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Digital, Culture, Media and Sport Committee

Oral evidence: Immersive and Addictive Technologies, HC 1846

Tuesday 2 April 2019

Ordered by the House of Commons to be published on 2 April 2019.

Watch the meeting

Members present: Damian Collins (Chair); Paul Farrelly; Simon Hart; Julian Knight; Ian C. Lucas; Brendan O'Hara; Rebecca Pow; Jo Stevens.

Questions 415 - 598

Witnesses

[I](#): Neil McClarty, Vice-President, Growth and Product Services, Jagex, and Kelvin Plomer, Director of Player Experience, Jagex.

Examination of witnesses

Witnesses: Neil McClarty and Kelvin Plomer.

Q415 Chair: Good morning. I formally welcome the witnesses to this further hearing of the Digital, Culture, Media and Sport Committee's inquiry into addictive and immersive technologies. So far during the inquiry we have heard particular evidence relating to the games industry and different formats of games, and we are delighted to be able to welcome the witnesses from Jagex today to talk about their work. In particular, we have some questions about their game RuneScape. We have been particularly interested in multiplayer games and we have received some evidence about that, so it is good to have the opportunity to talk to one of the leading practitioners in this area of the games industry. We are particularly interested in the way that the game's design affects the users' experience and the way they interact with it. I would like to start by asking you about that. When designing and running games like RuneScape, what consideration is given to the optimal amount of time people might play in particular sessions?

Neil McClarty: First, thank you very much for inviting Kelvin and me to speak in the inquiry today. I think that it is an incredibly diverse and interesting industry we work in with games. We are very passionate and we love what we do.

In reference to your question, for RuneScape, one of the things that we will talk about a lot today is the diversity of choice and the variety of content. The type of game that RuneScape is is one of the niche parts of the industry. We work in an area called MMORPG, which is massively multiplayer online roleplay games. For that particular type of game, the roleplay element is obviously the key part in terms of game design. When we are thinking about what that person as an individual is looking for from our type of game, the key thing is to immerse themselves in an online world, to take on the role of another character, and to be able to have the freedom to live out a life in a medieval fantasy world.

For RuneScape, the way that we see that is, as I said, the variety of choice. As a user coming in to play RuneScape, they enter the world; they basically can then decide how they wish to go about their time in our world of Gielinor. It may be that I want to do fishing or I may be fire making or I want to level up my player so that I can go and fight a dragon, for example—it really is about the variety of choice. When we are thinking about it from a design perspective, we are making sure that we are catering for the different varieties of players that come to play our game and making sure that they are all catered for. I think that will be one of the things that we will talk about during the meeting today is about the variety and depth of content that we provide.

Q416 Chair: If you think about the people who use RuneScape, who interact



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with RuneScape, what would you consider to be a typical usage? How many times a week might someone engage with RuneScape if they are considered to be a reasonably regular player?

Neil McClarty: Again, it varies wildly. We have hundreds of thousands of players playing every single day. The beauty of RuneScape is that you can dip in several times a day and play for maybe 10 minutes at a time. On average, our players play around two and a half hours a day, which is about the same time as watching television. It is their pastime and, as I said, that can be broken into one session or several sessions.

Q417 **Chair:** Just so that I am clear, if the average is two and a half hours a day, is that the average for people who play every day?

Neil McClarty: Correct, yes.

Q418 **Chair:** Okay. Then there will be other players who play less frequently?

Neil McClarty: Yes, absolutely. One of the great things about MMORPGs is that, particularly with RuneScape, you can take a break for an extended period of time and pick up your character where you left off. If you were wood cutting or fishing and you left your character by the side of a river, you do not play for six months and you log back into your account, it would still be there waiting for you to pick up where you left off.

Q419 **Chair:** Not still fishing?

Neil McClarty: Well, it would certainly be sitting by the lake and waiting for you to continue to fish. Again, from a design perspective, one of the key things for us is making sure that we do have people who come away for an extended break and that we make it easier for them to come back. We will maybe provide them with content and say, "Look what you have missed in the last six months" and give them an update of the things that they may wish to play.

Q420 **Chair:** Do you prompt them when they are off RuneScape? Will they get prompts and reminders? People who are familiar with social media tools and things like that, if you have not used it for a while you will get a little reminder.

Neil McClarty: RuneScape until very recently has been a PC-only game. Last November we launched our game on mobile, so you can now play your account across both platforms. I could log off my PC in the morning and then on the way to work or college I could log back in for a couple of minutes on my phone while I am on the way to work. One of the reasons we did that is, again, to give people the freedom of choice so that they can relax when they choose to. Yes, to your point, we would reach out to people if they have not played for a long time. We are very active with social media. We launch behind the scenes videos of our content every Friday. There is very much a large community of players who are not always actively playing, but who are reading and listening and watching.



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Q421 **Chair:** But they get prompts and reminders or notifications about new features or new things that have been added to the game?

Neil McClarty: Yes. If they are following us on social media, it would say that a new piece of content has been launched today, "Come check it out."

Q422 **Chair:** Do you e-mail people? When people set their account up, presumably they give an e-mail address and things like that.

Neil McClarty: Of course, yes, but with GDPR the user has to proactively opt in to receive marketing e-mails from us.

Q423 **Chair:** But for those who do, then they would—

Neil McClarty: Those who do, then where appropriate we do so, yes.

Q424 **Chair:** The average playtime is two and a half hours a day. What would you consider to be heavy usage? Do you have categories of people who will play for a lot longer than that?

Neil McClarty: Yes. Again, for the large majority the average is two and a half hours. We do have people who play longer than that and much shorter than that as well. Players will typically go through periods where they may play more or may play less, depending on the type of content that they are currently playing. If we are talking about quests, which are a core part of RuneScape and is very much about individual stories—Tolkienesque fantasy, individual pieces that players can engage in—they maybe take one to two hours to complete. Our largest one I think is six hours, for example. In those instances, players typically want to immerse themselves for that particular part of the story.

Q425 **Chair:** Some of the evidence we have received about games, not necessarily specifically about RuneScape but games like this where it is a game that never ends and there are always people around the world at any point in time that are playing in it, we have heard stories of people playing continuously through the night on games like this, interacting with different people all around the world who are playing the same game. In your experience, are you aware of cases where people are playing for maybe 10 to 12 hours or even longer in a single session?

Neil McClarty: It is extremely rare to that extent for a game like RuneScape, but you can get up to six to eight hours quite comfortably. When that is the case, that is a very small proportion of our players and it is very infrequent. It is when there is a particular event in the game where we launch a piece of content that people really want to engage in for a particular time.

Q426 **Chair:** Are there benefits to your character for playing longer periods of time? Does your character's story develop in a different kind of way depending on how you use it and how frequently you use it?

Neil McClarty: It is actually the opposite. We have things in the game that are daily rewards and daily activities that take largely about 10 to 15



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minutes to complete. A large proportion of our players will log in, spend the first 10 to 15 minutes doing the daily elements to it, and then they won't play again. It is much more skewed the opposite way. The longer period is really just when you are enjoying what you are doing and you want to complete a particular story.

Q427 **Chair:** The in-game daily rewards, what do they consist of?

Neil McClarty: For example, there may be activities or items where it is like a task. You might send the character to go and collect X amount of items from different characters within the game and they need to go around to a couple of locations, collect those, drop them off and then they can be rewarded with resources in game or experience that levels up their character.

Q428 **Julian Knight:** I was going to say it is about a game that never ends, and it feels like that at the moment with Brexit, I have to say. You are clearly across the numbers in terms of your business. As I understand it, you have been described as a billion dollar franchise, RuneScape. Would that be a correct description?

Neil McClarty: Yes, we are very fortunate to be so, yes.

Q429 **Julian Knight:** Yes, 260 million regular users or registered users?

Neil McClarty: Registered users, yes, over the 18 years since we started in 2001.

Q430 **Julian Knight:** It is huge. That is nearly the size of the United States in terms of actual scale.

Neil McClarty: That is right, yes.

Q431 **Julian Knight:** It is quite incredible. In terms of the fact that you are so across the numbers, I wonder if you can share with the Committee exactly how much regular users—and you said that was two and a half hours a day, so your average or mean user, effectively—spend on microtransactions within the game on an annual basis or in total.

Neil McClarty: Yes, of course. It is worth for the Committee's benefit just talking about our business model in general because the games industry is incredibly diverse. For RuneScape, we have a multitude of different ways to pay. For example, the first element is we have, give or take, about 200,000 hours of game play content, we believe, in the entirety of RuneScape. As you can imagine, after updating for so many years, that collectively adds up. For a large part of the game, tens of thousands of hours, you can play completely for free—free to play. The first thing, typically, that people will pay for is a subscription. People go into a subscription that allows them basically a larger area of the map, more areas to explore, and more content to engage in. The vast majority of our players have the subscription.

Q432 **Julian Knight:** What does that cost, first, your base cost?



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Neil McClarty: £7 a month.

Q433 **Julian Knight:** £7 a month, okay, and that is basically to get you into a wider scope of the game?

Neil McClarty: The wider scope of the game.

Q434 **Julian Knight:** These regular users, in two and a half hours they must be buying stuff in game, so what are they spending?

Neil McClarty: To be fair, as I said, only about 10% of our total base engages with what you would consider, I suppose, microtransactions; 90% of the base largely just continue with their subscription and go about it without ever really engaging in those elements. On a yearly basis, the spend total including subscription and MTX, on average you are looking around no more than the price of a boxed product in retail, so no more than about £50 or £60.

Q435 **Julian Knight:** Okay. I am a bit confused by that. It is £7 a month to subscribe, which is £84 a year. You are telling me that basically it is £50 or £60. Is that the additional spend on top of the £84?

