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Director – Strategy and Research, Online Safety, Media and Platforms Division
Department of Infrastructure, Transport, Regional Development, Communications and the Arts

Re: Digital Platforms – Consultation on Regulatory Reform

Epic Games welcomes the opportunity to provide feedback on the Issues Paper released by the Department in relation to the Statutory Review of the *Online Safety Act 2021* and the online safety environment in Australia. In this response, we will provide an overview of Epic Games, our services, approach to online safety, and the features we currently use to ensure our users have the best possible experience while using our services.

About Epic Games

Epic Games is a leading interactive entertainment company and provider of 3D engine technology. Headquartered in Cary, North Carolina in the United States, Epic has offices worldwide, including in Australia. Epic is the creator of Fortnite, a vibrant ecosystem of online entertainment experiences including first-party games like Fortnite Battle Royale, LEGO Fortnite, Rocket Racing, and Fortnite Festival, as well as creator-made experiences.

In addition to Fortnite, Epic operates popular games like Rocket League and Fall Guys. Epic also develops the Unreal Engine, which powers many of the world’s leading games and is also adopted across industries such as film and television, architecture, automotive, manufacturing, and simulation. Through the Unreal Engine, Epic Games Store, and Epic Online Services, Epic provides an end-to-end digital ecosystem for developers and creators to build, distribute, and operate games and other content.

Fortnite has continued to develop beyond the popular Battle Royale game. Players who log into Fortnite today can choose among thousands of games and experiences, including games built by smaller and independent developers and individual creators.

Epic’s Approach to Online Safety

Every day millions of players across the Epic Games ecosystem come together to play games and have fun with friends and family. Epic wants Fortnite to be a welcoming, safe, and fun experience for players of all ages. To keep our spaces welcoming, entertaining, and safe for all players, we set clear guidelines for respectful behavior and provide tools for players and parents to manage their experience.

Epic takes a multi-pronged approach to online safety that starts by providing strong protections for children. By balancing safety and privacy, Epic aims to promote an engaging and age-appropriate environment for all users:

- **Safety by Design:** High default safety and privacy settings help to keep under-18 users safe, while measures such as Epic’s “Cabined Accounts” (described below) provide even more protections for younger players.
- **Parental Controls:** Epic provides parents and guardians with a set of granular controls so they can tailor the experience to one that’s right for their family.
- **Age Ratings and Moderation:** Epic moderates player conduct and user-generated content according to its robust Community Rules and Content Guidelines. Epic also works with ratings agencies around the world to give parents and players access to trusted and

familiar age ratings that help them make informed decisions about what games they play across Fortnite and the Epic Games Store.

- **Purchasing Protections:** Epic's games can be played for free, with no pay-to-win mechanics or paid random item loot boxes. The Item Shops in Epic's games are designed to help users understand what to expect when making purchases and easy to cancel unwanted purchases and request refunds.

As Epic's products have evolved, the company has introduced a number of new and innovative safety measures, including Cabined Accounts, voice reporting, and age ratings inside Fortnite.

Cabined Accounts

In December 2022, Epic introduced [Cabined Accounts](#), a new type of Epic account designed to create a safe and inclusive space for younger players. Players with Cabined Accounts can still play Epic games, such as Fortnite, Rocket League and Fall Guys, but won't be able to access certain features such as voice chat until their parent or guardian provides consent.

When a player goes to create an Epic Games account, they are first required to provide their age. If they indicate that they are under 13 or their country's age of digital consent, whichever is higher, their account will be a Cabined Account and they will be asked to provide a parent or guardian's email address to receive consent to access certain features in Epic's products. In Australia, players who indicate that they are under 15 will be placed in a Cabined Account. Parents of players with Cabined Accounts will receive an email from Epic to inform them that their child has created an account with details on how to provide consent for additional features and set up Parental Controls. Parents who provide consent are verified via Epic's [Kids Web Services](#) (KWS).

The following features are disabled in a Cabined Account:

- Communicating with other players using voice chat or free text chat
- Purchasing items with money
- Downloading games that are not owned by Epic
- Recommendations based on past activity
- Email marketing or push notifications
- Sign in with Epic, including linking accounts to certain external services, such as social media websites or video streaming applications
- Custom display names
- SMS-based two-factor authentication

Verified Parental Consent

Epic makes it simple for parents and guardians to provide consent and manage their family's online experience through its [Kids Web Services](#) ("KWS") technology. Through KWS, Epic also helps other developers manage youth audiences by providing tools for consent management and parent verification, making the process and experience simpler for parents.

KWS is used to obtain verifiable parental consent ("VPC") before allowing children to access features that require it. Once parents verify that they are an adult, they can opt to be added to KWS' ParentGraph, a network of pre-verified parents built on the principle of data minimisation. The service enables verified parents to manage consent for their child in various digital experiences without re-submitting parents' personal data in every app, game, or website their child uses.

