Tuesday, 17 November 2026

(9.30 am)

SIR ADRIAN FULFORD: Please remain standing for a moment.

DR JESSICA POLLOCK ASHOOH (affirmed)

SIR ADRIAN FULFORD: Thank you very much. Do take a seat. Yes, Mr Boyle.

Questions by MR BOYLE

MR BOYLE: Sir, thank you. As you know, we are interposing Dr Ashooh in the timetable today.

SIR ADRIAN FULFORD: Absolutely.

Q. Doctor, could you give your full name, please?

A. My name is Jessica Pollock Ashooh.

Q. Thank you. You are Vice President for Policy at Reddit, is that right?

A. That is correct.

Q. Could we have your witness statement on screen please, it is RED000003. Do you recognise that as your witness statement?

A. Yes, I do.

Q. Thank you. Could we have page 40 RED000003_0040, please. We have redacted your signature for privacy reasons but can you confirm you have signed that statement and it is true to the best of your knowledge and belief?

A. Yes, indeed.

Q. Thank you. Could you, starting with your experience and background, describe your role as Vice President of Policy, please?

A. Yes. So I have been at Reddit for nearly ten years and over that time my role has transformed. When I first started at Reddit in mid-2017, I was Reddit's first policy hire of any type and that's relevant today because that means that I not only oversaw the company's global government relations and public policy work, which is the focus of my work today, but I also, critically, oversaw all of our content policy, all of our advertising policy, and all of our product policy and indeed, I originated those functions at Reddit.

Now, as the company has grown, we have developed other teams that are dedicated to owning those functions. As you can imagine it is quite a lot for a single person. But I still am very involved in those issues today, given my institutional history at the company.

Q. Thank you. So, as you said, initially your primary focus was on the rules and their enforcement but you have now moved into a slightly wider, policy-based role, is that right?

A. Yes, sir.

Q. Thank you. You talked about the change in terms of the site Reddit and your bringing in of the rules and enforcement. I think you have exhibited -- we see at the bottom of the page there a New York Times article which says "Reddit's IPO [initial public offering] is a content moderation success story".

I think the subheading in that article -- and it is not your wording -- is: the site's journey from toxic cesspool to trusted news source illustrates the business value of keeping bad actors at bay.

Has there been a big change, do you think, in Reddit's approach over that time period?

A. Undoubtedly, and I'm very proud to have been a part of that change.

Q. Thank you. If we were to go back quite a long way to 2019, I think the Inquiry has heard some evidence that Brenton Tarrant, the Christchurch attacker, had shared a link to his attack on forums on Reddit?

A. So that is actually incorrect. I remember -- I have firsthand knowledge of this because I was leading the content policy at the time and I remember very clearly being up all night responding to the Christchurch attacks. Brenton Tarrant did not have a Reddit account, did not, himself, post the video to Reddit. Others did. Brenton Tarrant himself did not. In fact, I checked the document that you sent me and I looked at the footnote that mentioned it and I referred to the document that they were citing. In fact, you will find that there is an error in the URL there, so you will have to do a bit of digging to find the original article -- I'm happy to provide it to you -- but they've completely and totally misinterpreted the source material in that article, so I can say [overspeaking] that that's false.

Q. Thank you, Dr Ashooh. I don't think it is something we need to get into, but thank you for that clarification. As you say, we had a report that did say something to that effect. But I think the substance of the point is you are saying that since 2019, whether it was posted by him or someone else, things have changed in your view?

A. Yes, absolutely.

Q. Can we have move on then, please, to Reddit as an overview. So Reddit Incorporated is a US corporation, but there's also Reddit UK Limited which serves as Reddit's UK's representative to the UK and European clients, is that right?

A. So that is correct but Reddit UK only serves -- only sells advertising. It does not offer the Reddit service. The Reddit service is offered in the UK by Reddit Inc, the American parent company.

Q. And Reddit is an online platform where users share knowledge and information on topic-specific discussion

boards which are called subreddits, is that right?
A. Yes.
Q. Thank you, and you give some examples of subreddits in your statement. You refer to handicrafts, television shows, sports animals and so on?
A. Yes.
Q. Just in terms of the user base for Reddit, I take this from your transparency report that in 2025, there were 4.4 billion posts and comments on Reddit, is that right?
A. I don't have the transparency report front of me but yes, I am aware we report that in the transparency report and I assume you have read it correctly.
Q. Dr Ashooh, we are just being asked if you could just slow down slightly in your answers. I know the natural temptation is to go quickly, but the transcriber has to get it all down.
A. Certainly.
Q. Reddit is categorised as a Category 1 user-to-user service, as a "discussion forum" by Ofcom, is that right?
A. Yes.
Q. I think that means that it must have over 7 million monthly UK users?
A. Yes.
Q. Thank you. You have provided the Inquiry with some

estimates of its under-18 users, based on age, inference modelling, in a recent letter, is that right?
A. Correct.
Q. And I think the estimate is that a little over 4 per cent of Reddit's UK users were assessed, by the age inference models, to be between the ages of 13 and 17, which gives an absolute number in the low hundreds of thousands, is that right?
A. Yes.
Q. And a much smaller percentage, 0.05 per cent, were assessed, by the age inference models, to be under the age of 13 which would be a number in the low thousands. Although, of course those users would not have been allowed to have a Reddit account, so they would have been banned, presumably?
A. Correct.
Q. Thank you. So you have told us about the site being text based and functioning like a bulletin board, featuring threaded conversations. Users can also post photographs and videos, is that right?
A. Yes.
Q. And content gains visibility on the basis of votes of users. Can you just explain how that works?
A. Yes, so Reddit relies less on black-box algorithms for content distribution than other platforms may. We have

always been very democratic. So every user with a Reddit account is able to vote on not only posts on Reddit but also comments on Reddit and that's how we sort the comments and the posts. Now, the unique thing is you can vote things up but you can also vote things down and the downvote is actually very, very important as to how we govern Reddit because if you think of a community, it is very important to have taboos and for the community to be able to say: this is not okay, we disagree with this, at scale. So the downvote allows for that.

And if you think of something like polarising content, for example, that is content that, by definition, gets a lot of upvotes and a lot of downvotes and because of that, they cancel each other out and that type of content generally stays at 0. So the voting system and the downvote again is very important because we are not maximising for engagement, we are maximising for consensus and quality through the voting system.
Q. Thank you. So you explained the two votes cancel each other out. So you might have a piece of content that has a large number of upvotes and a large number of downvotes. That would give it a low total score and therefore it wouldn't have its visibility raised based on having a higher total score, is that right?

A. That is correct and in fact, its visibility would be lowered.
Q. Thank you. But is this right, Reddit does recommend content to users from time to time, to help them find communities, subreddits that may be relevant to their interests?
A. Yes and we think of that much more in terms of navigation rather than engagement. Because the thing about Reddit is that there are hundreds of thousands of communities and it can be a bit overwhelming and difficult at times to find the particular community for your interest and so we are trying to demonstrate what is on Reddit so that users can find their home.
Q. Reddit users have a username, they don't post under their real names unless they choose to make that their username, is that right?
A. That is correct.
Q. And the Inquiry, I think, has heard mixed evidence perhaps about the benefits of anonymity but I think you refer to, your paragraph 6, a study which says that communities with stable pseudonyms alongside strong community norms can create a more civil environment, is that right?
A. Yes, sir.
Q. So that is where people are repeatedly posting under the

same pseudonym?
A. Yes.
Q. In an environment where there are appropriate rules, et cetera? And we will come onto those.
A. Yes.
Q. Thank you. So, in fact, coming onto that now, there are Reddit rules which apply to all users and communities, is that right?
A. Yes.
Q. And then communities will also have their own -- may also have their own rules as well, is that right?
A. Yes, not "may also", they are obligated to have their own rules. Governance on Reddit you can think of almost as a federal system, where the Reddit site-wide rules which we set as a company are like a constitution that apply everywhere and the individual subreddit rules are like state or municipal laws that are particular there. So, for example, you wouldn't expect the federal government to be worried about what day the trash is collected, that is a municipal rule. And so the same thing applies to Reddit.
Q. Thank you. Let's have the Reddit rules up then. It is RED000007. We have some explanation at the top there. I think you tell us in your statement these are deliberately sort of proportionate in their length, so

that they are accessible and because they are setting that kind of overall policy, and there are still community-specific rules underneath them, is that right?
A. Yes, that is correct. The one thing that I think is important to point out, you can't tell, based on how you have placed the evidence here, but there are certain keywords in these rules that will have hyperlinks to further articles. So, for example, violence, the word "violence" in rule 1, would have a subsequent article about it and that subsequent article does form part of the rules.
Q. We will come onto that guidance later. Just looking at the overall rules for now, I think the ones that are most relevant for our purposes is rule 1:

"Remember the human. Reddit is a place for creating community and belonging, not for attacking marginalised or vulnerable groups of people. Everyone has a right to use Reddit free of harassment, bullying, and threats of violence. Communities and users that incite violence or promote hate based on identity or vulnerability will be banned."

Then if we go over the page RED000007_0002, we also have rules 6 and 7:

"Ensure people have predictable experiences on Reddit by properly labelling content and communities,

particularly content that is graphic, sexually-explicit or offensive."

And rule 7:

"Keep it legal. Don't post illegal content, and don't solicit or facilitate illegal or prohibited transactions."