Neil McClarty: To be clear, that is the average spend across all of our users. As your colleague mentioned, players regularly take breaks. Over half of the people that are in membership are only on a one-month subscription. They sometimes take a break for three or four months and come back—

Q436 **Julian Knight:** I am sorry to be so obtuse about it but the question I had was very simple. Your regular users, which you can define in terms of time and place—you know the figures—how much do they spend on an annual basis?

Neil McClarty: As I said, the average is no more than £45 a year.

Q437 **Julian Knight:** So £45 a year is the average of those regular users, the two and a half hours a day people?

Neil McClarty: Correct.

Q438 **Julian Knight:** Okay, fine, thank you. In terms of heavy users of your games, presumably in your marketing model you will have different bands of usage. You will have those who do two and a half hours, those who do five hours, those who do 10 hours and those who do 20 hours. Let's say the two top bands of that—you understand what I mean by that?

Neil McClarty: Correct.

Q439 **Julian Knight:** What is their average spend per year?

Neil McClarty: Obviously, the more immersive they pay a larger amount. I don't have the actual figure to hand and I am happy to share that with the Committee afterwards for those top bandings.



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Q440 **Julian Knight:** That would be helpful, yes. Can it be thousands?

Neil McClarty: It can be thousands if they choose to. I don't know if you want to mention that, Kelvin.

Kelvin Plomer: Certainly. In terms of our players, they can potentially spend up to £1,000 a week or £5,000 a month.

Q441 **Julian Knight:** They can spend £5,000 a month?

Kelvin Plomer: Up to, yes.

Q442 **Julian Knight:** Is that an upper cap or is that—

Kelvin Plomer: Yes.

Q443 **Julian Knight:** That is an upper absolute cap? You do not allow anyone to spend any more than that per month?

Kelvin Plomer: That is correct.

Q444 **Julian Knight:** It is still a hell of a lot of money.

Kelvin Plomer: It is a lot of money, yes. Again, as Neil said, I suppose you are talking about a small proportion of our player base that would spend at that level.

Q445 **Julian Knight:** What proportion of your player base do you have to cap, who actually get to that limit and you say, "Enough is enough"?

Kelvin Plomer: I think that they have reached the cap once in the last 12 months. One player hit that cap once in the last 12 months.

Q446 **Julian Knight:** One player out of your entire database reached that cap once in the last year is what you are saying?

Kelvin Plomer: Yes.

Neil McClarty: It is worth just also noting that for RuneScape the audience that is currently playing, those who have been playing for 18 years, is incredibly dedicated and have been playing for a very long time. Compared to other games that you may speak to as part of the inquiry, our players on average have been playing for eight years in total, so they are a heavily dedicated player base. Because of that, the key thing is to see this as no different to any other pastime. I totally acknowledge that those figures can get very high, but if you play golf, any activity, if you are really committed and invested in those things, then it is your choice to engage with that.

Q447 **Julian Knight:** My local golf club does not have 260 million members, though. There is a slight difference in scale and also in the age of those particular users. You chose to do your microtransactions on RuneScape but your Old School RuneScape does not have microtransactions, that is correct, isn't it?

Neil McClarty: Correct, yes.



Q448 **Julian Knight:** Why have you made that particular decision to keep that just a pure gaming experience and basically allow this more addictive element of the microtransactions to be in place over just RuneScape? Why have you done that?

Neil McClarty: I wouldn't necessarily agree that RuneScape has that addictive element of the microtransactions. First, as I said, it is not part of the core game experience. It is very supplementary. All of the elements that we offer in RuneScape is stuff that you really do not have to engage in if you don't choose. It is cosmetic outfits that I can wear. If I want to be dressed as a wizard I can take that choice if I want to stand out. It can be stuff as simple as additional bank space. Obviously, if I play for a long time and I collect loads of items in the world, I run out of space. I can visit the shop and get more space in my bank and so on.

To your original question around Old School, we made a decision six years ago that with any online game, particularly ours, it goes through a lot of evolution and change over those first 12 years. We have been very fortunate to have a large player base, but as you make changes in game content you become quite divisive in terms of your audience and what they like and dislike. What we saw was that some players actively did not want to engage. One particular element was our combat system, which we changed pretty significantly in the way that you fight and interact. We added microtransactions and additional services to the game in RuneScape.

Q449 **Julian Knight:** Yes, but why do you have microtransactions in RuneScape and not in Old School?

Neil McClarty: I am getting to that, sorry. When we did that, that had quite a divisive opinion in the community. Old School was really a reflection on players who preferred what they would call the vintage version of RuneScape. Old School is based on the 2007 version, so the graphics are a lot more low fidelity, it is in a fixed-screen mode, and it is purely subscription so there are no additional elements. It was a way for us to offer freedom of choice. For the players who prefer the old flavour of RuneScape, they can enjoy playing that version. We want to continue to evolve. As you say, we aspire to be a forever game, and to do that you are going to have to make decisions that do polarise the community. I am pleased to say that—

Q450 **Julian Knight:** I am sorry to cut across you here but I am conscious of the fact that there are other colleagues who want to ask questions. Just to sum up, effectively, there is a large cohort of your users who did not want or do not really like the idea of microtransactions. That was obviously relatively polarising. Therefore, one of the reasons why you have the Old School is because of that, is that fair?

Neil McClarty: As well as other elements in terms of combat. Old School from a design perspective is much more "do it yourself". There is not much help in regards to guides around the game, et cetera.



Q451 **Julian Knight:** My final question in this part is in two parts. First, how much of your revenue is generated by membership subscription and how much by microtransactions? Secondly, what feedback have you had, and what complaints as well, from players and those involved around players—so parents, et cetera—in terms of microtransactions and how do you deal with that?

Neil McClarty: Sure. For your first question, we generate around two thirds of our revenue from subscription and one third from additional services like microtransactions. In regard to feedback, maybe that is more for you, Kelvin.

Kelvin Plomer: Yes. There are two elements, I suppose, to the complaints. One is, as Neil said, when we released changes to RuneScape a significant proportion of players were unhappy with those changes and the way that the game was going. Then people would either cancel membership or send quite forceful and emotive messages on that. Again, that was part of our considerations: if we change the community, we change the game to the detriment of our player base. Being a very community-focused game, we genuinely want to listen to our players. There are lots of mechanics in game where we poll all our players about new content and so on. That is one side in terms of a broader picture response, I suppose, to the complaints around the changes in the game.

If you are talking on a more specific, individual, case by case basis—and I must say I have seen the submission to the Committee from a member of the public—we obviously deal with that in a very considered way. When a player is citing things like addiction, we are extremely careful. I want to explain how responsible we are as an organisation. We probably get about 25 players a year who reference addiction in correspondence to us. To put that into perspective, we get about half a million pieces of correspondence a year, so it is 0.005% of that. In that kind of situation, we will obviously listen, acknowledge and seek to empathise, and we will explain what that user can do in order to limit game playing. Some of that falls into things like GDPR, so requests to delete information, requests to remove information, requests to disable an account either on a permanent or a temporary basis.

Q452 **Julian Knight:** What about parents coming to you saying, “My son or daughter has got into massive debt because of the microtransactions in your game”?

Kelvin Plomer: Broadly, we have a parents’ guide section in our support centre on the website with advice and links for parents. On a specific individual case, we are bound by the constraints of GDPR. We cannot discuss a user with a third party. We have to verify the identity of the person who is contacting us and if that is the user and the creator of that account, then obviously we can talk to them and engage. If it is someone who is contacting us about their son—their 24 year-old son, I believe, in that submission—we unfortunately cannot enter into a dialogue on that or else we are breaking the GDPR and privacy section of our terms and



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conditions as well. We will give as much advice as we possibly can and give the links to be passed on to the actual user so they can then request deletion of the account or suspension of the account or a payment block. We can block cards, et cetera.

Q453 **Ian C. Lucas:** You said that the subscription was £7 a month, £84 a year, the basic subscription?

Neil McClarty: Yes, £7 a month. The membership is discounted if you buy 12 months in one go, so you get it for a bit less.

Q454 **Ian C. Lucas:** Bearing in mind it is £84 a year for the basic subscription, discounted if you pay all at once, how do you spend £5,000 in a month on your game?

Neil McClarty: As I said, we have items in the cosmetic store. We have several hundred different cosmetic outfits that we have added to the game, largely over the last five or six years.

Q455 **Ian C. Lucas:** What is a cosmetic outfit?

Neil McClarty: In my character in the world, they could be wearing armour, a cape, or they could change their hairstyle.

Q456 **Ian C. Lucas:** If I wanted a suit of armour, how much does that cost?

Neil McClarty: It can range anywhere from £4 up to £30 depending on—

Q457 **Ian C. Lucas:** What determines the price? What is the price difference?

Neil McClarty: Largely the aesthetic style and look and the animation. Some items are maybe just a cape—

Q458 **Ian C. Lucas:** Obviously, you have artists and designers who work on these different outfits?

Neil McClarty: Correct, yes.

Q459 **Ian C. Lucas:** How do you establish whether a particular outfit is more expensive or cheaper? Is that to do with the number of people who buy it?

Neil McClarty: Not necessarily. It is the level of effort of our development team in creating that. There is a varying amount of time in terms of whether an item needs animation time; if you can imagine one item that is very static in look, one that changes colour, one that has fireworks going off the back of it, and so on. There is also the complexity of the outfit. It could be that it is a helmet, a full bronze arm, legs, platelegs. Some come with a pet that follows you around as well. It really has that diversity.

Q460 **Ian C. Lucas:** What is the most expensive single item that you can purchase on your game?



