

## Your response

Please refer to the sub-questions or prompts in the [annex](#) of our call for evidence.

Question	Your response
<p><b>Question 1: Please provide a description introducing your organisation, service or interest in Online Safety.</b></p>	<p><i>Is this response confidential? – No</i></p> <p>Electronic Arts is a world-leading company in digital interactive entertainment, developing household video game franchises such as <i>EA SPORTS FIFA</i>, <i>Need for Speed</i> and <i>The Sims</i>.</p> <p>Many of our games feature online interaction between players, including in some instances communication and/or sharing of user-generated content.</p> <p>Building an inclusive and safe experience for our online communities is a priority and business imperative for EA. Our online safety efforts are founded across four pillars: policy, prevention, moderation and discipline.</p>

**Question 2: Can you provide any evidence relating to the presence or quantity of illegal content on user-to-user and search services?**

*Is this response confidential? – No*

We can only speak to our experiences with player interaction in our own games. Nearly all the inappropriate conduct and content that we identify in our games falls into the category of disruptive behaviour – i.e. inappropriate or toxic language or names as opposed to unlawful behaviour or serious threats of harm. We see two significant reasons for this:

i) Our UGC functionality is much narrower than social media – there are limited opportunities to share photos and no opportunities to share video. We see almost no instances of sharing real-world imagery of extremist or CSEA material.

ii) Our chat functionality is built to further gameplay, so it is not conducive to detailed communication on non-gameplay issues.

**Question 3: How do you currently assess the risk of harm to individuals in the UK from illegal content presented by your service?**

*Is this response confidential? – YES*

**Question 4: What are your governance, accountability and decision-making structures for user and platform safety?**

*Is this response confidential? – No*

Player safety is a top priority for EA. This is a business imperative – if players do not feel safe and welcomed, they will choose to take their custom elsewhere in our highly competitive industry.

This work is embedded centrally in our business through our Positive Play group, with oversight and support from our Legal and Security teams. These groups work cross-functionally and with all our game development teams, our customer support team and our community managers to ensure the best practices and technology are available and used by all.

**Question 5: What can providers of online services do to enhance the clarity and accessibility of terms of service and public policy statements?**

*Is this response confidential? – No*

EA has robust codes of conduct that governs player activity and sets guidance for acceptable behavior in our products and services. The code of conduct applicable to all of our services is set out in our [User Agreement](#), our [Positive Play Charter](#) and in our [Help Pages](#). We also provide players with rules of conduct information through game specific messaging and websites.

Easy public availability, clear signposting, and statements of the behaviour that users have the right expect from each other, are all important.

**Question 6: How do your terms of service or public policy statements treat illegal content? How are these terms of service maintained and how much resource is dedicated to this?**

*Is this response confidential? – No*

We specifically prohibit a wide scope of disruptive conduct and content. This includes any unlawful activity and other harmful or offensive conduct, such as communications or UGC that is vulgar, harassing, abusive, profane, threatening, hateful, sexually explicit, defamatory, involve personal attacks or statements about race, sexual orientation, religion, heritage or constitutes hate speech, invades privacy, or otherwise disturbs the peaceful, fair and respectful gaming environment.

Our terms of service are subject to regular review, led by our Legal team.

**Question 7: What can providers of online services do to enhance the transparency, accessibility, ease of use and users' awareness of their reporting and complaints mechanisms?**

*Is this response confidential? – No*

EA has implemented mechanisms [across all our products](#) through which players may report any inappropriate conduct or content. We make in-game reporting easy and consistent and encourage players to use these tools through in-game and out-of-game prompts. More information on our reporting tools is available at <https://www.ea.com/news/reporting-tools>.