Are there any other rules that we need to look at for the purposes of this Inquiry?
A. I think that should be sufficient for today.
Q. Thank you. We talked about the upvoting and downvoting. Is this right, users are expected to downvote content that breaks these rules?
A. Yes.
Q. And if they are found to be upvoting rule-breaking content repeatedly, they will receive a warning from Reddit's safety teams?
A. That is correct. I want to point out that that, to my knowledge, applies at this point to rule 1, to violence and hate offences. I'm not sure we have rolled that out to all the offences yet, but it absolutely applies to violence.
Q. Thank you. It doesn't apply to rule 7? One might think that would be one of the first places to enforce.
A. So it is not necessarily apparent if content is legal or illegal, due to differences in jurisdictions. So that's

actually one where we wouldn't have automated enforcement.
Q. Sorry, you wouldn't have automated enforcement?
A. Correct.
Q. Automated enforcement on users?
A. We would not have automated enforcement on users' voting, yes.
Q. And users can also report content that violates the rules as well, is that right?
A. Yes.
Q. Now, moving on to the subreddits. You have already covered, they create rules and they will be based on their own specific topic, is that right?
A. That's correct.
Q. The only requirement on those rules is they may not conflict with the Reddit rules?
A. Yes.
Q. Is that right? Thank you. And subreddit rules are enforced by volunteer moderators, correct?
A. Yes.
Q. And is this right, do volunteer moderators have the ability to remove content and users from within their communities?
A. Yes, they can remove users and content from within their communities but when they remove content from their

communities, it also is removed from all of Reddit.
Q. Thank you, and they can do that without having to involve Reddit staff to do so, is that right?
A. Correct, yes.
Q. I take this from the transparency report, page 1 -- I don't think we need to put it up, but tell me if you disagree -- I think in 2025 the statistics showed that community moderators removed a bit over half the posts and comments compared to the company ones, does that sound right to you?
A. That sounds right and it is important to recall that that will include things that are not dangerous and don't break the Reddit rules. It could be just something off topic.
Q. Or spam, for example?
A. Correct. It could be spam. Although, to be honest, spam is primarily enforced by us, as Reddit employees, because if you think about spam, it is something that's very high volume and very signals-based and so you tend to need to have a back-end signal and some more technical work in order to be able to detect and combat it. So without a doubt, volunteer moderators are removing spam but we are removing the vast majority of spam, just because of the nature of our tooling.
Q. Thank you. So the volunteer moderators provide an extra

layer of moderating to some of the other sites that -- or tech platforms, is that right?
A. Yes. They ensure that we have human eyes and sensibility over all of Reddit.
Q. And how does Reddit ensure that moderators act appropriately?
A. So we have a moderator code of conduct that we hold moderators to. It includes rules like having rules -- that is an obligation of moderators, to have rules -- it includes things like: moderate with integrity. That means don't accept payment for moderation actions. It includes something along the lines of having stable communities. So, for example, if your community is about one thing, you shouldn't change the topic overnight so that people are surprised with what they are encountering in their communities. Things like that.
Q. And amongst other things, they are required, by the code, to uphold the Reddit rules, correct?
A. Yes.
Q. Thank you. You have an extra layer but those volunteer moderators are not paid to moderate. Can that lead to variable practice?
A. I'm sorry, you mean variable practice, in terms of the moderators enforcing --

Q. Yes, the quality --
A. -- rules --
Q. Yes, exactly.
A. Yes, it can and that's why we certainly don't rely on volunteer moderators as the primary means of enforcement of the Reddit rules. Our thinking about the distribution of responsibility between Reddit, the company, and the volunteer moderators is that, you know, if you imagine having a party, Reddit, the company, should be in charge of providing security, providing the venue, providing the janitorial services, all of those things. Whereas, the moderators should be doing the fun part, choosing the menu, choosing the decorations, making the seating arrangements, those types of things.
Q. What if moderators are inactive?
A. So it is a requirement that subreddits have active moderation and we do, in fact, have automated scanning to determine if there are any communities that are un-moderated and those communities would be automatically closed.
Q. Thank you, and you refer in your statement to the principle of bad actor moderators. I think you say one of the enforcement powers that Reddit has is to remove bad actor moderators, correct?
A. Yes.

Q. Is it possible that if a community is, for example, on a -- what might seen initially to be a violence-related topic, that perhaps goes off track and becomes a bit more sensitive in its content, for example, related to gore, is there a risk that the moderator might be in line with that change?
A. Yes, yes, it is possible.
Q. And if a moderator were to fail to tag content in that scenario, might that mean that violent content can be online without appropriate tagging for a period?
A. No, we don't rely on a user or moderator-based tagging. It is something that we offer but that is a redundant system. We also have automated tagging of content at point of upload that we, as Reddit, provide.
Q. Thank you. So just to explain the tagging process. Is this right, that Reddit has an "NSFW" tag, so "not safe for work"?
A. Yes, that is the tag that users have control over, we can also apply it as well. And you can think of that as the legacy tag. Before we had the automated systems that I will talk about in a moment, that's what we relied upon. Now, obviously it is not ideal or desirable to rely entirely on users and the honour system to do that and so we have, over the past several years, built our own content classification system,

which classifies content, as I said, automatically at the point of upload.

Now, that is a system that is not visible externally, that's something that we can view on the back end and that's, in fact, more granular than the NSFW tag. The NSFW tag, because it is a legacy tag and has kind of grown up with the culture of Reddit, is used by various people for various means. Everybody uses it for explicit content, graphic content, but people are also very judicious in how they use it and we encourage that. So, for example, some users may use it to tag cross-stitch with rude words, I have seen that, or, comically, vegetables shaped like human anatomy, you know, silly things and they will mark them as NSFW. And that's fine, we don't want to discourage people from marking it. But obviously, when we talk about relying on such systems for things like highly effective age assurance, we want to also have our own that is a bit more precise.

Q. Yes, so it might be thought that if something is particularly explicit, you might say that some of that would be in breach of the rules, but NSFW might -- to the observer, might not look like necessarily the right -- it doesn't necessarily sound like a particularly serious filter to seeing something?

A. I would dispute that on Reddit. Again, Reddit has a very strong culture and the users, as I said, are very judicious about using that tag, so it is very well known on Reddit what "NSFW" means.

Q. Fine. As well as the users, Reddit have quite a lot of people who access the website but don't have user accounts, is that right?

A. So that is correct. However, just about two weeks ago, we announced that we are challenging our policies there and we will shortly require log-in for everyone.

Q. And those users wouldn't, in any event, be able to see NSFW material without verifying their age, is that right?

A. That's correct. NSFW material is not available anywhere in the world without logging in. So one has to, at a minimum, have an account and then, of course, in the UK that content is also behind highly effective age assurance.

Q. Thank you. You spoke about the concept of your own categorisation. Is this right, Reddit categorises material as "violent" itself, is that the categorisation you are referring to?

A. Yes. There is a violence categorisation, there is also a sexually explicit categorisation, there is a categorisation for illegal drug usage and all of those

things would be behind highly effective age assurance.

Q. Thank you. So 4.4 billion posts a year. Clearly, it is not possible for human teams to keep on top of that?

A. That's right.

Q. So you have referred to the automated content moderation tools and I think you say that the vast majority of violent content will be raised through that automated detection systems, is that right?

A. Yes, everything that's uploaded will receive a classification through the automated system.

Q. Thank you. I think we have seen this across the platforms though, that that automated system can't be perfect and you refer to the "vast majority". So not everything can necessarily be caught by an automated system, would you agree?

A. That's right and for that reason, we also have a team of humans that is spot-checking and doing periodic checks.

Q. Thank you. Again, given the quantity of material, presumably it is possible for material that's not caught by the automated system to remain online for some period before it is detected by human moderation, is that right?

A. Yes, it is possible.

Q. The automated system, I think, you also tell us that you participate in Tech Against Terrorism's terrorist

content analytics programme, is that right?

A. Yes, that is correct.

Q. Is Reddit a member of the Global Internet Forum to Counter Terrorism?

A. So that's an excellent question. We used to be. In fact, when I first started at Reddit in 2017, that was one of my first priorities. Given my previous career focused very much on Middle East security, this was an area where I felt I could add value. When GIFCT started, it was originally a consortium of companies doing hash sharing, sharing information so that we could all collectively take down, on an automated basis, terrorist content and so that we could also coordinate with each other in real time when attacks were happening.

So we joined that in 2017. That was my doing. We really benefited from that, especially from the real-time coordination, it was very helpful. Now, in -- I believe it was 2021, GIFCT made the decision to move from being a consortium of companies to being an independent incorporated entity. And we decided to not join that entity because we had serious reservations about the governance. In particular, the board was made up of four very large companies and it would have cost a million dollars to have a board seat. On principle,

we don't like being a part of organisations where we cannot participate in the governance because, as we have talked about today, Reddit's approach is very different and we want to make sure that these type of safety bodies are inclusive and represent the practices of companies like ours. And in fact, we think that we have an ability to level up the industry when we are in these types of leadership positions.

So we made the choice not to join, thinking that there is no way that GIFCT would ever discontinue our usage of the hash sharing or the coordination because why would they? It wouldn't make any sense, that would be counterproductive to our shared goal of countering terrorism and violent extremism. But I was wrong and they actually did stop our hash sharing and kicked us out of the real-time coordination in September of either 2021 or 2022, around that time.

Q. Dr Ashooh, thank you for the explanation. I think the only question I have -- and I don't think we need to get too much into the government issues -- but would it not be useful to Reddit to have that wider library of hashes being provided to it?

A. So we do have the legacy library of GIFCT hashes. So we have that, from the point of when they cut us off. So that includes things like all of the legacy, ISIS

content, of course. But at that point, that's when we joined the Tech Against Terrorism hashing programme as well and so we have a library of hashes there, which is also very comprehensive, and we are very grateful for that organisation. They have been a wonderful partner.