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Neil McClarty: The single most expensive is a package of chests, basically, or keys that allow you to open chests where you can win prizes.

Q461 **Ian C. Lucas:** How much is that?

Neil McClarty: That is £74.

Q462 **Ian C. Lucas:** The most expensive item is £74 and you have people who spend £5,000 in a month?

Neil McClarty: Again, to clarify what Kelvin said, we have had one instance of that threshold being hit once in the entire last year. I don't think it is fair to say that we have several people at that rate.

Ian C. Lucas: I did not actually say that.

Neil McClarty: Otherwise the average would be much higher than the £45 a year.

Q463 **Ian C. Lucas:** How many people spend £1,000 a month?

Neil McClarty: I do not have that particular number to hand but again—

Q464 **Ian C. Lucas:** Is it quite a lot?

Neil McClarty: No.

Q465 **Ian C. Lucas:** Why did you settle on £5,000 as the limit?

Neil McClarty: We have an in-house fraud team. One of the things that we are very proud of is making sure that we responsibly manage people's data securely. We run our own billing and fraud team internally and those thresholds and checks are largely in place for fraud, basically.

Q466 **Ian C. Lucas:** Do you have any time limits on individuals rather than a cost limit? You have said that there is a cut-off of £5,000 in terms of cost. Is there a time limit? Because you can play the game without buying anything, can't you, without any purchases, you say?

Kelvin Plomer: Yes, you can. The first level of that is at six hours. A player will be logged out after six hours of continuous play.

Q467 **Ian C. Lucas:** Automatically?

Kelvin Plomer: Yes.

Q468 **Ian C. Lucas:** You cannot play the game for longer than six hours at a time?

Kelvin Plomer: Without a break.

Q469 **Ian C. Lucas:** What happens? Can you—

Kelvin Plomer: You can log back in.

Q470 **Ian C. Lucas:** You can log back in?

Kelvin Plomer: Yes.



Q471 **Ian C. Lucas:** Is there any limitation on the number of times you can log back in?

Kelvin Plomer: No, there is not any. There are very high-end throttles as safeguards against potential abuse and people attempting to hijack accounts or on the website but, broadly speaking, for the average user they are free to log in and play.

Q472 **Paul Farrelly:** Thank you both for coming along. Coming in front of Select Committees is usually a thankless task and lots of people dive for cover, and we are experiencing that with a number of your competitors at the moment, so thank you for coming and for being frank.

I am a parent and I am quite concerned through personal experience about some of the qualities and effects that games that I generically call "bash the dragon", including League of Legends, have but I do not want to get them out of context. I might find it weird that somebody is staying up until 4 o'clock in the morning watching other people play a game in a big stadium in Korea, but then my children might think that I am weird staying up until God knows what hour watching a rugby match from Auckland. It is important just to keep it in context, I think.

I want to go back to the previous question, just to keep on a thread. Clearly, you have a large number of customers, so managing those customers would be a big task. There is a danger of being too dispassionate and perhaps too liberal and perhaps, while the responsibilities of data protection are there, not looking at individual cases. Irrespective of your data protection duties and your outlook that people should be able to live their lives as they want to, if parents do raise issues with you I wonder how proactive you are, rather than just reactive, in looking into something and saying, "Mr X has an issue here because he has told us that his son or daughter is earning very little so is not a high roller, as you might find among some of the Chinese in gambling, but there is an issue there." What do you do proactively that is less dispassionate?

Kelvin Plomer: Let me just jump back. RuneScape and Old School RuneScape are fundamentally about choice, and we provide options and choice of game play across a variety of methods and mediums and all the rest of it throughout those hours of content. The other thing I would say is in terms of our demographic and our player base, our average age is 22. We are gated at age 13. You cannot create an account if your date of birth makes you 13 or under. In addition to that—I think it is about 2%, Neil?

Neil McClarty: Yes, 2%.

Kelvin Plomer: Yes, 2% are under the age of 18. That is our context in terms of our game. Mr Knight was talking about 260 million accounts created. That is accounts created. Some of those are created by individuals who create multiple accounts and so on. I think that we just hit a million subscribers at the end of 2018, so that is the number, I



suppose, that we are dealing with on a regular basis. Within that, the proportion of children, people under the age of 18, is very, very small.

In terms of how we approach that, we generally approach a lot of things with an educational aspect and, we feel, a corporate socially responsible outlook. For example, mental health and awareness and campaigning and so on is in our core being at Jagex. We invest a huge amount with our staff and we have also aligned ourselves with mental health charities in the last two years and are about to do the same for the next two years as well.

Along with that comes in-game events where we are not only raising funds but we are raising awareness. We put characters in game from our local Mind organisation and they can ask questions and interact with them around issues of mental health. We provided those links, so when individuals potentially are struggling and we are talking about mental health issues, we think that we have been quite proactive, to your point, in providing awareness within our community of what to do if you are in that type of situation.

In addition to that, we very, very proactively—I think we are among the leaders in our space in chat moderation and screening—are looking for things like references to suicide and self-harm. If players report other players for that type of behaviour, we filter that and then that is manually reviewed by our members of staff. Over and above that, we review all chat 24/7 for additional triggers, particularly around areas of sex and minors. Again, they will trigger and they are reviewed manually. Off the back of that, we will then escalate to law enforcement if we feel that is necessary.

Q473 **Paul Farrelly:** Okay. I am going to come back to it because you have not really answered the question. It just begs a fundamental question: of your users, how many are users who have given you their bank account details? Does everyone? I do not know, I have never played your game.

Neil McClarty: You don't actively have to.

Q474 **Paul Farrelly:** It is only when you come to make a purchase?

Neil McClarty: Only when you actually want to make a purchase do you need to.

Q475 **Paul Farrelly:** Roughly how many of your users? Do you know how many have given you—

Neil McClarty: Several millions of records of users over the 18 years.

Q476 **Paul Farrelly:** I am just trying to get a feel for the potential scale of the numbers you would have to deal with who might potentially have a problem. Of course, when there are so many users, I do not want to get one or two cases out of context, but one problem is one problem too many.



Neil McClarty: Always, yes.

Q477 **Paul Farrelly:** Some of the things that have been said in terms of the limits are quite staggering for me because it puts microtransaction in context. These can be macrotransactions. You also say that your limits are for fraud so that the bank of mum and dad is not being illicitly used, rather than just focusing on people who might not be able to afford those purchases. Why is the motivation for caps just fraud?

Neil McClarty: Ultimately, we recognise that our audience is largely of adult age and for the extensive retained audience who have been playing for such a long period of time, we feel that the current thresholds are sufficient and that they provide people the freedom to do so. We put a huge amount of effort into making sure that accounts are secure, accounts are safe. Kelvin mentioned the amount of effort we go to to ensure that people have as much information as possible. People do have the freedom of how long they wish to play and how much they want to pay.

Q478 **Paul Farrelly:** When you prompt people who have not been on for a while to say, "This is what you have missed", do those prompts differ depending on how much a person has spent on your platform?

Neil McClarty: No. Largely, it is very much based on game play.

Q479 **Paul Farrelly:** It is just time?

Neil McClarty: Not just time, it is the progress that they have made in the game more so than time invested. For example, if I was a character that was level 20 versus a character that was level 80, there will be particular pieces of game content that is relevant to me. When we talk about data and how we use data in a responsible way, it is largely driven around—obviously, like any other entertainment medium—wanting people to engage in our game and play our game.

Q480 **Paul Farrelly:** Okay, the word "largely" covers a multitude of sins, potentially. Just to be quite clear, if I am a user who has never spent anything or I am a user who on average might spend £10 a week or a user who might spend £100 a week, if I have not been on for three or six months you are saying there is no difference in the way any of those categories would be prompted?

Neil McClarty: In that example, no.

Q481 **Paul Farrelly:** In that example? What differences in prompts do you have?

Neil McClarty: As I said, when we are looking at people who have not played for a long period of time, our focus is very much on getting them playing again and giving them the relevant content for them to engage in. We do use our game data to provide people with different options. It may be that for someone who has not paid or played before, we may make them an offer if they wish to engage and make a payment, but no



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different to something where we would also prompt them by saying, "Try a piece of content" that they have not done in the past. We use our data responsibly but, of course, what we are ultimately trying to do is make them, like any medium, play and engage with the content.

Q482 Paul Farrelly: You understand the point I am trying to get to and I do not want to hedge around that example or "largely". Mr Plomer, have a go at it. You understand the point I am making? Are people treated differently depending on how much they have spent?

Kelvin Plomer: As Neil said there, we will make potential offers, a 50% discount on membership or on a microtransaction purchase, et cetera. We will do that and we do that as a matter of course. I would not say we do that particularly aggressively and equally it is alongside, as Neil says, enlightening people about the game play. We update them.

Q483 Paul Farrelly: If you have spent something you might in some fashion or other be prompted, encouraged or whichever word you use to spend more, "Have you tried this? Have you tried that?"

Kelvin Plomer: Not as a blanket across the board on all users in that we do not bombard all of our players continually with offers. In fact, we actively don't do that. However, yes, there are situations where we do that.

Q484 Paul Farrelly: Okay. I am going to wrap up because I want to talk very briefly about the example that we have had. Before I do, you have said that there is only one player in the last 12 months that has hit your limits. I would not dream of asking you here for a model that you might already have internally, "If we had lower limits, how many people might do that?", but it might be something that a regulator in future might have the powers to ask for, whether it is commercially sensitive or not. We have this evidence and we have seen the correspondence behind the anonymous evidence, which is anonymous because the identity is sensitive. This is a member of the public who said his son built up debts of over £17,000, which included at one point £247.95, evidenced by bank statements, spent in one day on your platform. He wrote a heart-wrenching story about how they had had to bail their son out and spent their life savings. I hope you do not get many of those letters. We also have a copy of the reply from one of your customer service managers. Mr Plomer, I imagine you are responsible for him.