KWS aims to empower developers and make online experiences safer for kids by simplifying the verification process for both developers and parents. It is offered to developers for free, at any scale, eliminating all parent verification costs for both developers and parents or guardians. These services are currently used by a number of large account systems, including 2K, LEGO, Niantic, Innersloth, Bandai Namco, and many others.

Default Settings

Epic has set high default safety and privacy settings for all players under 18 years old on Fortnite.

- Voice chat, text chat, and personalised recommendations are set to “Off” by default for all under-18 users.
- Player Parties are set to “Private” by default for under-18s, meaning no one can join their party without an invite from them.
- The Mature Language Filter is set to “On” by default for all players under 16.
- The Parental Controls PIN is required to add new friends by default for all under-10 users.

Parental Controls

Epic’s Parental Controls let parents and guardians choose how their child plays and interacts with others across Epic’s games and experiences, including Fortnite, Rocket League, and Fall Guys. These tools let parents and guardians make informed decisions about what is right for their family and manage access to social features such as voice and text chat, purchasing permissions, and more.

- **Epic Voice and Text Chat Permissions:** Manage who your child is able to speak with using Epic voice chat and text chat.
 - Parents and guardians can allow their child to speak with “Everybody,” “Friends & Teammates,” “Friends Only,” or turn text or voice chat off entirely by selecting “Nobody.”
 - If a child is under 10 years old, the maximum voice and text chat permission that parents and guardians can enable in Parental Controls is “Friends Only.” And if a child is under 13 years old, the maximum voice and text chat permission is “Friends & Teammates.”
- **Filter Mature Language on Fortnite:** Filter out mature language such as profanity in Fortnite’s text chat.
- **Require a PIN to Add Friends:** Choose to require your Parental Controls PIN to be entered for your child to send or accept Epic friend requests.
- **Require a PIN for Epic Games Payments:** Choose to require your Parental Controls PIN to be entered to authorise real money purchases using Epic payment.
- **Fortnite Content Ratings:** Every experience in Fortnite has its own rating and you can choose to limit your child’s access to experiences above a certain rating. Your Parental Controls PIN will be required to unlock experiences for your child that are rated above your age-rating setting.
- **Allow Creative Mode and Unreal Editor for Fortnite:** Players can use Fortnite Creative and Unreal Editor for Fortnite (UEFN) to design and create experiences in Fortnite. You can choose to restrict your child’s access to these toolsets.

- **Epic Games Store Rating:** You can choose the maximum rating for new games your child can buy or download from the Epic Games Store. If your child tries to view, buy, or download a new game above your chosen rating, your Parental Controls PIN will be required.
- **Enable Sign in With Epic for your child:** You can choose to require parental consent for each non-Epic game or site to which your child attempts to log in or connect using their Epic Account, or enable the 'Sign in with Epic' single sign on solution (SSO). Players can use Sign In With Epic to access games or connect to platforms that aren't operated by Epic. When using Sign In With Epic, players share account information including their Epic ID and Display Name, connected gaming account names, their online presence, and their Epic friends list.
- **Fortnite Playtime Tracking Report:** Sign up for weekly playtime reports on the amount of time your child plays Fortnite.
- **Activity Reports for Your Child's Epic Account:** Sign up to receive activity reports when changes are made to your child's Epic account:
 - *Parental Control Settings Updates* - Notifications when your Parental Control PIN is used to make changes to Parental Controls settings on your child's account.
 - *Friend Requests* - Notifications when your Parental Control PIN is used to send or accept a friend request.
 - *New Epic Friends Added* - Notifications of friends added to your child's Epic Friends list.

Moderation

Epic has [Community Rules](#) that apply to all users of Epic's games, services, and environments. Additionally, our [Content Guidelines](#) outline content that is prohibited across Epic's experiences, services, and marketplaces.

Consequences for violating Epic's rules and guidelines vary depending on the severity and number of offenses, including the following actions:

- A warning that additional abuses may result in account restrictions.
- Removal of the content that violates our rules.
- A temporary restriction on using certain products, making purchases, adding new friends, or social features like voice or text chat for a specific period of time, depending on the nature of the abuse.
- A permanent account ban that restricts someone from using Epic products.

Players can also block or mute players they no longer wish to interact with. If players suspect that content they encounter in any of Epic's products or services is illegal or violates the company's Community Rules or Content Guidelines, they can use the in-game report function or submit a report using [this form](#).

Epic takes reports of potentially illegal content seriously, using a combination of automated tools and human moderators to identify and flag content that is potentially illegal. A team of specially trained moderators review flagged reports to determine the appropriate action.

