivity in the video games industry

Scoping Note

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1 Introduction

This scoping note focuses on **inclusivity as a catalyst for creativity and innovation** in the video gaming **industry**. There is currently a momentum for advancing this agenda: although existing policies remain limited, there is growing awareness across industry, academia, and civil society of the need for more inclusive practices. Inclusivity, however, is relevant also on the gamers' and other users' side. Games can be designed in ways that represent and promote inclusivity and diversity or, to the contrary, stimulate toxic, violent, and intolerant behaviours. Research in the field of gaming and ethics show examples of games where specific groups, such as women, are objectified and where the scope of the game is to inflict pain and degradation to the victims[1]. But research also shows examples where gaming has been used to promote relationships, connections, empathy and cooperative behaviours among players from diverse socioeconomic backgrounds[2], intergenerationally[3], and with disabling mental and physical conditions[4]. Video games can be a means for enhancing inclusion as well as the many risks it presents.

This note examines **inclusivity in the video games industry, focusing on the challenges, opportunities, and policy responses currently shaping the field across Europe**. It forms part of the *ekip* project, an initiative that brings open innovation principles to policy-making for the Cultural and Creative Industries (CCIs). *ekip* supports the **development of collaborative innovation policies** that help CCIs not only grow but also contribute meaningfully to wider societal goals, including the Green Deal, digital transformation, and inclusion. Through a strong, diverse, and pan-European network, *ekip* promotes shared learning, collaboration, and evidence-based policy design[5].

As of 2022 the combined global market for PC, console, and virtual reality and augmented reality (VR/AR) games was US$80 billion. The size of the mobile gaming market alone is estimated at $101 billion[6]. Forecasts predict the market to grow to more than US$ 213 billion by 2027.[7] As of 2022, Europe was home to 5,300 video game development studios with a combined turnover of €19 billion in the EU[8]. 114,400 people are employed in the video games sector throughout Europe, of which only 24.4% are currently women[9]. Over the period from 2015-2022, across the CCIs, the video game industry is the top recipient of capital investment in the EU and among the top three sectors with startup activity[10].

The COVID-19 pandemic impacted the video game industry in a similar way to some other sectors: a substantial rise in consumption, while at the same time a market glut of titles released in 2023 which had been delayed by the pandemic. In Europe, an estimated 15% of employees have been impacted by layoffs between 2023 and 2024, with 5% still searching for a job in the industry[11].

Sweden currently has the largest number of **game developer studios** in Europe (939). France leads the way with the largest number of formal educational institutions offering **game development programmes** (130), with almost double the number of programmes as the UK (75) or within the EU, more than double the number in Poland (63[12].) France's introduction of a **video game tax credit** in 2007 has been credited with facilitating the continued stability and growth of the production base for video games in France in

[1] Sicart, M. (2009). The ethics of computer games. MIT Press.
[2] Harrington, B. and O'Connell, M. (2016). Video games as virtual teachers: prosocial video game use by children and adolescents from different socioeconomic groups is associated with increased empathy and prosocial behaviour. Computers in Human Behavior, 63, 650-658. https://doi.org/10.1016/j.chb.2016.05.062
[3] Osmanovic, S. and Pecchioni, L. (2015). Beyond entertainment. Games and Culture, 11(1-2), 130-149. https://doi.org/10.1177/1555412015602819
[4] Babichenko, D., Radovic, A., Patel, R., Hester, A., Powell, K., Eggers, N., … & Happe, D. (2023). Evaluating the feasibility of a multiplayer role-playing game as a behavioral health intervention in adolescent patients with chronic physical or mental conditions: protocol for a cohort study. Jmir Research Protocols, 12, e43987. https://doi.org/10.2196/43987
[5] https://ekipengine.eu/
[6] https://www.visualcapitalist.com/video-game-industry-revenues-by-platform/
7 https://newzoo.com/resources/blog/global-games-market-revenue-estimates-and-forecasts-in-2024
[8] European Game Developers Federation and Video Games Europe. 2022 European Video Games Industry Insight Report. https://www.egdf.eu/2022-european-video-games-industry-insight-report/
[9] European Game Developers Federation and Video Games Europe. Video Games Europe Key Facts Report 2023, 15. https://www.videogameseurope.eu/publication/2023-video-games-european-key-facts/
[10] https://monitor-industrial-ecosystems.ec.europa.eu/sites/default/files/2023-12/EMI%20CCI%20industrial%20ecosystem%20report.pdf
11 Including the EU, the UK andSwitzerland. https://boost.ingamejob.com/big-games-industry-employment-survey-2024-by-ingame-job-values-value/
[12] European Game Developers Federation and Video Games Europe. 2022 European Video Games Industry Insight Report. https://www.egdf.eu/2022-european-video-games-industry-insight-report/

the face of international pressures attracting talent to favourable locales beyond Europe (particularly Quebec[13]). These figures show the relevance of the European video game industry within the cultural and creative industries.

The paper maps the existing policy landscape around inclusivity in the video game sector, highlights emerging challenges and opportunities, and outlines a forward-looking vision for a more inclusive and representative industry. It begins by defining the policy problems, including relevant definitions, challenges, opportunities and current policy statements.

The second section sets out a policy vision, describing the ideal outcomes and current trends that inclusive policices in the sector could achieve, and taking into account the needs of industry-specific stakeholders.

The final section explores the existing policy and research landscape, identifying current strategies, support measures, and R&I intiatives relevant to video games and inclusivity. It also considers emerging trends based on social listening that are likely to influence future developments in this area.

The research summarised in this document sets the scope for the *ekip* Policy Lab on Inclusivity in the Video Gaming Industry in May 2025.

2 Policy Problem

2.1 Definition of inclusivity in video games

The video game industry is commonly **perceived as an area where inclusivity and diversity are still lacking.** By 'video gaming,' we mean the broad umbrella of the video game industry, including for example "online multiplayer, and mobile gaming" and "game genres, such as strategy, adventure, role-playing, serious games, and sports[14]," using infrastructure ranging from consoles to mobile gaming. These developments are also enabled by the progress of digital and ICT technologies. As the European Audiovisual Observatory elaborates, "Real-time 3D image processing and the development of storage media (CD-ROM) facilitated a shift towards games with more advanced graphics. The advent of peer-to-peer networks and greater bandwidths opened the door to online and multi-player games. The birth of the smartphone created the need for new types of game, while motion detection systems and virtual reality headsets paved the way for new forms of interactivity[15]." However, while there has been a lot of advancement in technology and business models in the broader industry and the industry has grown significantly, there are still many steps to take on inclusivity, both for users and for video game developers and designers. This makes it all the more important to understand what 'inclusive' video gaming means and how equality, diversity, and inclusion (EDI) are being addressed across the sector and along the value chain of the industry.

'Inclusive' video gaming refers to how the video game industry actively adapts its practices, end-products, and policies to address aspects related to EDI. For the purpose of this scoping note we take a **broad view of inclusive practices** that aim to reflect the full diversity of society, regardless of sex, gender (or gender reassignment), race, colour, ethnic or social origin, (dis)ability, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age or sexual orientation. Our definition of EDI draws from the freedoms afforded by the European Convention of Human Rights and the requirements of the EU Charter of Fundamental Rights. While different nation states embed these in their own laws in different ways, or may have specific policies addressing priority areas, our own definition here is about dignity and respect for people. Incorporated in this definition is also the question of (digital) accessibility.

[13] IRIS. Legal challenges and market dynamics in the video games sector. European Audiovisual Observatory, Strasbourg, 2024. ISSN 2079-1062, 17, https://go.coe.int/xac5L [Accessed 29 January 2025.]
[14] IRIS. Legal challenges and market dynamics in the video games sector. European Audiovisual Observatory, Strasbourg, 2024. ISSN 2079-1062, 1, https://go.coe.int/xac5L [Accessed 29 January 2025.]
[15] Ibid., 10.