Kelvin Plomer: Yes.

Q485 Paul Farrelly: It is very much a reply that says, "We can't engage with you because of data protection unless your son comes to us".

Kelvin Plomer: That is correct.

Q486 Paul Farrelly: "These are the tools that are available for him to do things if he wishes to."

Kelvin Plomer: Yes.



Q487 **Paul Farrelly:** It reads very much like a standard letter, so I get back to the opening question as to what happens in the company from your side more compassionately that says, "This father has a point here. We know the son's circumstances. We should do something about this ourselves".

Kelvin Plomer: It is very difficult because I am not going to comment on an individual here.

Paul Farrelly: You can generalise from the case.

Kelvin Plomer: Yes, I certainly can generalise off the back of the submission. I know that we will empathise and when anyone is talking about experiencing any potential problems we will reference organisations like the Samaritans that people can talk to. Fundamentally, and I do need to stand by this, our privacy policy and GDPR regulations do state that it has to be the owner of the account that requests any change to the account.

Q488 **Paul Farrelly:** Yes, but they do not stop you taking something seriously proactively and not so dispassionately inside the company.

Kelvin Plomer: Yes. However, there are questions of where responsibility lies and I think that is part of what you potentially may be getting at. There is a host of things that people can do. There are parental controls and spending limits that can be done and set on a computer, on a mobile phone and so on. Those things are there. We provide information in terms of parent support on our website for people, and on a case by case basis we will make a judgment as to what we feel is right in that case. Some of that could include refunding and goodwill refunding of purchases, as well as, as I say, the advice—specifically, what they can do to change that situation.

That is a really important point here, if I might say. The individuals in this internet age do need to know and understand what they can do and what their responsibilities are. We are extremely responsible in terms of how we use our data and a whole host of things that I explained to you there in terms of our responsible outlook. We do need individuals to make requests, and then we are happy to—

Q489 **Paul Farrelly:** I take the point. I only have one further question, but you will understand that people listening to that answer—and I am sure it will apply to your major competitors—will think that the approach you take is, "Get your son sorted. Sort him out, guv. It's not our fault".

Kelvin Plomer: I think we provide the means by which an individual can request help from us, and we will do that without question.

Q490 **Paul Farrelly:** My final question. There are links that we are exploring in terms of future regulation with the gambling industry. Are there any facilities in this respect for people to block themselves or be blocked or limited that gambling companies online in particular implement currently that you think you can learn from? Best practice?



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Kelvin Plomer: We do not view ourselves as a gambling company in terms of what we provide and the service that we provide. Items that are obtained through purchases or through gameplay are confined within the game. They cannot then be cashed out and sold for real money in the real world.

Q491 **Paul Farrelly:** That was not the question. Are there any elements of best practice to tackle the problems that we have encountered in this example that you have seen in the gambling industry that you might learn from?

Kelvin Plomer: I have not looked and I do not know specifically or even generally what you are referring to in terms of—

Q492 **Paul Farrelly:** Just elements of best practice.

Kelvin Plomer: Such as, may I ask?

Q493 **Paul Farrelly:** I am asking you.

Kelvin Plomer: I am not aware of and I have not looked into best practice around gambling because gambling is not our business. That is the point that I was just trying to make to you there.

Paul Farrelly: It was not my question, but let's move on.

Q494 **Simon Hart:** Just a quick one on the back of that. You mentioned earlier on that there was a six-hour time limit, following which you had to log out. Why did you choose six hours? What is so magic about six hours, and what harm are you attempting to prevent by installing it?

Kelvin Plomer: I would probably answer that in a slightly different way. We used to have log-out time—I am just trying to remember. Neil, it was a lot sooner than that, wasn't it?

Neil McClarty: Maybe four.

Kelvin Plomer: Yes, around four hours. Our community did not like it. Our community did not like the fact that on occasions they were being forced to log out, certainly when they were completing a new piece of content, a new quest and so on. In response to that, we did relax that.

Q495 **Simon Hart:** Why did you have a log-out at all?

Neil McClarty: If I may, as I say, we deeply care about our players and we do recognise that people should take a break. They should take a moment away from their screens and relax—

Q496 **Simon Hart:** That is my point, really. In a sense, you are suggesting that if they extend their presence in your space, there is a potential downside. There is a consequence to long periods online, which you are worried about. Whatever is—

Neil McClarty: I would not limit that to screens or games. I would say anyone reading a book for six hours should probably take a breather as well from staring at something for such a long period of time.



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Q497 **Simon Hart:** You said you have struck up a relationship in the mental health arena, too. I am not aware of any bookstores having that concern. There is evidence we have heard in this Committee about the potential impact on mental health from long periods in this area. Are you aware of that? Is your particular policy maybe a reaction to the fact that there is evidence that there might be a mental health consequence, and is that why you are forming a relationship with mental health charities, and is that why you are putting a time limit or recommended time limit on your games?

Neil McClarty: Those time limits have been in place for several years, but I would say before many of these conversations had arisen. I do not think they are a reflection of the current climate of this stuff.

Q498 **Simon Hart:** That is not quite my point. The point is, do you accept at all that there is evidence of mental health consequences arising out of the addiction that this Committee is looking into, or is it an entirely coincidental situation that you are putting time limits on and having relationships with mental health charities? Is it completely unrelated to the fact that there may be evidence that suggests there is a connection?

Neil McClarty: I acknowledge that with anything that you may do for a long period of time, with any entertainment medium, I do believe that there will always be a minority of users that can over-engage and immerse themselves too far. It would be naive of us to think that games would be any different to that, and it is our responsibility to make sure that we provide what we deem to be suitable breaks and also information that actively encourages a sensible lifestyle.

Q499 **Simon Hart:** Would I be right in saying that the six-hour limit that you put on you believe to be about the maximum reasonable uninterrupted period of time anybody should spend on your game? That is it?

Neil McClarty: We are very comfortable with that level. I do want to give context to the Committee. Again, this varies largely depending on the type of game. RuneScape is a very passive game. It is an experience where a large amount of the time you can very much do other stuff alongside it. It is not a lean-in, action-orientated game. It is a very social game. It is a game where you are passively engaging. You could watch something on Netflix while playing it. It is not intensive in terms of your mind. It is something that you can do. We are very comfortable with where those limits are in reflection on our game, and it is important for our game. That is where we are comfortable.

Q500 **Rebecca Pow:** Thanks for coming, gentlemen. Just a few points. I think you said the average age of a person using your game, which is a fantasy game, is 22. Do you have any statistics on the average spend per paying user? Quite a lot of users are taking it as a free game, are they not?

Neil McClarty: Sure.

Q501 **Rebecca Pow:** Do you have any details of that?



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Neil McClarty: Not to hand, and it is not something that we would be comfortable disclosing.

Q502 **Rebecca Pow:** You must have that information.

Neil McClarty: Of course, yes, but that is not information that we would share, typically. It is not something that is public domain.

Q503 **Chair:** I am interested in the sensibility there, because you said earlier on that for daily users the average spend per year is £45.

Neil McClarty: Yes, £45 per year.

Q504 **Chair:** That presumably would be commercially sensitive information you have shared, but I just wondered why you were not able to answer Rebecca's question.

Neil McClarty: Again, your colleague, Mr Knight, mentioned earlier that there is obviously a large difference between all of our users, and that particular number varies wildly, again, depending on the type of player, different region, different territory.

Q505 **Rebecca Pow:** I am imagining, with all your data—these things are very much data-led—that you must know what the average spend is. Clearly, you are a very large business, a very large company. Can you give us just a bit of background on how many people you employ or are engaged in your business in the UK?

Neil McClarty: Of course, yes. We are solely based in Cambridge in the UK. We have around 380 or 390 employees in total in the office. As I said, we have grown originally from a team of two brothers coming from Cambridge University and grown from that point.

Q506 **Rebecca Pow:** It is a franchise business, is it not? Worldwide, do you have lots of other businesses set up?

Neil McClarty: No. When we talk about franchise, we are talking more about the brand and the IP of RuneScape. We consider that to be an intellectual property that can spin off in different variations. When we talk about the franchise, we are talking about every variation of RuneScape, whether it is, as your colleague mentioned, the Old School-version RuneScape that has been running for 18 years. We look at stuff as merchandise or memorabilia. It is the entirety of that franchise when we talk about it.

Q507 **Rebecca Pow:** The base is here.

Neil McClarty: The base is solely in British—

Q508 **Rebecca Pow:** I was interested in that you know what the average spend per paying user is and you will be working on that, so your designers and the people creating the games, as well as being creative, do they have a monetisation side? Are they trying to design the next step again that you will hook people into to get them to part with more funds?



Neil McClarty: We have a team of around 80 working solely on RuneScape full-time, a mixture of designers, artists and so on. The way we break our products up is that we will have small satellite teams within the studio, a mixture of developers, artists and so on, who will work on individual pieces of content.

Q509 **Rebecca Pow:** They are obviously trying to extract money from people, because otherwise what would be the purpose of your business?

Neil McClarty: As I said, a large, large proportion of their business is providing content that justifies the subscription price. From our perspective, people who are paying us £7 a month, much like any subscription business, whether it is Netflix or something else, you have to justify that cost. The majority of our time is spent solely on providing content for them to engage in on a regular weekly or fortnightly basis. It may be creating a quest. There are some teams that are working on content that does have the additional services attached to it, and that is again very much a content-by-content element. It is certainly not at the forefront of elements of mind. We very much consider ourselves a subscription game that is regularly creating new content.