Voice Reporting

In November 2023, Epic launched voice reporting in Fortnite. In addition to being able to block, mute, and report other players, players are also able to submit audio evidence when they report suspected violations of Epic's [Community Rules](#). This helps Epic take action against players using voice chat to bully, harass, discriminate or engage in other inappropriate behavior.

When voice reporting is on, the last five minutes of voice chat audio are captured on a rolling basis. This means only the immediate last five minutes of audio is reportable. As new audio is captured, any previous audio that's more than five minutes old is automatically deleted. Voice chat audio is securely captured on the player's own device (such as a gaming console or PC), not the Epic Games servers.

When players report a conversation, the voice chat audio captured from the last five minutes will be uploaded with it and reviewed. Epic has no way of accessing any voice chat audio unless voice reporting is on, and a participant submits a voice report.

Voice reporting is always on for voice chats that include players under 18. Players 18 and over can set their voice reporting preferences to "Always On" or "Off When Possible." After selecting "Always On," voice reporting will be on in every channel that player is in. After selecting "Off When Possible", voice reporting will be off in parties formed among friends where all players have voice reporting set to "Off When Possible." Voice reporting will always be on in all Game Channels, which are channels that connect players on the same team but in different parties.

Ratings

In October 2023, Epic announced that in partnership with the [International Age Rating Coalition \(IARC\)](#), Fortnite would begin featuring internationally-recognized age and content ratings for all first and third party playable content. Since November 2023, all experiences published in Fortnite are required to have an IARC-assigned rating ranging from an ACB G ("General") to a maximum rating of M ("Mature"), giving parents and players access to trusted and familiar ratings that help them make informed decisions about what and how they play. This is a critical step toward building a metaverse that is safe and fun for everyone.

When a creator is ready to publish their island to Fortnite, they will fill out the IARC content rating questionnaire before they submit their island to be published and reviewed by Epic moderators. When the questionnaire is complete, creators will receive an age-based IARC rating for the content of their island along with region-specific ratings from [IARC-participating rating authorities](#). These ratings will automatically be applied and prominently displayed prior to access. Content sensitivities vary by region and IARC's scalable, global solution provides parents and players with trusted guidance from ACB (Australia), ESRB (North America), PEGI (Europe), USK (Germany), ClassInd (Brazil), GRAC (South Korea) and more depending on where they live. Participating rating authorities may modify one or more of the ratings assigned based on their own review of the experience once it's been published.

Parents and guardians can use Epic's Parental Controls to set content age rating limits based on their family's preferences. Parents can unlock specific islands that exceed the set ratings threshold using their Parental Controls PIN. There is also an option to turn on/off the ability for children to design their own games in Creative Mode.

Purchasing Protections

Spending V-bucks on songs, outfits, or LEGO kits in Fortnite is a fun way to enhance gameplay for players of all ages. Epic wants players to be satisfied with what they buy and is upfront about what they can expect when making purchases in Epic's games. We have a number of settings and tools to empower parents to choose the digital experience that's right for their family.

- **Purchases cancellations and refunds are simple.** Players can instantly [cancel purchases](#), and Epic enables refunds on eligible digital goods using [Return Tickets](#) within 30 days from the purchase. [Return Tickets](#) enable completely self-service refunds, unlike most games in which refunds have to be processed via player support. Where self-service refunds are not feasible, Epic has made its refund policies clearly visible, so players can easily access the information if they want to make a return.
- **Epic issues refunds to parents whose children make unauthorised purchases.** If you're a parent or guardian whose child made an unauthorised purchase on a computer, you can reach out to player support to get a full refund. If the unauthorised purchase was made through a console or mobile device, Epic provides information on how to get in touch with the respective platform's support team to request a refund.
- **Epic protects players from unwanted purchases.** Epic's Item Shops feature hold-to-purchase mechanics to ensure a player's intent to purchase (not an errant 'click').
- **Epic does not save payment methods by default.** While some players like the convenience of being able to save their payment method to their Epic wallet for future purchases, others prefer not to. When you enter a new payment method, you can decide if you'd like to save it with an explicit Yes/No choice.
- **No paid random item loot boxes.** No one likes to be disappointed. Epic eliminated paid random item loot boxes from Fortnite and Rocket League in 2019.
- **No pay-to-win mechanics.** Players can't pay to progress in player-versus-player experiences across Fortnite. This levels the playing field so that those who spend money in our games do not receive a gameplay advantage over others.
- **No monetary purchases for players in Australia under 15 without verified parental consent.** Players with Cabined Accounts can't make monetary purchases, until their parent or guardian provides consent and sets up Parental Controls.

Conclusion

Epic appreciates the opportunity to contribute to this consultation. We welcome questions from the Department on the measures and initiatives Epic has implemented to promote a safer and engaging experience for our players.