We are further interested in **how the video game industry can ensure it embeds inclusive practices** across its activities including: the **people working in the industry** and their voice and power within the industry; the **content the industry creates** and **how representative of wider society it** is; and **how well these games reflect, represent, and connect with diverse audiences and markets.**

When we talk about behaving inclusively, we are talking about treating individuals with fairness, providing an equitable experience regardless of their personal characteristics or background. Inclusive practices do not, however, always mean treating everyone in the *same* way, as differing needs and structural barriers may require different approaches to provide a fair and equitable experience. For instance, inclusivity encompasses the idea of accessibility. Ensuring that a game or gaming role is accessible may be achieved by designing for a broad spectrum of people with different abilities from the outset; however, it is also sometimes the case that ensuring an *equitable* experience is best achieved by providing a different and/or more tailored experience, product, or working environment designed to directly address key physical or structural barriers for those with different abilities,

2.2 Opportunities and challenges

The video games sector faces significant challenges while simultaneously promising opportunities for advancing inclusivity. As a creative and interactive industry with deep user engagement and an important cultural footprint, it holds particular potential to drive social innovation and better reflect the diversity of contemporary society. This section explores the dynamics shaping inclusivity in video games, examining both the structural barriers that persist, and the opportunities for inclusivity in video games. It also outlines key policy challenges using the building blocks for open innovation methodology. To guide the development of targeted policy responses, we articulated three overarching problem statements linked to the inclusivity challenges identified.

Opportunities for inclusivity in video games

In the video gaming sector, the **division between user/player and designer/developer is not clear-cut;** "video game players are always in transition between two roles: player and game developer[16]." Such role fluidity can create **challenging dynamics that impact on representation and inclusion**. Recent research suggests that, although there are an equal number of men and women playing games, women are a minority of the workforce in the industry developing those games[17], and people who identify as non-binary are even less represented in the workforce[18].

Lack of diversity and inclusion is pernicious for several reasons: in particular, it **hinders creativity and innovation in a sector where these are a real driving force for business and cultural development**, it can significantly impact on the representation of diverse people and experiences within the games being developed, and the lack of diversity in workplaces can feel, at best, unwelcoming but often extend to creating (intentionally or not) a hostile environment for workers from diverse backgrounds and experiences[19]. Additionally, the blurred line between player and developer in video gaming communities - in which consumers consider themselves to be experts - can overlap with existing inequalities, biases and prejudices that lead to a disproportionate level of criticism of work from diverse talent, which can lead to toxic public behaviours that further reduce the sense of safety and inclusion in the industry. These factors can present exceptional challenges to both attracting and retaining diverse talent in the games industry.

[16] IRIS, p. 125

[17] This reflects a gender gap persisting in many cultural and creative industries, in particular for leadership positions. See e.g., https://kultur.creative-europe-desk.de/wp-content/uploads/2022/11/2019_Panteia_Gender_gaps_CCS.pdf. However, the distribution of female vs male professionals in the CCIs is different across EU Member States. See European Commission: Directorate-General for Education, Youth, Sport and Culture, *Towards gender equality in the cultural and creative sectors – Report of the OMC (open method of coordination) working group of Member States' experts – Executive summary*, Publications Office, 2021, https://data.europa.eu/doi/10.2766/649513

[18] https://www.diversityintech.co.uk/diversity-in-gaming-why-it-matters-and-how-to-improve/#:~:text=Recent%20studies%20show%20that%20women,stereotypes%20and%20drives%20away%20talent.

19 See e.g., data from the Big Games Industry Employment Survey 2024, finding that Gender Discrimination is the most common form of discrimination in the industry. https://boost.ingamejob.com/big-games-industry-employment-survey-2024-by-ingame-job-values-value/

While these challenges are significant, there is strong evidence that **diverse teams produce better performance outcomes**[20]. At present 114 400 people are employed in the video games sector throughout Europe, of which **only 24.4% are currently women**[21]. While there is no granular data on the roles and levels of responsibility women hold in the industry, change is on the rise in pockets: in Sweden, 44% of new recruits were women in 2022[22]. The growth of 'indie' games is also leading to a **rise in independent game developers, micro-SMEs and SMEs,** which better enables diverse creators to develop work consistent with their own vision and experiences – though **funding remains a challenge** for this area of the industry.

There is therefore significant opportunity for **policies that nurture a more inclusive mainstream video games industry**, and that **better support alternative games developers**, undertaking work that better represents the diversity of society and better represents diverse experiences and stories, and open innovation ecosystems in the video game sector. In addition, **improving accessibility represents a market opportunity** with "429 million players worldwide who are affected by disabilities[23]". Such improvements can also benefit the wider audience of players who can use, e.g., more adaptable subtitling, controllers and accessories, filters and visual options[24].

Table 1: Summary of opportunity areas for inclusivity in video games

Opportunity area	Summary
Fluid player-developer roles	The blurred boundary between players and developers can foster participatory innovation, but also presents risks related to inclusion and representation.
Workforce diversity and innovation	While women and non-binary people are underrepresented in the industry, greater diversity is linked to stronger performance and innovation outcomes.
Rise of indie and micro-SME developers	Smaller, independent studios enable diverse creators to tell more authentic stories, although they face funding challenges.
Policy support for inclusive development	There is significant potential for policy to strengthen inclusion in both mainstream and alternative game development ecosystems.
Accessibility as a market opportunity	With over 429 million players worldwide affected by disabilities, improving accessibility is not only socially beneficial but commercially strategic.
Broader user benefits from accessible design	Accessibility features such as improved subtitles, adaptive controllers, and interface options benefit all players, not just those with disabilities, enhancing the gaming experience for wider audiences.

Contribution of inclusive games

In addition to wanting the games industry to better reflect and represent wider contemporary society, there is also evidence that **inclusivity in video games can contribute to improved community dynamics**[25] among spectators and fans as well as players[26], has recognisable mental health benefits[27], and that games designed wisely can be used as a means for enhancing empathy and prosocial behaviours in order to improve civic engagement[28]. This was also highlighted during interviews, where the communicative potential of video games was discussed, including their capacity to allow players to

[20] https://www.mckinsey.com/featured-insights/diversity-and-inclusion/diversity-wins-how-inclusion-matters
[21] European Game Developers Federation and Video Games Europe. Video Games Europe Key Facts Report 2023, 15. https://www.videogameseurope.eu/publication/2023-video-games-european-key-facts/
[22] Ibid.
[23] https://www.windowscentral.com/gaming/the-latest-xbox-accessibility-accessory-is-available-now-exclusively-via-the-microsoft-store; https://blogs.microsoft.com/blog/2025/03/18/microsoft-ability-summit-2025-accessibility-in-the-ai-era/
[24] https://www.makeuseof.com/accessibility-options-making-video-games-more-accessible/
[25] Hsu, C., Chiang, Y., & Huang, H. (2012). How experience-driven community identification generates trust and engagement. Online Information Review, 36(1), 72-88. https://doi.org/10.1108/14684521211206971
[26] Orme, S. (2021). "just watching": a qualitative analysis of non-players' motivations for video game spectatorship. New Media & Society, 24(10), 2252-2269. https://doi.org/10.1177/1461444821989350
[27] Babichenko, D., Radovic, A., Patel, R., Hester, A., Powell, K., Eggers, N., … & Happe, D. (2023). Evaluating the feasibility of a multiplayer role-playing game as a behavioral health intervention in adolescent patients with chronic physical or mental conditions: protocol for a cohort study. Jmir Research Protocols, 12, e43987. https://doi.org/10.2196/43987
[28] Fisher, J. (2020). Digital games, developing democracies, and civic engagement: a study of games in Kenya and Nigeria. Media Culture & Society, 42(7-8), 1309-1325. https://doi.org/10.1177/0163443720914030

experience perspectives different from their own, for example, games designed by autistic designers to help non-autistic players understand different modes of perception and experience. Such approaches were described as powerful tools to explore sensitive issues implicitly, through the mechanisms of gameplay[29]. These potential benefits also counter some of the mythologising around the direct harms of games[30], and connect to research on gaming and ethics that emphasises the agency and ethics of the player, and the implications of this for the design of more ethical and inclusive games[31]. Further good practice in inclusive game design was noted in relation to character customisation options, including the ability to select body types and other identity markers, provided in a manner that does not appear tokenistic or prescriptive[32].