<p><b>Question 8: If your service has <i>reporting or flagging</i> mechanisms in place for illegal content, or users who post illegal content, how are these processes designed and maintained?</b></p>	<p><i>Is this response confidential?</i> – No</p> <p>See answers to questions 3 and 7 above. As stated previously, we receive very few reports of illegal content on our services.</p>
<p><b>Question 9: If your service has a <i>complaints</i> mechanism in place, how are these processes designed and maintained?</b></p>	<p><i>Is this response confidential?</i> – No</p> <p>We have a robust and formalized process and policy for handling all complaints, which includes both Machine Learning and a well-trained 24/7 dedicated human team, and for quickly removing content that violates our User Agreement. This team is supported by our Legal and Security teams and works under a documented set of processes, guidance, and a documented disciplinary matrix to help guide their review and response to complaints.</p>
<p><b>Question 10: What action does your service take in response to <i>reports or complaints</i>?</b></p>	<p><i>Is this response confidential?</i> – No</p> <p>Our disciplinary and remedial action varies depending on the complaint and may include removing content, blocking communications, suspending players, banning players and, where appropriate, notifying law enforcement.</p> <p>Nearly all actionable abuse reports relate to claims of offensive, vulgar, or similarly other inappropriate content, or cheating. Our focus is to remove objectionable content and to take disciplinary action that will mitigate further disruptive behavior.</p> <p>In the very rare instances of complaints about or discovery of more serious conduct or content, such as threats of violence, harm or self-harm, or potential CSEA, we have escalation policies and processes, which are managed by our Legal and Security teams with</p>

	<p>support from external mental health professionals. For the even rarer instances of potential unlawful or harmful activity or threats, we have a process for engaging law enforcement or reporting bodies such as NCMEC. This activity is in the single or very low double digits per year, globally.</p> <p>We also have internal processes in place for quickly responding to law enforcement agencies that are seeking support from us, including a streamlined process for exigent circumstances.</p>
<p><b>Question 11: Could improvements be made to content moderation to deliver greater protection for users, without unduly restricting user activity? If so, what?</b></p>	<p><i>Is this response confidential? – No</i></p> <p>User reporting will always be our best line of defence, but we continue to invest in Machine Learning to improve identification of potential disruptive content, without impacting user privacy.</p>
<p><b>Question 12: What automated moderation systems do you have in place around illegal content?</b></p>	<p><i>Is this response confidential? – No</i></p> <p>We utilize AI/ML filtering solutions across our games and services to block offensive text, including chat involving potentially unlawful content or activity.</p> <p>We also use these tools proactively, supplemented by human oversight, to sweep text chat and other text based UGC to identify and remove offensive content.</p> <p>We also provide players and parents with account management tools that allow them to directly restrict certain communications and online activity.</p>
<p><b>Question 13: How do you use human moderators to identify and assess illegal content?</b></p>	<p><i>Is this response confidential? – No</i></p> <p>We have a robust and formalized process and policy for handling all complaints, which includes both ML and a well-trained 24/7</p>

	<p>dedicated human team, and for quickly removing content that violates our User Agreement. This team is supported by our Legal and Security teams and works under a document set of process, guidance, and a documented disciplinary matrix to help guide their review and response to complaints.</p>
<p><b>Question 14: How are sanctions or restrictions around access (including to both the service and to particular content) applied by providers of online services?</b></p>	<p><i>Is this response confidential? – No</i></p> <p>Our disciplinary and remedial action varies depending on the complaint and may include removing content, blocking communications, suspending players, banning players and, where appropriate, notifying law enforcement.</p>
<p><b>Question 15: In what instances is illegal content removed from your service?</b></p>	<p><i>Is this response confidential? – No</i></p> <p>We utilize AI/ML filtering solutions across our games and services to block offensive text chat at point of entry and to block it before it is uploaded.</p> <p>We also use these tools proactively, supplemented by human oversight, to sweep text chat and other text based UGC to identify and remove offensive content.</p> <p>For the very rare instances of potential unlawful or harmful activity or threats, we have a process for engaging law enforcement or reporting bodies such as NCMEC. All illegal content is removed upon discovery. This activity is in the single or very low double digits per year.</p>
<p><b>Question 16: Do you use other tools to reduce the visibility and impact of illegal content?</b></p>	<p><i>Is this response confidential? – No</i></p> <p>See previous answer.</p>