Q510 **Rebecca Pow:** I just want to ask you—it is touching on Mr Farrelly's point that he was trying to draw out of you—whether you thought there were any models that are a category you come into. You said you categorically were not a gambling industry, and yet people are effectively gambling away their money. We have had a lot of debate in Parliament and now we are bringing constraints on fixed-odds betting terminals and bringing down the amount of money people can spend on them. Do you not think that you fall into that category?

Neil McClarty: Fundamentally, no, because for us, as Kelvin mentioned to Mr Farrelly, the items that people are purchasing in RuneScape are exclusive to RuneScape. They do not have a real-world value. They are items that—

Q511 **Rebecca Pow:** Gambling fixed-odds betting machines are just about fixed-odds betting machines, the same as you are about your game. They are all about extracting money from people.

Neil McClarty: Again, not being an expert on gambling, in those examples there is the real money element to that, which is not the case for a game like RuneScape. Those items that you are referring to remain within the game. They are only utility for the players who are using them. As I said, it is only a very small proportion of our player base that are at all interested.

Q512 **Rebecca Pow:** They have still spent their money in the first place.

Neil McClarty: Of course.

Q513 **Rebecca Pow:** Yes. I am just trying to draw out of you whether you are at all conscious that your amazing technology and creativity has grown



like Topsy, and I just wonder whether you are aware of this other social knock-on effect that—we are discovering through this inquiry—many of these games are having on society in terms of mental health impact and addiction. We have had one guy, Dr David Zendle, who said, “The games are really trying to create a continuous desire in people, wanting to make them continue playing but also continue spending money”.

Neil McClarty: I would agree with the gentleman you mentioned there in regards to continuing wanting to play. I do not think that is the case. The pay element is a consequence of people wishing to play, enjoying playing and immersing themselves into the content. Our focus is not on getting people to pay. It is very much focused on retention of that player base and engagement in our content.

Q514 **Brendan O’Hara:** Again, thank you for coming. It is very much appreciated. Can I ask, when you are designing a game, how important is it to your business that you are able to maximise the amount of time and money a player will spend in the game?

Neil McClarty: Sorry, could you just—

Brendan O’Hara: When you are designing a game, when you talk to your designers, how much importance is put on making people stay and spending money?

Neil McClarty: As I said, again, on a content-by-content basis, we think a lot about the amount of content that we are trying to target. It may be that for a piece of content we are intentionally looking for something that can be done in 10 minutes, or it could be something where we are intentionally looking for something that is quite episodic and could take several hours to complete. When we do large expansions of content twice a year, you are talking tens of hundreds of new game content. Our focus is very much on: what is the content we are trying to create? How much do we want the player to engage in it? How regularly do we want them to engage in it? How do we want them to engage in it? As opposed to the spend element that you are referring to.

Q515 **Brendan O’Hara:** Did you employ behavioural designers, and are they encouraged to monetise the game?

Neil McClarty: We do not have behavioural designers. We have a game design team that oversees the entire game and all elements of that. As I said, there are teams that are focused on pieces of content that do have a monetisation tilt to them, and obviously from their perspective they are looking at what would make this piece of content, first, important to engage in, and secondly, if players so choose to, pay for it.

It is probably worth me giving an example. We would do maybe a two-week game event where we take over a particular area in the map world. We do a thing in the summer called “the beach”, and we will basically dress the areas like a beach kind of event with coconut shies and things for people to engage in there. Players can happily engage in that content,



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and if they choose to, they can also buy the outfit and dress up in beachwear and get a straw hat and t-shirt and shorts. They can engage in that content freely and wear what they want, but if they want to go for that extra element and really engage in it, they can do.

Q516 **Brendan O'Hara:** I would not expect anything less of you to come and defend your business and your game, but you are a one-billion-pound business. Is that right?

Neil McClarty: Dollar.

Q517 **Brendan O'Hara:** Sorry, a one-billion-dollar business, but you seem to be giving the impression that it is a passive, benign space that you occupy. That is not the impression we have been given from previous evidence sessions that the game industry is not passive and benign. Are we wrong to think that perhaps it is not?

Neil McClarty: I love the fact that I work in games because of the fast-paced nature, the level of innovation, the different platforms, the different types of immersion that it has. For us, what I can say, solely focusing on Jagex, the games that we make are incredibly passive. They are not your typical staring at the screen, controller in hand. This is very much a social game. It is as much about talking and chatting with people online as it is actually engaging with the game.

As I said, it is a bit unfair to comment on the industry, but I do think it is horses for courses. Normally, your games will have different levels of immersion. For us, that passive style is exactly what we love about RuneScape.

Q518 **Brendan O'Hara:** Do you think games can be addictive?

Neil McClarty: I think any entertainment medium can have an immersive side, and it would be naive of us to think that games are excluded from that.

Q519 **Brendan O'Hara:** Do you think RuneScape is addictive?

Neil McClarty: No.

Q520 **Brendan O'Hara:** Not at all?

Neil McClarty: Kelvin mentioned earlier that we are very cognisant and very sensitive to anyone who feels that they have addictive natures when they are playing RuneScape, and we address those as proactively as we possibly can do. In terms of numbers, you are talking about 0.0% of the amount of players and the amount of correspondence that we receive. For us, it is just not something that—

Q521 **Brendan O'Hara:** I remember the figure of 0.05% of people who use the word "addictive" in correspondence to you, but that is hardly empirical evidence, is it? Do you reject that RuneScape is addictive?

Neil McClarty: I reject that.



Kelvin Plomer: Yes, and I think this Committee has heard evidence that some people believe games are addictive, and some people believe games are not addictive. We are not psychologists. We are not mental health experts. We are experts in our area, in our game, in creating a successful British game that we see as very community-focused. It is a living game. It is about creating those experiences. There are players that stay with us for eight years.

It is part of an almost tribal alignment that individuals have, whether it is to a football club or a rugby club and so on. People feel that passionate about RuneScape, and we absolutely love that. When Neil then talks about the gameplay that we deliver, that our designers create, it is around giving those players what they are asking for in terms of their ability to continue to explore their affinity with RuneScape and enjoy the content in it. That is our focus and that is what we are about. I think that is quite a benign enterprise.

Q522 **Brendan O'Hara:** You say that you are not psychologists, but you have to accept that you do have a responsibility. Mr Farrelly was talking about people running up colossal amounts of debt. You do have a responsibility. You cannot be a passive bystander in this, can you?

Kelvin Plomer: I do not think we are. I do not think we are passive bystanders in it because we do a tremendous amount to try to educate and provide information to our player base around issues of mental health. Those are not specifically related to gaming. I think they are societal problems.

To the point that was raised earlier on, where we have aligned ourselves to mental health, that came from internally our staff and us experiencing from our staff increased issues around mental health. We upped our game internally from our HR department and our wellbeing programmes and so on. When we were then looking at a real focused and co-ordinated CSR approach, it was logical for us to go down a mental health angle on that. Through that, I would say, we are not ignoring any of these things. It is trying to say to our players, "Look, if you are struggling with any aspect of mental health, this is how you can get help".

Q523 **Brendan O'Hara:** How do you communicate that?

Kelvin Plomer: How do we communicate that?

Brendan O'Hara: Yes.

Kelvin Plomer: We have done a number of things. Twice a year we will run in-game events that are focused around mental health, and 100% of the funds from those will go to our mental health charities. As I referenced earlier, we have characters in game who represent three of our charity partners, and players can interact with them. There is basically a question-and-answer with some basic information and facts around mental health, and then further links for people to potentially be able to get help and assistance. In addition, we have used our social



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media team to then push out profiles of those charities, again with the information and links should people want to get help.

One further thing, if I may. At our fan event, RuneFest, which is held once a year and we have approximately 1,500 players who come to experience a real-life fantasy of RuneScape, we have our charities there. We had a quiet room where our players could come and talk to mental health professionals, should they wish to.

Q524 Brendan O'Hara: Does it not concern you, though, that as a business you feel the need to give out mental health advice?

Kelvin Plomer: I think every business needs to do that.

Q525 Brendan O'Hara: You do not think you are part of the problem at all?

Kelvin Plomer: No. I think that mental health is a growing problem in society.

Q526 Brendan O'Hara: Absolutely, but you are not part of creating that problem? You think you are part of the solution to it?

Kelvin Plomer: No, I do not think we are part of creating that problem at all. If you are talking about a million players in RuneScape, that is representative of society. You cannot get away from that. There are a whole range of positives and potentially negatives in the minority that those people will experience.

The other thing that I would like to challenge on that is there are positive aspects to gameplay. There are significant positive aspects to gameplay, whether that is social skills, whether it is improved cognitive behaviour, whether that is people learning how economies work because we have a very real virtual economy in RuneScape, and so on. All of those things are valuable life lessons. The fact that people can set themselves targets in terms of achievements and follow pathways on that within RuneScape, those are key valuable life lessons. All of us as project managers in our work need to be able to do that and manage to it. RuneScape does give our players elements of that, and they comment on it quite freely and openly.

Neil McClarty: The other part of it is we regularly survey our players and why they play RuneScape. The top answer is always, "As a way to relax, as a way to get away from the stress of the real world." They genuinely see RuneScape as a release for them and as a pastime. As Kelvin said, the positives of RuneScape and gaming—all of the elements that Kelvin has covered—there are so many of them.

Q527 Brendan O'Hara: A couple of last questions. On the six-hour limit, what is the longest you have ever recorded someone on RuneScape doing six hours, immediately logging back on, six hours, back on? What is the longest?



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Neil McClarty: I do not have that to hand, but again I would be happy to share that with the Committee afterwards. That would be no problem.