These beneficial impacts sit alongside the **application of 'serious games'** (broadly defined as games designed for a primary purpose other than pure entertainment, and used across fields such as defence, education, health care, emergency management, urban planning[33] and simulations for disaster preparedness[34]) to address significant societal challenges, or in the use of games-based learning (e.g. in the work of James Paul Gee[35]) in educational contexts. Whilst these applications sit outside the leisure market for games, they rest on the same video gaming technologies, skills and workforce, and it is at least as important that these applications are developed by diverse teams bringing a range of perspectives and experiences to bear. National policies for video games are starting to recognise these benefits, next to the innovation and economic potential. In the case of the German national games strategy, the promotion of diversity and culture through games, as well as their potential in the field of education, are explicitly highlighted[36]. Another example is the French national e-sports strategy (2020-2025) which includes a dedicated focus on promoting a responsible and socially inclusive e-sports practice[37]. One of its pillars aims to foster an ethical and inclusive environment by encouraging diversity, accessibility, and social cohesion. Key actions involve supporting awareness campaigns, inclusion policies, and educational tools, as well as introducing a labelling system ("France Esports") to guide players and stakeholders towards good practice[38].

Therefore, by focusing on inclusion and diversity within the industry itself, policymakers can improve the social impact of an already hugely economically important area of the creative industries, and potentially have greater confidence in unlocking the community, health, and civic benefits of a more inclusive video gaming industry.

Policy challenges

To organise and structure challenges related to the role of cultural and creative sectors in open innovation, a series of building blocks are used in *ekip*. which can be described as critical elements in the transition of industrial ecosystems[39]. These building blocks are of critical importance to functional and sustainable open innovation ecosystems, not only for the video game sector. Table 2 presents the selected building blocks that are of relevance to inclusivity in the video game sector.

The analysis of the key building blocks reveals several structural and systemic barriers that hinder inclusivity in the video game sector. In terms of **sustainable competitiveness**, the sector lacks shared spaces and accessible innovation platforms for underrepresented creators, while cross-sector

[29] Interview with Nikolina Finska

[30] Hodent, Celia. 2019. Ethics in the Videogame Industry: A Mythbusting and Scientific Approach (extended write up of a talk presented at GDC 2019, San Francisco). Brains, UX, & Games! [blog], 18 December 2019. https://celiahodent.com/ethics-in-the-videogame-industry/

[31] Sicart, Miguel. 2011. The Ethics of Computer Games. Cambridge, MA: The MIT Press.

[32] Interview with Nikolina Finska

[33] https://guides.lib.umich.edu/c.php?g=282989&p=5955091

[34] Tate, A 2011, 'I-Room: Augmenting Virtual Worlds with Intelligent Systems', IEEE Internet Computing, vol. 15, no. 5, pp. 56-61. https://doi.org/10.1109/MIC.2011.71

[35] Gee, James Paul. 2007 What Video Games Have to Teach Us About Learning and Literacy: Revised and Updated Edition (2nd Edition). London: Palgrave Macmillan

[36] https://www.bmwk.de/Redaktion/DE/Publikationen/Wirtschaft/games-strategy-germany.pdf?__blob=publicationFile&v=10

[37] https://www.vie-publique.fr/eclairage/284130-le-jeu-video-en-france-une-industrie-et-une-pratique-en-progression

[38] https://www.entreprises.gouv.fr/secteurs-dactivite/numerique/lesport/strategie-esport-2020-2025

[39] For a deeper discussion of the building blocks, see European Commission (2022) Blueprint for the development of transition pathways for industrial ecosystems. https://ec.europa.eu/docsroom/documents/49407

collaboration and inclusive talent development remain fragmented. **Regulatory and governance frameworks are not yet fit for purpose**: inclusive design practices are often not embedded early enough, data privacy concerns pose real limitations, and accessibility standards across platforms remain inconsistent or absent. **On the social dimension**, human-centric design and meaningful end-user involvement are underutilised, and grassroots or marginalised voices continue to be excluded from mainstream visibility. **The research and innovation landscape** also shows gaps in inclusive leadership, cross-sector integration, and professional development for diverse creators. **Infrastructures and technical services** remain unevenly distributed, particularly affecting small and indie studios that face significant hurdles in platform access, interoperability, and support for accessible design. **Skills-related challenges persist across the pipeline**, from stereotypes in STEAM education to limited pathways into leadership roles, while the investment and funding environment fails to incentivise diversity-driven initiatives, with inclusive projects too often seen as risky or marginal.

Table 2 Building blocks of industrial ecosystems and their relation to inclusivity in video games

Building blocks	Description of dimensions	Relation to inclusivity in video games
Sustainable competitiveness	• Collaboration, networking & cross-sectorality • New business models • Support to start-up & SMEs (including IPR, internationalisation) • Innovation culture & mindset	• Lack of shared spaces, both digital and physical, for inclusive co-creation. • Limited availability of open platforms and innovation centres accessible to underrepresented creators. • Insufficient cross-pollination between developers, artists, and marginalised voices. • Abdence of safe environments for networking, exchange, and systemic change. • Underuse of events and game jams as tools to embed diversity into the design process from the start. • Gaps in inclusive talent pipelines and limited support through open innovation networks and training.
Regulation & governance	• Regulatory barriers to transition & governance model (e.g. partnerships) • Directionality, vision & coordination of ecosystems (incl. multi-level & multi-actor coordination for co-creation & co-design of strategy) • Standardisation • Policy experimentation and reflexivity (including technology foresight)	• Inclusivity can be a double-edged sword from a data collection perspective, as often the very characteristics for which additional protections are legislated are those which participants are reluctant to disclose due to a fear of discrimination. • While additional data can make games more accessible, its collection and usage also raises privacy concerns for users. • Difficulty in balancing inclusive and accessible design with ethical and legal limitations on personal data collection.[40] • Lack of transparency around data collection and usage practices in inclusive game development.[41] • Absence of consistent design standards to ensure accessibility across devices, platforms, and player abilities. • Failure to embed inclusive design practices early in game development pipelines. • Insufficient policy frameworks that enforce accessibility and platform neutrality. • Gaps in regulatory standards and legislative tools to support cross-platform accessibility and address diverse player requirements.
Social dimension	• Social implication of transition (e.g. digitalisation impacting jobs) • Human-centricity of innovation & ethical development	• Lack of human-centric design of video games and involvement of end-users • Untapped audiences and markets – without adequate diverse representation and storytelling, the industry is missing out on audiences • Limited visibility and support for role models from underrepresented groups in mentoring or leadership roles.

[40] Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation); and Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector (Directive on privacy and electronic communications). https://eur-lex.europa.eu/eli/reg/2016/679/oj

[41] IRIS. Legal challenges and market dynamics in the video games sector. European Audiovisual Observatory, Strasbourg, 2024. ISSN 2079-1062, 1, https://go.coe.int/xac5L [Accessed 29 January 2025.]

	• Involvement of end-users • Connection to Just Transition	• Inclusion is often limited to teams, without integration into decision-making and creative leadership structures. • Underuse of real stories and practices behind inclusive games and creators. • Marketing efforts often focus on image management rather than genuine advocacy for inclusion. • Grassroots and independent initiatives are often excluded from mainstream visibility. • Underprivileged groups remain unaware or unable to access opportunities in inclusive game creation. • Small studios might lack the means to pay marginalised communities for their participation, therefore restricting their capacity to involve and work with them.
R&I, techniques & technological solutions	• New products, Tools, methods, processes • Interdisciplinary & trans-cross disciplinary • Valorisation of R&I results & uptake of technologies	• Limited cross-sector application of gaming technologies that could help attract more diverse talent profiles. • Lack of inclusive representation in decision-making and creative leadership within game development studios. • Gaps in inclusive talent pipelines and insufficient support through open innovation networks and training. • Inadequate access to professional development and peer learning, especially for independent or emerging studios. • Underdeveloped communication strategies that fail to showcase the value and impact of inclusive teams.
Infrastructures	• Availability & access to specific infrastructures • (Technical) services and support (tools, methods, space etc.)	• Small and indie games companies face barriers in accessing platforms (e.g., which consoles they can launch onto, whether they have publisher support, whether they can navigate IP licensing etc.). • Lack of interoperability, platforms, frameworks, standards in fostering accessibility • Limited funding schemes to support inclusive projects seen as too “niche” or high-risk. • Small and independent studios struggle with limited access to capital and networks. • Inconsistent or missing design standards that ensure accessibility across devices, platforms, and player abilities. • Absence of policy frameworks that enforce accessibility and platform neutrality.
Skills	• Adequacy of skills in the workforce • Adequacy of curricula and upskilling offer • Softskills & cultural mindset	• The sector struggle to attract diverse talent to video gaming (STEAM education) and to create learning opportunities across the education chain • People from diverse and maybe marginalised backgrounds are discouraged from entering the sector believing that gaming education and professions are not for diverse people. • Challenge in promoting diverse people into leadership roles or creative lead roles in games companies • Stereotypes regarding who fits for professions in gaming help explain underrepresentation in education. • Underrepresented groups’ limited access to tools and mentoring highlights their belief that gaming is not a viable professional route. • Educational policies and intiatives often fail to actively support diverse groups in accessing and progressing within game-creation related professions (e.g. women in STEM).
Investment & funding	• Access to funding & financing • Innovation procurement	• Smaller and indie studios struggle with accessing funding while, larger players have different resources • Most of protectable IP in games is brand assets, thus developing new mainstream titles is often expensive and inaccessible for most companies, • Funding for start up growth across the creative industries, often comes from the US where there is just a more active investment culture and larger available funds. • Little available public funding, investment in small/independent,studios, • Inclusive projects are perceived as too “niche” or high-risk, making them less likely to secure funding.