Q. The safety teams, they use -- is this right, you have safety teams that can use automated tooling and human review?

A. Yes.

Q. And they can ban posts and entire subreddits, if appropriate, which could include breaching the rules on violence?

A. Yes and they can also ban individual users from Reddit entirely.

Q. Thank you. There's also a threat detection team, which might investigate emerging threats that aren't yet on Reddit. I think you tell us they proactively monitor off-platform spaces and I think you refer to spaces where violent extremist groups operate and communicate, is that right?

A. That's correct.

Q. Do they also look for -- you will understand, this Inquiry is focused more on non-ideological extreme violence, sometimes linked to nihilistic violence, which is the term used in the US. Is that also part of the

threat detection team's role?

A. Yes, it is.

Q. Thank you. And you also talk about participation in threat-sharing networks with other tech platforms. I think you tell us, Reddit is part of several multi-contractual partnerships that enable tech platforms to share intelligence regarding new threats, actors, and coordinated manipulation tactics. Perhaps you were alluding to that when you were talking about GIFCT. Are those contractual partnerships that Reddit itself has created?

A. So in some cases, yes, and in some cases, they are broader organisations that we have joined.

Q. I think we heard, from Dr Hadley from Tech Against Terrorism when he gave evidence, talking about the benefit of liaison between platforms. How widely is that done across the industry, in your experience?

A. So, you know, I can't speak to what other platforms do but in terms of Reddit, we do have quite wide engagement with others in our industry. As I said, some of that is through structured or topic-based organisations and some of that is us having bilateral agreements. I believe that we have what are called ISAs, information sharing agreements, with most of our peer companies in this space.

Q. Thank you. And you find that brings value in terms of your moderation system?

A. So I would say it is less in part of the day-to-day moderation and more for the complex issues that move across platforms. But, yes, on a simple basis.

Q. Thank you. Could we have up page 7 RED000003_0007, paragraph 19 of your statement. So, you tell us there, that:

"... despite widespread narratives to the contrary about our industry in general, Reddit has not undertaken any reductions in the workforce regarding our safety teams, or otherwise scaled back safety efforts."

Is that rare then across the industry as far as your knowledge?

A. I can't speak to the rest of the industry.

Q. Thank you. But you, I think, acknowledge that it has certainly been reported that that has been the case?

A. Yes, absolutely and it has been frustrating at times when that has been assumed to extend to us.

Q. Are you able to say what percentage of Reddit's revenue is spent on moderation?

A. I don't have those figures, no.

Q. Could you come back to the Inquiry in writing on that, please?

A. I can check.

Q. Thank you. We talked, I think, about -- you gave evidence about enforcement, when an individual user might receive a warning, temporary suspension or banning.

And in your paragraph 59 -- we don't need to pull it up -- you tell us that I think 220 subreddits were banned for violent content in the second half of 2025, is that right?

A. I assume that to be right if you pulled it from our transparency report.

Q. I pulled it, I think, from your statement. If we just have page 22 RED000003_0022, paragraph 59. You see that at --

A. Yes.

Q. -- four lines from the bottom?

A. Yes.

Q. Thank you. And is this right, Reddit also has measures in place to detect ban evasion?

A. Yes.

Q. I want to move on to age assurance. I asked you about the figures and I think they were, you said, in the hundreds of thousands. So low numbers in total but still a significant number of children when we think about the total -- sorry, still a significant number of children, would you agree?

A. Sure.

Q. When content is rated for violence or NSFW, it is then put behind an age gate, is that right?

A. Yes.

Q. Is it also right that an adult has to change their settings to gain access to that content?

A. Yes, we do not default anyone into an experience where they would encounter that content.

Q. So the default is you don't have access and you have to change your settings to get it?

A. Correct.

Q. Thank you. In terms of how that age verification works, can we have, please, page 14 RED000003_0014, paragraph 35 of your statement. So you explain there, that:

"To access [that type of] content, users in the United Kingdom must input their birth-date and then either upload their photo ID or take a facial age estimation selfie for Persona, our third-party age verification provider, to verify that they are over 18 ..."

Then, as we said, you have to then opt in to see mature images, which would include violent content, is that right?

A. Yes.

Q. Thank you. The facial age estimation selfie and the photo ID, they, I think, would appear to come within the list of highly effective age verification given by Ofcom, are you aware of that?

A. Yes, and we have consulted with Ofcom on that system.

Q. Thank you. Could I just take you to one document on this though. It is DSIT000072.

So this is an Ofcom report on the use of age assurance and you will see, in the bottom left, that it is published on 15 July 2026. Could we have page 63 DSIT000072_0063, please.

So, the heading is:

"There is evidence to suggest users circumvent age checks, but the extent and impact is uncertain."

Could we then, please, go to paragraph 7.78. It talks about the risk that:

"Users may disguise, obscure, or manipulate signals that the age assurance method relies upon through presentation attacks. This might include face spoofing in liveness ..."

And if we go over the page DSIT000072_0064:

"... checks, for example using filters, masks, or printed images to interfere with facial age estimation. BILETA raised concerns about the accuracy of facial age estimation and whether these systems can be 'defeated'

by user behaviour, giving the example that the facial age estimation systems used by Reddit and Discord could reportedly be tricked with images of an adult character from a video game."

Were you aware of this before you prepared for your evidence for the Inquiry?

A. Yes.

Q. Thank you. And presumably, that's a matter of concern, from Reddit's perspective?

A. Oh, that has long been closed up. So that reporting was from very early in the rollout of -- required rollout of highly effective age assurance. You will note that this was from July 2026 --

Q. So if we go to the bottom of the page, we have the footnote and I think the date given in that is actually June 2025. So you were aware -- was Reddit aware of that at the time it was reported in 2025?

A. So, after we rolled out age assurance, we certainly were. I can't say if we were aware of this particular article but certainly, it was very widely reported at the time and that was closed very swiftly. We sat with Persona and made sure that that was closed. So it is my understanding that that is no longer an issue.

Q. Thank you. There's also a reference -- so if we go to back to your statement, page 18 RED000003_0018 and

paragraph 49. You tell us there that:

"Reddit also employs an AI-powered age inference system ..."

In what circumstances is that used?

A. That's used on everyone across the service.

Q. And is that a sort of backstop that applies after the other age verification we have seen has been used?

A. It is actually not an after, it is a before, right? So even if someone never wants to access mature content, we will still perform age inference on them.

Q. Understood. So, when someone opens an account, is this right, they are able to use Reddit and do they have an age-gated experience in that, in other words, are they assumed to be under the age of 18 at that point?

A. So, in the UK, they will not be able to access any mature content without going through an actual age verification, we do not rely on the inference for that.

Q. Thank you and what's the trigger then for the age verification?

A. Their attempt to access mature content is the trigger.

Q. Okay, so subject to the age inference system, an under-18-year-old could be on the website, but assuming that sensitive or violent content has been appropriately classified, they will not be able to access it?

A. That's correct.

Q. Thank you. There is then a residual risk that they can access material which is yet to be identified by moderation systems, is that right?

A. That is a risk. It is obviously one that we have systems to mitigate, but it is a risk.

Q. Thank you. In addition to this, Reddit is 18-plus-rated on the app store?

A. That is correct.

Q. The iOS App Store. Thank you. You talk about Apple iOS age API. Is this right, is that user information that the app store can give to Reddit -- talking in very simplistic terms -- which indicates the age of the App Store user?

A. Yes, that is correct.

Q. So is this right, parents can choose to put the settings on iOS so that their child's use of the App Store is age appropriate?

A. They can, yes.

Q. If Reddit were to receive information to say that the user was below 18, would they be precluded from downloading the app?

A. Yes, they would.

Q. Could we have your paragraph 46 RED000003_0017. You tell us there, that:

"... in Reddit's most recent Transparency Report ... investigations pertaining to violent crimes form only a small minority ... of law enforcement requests that Reddit receives."

It says:

"It is worth noting, in this context, that Reddit did not receive any law enforcement requests related to the Southport attack, and the perpetrator, AR, is not known to have had a Reddit account."

Now, I have no doubt that that was your knowledge at the time that you wrote this statement but I think, in preparation for giving evidence, you will have been provided with part of the Phase 1 report. Perhaps we can have that on screen, it is CHAIR000002. Page 264 CHAIR000002_0264.

We see paragraph 199. Thank you. This comes from a medical record that AR gave. Just to give some context, the day before he had gone missing and had been found on a bus with a knife and this record is from his child and adolescent case manager, Ms Steed. If we look at the record, you will see that AR said that he did not want his parents to know that he left home:

"'... so that he could get arrested and then the Police could get his online accounts for which he [had] lost his passwords and then he could delete videos which

he made of himself. I asked again about the videos which he had previously said were just silly videos he made when he was 10. We talked again about how young he was to have these online [accounts] ie TikTok and Reddit and Insta and he said everyone his age had them at the time.'"

So that was in 2022. And he, I think, was aged 15 at the time of that record. So ten years previously would have been 2017. I assume that hadn't previously been brought to Reddit's attention and we know that it wasn't a feature of the Merseyside police investigation?

A. No, I was actually aware of that. This report came out in April and my witness statement was from August. I had reviewed this evidence when I made my witness statement. So, you know, this is evidence of someone recalling a conversation that they had and it does not actually include AR saying that he had a Reddit account. It seems to be a recollection of someone talking about it and Reddit is raised in passing. So let me tell you what we did to search and come to the conclusion that we have no record of an account.

So, when any -- and I also want to emphasise that I do say this with all due sincerity, care and sensitivity. I'm not trying to be argumentative here, but we have done a full and diligent investigation into

this and the best of my knowledge is this: so when any type of high-profile incident happens, that threat detection team searches for information and identifiers about the perpetrator that they are able to find and checks those against the information that we have on Reddit, to see if there is any type of match.

