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For the Ministry of Interior,

Neogames Finland ry's response on the draft Finnish national action plan for the prevention of violent radicalisation and extremism 2024-2027

Neogames Finland ry. is a membership-based, non-profit national umbrella association for the game industry. Our mission is to coordinate and support the growth and development of the Finnish Game Industry and its ecosystem. We bring together all the players from different sectors of the game industry and promote their shared interests.

1. In general

The games industry is a global pioneer in addressing challenges related to building safe online communities.

Games are, by their nature, global products and services. Many of them are also home to international online communities. Game developer studios make constant efforts to ensure that in-game online communities and interactions are safe and do not expose players to harm. Over the years, the games industry has introduced several novel tools (e.g. AI tools asking players to think twice before posting something toxic) and methodologies (e.g. community management practices) to limit harmful behaviour and prevent any illegal behaviour in in-game communication between players. Game developer studios increasingly rely on professional community managers to build healthy, inclusive and non-toxic communities. These community managers are on the front line of addressing any harmful behaviour in digital communities.

Prevention of violent radicalisation does not happen only in Finnish

Finland has always been a multicultural and multilingual society. Consequently, the national action plan to prevent radicalisation should be built on a multilingual approach. It is crucial for the success of the program that its key activities and review process are accessible to non-Finnish speakers.

2. Detailed comments

Action point 2: The action plan must take a multilingual approach to fostering communication actions supporting the prevention of violent radicalisation and extremism

Communication actions fostering the prevention of violent radicalisation and extremism must be multilingual. Finnish online communities or online communities moderated and managed from Finland do not operate only in Finnish. Thus, these actions must also reach non-Finnish-speaking online community managers and moderators.

A proposed change in the draft action plan: *Tavoitteena on edistää ennaltaehkäisyä tukevaa, suunnitelmallista ja ajantasaista monikielistä viestintää kansallisella ja paikallisella tasolla.*

Action point 10: New partnerships in identifying the impact of emerging technologies on violent radicalisation and extremism.

As acknowledged in the action plan, the emerging technologies are both a risk and an opportunity to prevent violent radicalisation and extremism.

The development and use of new emerging technologies in online community management and moderation are increasingly regulated in the EU. These new technologies can easily be at the same time under the scope of, for example, GDPR, ePrivacy directive, Digital Service Act (DSA), AI act and Terroristic content directive. Unfortunately, the national enforcement of these EU regulations and directives is scattered across different enforcement authorities. Consequently, there is a significant risk of legal uncertainty and a fragmented legal framework, creating substantial obstacles to the development and use of emerging technologies in the prevention of violent radicalisation and extremism.

Consequently, the Finnish government must succeed in building a holistic, predictable, coherent and consistent regulatory framework for the use of new technologies in the prevention of violent radicalisation and extremism. This requires strong national coordination and cross-sectoral dialogue between competent enforcement authorities across policy sectors. Instead of building competing coordination bodies, the Ministry of Interior should mainstream awareness of violent radicalisation and extremism among already existing coordination structures (e.g. Traficom coordinates national implementation of the DSA).

Proposed changes in the draft action plan: *Lisäksi yhteistyön avulla voidaan tarkastella keinoja hyödyntää kehittyvää teknologiaa näiden ilmiöiden ennaltaehkäisyssä ja torjunnassa sekä kartoittaa ja poistaa kehittyvien teknologioiden hyödyntämistä haittaavia lainsäädännöllisiä esteitä. Sisäministeriö edistää toimenpidettä osana kansalliseen koordinoointiin liittyvää rooliaan, kutsuu eri toimijoita mukaan yhteistyöhön. Sisäministeriö edistää poikkihallinnosta koordinaatiota teknologiaregulaatiossa ja tukee muita kansallisia valvontaviranomaisia väkivaltaisen radikalisoitumisen ja väkivaltaisen extremismin vastaisen työn sisällyttämisessä osaksi teknologiaregulaation kansallista toimeenpanoa.*

Action point 11: Building new partnerships with online community managers and moderators

Online community managers and moderators across different sectors are on the front line of identifying and tackling violent radicalisation and extremism. It is essential to remember that community managers and moderators are not a unified group. They can be volunteer moderators of small local Facebook groups of city districts without any formal training. They can be global experts on the topic, facilitating the growth of online communities of hundreds of thousands of people with well-established collaboration with public law enforcement agencies across the globe. And they can be everything in between.

Online community managers and moderators must have access to the necessary skills to identify violent radicalisation and extremism, as well as means to address it and, when needed, easy-to-access ways to report it to competent authorities.

Proposed changes in the draft action plan: *Sisäministeriö ja kansallinen yhteistyöryhmä tarkastelevat yhdessä toimenpiteen edistämistä kansallisella tasolla kiinnittäen erityistä huomiota toimenpiteisiin joilla edistetään yhteistyötä verkkoyhteisömagerien ja -moderaattorien kanssa väkivaltaisen radikalisoitumisen ja väkivaltaisen extremismin tunnistamisessa ja siihen puuttumisessa.*

For more information, please contact

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