	• Long-term investment in diversity-driven initiatives is insufficiently incentivised. • Small and independent studios face limited access to capital and networks. • Financial models that reward social impact and community-centred development are not widely adopted. • Existing funding and financing systems are not adequately tailored to support inclusive game creation, or to lower financial obstacles to diversity.

Source: ekip

The challenges identified served as a foundation for formulating the problem statements, guiding the definition of core issues that will be addressed during the Policy Lab.

Problem statements

The *ekip* Policy Lab seeks to address several key questions related to inclusivity in the video game sector that will be instrumental to shape policy recommendations and future policy actions and are linked to the current analysis of challenges identified in the scoping phase. Each problem statement is designed to reflect innovation not as a separate theme, but as a concept embedded within the issue itself.

Addressing inclusivity challenges within the sector

This issue addresses the challenges and opportunities related to inclusive practices related to the industry in itself. Here, challenges exist in the **diversity of the workforce**, the **talent pipeline,** and **work culture,** as well as the **attractiveness of the sector** overall.

Guiding Question: How can the video game industry embed inclusive practices across the people working in the video game ecosystem (developers, designers, artists…)?

Tackling accessibility and inclusivity for end users

Under this topic, we group the value chain of problems related to **accessible products** within the video gaming sector. **Web accessibility** is a growing issue, with possible benefits not just for persons with disabilities. However, costs of supportive devices can be prohibitive and game play might require adaptation. In addition, developers and companies need to be sensitive to user needs', requiring interaction with users and sharing of good practices. On the side of **inclusivity**, this entails issues related to **representation in video games and gaming culture**.

Guiding Question: How can the video gaming industry be inclusive/accessible in the content created and how such content can be representative of society?

Fostering open innovation with inclusive practices

An overarching aspect are the **innovation benefits** that could be reaped through inclusive practices, voidingng fresh perspectives and ideas. This is both at the **firm level** and at the **ecosystem level**.

Guiding Question: How can inclusivity and accessibility in the video gaming industry become a force for innovation?

3 Policy vision

3.1 Objectives

Current EU policies provide a multi-tiered framework applicable to the video games industry. On the basic level, the regulatory framework in Europe promotes a **broad vision of non-discrimination**, in itself applicable beyond the video games industry. The **European Convention on Human Rights** (ECHR), for instance, prohibits "discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status." This is further codified in the EU legal landscape. the **EU Charter of Fundamental Rights** requires that: "Any discrimination based on any ground such as sex, race, colour, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age or sexual orientation shall be prohibited[42]." These rules have been transposed into

[42] https://fra.europa.eu/en/eu-charter/article/21-non-discrimination

national law, also further defining specific "protected characteristics". For example, the UK's Equality Act 2010 defines these as: "Age, gender reassignment, being married or in a civil partnership, being pregnant or on maternity leave, disability, race including colour, nationality, ethnic or national origin, religion or belief, sex, sexual orientation". In the context of employment, EU Directives include the **Employment Equality Directive** (Directive 2000/78/EC) and the **Racial Equality Directive** (2000/43/EC), both of which set out frameworks for non-discriminatory employment practices. For the video gaming industry, more specific recommendations exist, for example through the Council of Europe Human Rights Guidance for Online Gaming, summarising upon handling human rights, racist content, the portrayal of violence, dignity and safety of children, and freedom of expression[43].

At the product, service and technical level, the legislator also provides the framework for **accessibility of products and services,** as part of the practical implementation of the right to non-discrimination. The **European Accessibility Act** (Directive 2019/882) sets accessibility requirements for products and services (which must be transposed into national law by all 27 EU Member States and will enter into force on 28 June 2025) and the **Web Accessibility Directive** (Directive 2016/2102), which aims to ensure that the websites and mobile applications of public sector bodies are made more accessible for users. The **European Accessibility Act** (Directive 2019/882) will extend the applicability of Directive 2016/2102 to private bodies covering both hardware and software, thus emphasising the importance of interface accessibility across **digital platforms and audiovisual media services,** including video games. Here, the video game sector will need to adapt through technological innovation. While there are many initiatives and resources addressing accessibility available in the sector[44], including commitments of key companies,[45] the updated legislative framework is likely provide a new impetus to video game studies to foster accessibility of their products and services.

Within the European R&I policy sphere, the overall vision for the development of the video game sector is limited. A broader recognition is emerging only slowly (see section 4.1.1). The Annual Work Programme of Creative Europe highlights in interestin in improving the "competitiveness of the European video games industry and other companies producing interactive immersive content in European and international markets by enabling the retention of intellectual property by European developers.[46]" Within the Horizon Europe Strategic Plan 2025-27, Cluster 2 is intended to support CCIs,"paying particular attention to regional specificities and cultural diversity, as this enriches society as a whole," further exploreing "the relation between artistic expression, social inclusion, and well-being, particularly among vulnerable individuals, such as older people and populations at risk of isolation. In this context, the link between art, culture and health will be emphasised, contributing to a more resilient and inclusive Europe."[47]

3.2 Stakeholder needs

The video game ecosystem brings together a diverse range of stakeholders, including companies of all sizes, developers and creators, players and consumers, industry associations, policy institutions, educational and training providers, assistive technology developers, and civil society organisations. Each of these actors plays a distinct role in shaping a more inclusive and accessible sector, with overlapping responsibilities and needs that span workforce diversity, inclusive design, accessibility standards, innovation, and policy development.

Companies need to attract and retain a **skilled and diverse workforce**. The Video Games Europe Manifesto 2024-2029 highlights the role of inclusivity actions in addressing this need, such as supporting uptake of STEAM skills of girls[48]. Video Games Europe, as sectoral organisation, has pledged to improve

[43] Council of Europe (2008). Council of Europe Human Rights Guidance for Online Gaming https://rm.coe.int/16805a39d3
[44] See e.g., https://wid.org/a-guide-to-video-game-accessibility/, https://gameaccessibilityguidelines.com/, https://www.videogameseurope.eu/policy/accessibility/
[45] https://www.windowscentral.com/gaming/the-latest-xbox-accessibility-accessory-is-available-now-exclusively-via-the-microsoft-store; https://blogs.microsoft.com/blog/2025/03/18/microsoft-ability-summit-2025-accessibility-in-the-ai-era/
[46] https://culture.ec.europa.eu/sites/default/files/2024-10/2025-creative-europe-annual-work-programme-C%282024%296503%2018-09-2024.pdf
[47] https://data.europa.eu/doi/10.2777/092911
[48] https://www.videogameseurope.eu/wp-content/uploads/2025/03/Video-Games-Europe-2024-2029-Manifesto_FINAL_compressed.pdf

diversity and inclusion in the sector[49]. According to a study by SCOPE, key actions could include tackling negative attitudes in online video games, better and more accurate representation in video games.[50] As highlighted above, this implies tackling challenges related to inclusivity, diversity and representation in the video game, which may unlock also additional market segments.