They did this, including when we saw this evidence, and we found no match. Furthermore, with these types of investigations, of course, when the arrest happens, the police have access to the perpetrator's devices and then very methodically send law enforcement requests for anyone that they have accounts for. Even if they don't have an account, they would know the email address. They are very liberal, in our experience, in sending out identifiers to see if they can find any more evidence. We never received any law enforcement requests --

Q. So, so --

A. So my best hypothesis to explain this is that perhaps AR was using the site without an account, but we do not believe that he had an account.

Q. Thank you. I mean, I think what this record is doing is transposing what AR said to Ms Steed. So I think it is a firsthand account, or at least it is a written account of what has been said at an appointment. But is this possible, that this was quite some time before the

police investigation and that AR may have been using Reddit with an account but with an email address that he ceased using a long time before the attack happened?

A. It is possible but again, that could have been the case. He had other accounts and in those normal cases, the police would know the emails from those other accounts and again, widely send identifiers and we received no enquiries.

Q. This is some time before the attack but I think what you are telling us that we note is that this was actually proactively looked into by Reddit?

A. Yes, absolutely, as soon as we became involved in the Inquiry.

Q. Given we are talking about some time ago, is this right, Reddit brought in age assurance in 2025, mid-2025, when that became an obligation under the Online Safety Act?

A. Yes, however, prior to that, as I have mentioned before, it still would have been a requirement to log in and have an account in order to view violent material.

Q. And what were the systems for ensuring that the account holder was over the age of 18?

A. At that time, it was a self-attestation.

Q. Thank you. Of accounts that were created at that time, has Reddit gone through the process of age assuring them since, so that if someone give a false attestation and

remains a child, that they are age assured?

A. Yes, that's what the age inference model does.

Q. Thank you. Sorry, so that's done by age inference, it is not done by an identification or a facial scan?

A. I see. Yes, they would have to -- because we don't consider -- and certainly, the law does not consider, any more, self-attestation to be sufficient, we would not carry over that self-attestation, they would have to go through age assurance if they sought to see that content.

Q. I want to move on please to the approach to violent content and the policy that you referred to before. So that's RED000008. So this is the violence policy and we see, at the top:

"... focuses on credible risks of real-world harm (including to oneself) or speech that genuinely makes others feel unsafe ... [You] understand there are sometimes reasons to post violent content, (eg educational, newsworthy, artistic, satire, documentary, et cetera) ..."

But then there is an invitation, I think, for people to tag posts that they do. It says:

"... ensure you provide context to the viewer so the reason for posting is clear."

A. Yes, the tag is a separate rule, context is

a requirement of this policy.

Q. Thank you. There is a list there of things that may violate the policy. I think, for our purposes, the first is:

"Threatening violence, such as directly or indirectly stating an intent to physically harm or attack an individual, a group, or a location.

"Inciting or encouraging violence, such as calling for others to commit violent acts, including through the use of coded references or memes with a known violent meaning."

And then:

"Glorifying or celebrating violent events, such as praising perpetrators of mass violence (eg mass shooters), sharing killers' manifestos, or mocking the victims of violent tragedies."

The Inquiry has seen some evidence of grossly offensive posts glorifying AR, is that the sort of thing that this is aimed at?

A. Yes.

Q. Thank you. Then we see "terrorist content" and also:

"Posting graphic or disturbing content purely to disgust or horrify users, such as sharing real-world gore without context or in unrelated communities, or sharing footage filmed by a perpetrator during

an attack."

There might be people out there who post gore because of a fascination with violence rather than an intent to disgust or horrify users. Is that caught by this provision or is there a little bit of a gap in the wording there?

A. No, we would generally enforce against that. You know, we are not looking to split hairs. We are not looking to keep horrible content on the platform. As I said, the context is a requirement of this policy and if the context is not absolutely clear and the content is very severe, we are really not going to let that hang around.

Q. The context, does that mean newsworthiness?

A. It can, but not exclusively.

Q. So, how -- the context, does it have to be a positive context or could someone just give a bit of background but without necessarily giving any kind of public interest reason for posting it?

A. So, I would characterise it a bit like this, like the old chestnut about: you know it when you see it. It is pretty clear, when we are looking at something, whether there is legitimate context or not. And as I said, we are not looking to lay down on the tracks on this type of content. The context has to be clear. You know, an example of something that is allowed is we have

a subreddit dedicated to documenting the Ukraine war, right, there is an obvious public interest there. We obviously have communities for medical gore, which are unpleasant to look at but also interesting and you can see the educational value because, with some of these injuries, it is actually doctors talking about: what is the procedure? If someone is too mangled to intubate, what do you do then? It is that type of thing, where the context is very clear.

Now, the moment that those veer into disrespect, we have quite a different situation on our hands and that's when we will evaluate.

Q. I'm not necessarily talking about disrespectful posting, but more gore for its own sake.

A. Yes, that's not allowed.

Q. The posting about medical gore example that you gave, Reddit obviously has no measure of who is accessing that, correct?

A. That is correct, we don't track what users view.

Q. So, as long as someone is over 18, they could access that community, but would you say legitimate public interest in allowing that sort of posting for the typical user?

A. Yes.

Q. If we look at some of the examples of policy violations.

Posting:

"... violent imagery that encourages others to take action against an individual or a group."

If we go over the page RED000008_0002:

"Creating a community that praises a mass shooter as a hero."

Third:

"Posting a graphic image of a car crash victim with a title that makes fun of them."

And so on. The last is:

"[Posting or] sharing a meme or image meant to celebrate a known killer."

Thank you, that can come down from the page there.

The last sort of topic about content that -- or moderation systems I wanted to ask you about was searching. So, the safe search system, is this right, is turned off for all UK accounts by default?

A. Safe search is turned on by default.

Q. Sorry, that's what I meant to say, thank you. You are right to correct me. And a user might verify that they are over 18 to turn safe search off?

A. Yes.

Q. Thank you. You tell us that Reddit's systems proactively surface resources, is the wording you use, on self-harm searches? So is that if someone is

searching for self-harm, they might be redirected to resources like, for example, the Samaritans?

A. Yes, exactly. We do work with the Samaritans.

Q. Is there anything comparable on searches for past attackers or attack footage? One can see that a one-off search might come within your Ukraine war example, but something more consistent would be more concerning?

A. So I'm glad you raise that because there isn't now, but we are in active discussions with a couple of entities to provide that. One includes Tech Against Terrorism. Another includes a Home Office of another commonwealth company.

Q. Thank you. I think we actually have a statement from Vidhya Ramalingam and Ross Frenett of Moonshot, who I think you mentioned work alongside Reddit, is that right?

A. My understanding, from the documents that you showed me, is that they do work on Reddit, they have not worked with us. So Reddit has a developer platform that allows researchers and users to access the Reddit API, to build tools that might be helpful, to build games. And from my estimation of reading that document, that appears to be what Moonshot have done here. I have not interacted with Moonshot. We don't have an official relationship with them, but they seem to have been using that

facility that we offer, to do this.
Q. So they can use that programming tool to put forward positive messaging, is that right?
A. Yes, they can.
Q. I want to move, please, to the prevalence of violent content on Reddit and explore whether that is an issue. Can we have, please, the transparency report that we have referred to before, it is RED000010.
So, you tell us, in your statement, that Reddit publishes a biannual transparency report, which I think you say has become a Reddit tradition and that a lot of information is shared in this report?
A. Yes, that's correct.
Q. And I think you say compared to other platforms in the industry, you think that Reddit shares more, is that right?
A. Yes, and I have been very involved in the development and expansion of this transparency report. When I first arrived, we only reported on law enforcement and external requests and it was me who insisted on expanding it to report on our content moderation actions.
Q. Thank you. So if we go to page 12 RED000010_0012, we can see that. So we see here a chart of "Posts and comments removed by Reddit Rules violation". And we see

at the top, "spam" is 38 million-odd. So that's by far and away the largest of the categories. At the bottom is "other" and if we follow the asterisk, it says that includes "report abuse or repeated, spam-adjacent content", is that right?
A. Yes.
Q. Thank you. And then the second, we see is "violent content" and that is a little over 600,000 posts and comments removed by Reddit rules violations. And I think we see, apart from "hateful content" -- apart from "other" content manipulation", that is -- sorry, let me start again.
Apart from "other" and "spam", that is the highest area where posts and comments are removed, is that right?
A. No.
Q. So, it is third?
A. In terms of percentages, "non-consensual intimate media" is higher.
Q. Sorry, "remove" perhaps is not the right term. Is -- 614,000, what does that relate to?
A. That is the total number removed, yes.
Q. So when you say the --
A. Yes, I see what you are asking. The answer to your previous question is yes.

Q. Thank you. So, of the kind of categories apart from "spam", this suggests that violent content is the most significant problem, in terms of posts and comments removed, would you agree?
A. Yes, it is an area where we focus a lot of attention.
Q. Thank you. Could we have up your statement, page 17 RED000003_0017 and paragraph 47. You say there:
"Statistics from our Transparency Report also support the conclusion that violent content or behaviour is not disproportionately problematic on Reddit. Only 11% of all post [and] comments removed by Reddit were for violations of our violence policies, and only 0.04% of banned subreddits were for the same."
So that's -- the latter, 0.04 per cent, is a slightly different metric, is that right? That is for the banning of a community or a subreddit?
A. Correct, yes.
Q. But to say that only 11 per cent of all posts or comments removed were for violations "of our violence policies" that, on its own, is a slightly misplaced static, isn't it, because it is overlooking the 38 million-odd posts relating to spam, by way of example?
A. It includes the spam figure. Yes, that figure is talking about all of the posts that we remove.