Q528 **Brendan O'Hara:** The six-hour limit again. Is that in all cases without exception?

Neil McClarty: Correct.

Q529 **Brendan O'Hara:** There is no level at which you get in that game that the six hours does not kick in?

Neil McClarty: Correct.

Q530 **Brendan O'Hara:** There are no exceptions? A player cannot circumvent it?

Neil McClarty: Correct.

Q531 **Brendan O'Hara:** How often do you use the six-hour cut-off? How many players play six hours and have to be cut off in an average week or month?

Neil McClarty: Again, I do not have that to hand, but I am happy to share it. As I said, on average, the majority of our players are not hitting those thresholds because they are playing at that two and a half hour—

Q532 **Brendan O'Hara:** I would not expect the majority to hit that threshold. It would be a serious problem with RuneScape if the majority of your players were playing for six hours at a time. If you could get the figures as to how often in a week or a month that that six hours is—

Neil McClarty: Absolutely. I am happy to share that.

Q533 **Brendan O'Hara:** Finally, do you think that you and your peers in the industry are acting quickly enough to address the concerns of the potentially addictive nature of gaming, or is there still a deniability out there that it is not addictive?

Neil McClarty: Not to dwell on what we have mentioned before, we run a live game. We run a live service. It is a free-to-play game at its heart. People talk with their feet. If our players are dissatisfied, unhappy, they will no longer play those games. That is why we—

Q534 **Brendan O'Hara:** They will if they are addicted to them.

Neil McClarty: We deeply care about the wellbeing of our players. The fact that we have players who have been playing for multiple years, we are very proud of the fact that we have that. In those cases that you do mention, which are incredibly rare, we provide all of the necessary information to support them through that difficult period.

Q535 **Brendan O'Hara:** Again, I know people who have been drinking for years. It is not because they particularly like it; it is because they are addicted to it. That is the point I am making. Is there not a problem in the industry that it is not recognising the addictive nature? These are not



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loyal customers, or they might not all be loyal customers. These could be addicts. Do you think you and the industry are doing enough to identify the difference between a loyal customer and someone who is addicted to your product?

Kelvin Plomer: As I said earlier, there is evidence to suggest potentially there are players who are addicted to games, and there is more than enough evidence out there to suggest there are not. That is part of the evidence that has come to this Committee. We are in the middle of that. We are not the experts in that. However, we feel we do a lot, as Neil said, both to engage a passionate player base and do the corporate responsible things that we feel we should as a business.

Q536 **Jo Stevens:** You have an incredibly successful product, have you not? I am astonished at the revenue it generates and the growth that you have achieved, but if you produce a product, you have to look at product safety. I am interested to know what you do when you make your product, when you create it, what you do when you are looking at risk. The risk that your product creates. What do you do?

Kelvin Plomer: I would say a lot of our focus is around the chat moderation and the risks around that.

Chair: Sorry, Mr Plomer, to interrupt you. Would it be possible for you to remove the sheet of paper for the microphone? Thank you very much.

Kelvin Plomer: Sorry.

Jo Stevens: Chat moderation.

Kelvin Plomer: Yes. In terms of players online potentially being at risk, it is a very, very small proportion. 2% of our players are under 18, but we know we have players aged between 13 and 18 in our game. We are looking for and proactively searching for any inappropriate conversations in there, whether they are sex and underage, whether they are acts of terror, whether they are self-harm, and then escalating to your important—there is a risk to those players, a genuine risk. We have seen situations where we have escalated it to police. On social media, a player has commented, “Jagex sent someone round to knock on my door to make sure I was okay.” Sometimes it is a false alarm, and sometimes it is genuine.

Q537 **Jo Stevens:** The focus is on safeguarding, your risk model is on safeguarding?

Neil McClarty: If I may add, that is one element. The other side that I would say we take a huge amount of concern around risk is our data provision and the safety of our data for our players.

Q538 **Jo Stevens:** I am going to come on to data in a minute.

Kelvin Plomer: Of course. No problem.

Q539 **Jo Stevens:** You also said, “We are not psychologists. We are proactive.



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Some academics say immersive technology is addictive; some say it is not. Would you be willing to help academics in their research to look at this issue? We have heard evidence—I think it is quite powerful evidence—about the addictive nature of some games. Would you, as a leading company, be willing to share information with academics in order for them to carry out proper empirical research into this issue?

Neil McClarty: Wholeheartedly, yes. Again, talking more broadly, the internet and the gaming industry are incredibly fast-paced. It is incredibly innovative. With any of these issues, the co-operation between the internet service providers, social media, online networks, the Government and ourselves, all of those different initiatives, more communication and talking about how to address the not-so-nice side, and in consequence of that—we absolutely believe that that is a responsibility on us as much as everybody else.

Q540 **Jo Stevens:** That is really good to hear, because my sense from listening to your evidence up until now has been that all the steps you are taking are reactive, rather than proactive, as you have suggested. I think for all of us it would be really helpful if there was some clear scientific research and data that can help you when you design and create new products in the future, to take that risk element more broadly into account, so not just the safeguarding stuff but the addiction stuff as well.

I wanted to ask you about data. You mentioned it earlier. How much can you identify about a particular player from the data you collect about them?

Neil McClarty: As we mentioned earlier, when someone creates an account for RuneScape they are required to give us their date of birth, their e-mail address, and so on. We do collect their location from where they are logging in via the internet and so on. Beyond that, the large amount of data on top of that is game data. That is looking at the progress that they have made in the game, the content that they have engaged in. If they do decide to make a payment for any of that, that information is also collected.

It is important, and we take it incredibly seriously. We do not share or sell any of that information to third parties. When we review that information, we are not looking at an individual basis. We are looking at much more of an aggregated data set to make our decisions based on that.

Q541 **Jo Stevens:** I think you said earlier that you use your game data to make offers to get players to engage with particular types of content. What triggers you to contact a player with messaging to encourage them back to the game? How long do they have to have been off the game before you directly contact them to say, "Come back in, and here is an offer, a discount on X, Y or Z"?

Neil McClarty: There is not a hard and fast rule. If they are not playing, really the only way we can directly contact someone is via their e-mail



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address, if they have given us permission to do so. We will typically reach out to someone, if they have not played, maybe one or two months afterwards. Again, it is largely based on the game content and whether or not that piece of game content is something that would appeal to them. There is no point in me contacting an individual about a new quest, for example, that they are not able to play. Really the driving force behind us using data is to make sure that we are providing the right experience, the right piece of content, to the right user at the right time.

Q542 Jo Stevens: If I am a player and I play for six hours, and then I stop playing, and I stop playing for an hour, is it possible that I could receive an e-mail from you in that hour to tell me to get back on the game because there is a discount available to me?

Neil McClarty: A lot of those campaigns are completely manual. You would have to be very unlucky or—

Q543 Jo Stevens: It is possible?

Neil McClarty: It is very, very possible, but very, very unlikely that that is the case.

Q544 Jo Stevens: On that six-hour period where you log out of the game, how quickly can you log back in? Can you do it immediately?

Neil McClarty: Sorry, say that again.

Jo Stevens: The six-hour limit where—

Neil McClarty: Yes. Sorry, yes.

Jo Stevens: If I reach my six hours, can I then log back in immediately and start playing the game? What is the gap between the first six hours and the second six hours?

Neil McClarty: It is almost immediate. Really, as I said, the auto log-out is very much a prompt to take a break. It is to break that potential immersion to say to the individual, "Take a break. Go and make yourself a cup of coffee. Grab a sandwich". It is not there to enforce a particular period—

Q545 Jo Stevens: I see. It does not automatically log me out, then?

Neil McClarty: Yes, it does, but if you so choose, you can log straight back in.

Q546 Jo Stevens: Straight back in. Fine. Do you use individual player data to increase monetisation of users?

Neil McClarty: No. I think what we would do, as I said, is use the data to focus on engagement in the content. Whenever we are making a piece of content, the key goal, the key metric that our team are looking for is for that particular piece of content, how many of the addressable audience that we were targeting in that piece of content have actually engaged in that piece of content? We are trying to get as many people as



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who wanted or possibly could play that content to play that content. Some of those pieces of content have monetisation attached to that, and for some they will engage in that.

Q547 **Jo Stevens:** Has the way in which you collect data from your players changed over time? I think you said earlier you do not sell user data at all to anyone.

Neil McClarty: Yes. Kelvin and I have been at Jagex for a long time. From recollection, for a large proportion, the very early years of RuneScape, we did not collect any e-mail addresses. I think we added that around 2010. We added that as an additional element or option. Most recently, we have made huge provision to become GDPR compliant last year, so around 600 hours of work internally to make sure that we fully met the new compliancy.

Q548 **Jo Stevens:** Did you have to change anything that you did pre-GDPR to post-GDPR?

Neil McClarty: Yes, absolutely. One example that is relevant is the opt-in versus opt-out for marketing e-mails.

Q549 **Jo Stevens:** Anything else particularly?

Neil McClarty: Kelvin, can you think of anything?

Kelvin Plomer: It was more around the facility for the individual in terms of their right to delete data, their access to data and so on. We did have to spin up new processes around that in terms of data collection and redaction of certain elements of data, so we could then send it to an individual. That stuff certainly we had to change.

Even to the extent of credit card storage. That is through our credit card supplier. We do not hold those ourselves. Again, that means that we are being extremely responsible in terms of financial details.

Q550 **Jo Stevens:** You collect date of birth, do you not? Did you used to do that pre-GDPR?

Kelvin Plomer: If you go back 10, 12 years or so, we did not collect date of birth. We brought that in to ensure COPPA compliance with the US law, and then we put it in that gate.

Q551 **Jo Stevens:** Is that how you determine whether a player is a child or an adult, that date of birth?