<p><b>Question 17: What other sanctions or disincentives do you employ against users who post illegal content?</b></p>	<p><i>Is this response confidential? – No</i></p> <p>Our disciplinary and remedial action varies depending on the complaint and may include removing content, blocking communications, suspending players, banning players and, where appropriate, notifying law enforcement.</p> <p>In the rare instances of potentially illegal content, we would report to law enforcement or NCMEC as appropriate and apply the highest level sanctions (full banning) against the user.</p>
<p><b>Question 18: Are there any functionalities or design features which evidence suggests can effectively prevent harm, and could or should be deployed more widely by industry?</b></p>	<p><i>Is this response confidential? – Y / N (delete as appropriate)</i></p>
<p><b>Question 19: To what extent does your service encompass functionalities or features designed to mitigate the risk or impact of harm from illegal content?</b></p>	<p><i>Is this response confidential? – No</i></p> <p>See answer to question 2 – the nature of player interaction in our games reduces the risk of players sharing illegal content.</p>
<p><b>Question 20: How do you support the safety and wellbeing of your users as regards illegal content?</b></p>	<p><i>Is this response confidential? – No</i></p> <p>As described throughout this document, our online safety efforts are founded on four pillars: policy, prevention, moderation and discipline.</p>
<p><b>Question 21: How do you mitigate any risks posed by the design of algorithms that support the function of your service (e.g. search engines, or social and content recommender systems), with reference to illegal content specifically?</b></p>	<p><i>Is this response confidential? – No</i></p> <p>We do not believe this question is applicable to our services.</p>
<p><b>Question 22: What age assurance and age verification technologies are available to platforms, and what is the impact and cost of using them?</b></p>	<p><i>Is this response confidential? – No</i></p> <p>As recognised in the opinion “Age Assurance for the Children’s Code” published by the Information Commissioner in October 2021, the potential benefits of age verification</p>



	<p>technologies have to be balanced against the potential risks to the privacy of the child.</p> <p>As set out throughout this document, we believe that the risks from user interaction in our games are predominantly around disruptive behaviour rather than illegal content, and are well managed by our four-pillar approach to policy, prevention, moderation and discipline.</p> <p>In this context, we currently use or rely upon robust self-declaration age gates, which we may combine with parental confirmation depending on the game, platform and feature. We believe this is the most proportionate approach to age assurance, including the application of data minimisation principles when children’s data is collected.</p> <p>We believe that the current offerings of further age assurance and verification technologies go beyond this point of proportionality, as recognised in the ICO Opinion. We will continue to monitor developments in the market, however.</p>
<p><b>Question 23: Can you identify factors which might indicate that a service is likely to attract child users?</b></p>	<p><i>Is this response confidential? – No</i></p> <p>The ICO’s Children’s Code provides guidance on this.</p>
<p><b>Question 24: Does your service use any age assurance or age verification tools or related technologies to verify or estimate the age of users?</b></p>	<p><i>Is this response confidential? – No</i></p> <p>See response to question 22 – we currently use or rely upon robust self-declaration age gates, which we may combine with parental confirmation depending on the game, platform and feature. We judge this to be proportionate to the potential safety risks in our services. We will continue to monitor developments in the market.</p>

<b>Question 25: If it is not possible for children to access your service, or a part of it, how do you ensure this?</b>	<p><i>Is this response confidential? – No</i></p> <p>All platforms on which our games are available offer parental controls which enable parents to control access to content, functions and/or features.</p>
<b>Question 26: What information do you have about the age of your users?</b>	<p><i>Is this response confidential? – No</i></p> <p>Users must sign up to an EA Account and provide their date of birth in order to access online functionality in our games.</p>
<b>Question 27: For purposes of transparency, what type of information is useful/not useful? Why?</b>	<p><i>Is this response confidential? – Y / N (delete as appropriate)</i></p>
<b>Question 28: Other than those in this document, are you aware of other measures available for mitigating risk and harm from illegal content?</b>	<p><i>Is this response confidential? – Y / N (delete as appropriate)</i></p>