Q. So when you say that violent content or behaviour is "not disproportionately problematic on Reddit", if we put spam to one side and look at the breaches of the more substantive rules, so NCII, violence, hateful content, it is the most significant, isn't it?
A. It is the most, but I would not say it is disproportionate.
Q. How so?
A. It is not like there are wild numbers there. It is still within the range of the others. It is more, certainly. Within any group of statistics, there will be one figure that is the highest and for us, for this report, that happened to be violence, but I don't think it is disproportionate to the broader numbers.
Q. We have "spam", "other content manipulation". The next category is "hateful content" and "violent content" is more than double of that. Isn't that concerning?
A. No. I read that as saying that we are actioning that content.
Q. What risk levels did Reddit's UK illegal harms and child risk assessment give violent content, do you know?
A. Yes, I reviewed this and so those risk levels are on a scale of 1-6 and we gave it a 3.
Q. Thank you. I don't think those have been disclosed to the Inquiry. They should have been, shouldn't they?

A. I don't know. I'm happy to check.
Q. Please will you follow up on those and disclose them?
A. Yes.
Q. I wanted to ask you about the Bishop Mar Mari Emmanuel video. So, in Phase 1, the Inquiry heard that AR had watched a video of the Australian cleric, Bishop Mar Mari Emmanuel, being stabbed during a service which was live-streamed on YouTube and the attack was therefore captured in live footage.

The Phase 1 report found that AR had watched that video minutes before leaving the house to carry out the tragic attack. I don't think we need to pull up the report, but it said that initially the footage was shared across many websites worldwide -- that is after the attack on Bishop Mar Mari -- which included a range of platforms, including YouTube, Instagram, TikTok, X, but also Reddit. The Inquiry has obviously taken up with X the continuing posting of that video. Are you able to help, does Reddit still host the video?
A. No, we do not.
Q. Thank you, and was that proactive work from Reddit in response to the attack on Bishop Mar Mari Emmanuel or in response to the Inquiry's reporting of the issue?
A. To the attack and again, I was involved directly to the response to this. I believe I have mentioned in my

witness statement, I described the incident protocol surge that we have in relation to these types of violent events and particularly violent events that do have some type of video or media attached to them.

So, when we learned of the Australian attack, the threat detection team and the safety team activated this protocol and looked for copies of the video on Reddit, removed them, hashed them so that they could not be re-posted and further, looked for other copies on other platforms that perhaps had not yet appeared on Reddit, so that any other copies that were perhaps slightly different would also be hashed and automatically prevented from being uploaded.
Q. Thank you. Would that process have been repeated after the Southport attack as well? Not that there was footage, but --
A. Yes.
Q. Thank you. I just wanted to ask you about the algorithm. So, is this right, communities that deal with violent subject make aren't eligible for recommendation?
A. Correct.
Q. You have explained the upvote and downvote system, which means that Reddit doesn't rely on recommendations in quite the same way as some other social media platforms

would?
A. Correct.
Q. So are users unlikely to upvote a piece of violent content and then be served, unwillingly, a number of further violent videos in a short period of time, is that right?
A. Correct, that's not how we work.
Q. Thank you. Nevertheless, could there be a risk that a community dedicated to certain issues could expose a user to violent content?
A. So, if the community is rated appropriately, that community will not be recommended. The community will still be available for direct navigation, for example. However, it would have the age assurance on it.
Q. Thank you, subject to the risk that you accepted that not all content will necessarily be caught immediately?
A. Correct.
Q. Can we have, please, the Youth Endowment Fund report, it is ILT000302. Thank you. This was a 2024 report, about the role that social media plays in violence-affected young people. Can we go, please, to page 17 ILT000302_0017.

So we have two graphs there and on the left, we see "percentage of all 13-17-year-olds", and Reddit at 3 per cent, so it has a low percentage of child users,

is that right?
A. Correct.
Q. That's presumably consistent with -- well, it is consistent, I think, with your own evidence, thank you.
A. Yes.
Q. If we look on the right-hand side, we see Reddit about in the middle of the graph, so I'm not going to suggest that it is the worst offender, but we see -- the figure given is 26 per cent and that is "proportion of children seeing violent content on social media platforms". Now, this was at a time before the highly effective age assurance was in place on Reddit in 2024, correct?
A. Correct.
Q. So, there might have been some children that declared themselves to have an age that made them appear to be adults even though they were not and they were exposed in that fashion, is that right?
A. That is possible.
Q. But does that also -- might this also reflect that kind of residual risk that I asked you about, that content isn't being moderated either effectively or quickly enough?
A. Of course, it is a possibility. That is not the conclusion that I personally would draw from the evidence. My personal conclusion would be that this was

a result of the fact that age assurance was not yet in place and if you look at later statistics, including research done by Ofcom, we do see these numbers go down. And in fact, in Ofcom evidence, we do not see children reporting seeing any harmful content on Reddit.

Q. So, is your evidence that you think the picture has improved since 2024?

A. Absolutely.

Q. Thank you. You tell us -- in your statement, you mention the threat detection team that we have already talked about and you say that it is also closely following the developments of niche and violent communities that seek to groom, exploit and victimise young people. Is that a reference to Com groups, as they might be known?

A. Among others, yes.

Q. Thank you. You note, in your statement, so perhaps if we have up page 26 RED000003_0026, and paragraph 70:

"Reddit's resistance against such groups from taking hold stems from several design and operational issues. Firstly, as discussed, because Reddit is an open platform, it is difficult for such groups to hide undetected in the shadows. On the contrary, they are quickly discovered, reported, and banned."

I think, when he was talking more generally,

Mr Hadley said that actually the fact that a platform is open does not necessarily stop these Com groups, that actually they do work in open parts of the internet at least to start with. Are you aware of that risk?

A. I'm aware that Mr Hadley gave that evidence and yes, I am aware of that concept.

Q. Thank you. Could we please have then the report from the Institute for Strategic Dialogue, so it is ISD000037.

So it is a report about sextortion, which is not the sort of topic of the Inquiry but nevertheless, it is talking about a Com network, are you aware of that, 764?

A. Yes.

Q. Thank you. And could we have, please, page 7 ISD000037_0007. I should just say, for context, that this was published on 6 November 2025, so it would have been after the age assurance came in place. And the ISD report says that:

"764 members are active across nearly all the social media apps, but the most prominent include Telegram, Discord, Roblox, X, Instagram, TikTok and Reddit."

Reddit is obviously given there in a list of a number of platforms and with the background that they are actively nearly all social media apps. But you must be concerned by seeing Reddit in that list?

A. Obviously and these are groups that we are aware of and we have a threat detection team to monitor and mitigate. Absolutely, they are a high priority.

Q. But if, in late 2025, the ISD is saying that they are most prominent on Reddit, does that show an issue with the threat detection team's work?

A. So I don't see any evidence here, is the problem. They are asserting this, but I don't see what they are basing it on.

Q. Are you aware of the Institute for Strategic Dialogue?

A. At a surface level, yes.

Q. Whether it is statistics or anecdotal, I think you accepted, nevertheless, it is concerning, isn't it, to see Reddit in that list?

A. Of course.

Q. From an organisation which has expertise in this area?

A. They may have expertise in the area but they may not have expertise in Reddit.

Q. It goes on to give a hypothetical example:

"Victims may initially be contacted on Roblox, X or Reddit then moved to other less known platforms such as Telegram or Discord."

So perhaps that goes to the risk that actually, open platforms are not necessarily a protection for people from these networks, would you agree?

A. So I note that that is a hypothetical example but to the broader point, of course we see this as a risk and we take steps to mitigate it. So, for example, people under 18 do not, by default, have access to chat, to specifically present -- prevent these types of approaches. Users under 15 have no access to chat, it is off by default for users who are 16 and 17. And that's something that we do directly to address these types of risks because I believe there was a later instance in this report where Reddit is also mentioned, where it is an anecdotal piece of evidence where someone is relaying that someone tried to contact them. And that is actually a great example of how Reddit works because it is an open platform and people warn each other and the moderators see that and I presume, if someone was taking the time to warn others about it, they would have reported that to us and we would have taken action appropriately.

However, we are not waiting for people to report them to us. As I mentioned, the threat detection team is actively looking for this type of activity.

Q. So if you relied on it to be reported to you, particularly if we might be talking about a vulnerable child, that would not be enough?

A. No, absolutely not.

Q. Thank you. Can we have, please, another document, it is DSIT000085. So, this is a report "Understanding Pathways to Online Violent Content Among Children" and you will see that it is a qualitative research report from March 2024. Could we have page 24 DSIT000085_0024, please.

So:

"While all children in the research had come across violent content, only a minority were actively searching for it. Those actively seeking it out said they are most likely to do so on social media and video sharing services and chat room and discussion forums, most commonly naming TikTok, Instagram, Reddit, and Twitter ..."

Could we also, please, just before I ask you about this, go to page 31 DSIT000085_0031. We have "Extreme violent content pathways":

"Much of the most extreme violent content that a minority of children described included murder, shootings and stabbings in full detail, and often related to gang violence.

"Many of the children explained that very violent content tended to originate on the social media and discussion forums they used less frequently, which they typically said were either Reddit or Twitter ...

However, children explained that content uploaded to these sites would eventually make its way through to the social media and video sharing services they use more often. For example, they explained how content originating on Reddit [or] Twitter ... had been shared onto TikTok, Instagram and Snapchat."

Now, I suspect that you will understandably raise the point that this was in 2024, so it was a different age assurance process in place, but do you recognise the risk here, firstly, of the children who are actually seeking out violent content and finding it on Reddit?