The International Game Developers Association IGDA world's largest not-for-profit membership organisation serving all individuals who create games) drafted a **Code of Ethics**[51] to, among other things, promote the growth of the industry and creative endeavours and foster inclusivity among which highlights that "inclusion and diversity […] makes us stronger, relevant, and more successfully.[52]" In a similar vein, inclusivity is also one of the core values of IGDA, stating that :"We value inclusion, equity, and diversity to empower us to be stronger, wiser and more relevant to the needs of all game developers. We believe that diversity of all kinds in game development leads to better and more successful products and companies, and happier and more successful game developers[53]." A handbook to address inclusivity in game design has been developed to support the application of these principles[54].

Related to **accessibility,** there is a need for more **widely used common standards across platforms** that minimise costs for players with disabilities and companies entering the market. This includes a range of products and tools, such as different types and more programmable controllers, contrast and co-pilot modes, standardised information on accessibility features and more[55]. The Entertainment Software Association launched the Accessible Games Initiative[56] with the specific objective of improving and standardising tags and criteria for accessibility features across video game producers and platforms.[57]

It was noted in the White paper on accessibility for developers, published by the Spanish Video Games Association and Spanish National Organisation of the Blind Foundation[58], that **accessibility** should ideally be **embedded organically from the early stages of game development**, at the level of concept, analysis and design, in order to avoid significant increases in cost and complexity when retrofitted at later stage[59]. The White Paper on Accessibility for Developers further recommends that accessibility practices be aligned with recognised functional use profiles (e.g. limited vision, no hearing, reduced mobility), in accordance with the European standard EN 301549, which provides a reference framework for accessibility across ICT products and services.[60] The white paper also recognises the central role of tools and peripherals in creating accessible game experiences. **While software solutions are key, it is often the physical controllers that pose the greatest barriers for players with disabilities**. Customisable devices such as the Xbox Adaptive Controller, PlayStation Access Controller, and Nintendo-licensed Hori Flex have been cited as significant advances.[61] These allow for varied hardware configurations tailored to users' specific needs, and can be further enhanced with 3D-printed components and user-defined profiles.[62] The increasing availability of affordable, adaptable hardware, often developed through collaboration with disabled users and makerspaces, was identified as essential for promoting equitable access to gameplay and development environments alike. These considerations also align with interview insights that underscored the importance of **accessible development tools, which enable individuals with disabilities to engage not only as players but also as creators**. It was noted that technical barriers, such as the size or complexity of interfaces, are more readily addressed by larger companies with sufficient capacity[63].

[49] https://www.videogameseurope.eu/games-in-society/our-diversity-pledges/
[50] https://www.scope.org.uk/campaigns/research-policy/accessibility-in-gaming
[51] https://igda.org/about-us/core-values-and-code-of-ethics/
[52] https://members.igda.org/page/inclusivity
[53] https://igda.org/about-us/core-values-and-code-of-ethics/
[54] See https://igda.org/resources-archive/inclusive-game-design-and-development/
[55] https://access-ability.uk/2024/01/05/video-games-need-accessibility-standards-2024/
[56] https://accessiblegames.com/
[57] https://www.theesa.com/entertainment-software-association-introduces-the-accessible-games-initiative-to-provide-players-with-information-about-accessibility-features-in-video-games/
[58] https://www.aevi.org.es/web/wp-content/uploads/2023/09/01_libro_blanco_de_accesibilidad_inglesdigital_ac.pdf
[59] https://www.aevi.org.es/web/wp-content/uploads/2023/09/01_libro_blanco_de_accesibilidad_inglesdigital_ac.pdf Page 6
[60] https://www.aevi.org.es/web/wp-content/uploads/2023/09/01_libro_blanco_de_accesibilidad_inglesdigital_ac.pdf Page 8
[61] https://www.aevi.org.es/web/wp-content/uploads/2023/09/01_libro_blanco_de_accesibilidad_inglesdigital_ac.pdf Pages 103 - 105
[62] https://www.aevi.org.es/web/wp-content/uploads/2023/09/01_libro_blanco_de_accesibilidad_inglesdigital_ac.pdf Page 112
[63] Interview with Thomas Westing

The SCOPE study cited above highlights the relevance of tech-related aspects, such as more affordable devices, better information, and more assistive tech options as relevant next to improved representation in video games.[64] Access to **patents and other IP** play a role in this context, highlighted by EA's decision to create a royalty-free patent pool for accessibility-related technologies[65]. The World Intellectual Property Organisation is also working on enhancing professional IP management in the video games sector[66].

European policy is starting to take note of these challenges. A 2023 study conducted for the European Commission highlights several stakeholder needs, including **tech and programming skills needs**, **AI skills, as well as soft skills**. In addition, the report highlights the need for **improved representation and accessibility of games**[67]**.** The same report synthesises many strengths, weaknesses, opportunities and threats at play in the video game sector (Figure 3-1).

Figure 3-1 SWOT of the EU video games industry

Source: European Commission: Directorate-General for Communications Networks, Content and Technology, ECORYS and KEA, *Understanding the value of a European video games society – Final report*, Publications Office of the European Union, 2023, https://data.europa.eu/doi/10.2759/332575. Licensed under Creative Commons Attribution 4.0 International (CC-BY4.0) (https://creativecommons.org/licenses/by/4.0/).

While these findings go beyond questions of inclusivity, they form a backdrop for policymaking within the EU. In addition, they are the basis for the recommendations in the report, which include strengthen policy dialogue mechanisms, financing solutions for video game companies, cross-sector collaboration, as well as data collection and monitoring about the sector, improving education and training provision for the need of the sector, reforming state aid rules, and supporting small businesses. Finally, the **recommendations address promoting education and diversity** directly. Beyond purely ethical considerations, they recognise that a diverse workforce "ensure[s] that the sector is better placed to recognise and meet the need of a wide range of consumers. There is also benefit in widening the range of skill sets, abilities and experiences within the workforce, as this can support future innovation and competitiveness. Increasing workforce diversity can draw fresh skills and ideas to the industry, and can

[64] https://www.scope.org.uk/campaigns/research-policy/accessibility-in-gaming
[65] https://www.makeuseof.com/ea-accessibility-patents-open/
[66] See e.g., https://www.wipo.int/en/web/business/videogames
[67] European Commission: Directorate-General for Communications Networks, Content and Technology, ECORYS and KEA, *Understanding the value of a European video games society – Final report*, Publications Office of the European Union, 2023, https://data.europa.eu/doi/10.2759/332575

bring new perspectives on consumer demand and product and service innovation[68]." In other words, **inclusivity and diversity also bolster the contribution of the video game sector to the EU economy**. Beyond firm-level action, the document sees some need for EU-level action in this area. Specifically, it recommends that "Member States and European Agencies including the European Commission work to facilitate the exchange of good practice in relation to inclusion and diversity initiatives. Here they might work to identify and raise awareness of effective initiatives delivered by video games companies across the EU video games sector[69]."

This need for broader awareness and visibility of inclusivity efforts was also reflected in one interview, where it was suggested that public conversations, such as those hosted on social media or at industry events, should be expanded. Greater outreach, alongside more accessible and free training opportunities for professionals, was identified as a way to demystify the topic of inclusivity and build wider support across the sector[70].

While distributed across Europe, the industry is amalgamating around localised clusters, often also centred around large industry players. A key part of nurturing sustainable open innovation ecosystems is to rally support for such networks[71]. Supporting clusters can also unleash cross-sector or cross-technology innovation. According to a recent report by the Robert Schuman Foundation, "Video-game ecosystems (clusters) can be the ideal framework for exchanges between industries, with a view to establishing local roots[72]." Similar notions related to video game clusters are visible in the final report of the Power UP project on the Swedish game industry, which argues that "One of the simplest ways to ensure the continued development of the games industry is therefore to give these organisations [clusters], which are familiar with local and regional needs and conditions, the opportunity to operate on a long-term basis. Investing in this 'structural infrastructure' is therefore an endeavour that affects many companies across the country and benefits from existing structures[73]." A case study on the local ecosystem in the city of Montreal highlights not just the networks of actors but also the "common reservoir of resources" facilitated through the ecosystems, supported by "associations, festivals and joint events".[74] The capacity of local ecosystems also enables companies to establish global ties, attract talent, and design games for their target geographies[75].