Kelvin Plomer: Yes.

Q552 **Jo Stevens:** If I have a date of birth and I am playing the game, and you know I am a child, and I am using a credit card to purchase extra things on the game, what do you do then? Obviously, if I am a child, I cannot use a credit card.



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Kelvin Plomer: Because you need to physically have the card, there is parental consent, I suppose, in allowing use of that card. There are other ways to pay as well. There are game cards that you can buy in game stores and so on that people can also use to pay for subscriptions.

Q553 **Jo Stevens:** Do you ever look at the behaviour of child players on your game compared to adult players, so in terms of how much they are playing, the sorts of things we have been talking about today, those sorts of metrics?

Neil McClarty: Not explicitly, no. I think we—

Q554 **Jo Stevens:** Is there a reason for that?

Neil McClarty: No, there is not. Again, we are incredibly comfortable with the passiveness of the gameplay that we provide. We do age it to 13-plus. RuneScape is not a violent game whatsoever. There is not what you may see in other games. It is very much a quirky, fun, British, humorous kind of game, like Monty Python jokes and so on. There is nothing in there that we find to be not something that we would be happy for a 13 year-old to engage in versus a 23 year-old to engage in.

Q555 **Jo Stevens:** You mentioned earlier chat rooms. If I am a shrewd kid and I am 10 years old, and I put a false date of birth in, and I play the game and I go into the chat room, you cannot tell that I am a 10 year-old, can you?

Kelvin Plomer: No. If someone was to put in a date of birth that was under the age of 13 and then try it again because they were blocked, they would be blocked through the cookies that are stored on the device.

Q556 **Jo Stevens:** Yes, but it is only if they attempt it twice. If they just put in a false date of birth—

Kelvin Plomer: Yes. If they just put in a false date of birth, yes.

Q557 **Jo Stevens:** Your age verification system—a bit like Snapchat, which we heard last week—you can get around it.

Kelvin Plomer: I would say that is general practice in terms of internet sign-up. Generally, you ask an individual to enter a date of birth, and you are proceeding on that basis, rather than asking for ID to create an account.

Q558 **Chair:** You have Facebook log-in for RuneScape, do you not?

Neil McClarty: Yes. Rather than creating an account, you can log in using your Facebook credentials, correct.

Q559 **Chair:** In the permissions for the Facebook log-in, what Facebook data are you requesting access to from the users that log in through Facebook?

Neil McClarty: Just the absolute minimum. We are not asking for permission to post. We are not collecting any further information. I would



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have to double-check exactly, but I know it is the absolute minimum that is required that we can collect.

Q560 **Chair:** If you look on their Facebook for developers page, it lists quite a range of options about accessing data about things that people have liked on Facebook, things that people have engaged with on Facebook, as part of the profile of the Facebook user, and that is all data that a developer can ask for when creating a log-in mechanism. Do you gather that sort of data? There is nothing wrong with it. It is perfectly proper.

Neil McClarty: We choose not to. The reason that we see the benefit of having Facebook log-in as an option is really just to remove the friction for people having to have another account for something with another password. We see it as more as utility as opposed to an ability to collect data. Therefore, that is why we have it at the minimum.

We are also cognisant of individuals feeling comfortable about what they are sharing and how they are sharing and so on.

Q561 **Chair:** What data do Jagex or RuneScape share back with Facebook about Facebook users who are logging into the game via Facebook?

Neil McClarty: I do not know the specific information. Again, I am happy to share that with the Committee afterwards.

Q562 **Chair:** There will be some?

Neil McClarty: As I said, we share—

Q563 **Chair:** It is a normal part of the process.

Neil McClarty: We share none of our own data with any third party in terms of sharing or selling. In terms of sharing any of our data with Facebook, we do not share. The only information that is co-shared in effect is the linking between creating a RuneScape account with the creation of a Facebook account.

Q564 **Chair:** We will write to you at the end of the session anyway. There are a number of things you can get back to us on. Specifically on this, I would be grateful if you could just confirm, as part of a Facebook user logging into RuneScape through Facebook, as part of the permissions for that log-in, what are they giving their consent to in terms of Facebook data that is shared with RuneScape, and RuneScape data that are shared back to Facebook about that individual user? It will be about the individual account, rather than in general. I am not suggesting you just generally make your data available. It is normal as part of those agreements that there is some data sharing.

Neil McClarty: We are not sharing that data. All we are asking permission for is to say, do we permit that user to log into their RuneScape account with the log-in credentials of RuneScape? Therefore, we create a link between the Facebook account and the RuneScape account as a one-by-one link. An individual, if they choose to, can just



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one-click log-in with Facebook and then they are able to access the game.

- Q565 **Chair:** I absolutely understand that, but what is normal for those sorts of agreements is that there is some sharing of data between both Facebook and the company that they have created the log-in tool for. The user has to give their permissions for it, but it is normal as part of the agreement. When you write back to us, if you could just—

Neil McClarty: Of course.

- Q566 **Chair:** In the answers, just explain how that has been set up, what permissions are being asked for, what someone is giving consent to when they sign up online.

Neil McClarty: I am more than happy to share that with the Committee afterwards. It is just not information I have to mind. It has been a while since we did that.

- Q567 **Chair:** It is pretty technical and specific. I appreciate that. I would be very impressed if you had it all, chapter and verse. It is something we are quite interested in, and we would be grateful if you could confirm that in writing.

Neil McClarty: Again, we are more than happy to share that after the end of the inquiry.

- Q568 **Chair:** Do you have an in-house data team that analyses metadata of user play and experience on RuneScape?

Neil McClarty: Yes. We have a team of around 16 people, a mixture of both analysts and also data engineers and data scientists as well. We also have the IT security team that I mentioned to your colleague, Ms Stevens, around data security as well in the IT team. That group is around 16 to 18 people.

- Q569 **Chair:** Does the data team create data categories of players?

Neil McClarty: “Cohorts” is how we would refer to them. Absolutely, yes. One of the key founding principles of game design is that you are almost creating for a particular type of player. We have cohorts of four or five archetypes, basically, of players in our minds when we are designing for games. It could be someone who loves quests or someone who is a bit of a free-for-all, they like to do everything, or it could be someone who is a bit of a social butterfly, who basically does not really engage in the game content but is very much chatting and online and talking to people and so on. That is the standard across gaming. Yes, absolutely.

- Q570 **Chair:** How many different cohorts are there?

Neil McClarty: As I said, from a design principle, I think we have four or five. You could cut the player base into genuinely hundreds of different, small cohorts based on their geolocation, their length of play, how long they have—



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Q571 **Chair:** Yes. The data team probably has maybe hundreds of different cohorts based on different characteristics of play.

Neil McClarty: Absolutely.

Q572 **Chair:** What a lot of data teams would do is, when they created those cohorts, they would think about how they engage with people within that cohort, and maybe do it in a different way than they would with other people.

Neil McClarty: Yes. Again, like I mentioned earlier, we are doing that so that we are engaging the right group of individuals with the right piece of content. There are, as I said, hundreds of thousands of hours of game content. Some of that is locked behind progress. If I give you an example, there is an elven city called Prifddinas that you can only access if you are at level 75, which you must have played for several tens of hours to get to that level. We do not talk about that or show that to our users until they reach that level because it is just not relevant to them.

Q573 **Chair:** The basic job of the data team is to analyse behaviour within these different cohorts and then, presumably, there must be a commercial value to what they do. If you are not selling this data, you are looking to make the most of it yourselves, so presumably you are then looking at how you can improve the game to appeal to different cohorts. Would that be a fair description?

Neil McClarty: As I said, our absolute core key metric that we focus on is game retention and engagement. For us, if we are having players coming back, wanting to play, wanting to engage with the content, then we are doing the right thing and people will hang around. For the people who wish to pay a subscription or pay for the extra services, they can. Again, no one is going to want to pay for something that they do not want to engage with. Normally, people walk with their feet, and it is very key for us to make sure that people are really enjoying the game.

Q574 **Chair:** You mentioned earlier on, in response to Jo Stevens's question, "We are not psychologists". Does your company work with academics who are interested in analysing metadata about people's activities in games? There is quite a field of academic study, not necessarily just about addiction but about human psychology, based on social gameplay.

Neil McClarty: I would not say we proactively do that. We have done on an individual case by case if we have been reached out to. There are very few that have ever directly engaged with us and asked to work with us.

Q575 **Chair:** Hypothetically, you have the psychometric centre in Cambridge University. If they approached you and said, "We would be interested in analysing metadata about gameplay on RuneScape"—have you done that in the past?

Neil McClarty: Again, we are very conscious of our GDPR responsibilities.



Q576 **Chair:** And before GDPR?

Neil McClarty: Even before that, to be fair. We would never share information with anyone that had any level of individualism about it, but from an aggregated data set, we have done that internally. We would have to work out if the people that were requesting that were doing it in a fair and safe way with that data.

Q577 **Chair:** Yes, but I was asking, have you? Normally, when this data is shared, it is done in aggregated form, not in a personalised form. I just wondered, have you shared data?

Neil McClarty: Not that I can think of. Again, I am happy to go back to the data team internally and ask if they have had those types of requests in the past.

Q578 **Chair:** Yes, if you could ask if they have had those requests and if they could say when they have accepted those requests as well. Thank you.

Neil McClarty: Yes.

Kelvin Plomer: Sorry. I might just jump in on data usage as well, because there are additional use cases—for example, anti-cheating. There are a lot of people that use programs to cheat and gain progress within the game or mine resources and so on. That disrupts the genuine players' gameplay, and we put quite a lot of resource into that. We also use our data to help with our detection of the use of cheat programs, and also in customer support as well to help identify an account. We have done some modelling with work in terms of helping us create a probability list of, "Actually, this person is contacting us about X, Y or Z account." Often, when people contact you, they give you bits and bobs of information. They do not necessarily give all the information we need to find their account and sort their issue out nice and quickly. There are a lot of uses that we have in-house for data science.