A. Yes, of course, and that's why we have taken steps to mitigate it.

Q. And also that violent content might be present on Reddit and although Reddit doesn't have comparatively, many child users, compared to some of the bigger platforms for children, that that content might originate there but be shared onto other platforms?

A. Yes, that is possible.

Q. It is obviously not within Reddit's gift to moderate those platforms, but there is a risk, is there not, that if you have a collection of violent content on Reddit, that it can be shared in that way?

A. Yes and that is true for the entire internet.

SIR ADRIAN FULFORD: How are we doing for timing Mr Boyle?

MR BOYLE: Sir, I understand that I have clearance to go until 11.00 am and that is about -- I think I'm on track for that.

SIR ADRIAN FULFORD: Right, fine. As long as --

MR BOYLE: Subject to any indications to the contrary.

SIR ADRIAN FULFORD: And there are none. Thank you very much.

MR BOYLE: Thank you. Can we have the last report, please, it is ILT000242. So, this is a report:

"Gore and Violent Extremism. An [exploratory] analysis of the use of gore websites for hosting and sharing extremist and terrorist content."

Could we have page 22 ILT000242_0022, please. Sorry, I should say, for background, that it was published in July 2025:

"How users arrive at gore-related websites."

So this is specifically -- websites specifically dedicated to gore. I think if we look at the second paragraph, it says:

"On average, websites obtain just 1-5% of their traffic from social media platforms. However, there are examples of websites obtaining a much larger proportion of their visitors from these sources. For example, one website receives 14% of its web traffic from social media platforms, with 95% of that coming from Reddit."

This maybe suggests a slightly different issue, that Reddit is not hosting that gore content but users are sharing links which are driving its users to that content. Is that something that you are aware of?

A. Yes, we are aware of that and we have steps to mitigate it. So, for example, the threat detection team will search for these types of sites on the internet and when they are found, we will insert the URL into our blocking mechanism, to automatically prevent the upload of those types of URLs.

Now, the challenge, of course, is that we are dealing with adversaries, right? These are people who are, for whatever reason, very dedicated to having this content be available and they will shift websites and move around, some of them will be hosted offshore. So it is absolutely a cat and mouse game and that's why we have a dedicated threat detection team, but it is something that's very active and never done.

Q. Was the threat detection team in place in 2025?

A. Yes.

Q. So, doesn't this report suggest that there were issues with the work that the threat detection team was doing in countering links to gore websites?

A. It is possible. This evidence is very vague. So without looking at the -- without knowing the actual

URL -- and I recognise why we can't share that and they won't share that -- it is hard to tell what's going on. But this is absolutely something where, if we came across a report like this, that did have actionable intelligence, this is the type of thing that every day, I would see and send to the threat detection team and they would work on it.

Q. So, Dr Ashooh, I understand you don't have the website link and you recognise why it is not put in this report, but it is not really vague, is it, to say that the website received 14 per cent of its web traffic and 95 per cent of that comes from Reddit. It is quite specific, isn't it?

A. It is specific. Again, I don't know where they got that information from because that would be proprietary information of the website.

Q. Well, I think if we look at the paragraph above, we can see that they have clearly gained data from websites, haven't they?

A. They have, but I don't know the quality of that data.

Q. But there is enough here, isn't there, to worry you?

A. Certainly. Certainly. I'm not going to argue about this. If we see something like that and we have actionable information, absolutely, we will do something about it.

Q. Do these papers suggest that Reddit might have a small, but nevertheless significant, subset of its users that might seek out gore or be fixated in violence?

A. So, I can't tell the motivation of any person who is looking at any given thing. I just don't have that information.

Q. If we have your statement back up at page 17 RED000003_0017. And paragraph 45. You say:

"Considering Reddit's strong rules, extensive safety mitigations, multiple layers of moderation, and product model that does not heavily rely on algorithmic curation (and specifically disallows the recommendation of violent [conduct]), we consider the risk of the platform facilitating or aggravating fixation or attack planning to be low."

Do these reports suggest that there is more to do?

A. Absolutely. There's always more to do.

Q. If we could have, please, page 23 RED000003_0023 and paragraph 63 at the bottom. You are addressing the data, and you say:

"Reddit does not possess specific statistical data or first-party analysis regarding the prevalence of young people accessing violent content on the platform. Due to our commitment to privacy and data minimisation, Reddit has not until recently ... collected dates of

birth or inferred user ages from personal information. And as discussed previously, Reddit does not as a matter of course track the viewing habits of individual users. As such, we do not have information to offer regarding patterns or trends of young people viewing violent content."

You then go on to explain the systems, nevertheless, that Reddit has in place.

Without that data, how are you able to say that the risk is low? Isn't the answer that actually, you can't be sure?

A. No. The methodology of assessing risk is a combination of likelihood of encountering the content and then the impact of that content on the average population. So, as we have discussed, we have many systems in place to prevent young people under 18 from encountering that type of content. And then for -- you know, the average person is not a violence-fixated individual and so the impact on the general population -- and when we are talking about the internet, we do have to operate at scale, so overall the risk is low. Just as if, you know, the risk of a plane crash is low, plane crashes still happen.

Q. Yes, but I think your paragraph 45, that we saw below, so we saw previously, said the risk of the platform

facilitating or aggravating fixation or attack planning is low. That's not right, I don't think, is it? Or rather, should the answer be: it is hard to be sure, based on the data we have?

A. I think it is a bit of both, to be honest. I think you can't -- without the data, you can't conclusively say. But given the data that we have, my assessment is that it is low.

Q. I understand about the fact that you have to moderate at scale, given the amount of content you have, but you also, do you not, have to keep a very careful eye on the risk of violence-fixated individuals who might carry out attacks?

A. We do proactively report on people that we believe are planning violence. Yes, that is something we look out for.

Q. So, you will make a disclosure proactively, if there is a good faith belief that it is necessary to prevent imminent harm or serious bodily harm to a person, is that right?

A. Yes, that's correct.

Q. Thank you. And I think you tell us in your statement that in 2025, there were 84 proactive reports made to law enforcement, although none to UK law enforcement?

A. Yes, that is correct.

Q. Has Reddit considered users that might be posting very concerning information but it falls short of imminent death or serious bodily harm to a person?
A. Yes, certainly and I -- I want to emphasise that there is always a process of judgement here. You know, if we see something that's truly disturbing, we are not going to get hung up about the word "imminent", for example. This is a judgement call. But that said, if it is something that is seen that's not -- doesn't necessarily rise to the level of a proactive disclosure, there are still several avenues that we can take. We can alert law enforcement and they can assess the content themselves and if they believe that it is something that they would like to investigate, then they can send us the legal process and we will respond to the legal process. That's why we ensure that we have cooperative relationships with the authorities in this area.

Then, also of course we have talked about situations where we wouldn't necessarily have knowledge about any individual person and that's where we are exploring the search interventions and resource surfacing and things like that.
Q. Thank you. The transparency report says that five emergency disclosure requests from UK law enforcement were received in the second half of 2025 and I think two

were disclosed. Without talking about the specific cases, are you able to explain why there was a gap between requests and answers?
A. Yes, absolutely. So, the main reasons why we wouldn't report a disclosure in those instances is, for example, if they have given us identifiers that don't match information that we have, so there is simply no information to disclose, or they have given us identifiers that are not things that Reddit has. So, for example, a real name. We don't collect that information, so again, we wouldn't be able to disclose. And then the third main reason is that the request comes from someone not authorised to make the request. Because of the special circumstances of emergency disclosure requests we require those to come from sworn officers and the reason for that is that we have noted a quite disturbing uptick in fraudulent emergency disclosure requests.
Q. The figures are in the transparency report?
A. Yes.
Q. Thank you. One issue you pick up in your statement in response to questions for the Inquiry is VPN use. You say that identifying VPNs is technically difficult, is that right?
A. That's correct.

Q. One of the concerns from the Phase 1 Inquiry report was that of children using VPNs to circumvent age-related protections. Your statement, I think, effectively says that age-gating VPNs is not the course of action that you suggest is appropriate. If that's the case, what is the alternative, to avoid children from bypassing age assurance in the UK?
A. So the alternative, at least for our platform, is by and large, the controls on mature content have been converging for us across jurisdictions. So obviously there are special requirements in the UK with the highly verified age assurance. But around the world, we are rolling out the inference model and we will gate that content based on the inference model, when there is not kind of specialised requirements, as there are in the UK.

So, we would still have an inferred age for a user under 18. Now, it is not the same as the highly effective age assurance but I think the statistics show, so far, that is generally quite accurate. And so that's how we are addressing that problem, is making sure that that content is more comprehensively gated, regardless of jurisdiction.
MR BOYLE: Thank you. Those are my questions. I think we will need to break regardless. There are no questions,

thank you.
SIR ADRIAN FULFORD: Doctor, thank you very much indeed. That has been extremely helpful evidence, both in your written witness statements and your oral testimony today. So, you leave with my gratitude.
A. You are very welcome, sir.
SIR ADRIAN FULFORD: We will rise. How long, Mr Boyle?
MR BOYLE: 10 minutes?
SIR ADRIAN FULFORD: I think we will say 15. Quarter past.
(11.00 am)
(A short break)
(11.15 am)
WITNESS A (recalled)
SIR ADRIAN FULFORD: Please have a seat. You are still under oath. Yes, Mr Moss.
Questions by MR MOSS
MR MOSS: Thank you, sir. Witness A, thank you for accommodating us overnight and the change in witness order this morning.

During the course of questioning yesterday, a number of matters for follow-up arose but there were a couple of matters that I asked you if you could check and verify overnight. Have you been able to establish the date on which Telegram implemented its facial age estimation, age assurance system?