Clusters supporting open innovation may be particularly relevant considering the interdisciplinary nature of the video game industry. As put by one researcher "given the intricately interconnected nature of the various aspects of VG production, such as art, music, storytelling, technological capability and a general understanding of human entertainment, the nature of how open innovation may be leveraged in this domain is something future research should consider[76]." Typical co-creation processes supported through innovation ecosystems include in the video gaming sector include "direct value creation, supporting value creation, encouraging entrepreneurship, and leadership", enabling "co-discovery, co-development, co-deployment, co-delivery and co-dissemination[77]." Considering EU policy objectives, facilitating the growth of local ecosystems across the EU could also play a role not just in the

[68] Ibid.
[69] Ibid.
[70] Interview with Nikolina Finska
[71] https://server.www.robert-schuman.eu/storage/en/doc/questions-d-europe/qe-724-en.pdf
[72] Ibid.
[73] https://ri.diva-portal.org/smash/get/diva2:1956989/FULLTEXT01.pdf
[74] Rampa R, Simon L and Manent M, 'Local and Social Dynamics in Innovation Ecosystems: The Case of the Video Game Industry in Montreal' (2021) 25 Management international 143 <http://id.erudit.org/iderudit/1088143ar> accessed 17 February 2025
[75] Chaminade C, Martin R and McKeever J, 'When Regional Meets Global: Exploring the Nature of Global Innovation Networks in the Video Game Industry in Southern Sweden' (2021) 33 Entrepreneurship & Regional Development 131 <https://doi.org/10.1080/08985626.2020.1736184> accessed 17 February 2025
[76] Edward Goh, Omar Al-Tabbaa and Zaheer Khan, 'Unravelling the Complexity of the Video Game Industry: An Integrative Framework and Future Research Directions' (2023) 12 Telematics and Informatics Reports 100100 https://www.sciencedirect.com/science/article/pii/S2772503023000609 accessed 17 February 2025.
[77] See Klimas P and Czakon W, 'Gaming Innovation Ecosystem: Actors, Roles and Co-Innovation Processes' (2022) 16 Review of Managerial Science 2213 https://doi.org/10.1007/s11846-022-00518-8 accessed 17 February 2025

competitiveness and technological developments related to video games, but also in supporting the cultural diversity of the sector and its products.[78]

4 Policy landscape and trend analysis

4.1 Policy context

Current policy strategies

The video game sector is still a relatively young sector with **slowly emerging recognition in policy documents**, including those aspects related to inclusivity and accessibility. A recurring theme bemoaned by observers is the absence of comprehensive strategies on the video game sector. Such challenges have been identified in the Netherlands[79], Denmark[80], and the EU at large[81]. Notably, Germany has adopted a strategy on the sector which incorporates diversity and inclusion[82]. A strategy currently under development in Scotland also recognises these aspects[83].

This situation is reflected at EU level, where there is **no comprehensive strategy for the sector**. Several policies relevant for cultural and creative industries highlight cross-cutting issues relevant for the sector, such as the recognition of diversity and inclusivity, and digital skills needs in the 2018 New European Agenda for Culture[84]. The agenda's counterpart from the side of industrial policy, the 2020 New Industrial Strategy for Europe, lacks a reference to the cultural and creative industries altogether[85], a shortcoming minimally rectified in its 2021 update[86].

Despite this absence of strategy concerning the sector, a positive development is the **inclusion of the video game sector in various monitoring exercises conducted at EU level**. A mention occurred for example in the Annual Single Market Report 2021, placing the video game sector in the Cultural and Creative Industries Ecosystem[87]. Subsequently, video games have been included in the European Monitor of Industrial Ecosystems under the CCI heading[88] and the European Media Industry Outlook[89].

As highlighted above, in Chapter 3 actual EU-level policies directed towards the sector are only emerging. A recent Creative Europe Work Programme highlights the need for improving the "competitiveness of the European video games industry and other companies producing interactive immersive content in European and international markets by enabling the retention of intellectual property by European developers[90]." Within the Horizon Europe Strategic Plan 2025-27, Cluster 2 is intended to support CCIs,"paying particular attention to regional specificities and cultural diversity, as this enriches society as

[78] IGDA, for example, highlights the role of cultural and historical inspirations for game developmet. See https://igda-website.s3.us-east-2.amazonaws.com/wp-content/uploads/2021/12/08124833/Inclusive-Game-Design-and-Development.pdf

[79] https://publications.beeldengeluid.nl/pub/670/Dutch-game-industry-ecosystem-final.pdf

[80] https://research-api.cbs.dk/ws/portalfiles/portal/68329557/1095939_Masterthesis_HelenaSokol_170521.pdf

[81] https://server.www.robert-schuman.eu/storage/en/doc/questions-d-europe/qe-724-en.pdf

[82] https://www.bmwk.de/Redaktion/DE/Publikationen/Wirtschaft/games-strategy-germany.pdf?__blob=publicationFile&v=10

[83] https://scottishgames.net/2025/03/17/scotlands-games-action-plan-v2/

[84] COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE EUROPEAN COUNCIL, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS A New European Agenda for Culture. COM/2018/267 final. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM:2018:267:FIN

[85] Communication From The Commission To The European Parliament, The European Council, The Council, The European Economic And Social Committee And The Committee Of The Regions A New Industrial Strategy for Europe. (COM/2020/102 final). https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52020DC0102

[86] Communication From The Commission To The European Parliament, The Council, The European Economic And Social Committee And The Committee Of The Regions Updating the 2020 New Industrial Strategy: Building a stronger Single Market for Europe's recovery. (COM/2021/350 final) https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52021DC0350

[87] Commission Staff Working Document Annual Single Market Report 2021 Accompanying the Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions Updating the 2020 New Industrial Strategy: Building a stronger Single Market for Europe's recovery. (SWD/2021/351 final) https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX:52021SC0351

[88] EMI 2024. https://monitor-industrial-ecosystems.ec.europa.eu/sites/default/files/2023-12/EMI%20CCI%20industrial%20ecosystem%20report.pdf

[89] European Media Industry Outlook (2023). SWD(2023) 150 final.

[90] https://culture.ec.europa.eu/sites/default/files/2024-10/2025-creative-europe-annual-work-programme-C%282024%296503%2018-09-2024.pdf

a whole", further exploreing "the relation between artistic expression, social inclusion, and well-being, particularly among vulnerable individuals, such as older people and populations at risk of isolation. In this context, the link between art, culture and health will be emphasised, contributing to a more resilient and inclusive Europe[91]."

The EIT Culture and Creativity identifies the gaming sector as a key area for fostering competitiveness, growth, and resilience within the EU's CCIs[92]. Although the global gaming market is expanding rapidly, the EU remains underrepresented, facing structural limitations such as restricted access to talent, data, markets, and platform infrastructure dominated by non-EU actors. To address these challenges, the EIT CC will prioritise the following strategic actions over the next 15 years:

- **Education -** Strengthen access to gaming talent through improved and aligned education and training, including synergies with technology-related curricula and disciplines.
- **Innovation -** Promote the development and adoption of disruptive technologies (e.g. AI, no-code platforms, user-generated content), digital ethics, and cross-sectoral collaboration.
- **Business creation -** Focus on scalable business models, global expansion, and the unique positioning of EU gaming companies in line with EU regulation. Encourage collaboration with other sectors and SMEs, and support IP monetisation and technology uptake.

Within the industry itself, the preferred approach appears to be **self-regulation** through deontological approaches. This means developing rules which are included typically in Codes of Conduct, not enforceable by law, but only by virtue of membership agreement. Besides the IGDA Code of Conduct, key examples include the Association for Computing Machinery (ACM) (the world's largest computing society) and its Code of Ethics and Professional Conduct[93] as well as the Code of Ethics of IEEE, the Institute of Electrical and Electronic Engineers, the world's largest technical and professional organization in the field of technology[94]. IEEE also recognises inclusivity as a value in relation. As per IEEE Diversity Statement, "IEEE's mission to foster technological innovation and excellence to benefit humanity requires the talents and perspectives of people with different personal, cultural, and disciplinary backgrounds. IEEE is committed to advancing diversity in the technical profession, and to promoting an inclusive and equitable culture in its activities and programs that welcomes, engages, and rewards those who contribute to the field without regard to race, religion, gender, disability, age, national origin, sexual orientation, gender identity, or gender expression." IEEE also runs an accessibility research hub[95].