Q579 **Simon Hart:** Just the end of Brendan O'Hara's comments. You were talking about addiction. I may have got this wrong, but the suggestion you were making was that because your game is essentially benign, somehow the length of time people might spend on it would have been less impactful than perhaps a game that was more aggressive. In terms of addiction, it is about time, is it not? It is not about content. It is about time.

Neil McClarty: Again, I am not an expert, but I could not comment on that. I feel that our genre of game is there to be intentionally immersive. We are a role-playing game. The intention of that type of game is for someone to create a character that lives in a world, and they become that character. In its very nature there is a sense of immersion.

However, in that market, as I said, I can completely disengage, other than a click, for a couple of minutes and quite happily watch an episode of something on television or Netflix. For RuneScape, it is very much that



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noise of the radio in the background. I say that to the Committee just because that is for us; that is not reflective of the entire industry.

Q580 **Simon Hart:** I take your point on that. There is a bit of me wishing maybe you should be an expert. You are producing this stuff. You are selling it to a global expert. Maybe you should be an expert on what its impact might be. Is that fair? If you were selling a food item, you would be required to by law. I just wonder why, in your capacity in this space, you do not feel you need to be an expert in what the ultimate impact might be.

Neil McClarty: I feel like we are world experts in a multitude of different areas. I do feel that we do a large part to make ourselves aware of the consequences of gaming, and we make sure that we do have the support in place for players. I do not necessarily believe that we do not have those provisions in place.

I think where we are experts is in running games, making sure that we are creating engaging content that players want to play again and again.

Q581 **Simon Hart:** In other words, it is in your interests for them to be addicted to it.

Neil McClarty: It is the same with any entertainment genre. It is our responsibility to make something that is—

Q582 **Simon Hart:** It is, until there is a demonstrable impact on mental health. That is the bit I am quite not sure about where we are getting here. You used the word “golf” earlier on. What we are seeing and what the other Select Committees have come up with and what individuals have submitted evidence to us about is the fact that extended periods of time engaged in online activity of this nature—not specifically, but of this nature—has a negative mental health consequence. That is not, as far as I am aware, being assigned to reading a normal book or playing golf. It is being assigned to online activity.

I suppose where I am getting is: is the value of your company based on predominantly numbers of participants, or on the length of time they spend, or both?

Neil McClarty: Sorry, to clarify the last part—

Q583 **Simon Hart:** The success of your company. Is it dependent on the number of people who are buying a subscription?

Neil McClarty: No. Very much the longevity of our users wanting to continue to play.

Q584 **Simon Hart:** It is in your interests for them to spend as much time, as many years as possible. It is in your financial interests. For the health of the company, it is in your interests for them to be on your game for as long as possible, for as many years as possible. Does that conflict with your commentary that you deeply cared about the wellbeing of your—on



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the one hand, you are trying to make a profit. There is nothing wrong with that. You are trying to expand your company, trying to do well. There is nothing wrong with that. Does that conflict with your responsibility to make sure there are no negative mental health consequences as a result of the longevity that produces the profit in the first place?

Neil McClarty: We are incredibly aware of the damaging consequences of addiction in any medium. As I said before, we are not naive enough to think that gaming does not potentially has that element to it. As I said, there are conflicting reports. Neither of us is here to say whether it is or it is not, but I know and I am very confident in what Jagex is doing in regards to making sure that if there are individuals who do have those problems, we are providing as much information as possible to make sure that they do feel supported and that they do have an education. It is as much about making sure that they understand not just the gameplay element, but it is also the societal—

Q585 **Simon Hart:** Yes, but it does require them to come to you, rather than, as you said, under GDPR conditions, somebody who might be concerned about a relative who might be having a difficult time as a consequence of online addiction. You cannot really react to that until they contact you directly under GDPR, so you do not really know how many people might be in that slot, do you?

Neil McClarty: I think that is fair.

Q586 **Paul Farrelly:** We are very much wrapping up now. I am sorry I just had to pop out for a few seconds while Jo was asking some questions.

Just in terms of getting people engaged, you will be concerned about people not using you and going to competitors. In your genre, who would you say are your main competitors? I mentioned League of Legends before. Is that a competitor?

Kelvin Plomer: It is a different type of gameplay. League of Legends is a five-on-five kind of match. It is very different to our spooling, make-your-own-adventure type of concept.

Neil McClarty: I would not limit it to games, to be honest. It is people's entertainment and pastimes. When we ask players why they have taken a break from RuneScape or why they have left playing RuneScape, a large amount of the time it is more time and having time to engage in that, as opposed to, "I have gone to play a different game." That was one of the driving reasons why we launched RuneScape on mobile phones, so that we allowed people the freedom, for the people who can no longer commit on average two and a half hours to play the game. If they wish to, they can still engage for a couple of minutes, 10 minutes here or there, where it fits around their lifestyle. We are not forcibly making people come back again and again every day. We totally understand and appreciate that it is a choice. At the end of the day—I play games a lot—you want to make sure that it fits in people's lifestyles.



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Q587 **Paul Farrelly:** You are here, other people are not. The limits on spending, the caps, the tools to self-limit in terms of time or spending: do you regard what you do as pretty much standard across the respectable industry?

Neil McClarty: I would not feel comfortable commenting on that. I genuinely believe the market to be so diverse, so different. There are so many different, innovative ways to engage and monetise audiences that it would be foolish for me to say that what we do works for everybody. We are very comfortable with it, but, again, what the market does and everyone else—

Q588 **Paul Farrelly:** I probably missed this, I am sorry. What is your minimum age that you ask people when they ask to sign up?

Kelvin Plomer: Thirteen.

Q589 **Paul Farrelly:** Thirteen, like Facebook?

Kelvin Plomer: Like a great many companies. I think.

Q590 **Paul Farrelly:** Yes, that is fine. I just missed it. By definition, when you say your average age is 22, it can only be based on the dates of birth that people give you.

Kelvin Plomer: That is correct, yes.

Q591 **Paul Farrelly:** Age verification is an issue across—

Kelvin Plomer: Yes. People will enter a date of birth, and based on that they will access the game.

Paul Farrelly: Yes. My son cannot change his date of birth on Facebook. You can only by definition be born on one day. Thank you very much. As I said before, thank you very much for coming in.

Q592 **Chair:** Just a final question from me. The only thing we did not particularly talk about in this session but I just wanted to ask about was: there have been occasional reports about some players engaging in abusive behaviour and conduct towards other people that are part of the world of the game. Do you have the ability to proactively identify bad behaviour, or do you rely on users reporting it to you?

Kelvin Plomer: Two things. I mentioned the chat, showing what we do 24/7, and a lot of that is around safeguarding behaviour and stuff as well. Then there are also some trigger pop-ups that happen in-game, if people are being particularly offensive in terms of solicitation, to say, "That is not appropriate for our game. Please stop." If they were to then persist, they would then be suspended from the game.

Q593 **Chair:** Those are your tools that are monitoring that, picking it up yourselves?

Kelvin Plomer: Yes.



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Q594 **Chair:** You warn people in play that they should not do that, and then I know there is a complaint mechanism that you have if people complain about an individual account on top of that, yes.

Kelvin Plomer: On top of that, yes.

Q595 **Chair:** You resolve to deal with complaints within 24 hours. Is that correct?

Kelvin Plomer: To deal with what, sorry?

Chair: To deal with complaints within 24 hours.

Kelvin Plomer: We generally say 48 hours to our player base, but about 96% of the time we are within 24 hours, and we are looking to improve that. I think 40% is within four hours.

Q596 **Chair:** For offenders where their behaviour is particularly bad, that would include blocking them from the game, would it?

Kelvin Plomer: Yes. We have our rules of RuneScape, our terms of service, and they are a series of quite detailed rules. A lot of them relate to gameplay as well as things like harassment, bullying and so on. Then we have a series of sanctions that we can take, which are temporary mutes or 24, 48 or 52 hours and so on, all the way up to a permanent mute so people cannot talk in-game anymore. Similarly, there are temporary and permanent bans where people are unable to log in to the game for periods.

Q597 **Chair:** Do you know how many permanent bans have been issued?

Kelvin Plomer: No, not off the top of my head. I can tell you on a daily basis we will issue about 23,000 offences. That is a combination of permanent and temporary offences. The vast, vast majority of that is related to cheating activity in-game. I do have it with me, if you are interested in those statistics, in terms of just how that breaks down a little bit further. Yes, 99% are for cheating activities in-game, and then seriously offensive language, 0.26%. You have people scamming, so people trying to con people out of items in-game, even though we do have safeguards within the game, so when players trade there is a warning of, "Do you really want to do this trade?" which is supposed to be a, "If it is too good to be true, it probably is, and don't do it," thing where people get scammed. That is 0.13%. For the community safety escalations that I mentioned, you are looking at less than 200 a year of those.

Q598 **Chair:** Thank you for those. Would you be able to write to us afterwards to say how many people have been permanently excluded from the game as a consequence of abusive behaviour, rather than cheating?

Kelvin Plomer: Yes. I will have to have a look. Sometimes we apply a permanent manual ban. Sometimes it is tied to a specific reason. I will see what information we can dig out for you on permanent bans particularly for abusive behaviour.



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Chair: Thank you very much. That concludes the Committee's questions. We are very grateful for your evidence this morning. Thank you.

Neil McClarty: Thank you very much for having us.