A. I have. It was 24 June 2025.
Q. Thank you. Secondly, were you able to check for what explanation there is as to why Telegram's app is only rated 13 when the terms of service require all users to be 18 or over?
A. Yes. I spoke with the relevant members of the team and they explained that in the process of achieving an age rating within an app store, an application does not set it itself, it receives a questionnaire from the app store, with regards to the content that's on the service. It then submits that questionnaire and the app store then sets the rating. So we would take the position that we followed the questionnaire approach, as is standard for any application, and then the terms of service fundamentally govern the platform.
Q. But surely in relation to that, if you made clear that there is material on Telegram which is only suitable an adult audience, and therefore the app should only be available to those over 18, you are not saying that the app store would ignore that, are you?
A. I can't speak to the -- I haven't seen the contents of the questionnaire and I can't speak to the decision-making of the app store, but what I can speak to is the process that we followed.
Q. Right, is that something which seems to you -- given the

emphasis that you place in your own evidence, in terms of safety on Telegram not being available, it seems both counter intuitive and undesirable that the app as a 13-plus rating. Is that something which you can revisit, in terms of looking at that process and seeing whether that ought to be changed?
A. I think it is something we can revisit. We can take it internally and I can pass it to the relevant team members and discuss it.
Q. Thank you. So, if there is a change in relation to that could you please inform the Inquiry by no later than 17 December? Otherwise, in terms of report writing and recommendations, the Inquiry will proceed on the basis that Telegram has an 18-age rating, but has an app which is rated 13-plus?
A. Understood.
Q. Thank you. And were you able to establish whether Telegram uses hashes provided by the Global Internet Forum to Counter Terrorism, GIFCT?
A. I was.
Q. In addition to Tech Against Terrorism?
A. I was. We had initial meetings with the GIFCT in 2021, from my understanding, and we did not end up proceeding with them. There were some concern around competition, given that the GIFCT was funded by Meta and some of

the -- from my understanding, the information required in the on-boarding process was deemed commercially sensitive and operationally sensitive. We do obviously have a longstanding collaboration with many other hash databases including Tech Against Terrorism. But it is something that we would revisit.
Q. Surely obtaining the largest number of reliable hashes to maximise the extent to which Telegram is not used for the posting of extremist material, should be very high up on your priority list?
A. It is. Again, we have longstanding collaborations with many NGOs who provide us with a multitude of hash databases and again, we have an extensive hash database of our own, based on content that we have successfully identified on the platform as harmful and have removed.
Q. All right. Again, if the position in relation to the Global Internet Forum to Counter Terrorism hashes changes, if you would let us know before 17 December, we'd be very grateful. Thank you very much.
So if we can go back to your statement. We were looking at moderation and if we look at page 7 TEL000018_0007, paragraph 28.
We see, on the plus side, as it were, that:
"Telegram leverages specialised AI-based and [machine learning] based systems with custom data

pipelines that use keywords, phrases, imagery, and logos to identify new or unknown potentially illicit content and automatically flag or remove content identical or similar to previously blocked items."
Yes?
A. Correct.
Q. And your claimed hit rate is very high. You say that they operate in an accuracy rate generally above 99 per cent, with an error rate below 0.9 per cent. What's that based on?
A. It is based on internal testing.
Q. And do you open it up for external testing?
A. We do not currently.
Q. Why not?
A. Much of Telegram is open source and available for everyone to access online, to check the code and the functionalities that we operate. We feel that opening these systems up could potentially allow malicious actors to understand exactly how they function, and potentially develop a workaround to those solutions.
Q. One of the challenges for those on the outside seeking to test material of this kind is that if you seek to report information in relation to particular posts that may go against terms of service or are violent or extremist in nature, if you then want to measure how

quickly after a report they come down, that's extremely resource intensive to do, on a manual basis, unless the platform allows API use to check. Ordinarily, that sort of check, we have been told, would be stopped by platforms because it would detect an attempt to mass suck data and would detect that as bot use. Do you permit outside organisations to have API access to check, for example, channels and public group chat, so that they can conduct their own research?

A. I don't have an exact answer to that currently. My understanding is that we have a suite of offerings, including the development of bots on the platform. So it is something that I would like to come back to you on and give you a definite answer.

Q. Again, could you please do so. And the hit rate assessment is run against what materials? Thinking back to paragraph 13 of your statement, what is being assessed there by the automated systems?

A. Sorry, could you clarify what you mean by "thinking back to paragraph 13"? You mean the functionalities that we have?

Q. Yes, so if we look at page 4 TEL000018_0004 on screen, Witness A. Let's start at the previous page, page 3 TEL000018_0003, in fact, paragraph 13.1 at the bottom of the page. You can't be assessing against the secret

chats because you don't have access to them.

A. I think -- no, again, I think it is worth clarifying. When you say "assessing", the systems are assessed against efficiency at identifying items of content. They are not assessed against environments because that's just where they are employed. You are correct, they are not deployed in secret chats.

Q. Thank you, and nor in private chats?

A. Correct.

Q. And if we go down -- scroll down, channels, presumably, are being monitored?

A. That's correct.

Q. But in group chats, should we understand that the material is not being auto-detected for breaches, other than hashes, if it is a private group?

A. Yes. Again, I think I agree. The distinction between private and public is important there and in a private group, no, keyword matching is not happening. In a public group it obviously is.

Q. If you were a largely malicious actor, seeking to use Telegram to set up a group discussion to share gory, violent, unpleasant content, do you think that it is likely to be set up as a public group chat or a private group chat?

A. In such a scenario, I can't answer that hypothetical.

It is not something I have given due consideration to. I think, to kind of give a bit of context to that, these instances of an individual setting up something like that, like a private group, do not happen in a vacuum. There are obviously account-level indicators that we take into review when such an account is flagged and if that account is found to be engaging in some form of illegal or harmful content, it is banned.

Q. But can I invite you, Witness A, to apply some common sense, or an approach that you ought to be taking if you are risk assessing the risks of abuse, because I suggest the answer to that question is obvious, that it is more likely to be set up as a private group, would you agree?

A. Again, I think -- I can't speak to the knowledge of the hypothetical individual who is setting up the group. They would have to understand, in your example, what moderation measures are taken --

Q. Witness A, forgive me. Come on, if you are a group who is wanting to share material that is violent and gory, and may well be in breach of Telegram's terms of service, and you want to use that, in particular, as a site to which you may invite vulnerable individuals on, you are highly unlikely to set that up as a public group that's open to moderation efforts, are you?

A. Again, I think it depends. It is important, again, to

qualify the discoverability of these groups. Private groups are fundamentally very closed and difficult to discover. So your example of inviting people into that group would be the only way that it could be accessed. If you are talking about, in the example you gave, of vulnerable individuals and -- being directed to that group, it would be very difficult for those people to incidentally discover that group.

Q. But you know the risk to which this relates. It is hostile actors, Com networks and the like, who will predate on vulnerable individuals on larger platforms and then get them interested and then invite them onto the group. And what they can do is they can give a link, giving them access to a private group on Telegram, can't they?

A. Yes, in that scenario.

Q. And you know that that sort of thing is going on, don't you?

A. No, I don't know that sort of thing is going on. We have extensive kind of internal policy around Com groups, including keywords and hashes that have been supplied by various NGOs that we collaborate with, and as soon as we discover illegal activities related to Com groups and the like, we try --

Q. Yes, the hashes we have dealt with.

A. Yes.
Q. So if they are using that material, that will be detected. But if they are exchanging keywords in their group chat and it is private, you are not monitoring that?
A. But again, there's -- keywords in a vacuum, no, but these accounts have other indicators. It is very rare that an account simply exists to -- just exists in this private space. There are often public indications in terms of channels that they follow and these are all part of the information that moderators consider when they review an account.
Q. If we go back to page 7 TEL000018_0007, please, paragraph 28. The automated systems there -- so, you are saying: we check imagery, we check keywords, we check phrases, we check logos. That software is simply not being run on private group chats?
A. It is a technical limitation of the architecture, yes.
Q. And remind me when the number limit is for how many people you can have in a group chat?
A. My understanding is for public, it would be up to 200,000 and I have to double-check that it is the same for private.
Q. That shows it is not public in the technical sense, but the numbers that could potentially be involved could be

very large, exposed to whatever the main leaders in the group might want to share in that group chat, which is not, in truth, being moderated, other than if someone in the group complains or if a hash comes up?
A. In that scenario, yes that is correct, but I think due consideration should also be given to rate limiting, about large waves of people joining even a private group at any given time would alert moderators to that group. And also, again, if you had, in a hypothetical scenario, a large private group, it is very rare that all of those accounts do not have any other kind of indicators of being engaged in harmful content and it is something that we have taken a considerable focus to.
Q. Thank you. If we look, in terms of other aspects of the positives that you emphasise in your statement, you explain that, page 7, paragraph 25, that, in addition to the automated systems, you have human moderators reviewing content on a 24-hour basis, seven days a week, is that right?
A. That is correct.
Q. In what circumstances, broadly speaking, do the human moderators become involved? Is that if the automatic moderation of channels and public group chats flags a concern but it is not clear that it should definitely be banned or taken down?

A. It can be a variety of scenarios. So human moderators can also go out and publicly check -- or check publicly available content themselves. There's obviously an escalation process from automated systems and also user reports go to human moderators for review.
Q. I follow, thank you. If we are in that situation though, where the automatic moderation systems have detected something of concern and it is being sent to a human moderator for check, is the material frozen or deactivated pending the review or does it remain up until it has been reviewed?
A. It depends on a case-by-case basis but if the material is identified as likely illegal or violating Telegram's terms of service, then yes, it is likely removed from public view.
Q. Thank you. We are asking all our witnesses from online platforms to explain what proportion or percentage of your revenue is spent on content moderation and we have given you notice of that question. Are you able to let us know the proportion?
A. I'm not able to disclose that, unfortunately, no.
Q. When you say you are not able to disclose it, do you mean you don't know?
A. Correct.
Q. But you can find out?