Accessibility

Policy measures having an impact on inclusivity in video gaming include pan-national and national level European legislation relating to equality and human rights generally, as well as in the specific domain of employment equality, such as those cited in the Definitions section in part 1 of this document. Furthermore, the newly introduced European Accessibility Act (EAA), taking effect in all EU countries in June 2025 establishes accessibility requirements for products and services, including video games[96]. While the inclusion of video games under the scope of the EAA marks a notable policy milestone, **concerns have been raised about its implementation**. It was observed during one interview that games differ from other software applications in that they are deliberately designed to pose challenges for users. As such, the application of accessibility legislation to games may create ambiguous legal scenarios, and

[91] https://data.europa.eu/doi/10.2777/092911
[92] https://eit-culture-creativity.eu/wp-content/uploads/2024/07/EIT-CC-Strategic-Agenda-2024-2027_signed_public-version.pdf
[93] https://www.acm.org/code-of-ethics. According to rule 1.4, "The use of information and technology may cause new, or enhance existing, inequities. Technologies and practices should be as inclusive and accessible as possible and computing professionals should take action to avoid creating systems or technologies that disenfranchise or oppress people. Failure to design for inclusiveness and accessibility may constitute unfair discrimination."
[94] https://www.ieee.org/about/corporate/governance/p7-8.html. Per rule 7.8, II, all professionals must treat all persons fairly and with respect and not engage in harassment or discrimination. In particular, members shall treat all persons fairly and with respect, and not engage in discrimination based on characteristics such as race, religion, gender, disability, age, national origin, sexual orientation, gender identity, or gender expression. Further, harassment of any kind is strictly forbidden.
[95] https://www.ieee.org/about/collaboration-engagement/ieee-accessibility-research-hub
[96] Directive (EU) 2019/882 of the European Parliament and of the Council of 17 April 2019 on the accessibility requirements for products and services. https://eur-lex.europa.eu/eli/dir/2019/882/oj

a rigid interpretation could risk unintended consequences for the creative integrity of the sector. The need for a proportionate, flexible implementation approach was therefore highlighted[97]. This will impact the player experience, but also from an employability perspective, making all games more accessible will presumably increase the accessibility of development tools and environments used within the industry in the creation of games.

Broader issues

While broader policy issues vital to the sustained successes of the gaming industry include IP law, competition and anti-trust, and general digital services protections, these are largely neutral from a human rights perspective. Consumer and citizen protection laws, particularly those focused on the protections of minors or other vulnerable users, are an important tool at policymakers' disposal to shape the future of the industry. Usability standards such as the International Organisation for Standardization (ISO) standard 9241-210:2019[98] can also be an important lever for improving inclusivity in video games.

2023 represented the 20th anniversary of the Pan-European Game Information System (PEGI)[99], an age classification system enabling parents to restrict access to particular forms of engagement or content such as in-game purchases, or content relating to do drugs and violence. As well as its role in facilitating parental content control over children's gameplay behaviour, the 2023 PEGI code of conduct was updated to require game publishers to have policies governing transparency and "adequate community standards[100]." Safeguarding users from harmful online content has been a recent policy priority in both the EU with the Digital Services Act (DSA[101]) and the UK with the Online Safety Act (OSA[102].)

Current policy measures & R&I portfolio

The EU supports the growth and innovation of the video game sector through several of its funding programmes for research, education, and the cultural sector. **Horizon** Europe, funds various projects in recent calls. **Creative Europe** supports the cultural and creative industries, including video game developers, by funding innovative game concepts and helping studios reach wider European and international audiences.[103] Meanwhile, **Erasmus+** contributes by fostering skills development, education, and cross-border collaboration through projects that train future professionals and encourage diversity and inclusion within the sector.

Horizon Europe

The Horizon Europe Strategic Work Programme 2023-2025 under Cluster 2 emphasises inclusivity and accessibility across various sectors. With regard to inclusivity and accessibility, the focus lies mainly on digital transition and accessibility in terms of designing digital solutions that are accessible to all individuals, including those with disabilities. While it does not explicitly address inclusivity from a social standpoint, it encourages social and cultural cohesion to promote diversity and accessibility across various sectors.

Prior funding in this area is especially prominent under Horizon Cluster 2, "Culture, Creativity and Inclusive Society". The objective of Cluster 2 is the ability to meet EU goals and priorities on safeguarding and promotion of cultural heritage and respond to multifaceted social, economic, technological and cultural transformations. In particular, HORIZON-CL2-2023-HERITAGE-01-06: A world leading European video game innovation system, has the aim to, among others, support contributions towards a thriving European video game industry that contributes decisively to economic growth, job creation, physical and mental wellbeing, as well as to social and cultural cohesion. The EU is and has previously funded several R&I

[97] Interview with Thomas Westin
[98] International Organization for Standardization, Standard 9241-210:2019(en). https://www.iso.org/obp/ui/#iso:std:iso:9241:-210:ed-2:v1:en
[99] https://pegi.info/
[100] European Game Developers Federation and Video Games Europe. Video Games Europe Key Facts Report 2023, 23. https://www.videogameseurope.eu/publication/2023-video-games-european-key-facts/
[101] Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC (Digital Services Act). https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32022R2065
[102] Online Safety Act 2023. https://www.legislation.gov.uk/ukpga/2023/50
[103] A more comprehensive mapping of funding opportunities and projects is available at https://www.egdf.eu/documentation/executive-summary/ and https://www.egdf.eu/projects/

programmes related to the video gaming industry, including some with a partial focus on diversity and inclusion both as outcomes of gaming experiences for players and communities, and within the industry itself.

- **GAMEHEARTS**, a joint Horizon Europe and United Kingdom Research and Innovation (UKRI) programme, aims to create "more inclusive and socially responsible cultural experiences"[104]. With reference to *ekip*'s work, GAMEHEARTS is also notable for its focus on "how videogame know-how and technologies could drive innovation in the wider CCI[105]." GAMEHEARTS' first newsletter issued in February 2025 gives early indications of their ongoing research regarding effective game design techniques for incorporating EDI into game mechanics and aspects of game design. Though the current research does not specifically address how to improve gaming within the industry as well as in player experiences, some of the recommendations like "fostering community" and "educating dominant groups" could equally apply to industry improvements[106].
- **EPIC-WE** is a Horizon Europe project for "value-sensitive game-making and games through and for culture as a novel approach to empower young people as co-creators of European culture and shapers of their own futures in society, cultural institutions (CHIs) and creative industries (CIs)[107]." EPIC-WE hosted a capacity-building webinar on 20 January 2025 focusing on diversity and inclusion in the video gaming industry; a recording is available in the EPIC-WE resources bank[108].
- **i-GAME**, a Horizon Europe project "to create an accessible open-source game development platform that will facilitate the co-creation of games by diverse actors within different ecosystems of cultural and creative sectors and industries (CCSI), to enhance innovation and to bring positive impact on social cohesion and sustainability," with a specific aim to "video game stakeholders of different abilities, expertise, and disciplines[109]."
- **GAME-ER**, a joint Horizon Europe and UKRI project to "research the emergence, development, and sustainability of local and regional video game clusters…compiled into an Interactive Methodological Toolkit, specifically targeting local and national policymakers and decision-makers[110]."
- **Gaming Horizons** was a Horizon 2020 project exploring "the use of games or game-derived elements for learning and critical reflection, benefiting a range of stakeholders in various sectors: education, ICT, game development, and policy[111]."

There are a wealth of other EU-funded actions related to the application of video gaming technologies to societal and consumer domains of equality and inclusion like motor skills improvement for people with disabilities[112], rehabilitation and recovery[113], and greater academic attainment and social inclusion for children with ADHD[114], however there are few R&I interventions examining the inclusivity of the industry itself. The 2023 Video Games Europe Key Facts Report included a call to "Use Horizon programme funding for a project mapping the video game workforce, the availability of relevant education programmes, and the skills gaps that still exist, to help the sector's success and growth[115]." Were Horizon to take on such an initiative, a core component could include mapping the current state of equality, diversity and inclusion within the industry itself, and detailed research on what might improve the equity and accessibility of the sector.

