RULING BY THE CHAIR REGARDING APPLICATIONS BY TELEGRAM AND ROBLOX FOR A RESTRICTION ORDER AND SPECIAL MEASURES

1. On 29 October 2026, the Inquiry issued a third "minded to" note on applications by Telegram and Roblox for a Restriction Order and Special Measures. This set out the approach that I was minded to take in response to those applications. The Inquiry invited Core Participants, the media, Telegram and Roblox to make submissions in response to the minded to note. As a consequence, I received a single set of submissions from Mr Duncan Gardham on behalf of media, including the Times, Guardian, Daily Mail, for which I am grateful.

2. Mr Gardham has responded to the application for anonymity from the Telegram witness who is ciphered as Witness A. I deal with the relevant issues raised and my ruling as follows:
    a. As set out in the minded to note, Witness A's name is not linked to Telegram in open source materials, nor in the knowledge of those outside their colleagues, close friends and family;
    b. Mr Gardham asks whether it can be right that Telegram has no one able to give evidence in public. I do note, however, that Witness A's role at Telegram suggests that, firstly, they are appropriately senior to be giving evidence to the Inquiry and that, secondly, they are in a role which should mean they are well placed to address the issues the Inquiry will explore;
    c. Mr Gardham raises various issues with the content that Telegram hosts and cites media reporting which raises various issues. Some of those issues are not directly relevant to the Inquiry, such as the suggestion that Telegram is used as the "*communication and recruitment tool of choice used by … gun runners, drug dealers and child abusers*";
    d. There are, however, suggestions that Telegram is used by terrorists and Com networks. In addition, Mr Gardham refers to the founder of

Telegram, Mr Pavel Durov, opposing Spain's intent to ban under 16s from Telegram and introduce other restrictions. These are relevant either directly or by analogy to Phase 2 of the Inquiry. Nevertheless, evidence relating to some of these issues has already been heard (including during the Inquiry's Seminars 4 and 6B) and the issues can still be explored with Witness A in evidence, regardless of anonymity;

e. Those allegations are not made directly against Witness A but instead towards Telegram, who Witness A represents;
f. Mr Gardham refers to Telegram's suggested links to Russia as an example of a totalitarian regime. This is relevant to the issue of transnational repression which is one of the bases for the anonymity application. The Inquiry cannot determine the extent of Telegram's links to Russia but, nevertheless, the concern of transnational repression raised by the application is much more widely framed than in relation to Russia; and
g. While any social media witness could feasibly be targeted by a hostile actor, the minded to decision found that Telegram has a different risk profile to many other technology platforms.

3. While I note the issues raised, on balance, I consider that the application should be granted. No issue has been raised with Roblox's application. As a result, a Restriction Order will be issued in the terms as suggested by the minded to note.