Creative Europe

[104] https://cordis.europa.eu/project/id/101132543
[105] Ibid.
[106] https://gamehearts.eu/gamehearts-newsletter-issue-1-february-2025
[107] https://cordis.europa.eu/project/id/101095058
[108] https://epic-we.au.dk/capacity-building/8
[109] https://cordis.europa.eu/project/id/101132449
[110] https://www.game-er.eu/project-overview
[111] https://www.gaminghorizons.eu/About-the-Project.html
[112] https://cordis.europa.eu/project/id/732363/reporting
[113] https://cordis.europa.eu/project/id/856998
[114] https://cordis.europa.eu/project/id/732375/reporting
[115] European Game Developers Federation and Video Games Europe. Video Games Europe Key Facts Report 2023, 21. https://www.videogameseurope.eu/publication/2023-video-games-european-key-facts/

The Creative Europe programme places video games together with other immersive media sectors. In the annual Work Programme, a total of EUR 7 million are earmarked for projects intended "to increase the capacity of European video game producers, XR studios and audiovisual production companies to develop video games and interactive immersive experiences with the potential to reach global audiences." These actions are intended to "improve the competitiveness of the European video games industry and other companies producing interactive immersive content in European and international markets by enabling the retention of intellectual property by European developers[116]". The 2024 call for this topic funded a total 41 individual projects[117]. These are aimed at game or content development.

Erasmus+

Several Erasmus+ projects are actively contributing to skills development and training in the video game industry across Europe. **GAME-EDU** (gameeduc.org) focuses on enhancing game education and aligning academic curricula with industry needs. **Video Games for Good** (videogames4good.eu) promotes the use of games for social impact, fostering skills in designing games that address societal challenges. **Fair Game** (fairgameproject.eu) explores gender equality and inclusion in the gaming industry, providing training and tools to create fairer work environments. The project **GATE: Gaming for Skills Transfer and Career Development** (2020-1-NO01-KA203-076512) develops training modules for using games in career guidance and education. Lastly, **GRAINE** (2019-1-PL01-KA203-065694) focuses on integrating game design into higher education as a means to foster creativity and interdisciplinary collaboration.

Digital Europe

Within Digital Europe, an action on the video game sector is planned under the 2027 call "Excellence in higher education and training programmes in key digital areas and applied technologies". The call is intended to support the development of tertiary education level from short cycle to PhD.

4.2 Future trends

The social media analysis (see Table 2) of European Cultural and Creative profiles has highlighted several key trends in the conversations surrounding inclusivity within the video game industry. These discussions highlight both progress and ongoing challenges in creating a more diverse and welcoming environment across five key areas.

Table 3 Methodological note on social listening

The social listening methodology is a **qualitative approach** mapping public conversations within a curated EU CCI community sample on accessible platforms (e.g., Instagram, YouTube, X, Behance), not aiming for statistical representativeness. Its findings reflect actual online activity, meaning lower visibility for some sectors (e.g., 'Gaming and IT' at 4%) or groups is a structural limitation, not a selection bias. This method is part of the ekip project's broader mixed-methodology framework, which uses interviews, focus groups, and surveys to address underrepresentation and other limitations. To avoid misinterpreting isolated posts, analysis relies on algorithmic topic clustering and curated illustrative examples reflecting broader narratives. The community sample is continuously reviewed (next update: summer 2025, following a Q4/2024 review).

Source: *ekip* consortium

1. Inclusive Narratives: There is ongoing debate around how best to integrate diversity and inclusivity into game narratives. While diverse representation, including LGBTQ+, persons of colour, and gender-diverse characters, is increasingly seen as essential, there are heating debates whether including such characters in ways that feel forced or inauthentic can undermine the intended impact. This challenge is not unique to video games. These discussions are especially active in Western and Central Europe. The general

[116] 2025 Annual Work Programme for the implementation of the Creative Europe Programme. C(2024)6503 of 18 September 2024. https://culture.ec.europa.eu/sites/default/files/2024-10/2025-creative-europe-annual-work-programme-C%282024%296503%2018-09-2024.pdf

[117] See https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/opportunities/topic-details/crea-media-2024-devvgim

consensus is that inclusivity is crucial, but it must be woven thoughtfully into stories to deliver meaningful and resonant messages.

2. Diverse Representation: When it comes to organically enhancing diversity in storylines and gameplay, a key concern is the risk of cultural appropriation and reinforcing stereotypes. To address this, social media trends highlight involvements people from diverse backgrounds throughout the creative process. They also emphasize leveraging the unique capabilities of video games, especially their potential for abstraction and world-building, to create authentic, nuanced representations. These conversations mirror challenges in the audiovisual production industry.

Many game designers, especially those working in the expansive indie development landscape, are already proactively embedding inclusivity across multiple dimensions, including narrative, representation, and design. This was contrasted with larger companies, where the development of "woke" games received mixed reactions amongst players. Nonetheless, designers across all scales were described as increasingly aware of their role in shaping cultural norms, with a shared understanding that games should at the very least avoid perpetuating harm[118].

3. Work culture: The work culture in the video game industry is marked by tension around inclusivity policies. Social listening findings highlight tensions that when such policies are implemented without broad engagement or educational support, they risk being perceived as tokenistic or even backlash as prioritising identity over competence. According to these findings, without a genuine cultural shift, top-down initiatives risk exacerbating already difficult and exclusive work environments.

4. Design for all: Accessibility is increasingly being recognised as a standard in game design, with significant progress being made to ensure games are playable by individuals with physical disabilities and neurodivergent players. The current challenge is to deliver a consistent core gameplay experience for all users, with only minimal but effective accessibility adjustments.

5.: Healing narratives

Beyond specific inclusivity measures, a broader trend is emerging where consumers increasingly seek emotional enrichment and healing from media, including games.

- Evolving expectations: Media is expected to positively influence emotions, moving beyond passive escapism.
- New success metrics: The impact of entertainment is shifting from mere viewership to a story's ability to captivate, inspire, and offer emotional support. Audiences are drawn to narratives offering emotional depth, like cozy stories and biographical dramas.
- Emotional literacy: The growing importance of emotional connection in entertainment choices points to "sentimental education" as a significant cultural factor, suggesting potential benefits from policies supporting it.
- Empathy through gameplay: Games, through abstraction and immersion, can educate, challenge perceptions, and naturally weave diverse perspectives into storytelling and gameplay, fostering empathy.
- Psychology and video gaming collaboration: As games become spaces for healing, collaboration with experts in psychology, education, and healthcare is encouraged to enrich game design.
- Collaborations as industry entry points: Such cross-industry collaborations not only improve narrative depth but also create new pathways into the video game industry. This approach, fostering foundational education in diversity and emotional intelligence, is seen as a more organic route to meaningful representation than rigid top-down mandates like quotas.

Regarding players, it was observed that while opposition to inclusive content can be vocal on social media, this group does not represent the majority. Rather, most players are seen as open and receptive to diversity in games, with the current challenge being a lack of sufficient supply rather than lack of demand. Inclusivity was described as something that players are ready for, indeed, already expecting, but which is still unevenly delivered by the industry[119].

[118] Interview with Maresa Bertolo
[119] Interview with Nikolina Finska

Annex 1: Methodological note

This scoping note draws on a combination of primary data, gathered through interviews with experts and the policy corner hold on the 27th of March 2025, and secondary sources, including desk research and outputs from EU funded projects. The list of interviews can be found below:

- Thomas Westin, Senior Lecturer (PhD), Department of Computer and Systems Science, Stockholm University, Sweden (online interview, 19 February 2025)
- Maresa Bertolo, researcher at IMAGIS LAB-Designing Brands, Stories, and Audiovisual Content for Communication and Game Experiences, Politecnico di Milano University, Italy (online interview, 25 March 2025)
- Nikolina Finska, C-level executive, serial entrepreneur, public speaker, board member, author, consultant, coach, and diversity champion