A. We can provide a high-level estimate, I believe, yes. It is difficult -- because of the allocation of resources at Telegram across multiple functionalities, it is difficult to specifically segment one bucket of --
Q. Of course, one understands that teams may be working in different areas but could you do your diligent and, importantly, candid best to assess what proportion of Telegram's revenue is spent on content moderation? The precise formulation of the question we will follow up in writing.
A. Understood.
Q. But that, of itself, I would suggest, can't be confidential and is something we are asking all platforms to provide. So we will follow that up in writing, if we may. Thank you very much.

I want to turn then to -- having looked at content moderation in general and in theory, to the issues and risk in relation to violent content, weapons and niche online communities appearing on Telegram.

Can we start, in relation to this, with TEL000013. If we start with the front page just for context. So this is your July 2026 "Children's Risk Assessment" for Telegram Messenger.

If we turn then, please, to page 34 TEL000013_0034. In relation to violent content, you sought, and were

granted on a provisional basis, a number of redactions here. The Core Participants have been able to see below that material and for full transparency, I was able to have a discussion with you and your legal representatives on your attendance yesterday and I think you have agreed that the overall risk score in this area, you are happy to be given publicly, but not some of the metrics that sit below it because of the way they could be misused by hostile actors. So I think you can confirm that the overall risk for violent content in this assessment is "medium"?

A. That is correct.

Q. Thank you very much. If we take that down then and go back to your statement at page 12 TEL000018_0012, paragraph 48. I think although you give that assessment for Ofcom's purposes, following Ofcom's guidance of how risk should be assessed, in your statement, you say:

"Both assessments conclude that a theoretical child user, or an average user, is unlikely to encounter harmful content in practice, and that even a user making a concerted effort to seek out such content faces low associated risks in most scenarios."

So I think what you are saying there is that although when you apply the Ofcom guidance, Telegram itself would still suggest that the overall risk in this

area, of children being exposed to inappropriate violent material, is low, is that correct?

A. I would agree with that, yes.

Q. Can I ask you in general terms, having seen evidence to the Inquiry and the large number of reports that flag the way in which Telegram is used, and in fairness to you perhaps abused by some groups, that the risk is not in fact low and that that is unduly optimistic?

A. I would disagree with that. Again, I think it is important to quantify the reasons as to why we believe it to be low, which is something that we discussed yesterday. The absence of algorithmic amplification, we view as a key benefit to using Telegram and avoiding incidental exposure to these kind of groups. The discoverability settings and granular privacy settings that we offer on the platform enable users to prevent unwanted interactions and also block and report, or report and leave groups that they are added to.

Finally, again, I would say that our moderation systems operate at an incredibly high level and we have confidence in the efficiency of those systems and as to the evidence that I think you are referring to, I think it is important to note that the malicious actor landscape is constantly evolving and we are constantly trying to improve and some of these pieces of evidence

relate to historic time periods.

Q. I'm principally interested here in the risks of your channels having inappropriate material. So, for example, extreme right-wing ideologies, or nihilistic violent content and the risk, not of algorithmic feeds that one sees on other platforms, but of young people and children being drawn into that material and perhaps becoming fascinated and fixated with it, as opposed to it being pushed to them.

You mention the historic nature. Could we start with something very recent, ie yesterday, so ILT000435. Just get your bearings on this Witness A. So this is a Metropolitan Police news release of yesterday, 3:30, deals with the jailing of a couple for attempting to buy a firearm and discussing mass shootings. Have you had an opportunity to see this news material? It was alerted to your legal representatives last night.

A. I did see it this morning, yes.

Q. Thank you very much. So we see:

"A young couple who attempted to buy a firearm and exchanged messages about mass shootings have been jailed following an investigation by Counter Terrorism Policing.

"Rex Clark, [aged] 20 ... and his girlfriend, Sofija Vinogradova, 21 ... were both arrested by

officers from Counter Terrorism Policing London on 10 August 2024 ..."

And Commander Flanagan said:

"'This case is yet another example of the concerning trend we are seeing of young people being exposed to and radicalised by extremist and terrorist content online.

"'What began as online activity, exposing the pair to highly toxic material and ideologies, combined with them progressing to attempting to obtain a firearm [and] could have ended with lethal consequences.

"'Today's sentencing demonstrates the very real dangers of being drawn into this kind of material online and the very serious consequences that can have. It also highlights the importance of acting early, and I urge parents, guardians and the wider public to be alert to the signs of radicalisation.'"

Now, you will readily understand how that resonates with the concerns of this Inquiry?

A. I do.

Q. If we look just a little bit further down this page, in the penultimate paragraph:

"The investigation identified how the pair were self-declared National Socialists who immersed themselves in online extremist communities, including Telegram channels ..."

Note the word, thinking about your paragraph 13:
"... promoting neo-Nazi ideology, the death cult No Lives Matter, and the British-founded neo-Nazi occult group the Order of Nine Angles."
How were these two offenders able to be radicalised, as it appears they may have been, by that sort of material on Telegram channels?
A. Again, my understanding -- and forgive me because it did come through early this morning to me -- I have spoken to members of my team, we have no record of being contacted by anyone with regards to this. With -- identifying material on Telegram via communication with law enforcement, what we require, as I think I mentioned, the affidavit is a clear -- or a clear identifier, so a "t.me/" link, or the related number, or the actual item of content itself, to enable us to accurately identify the specific channel and the specific item of content.
These channels, I think it is worth noting -- I appreciate the story is from yesterday -- but relate to an incident in 2024. I have not been able to identify these channels myself but we are obviously looking into it currently and we will be able to come back to you, if we do find anything further about it.
Q. It doesn't matter, for our purposes, whether or not

the Metropolitan Police or others, Counter Terrorism Policing, made a legal process request to Telegram, even accepting your point about it being a 2024 arrest. That is profoundly concerning, the fact that Telegram channels, as reported by Counter Terrorism Police, were promoting neo-Nazi ideology and the death cult No Lives Matter and the British-founded neo-Nazi occult group and those are on channels that ought to be moderated?
A. Again, because I'm not able to confirm that these -- what these channels are or what was posted on these channels, but what I can say is our list of keywords, again, has been constantly evolving and I'm acutely aware of our internal policies relating to these forms of ideology and the content that is there and we have an extensive and exhaustive keyword list with relation to this kind of subject matter.
Q. Could we look, please, at the statement of the NCA witness who provided written evidence, Timothy Wright, it is NCA000005. It is page 7 NCA000005_0007. I think it will be the bottom of the page. Starting at paragraph 28. I will just read it:
"Online platforms play a central role in enabling and shaping Com offending. Com networks operate as international online subcultures that exploit widely used social media, messaging, and gaming platforms to

connect offenders, recruit participants, and target victims. Commonly used platforms include Discord, Roblox and Telegram."
So you are not, there, being the only one but you are being referred to as "commonly used" by these groups:
"The digital environment enables both anonymity and visibility. Encrypted platforms, invite-only servers and coded language provide privacy and protection from detection. Social media engagement design incentivises recognition and reward. 'Likes', shares and comments function as validation mechanisms, helping to provide a social framework in which abuse and extremist narratives are normalised, reinforced and escalated."
Then, over the page NCA000005_0008:
"Online spaces encourage like-minded individuals to identify and connect with each other. This is exploited by Com offenders to create spaces for networking and communications dedicated to the normalisation and incitement of offending and the sharing of knowledge and tradecraft. Discord and Telegram are frequently seen as primary platforms used by Com offenders for operating and communicating."
Do you agree that that is the case? That Telegram is frequently seen as a primary platform used by Com

offenders?
A. I do not. I think that our moderation efforts over the last year have been specifically targeted around Com groups and we have communicated this to Ofcom especially. We are expanding our moderative efforts and as soon as we identify, or are made aware of, anything that might resemble illegality with connection to content to Com groups or from Com offenders, we take it down and moderate the accounts accordingly.
Q. You understand the difference between fringe researchers who have perhaps biased interests and senior officials from law enforcement agencies?
A. I do.
Q. And you understand that this is from the National Crime Agency in the UK?
A. I do, but I also believe that, while we communicate with the NCA, there is obviously room for further clarification around the moderative efforts we are taking around these kind of groups.
Q. When they say "frequently seen as primary platforms used by Com offenders", are you doubting what they say about that, that they see Telegram frequently used by Com offenders? Are you suggesting that they have somehow got that wrong, Witness A?
A. No, I'm not questioning the veracity of the statement.

What I am saying is that I think perhaps, in the current day, the efforts that we've undertaken might potentially change the narrative as to how they see Telegram in this kind of environment.

Q. He goes on to say:

"This is likely due to:

"The ability for offenders to create private groups and servers on both platforms;"

That's precisely the issue, Witness A, that I have been seeking to question you, and indeed challenge you about, because the potential to have large private groups where the only moderation is the user raising a complaint or a hashed image being shared, gives a degree of freedom of operation to groups like this on Telegram because the moderation is light touch. Would you agree?

A. I would not. I would not say the moderation is light touch. I think it is important to identify the technical limitations of the structure of the platform, while also, again, re-emphasising this idea that individuals in private groups do not act in a vacuum. They behave in a certain way on online platforms, they will interact with specific types of channels. And also a big degree of importance that we place is on user reporting and if these groups are large and they are

trying to invite vulnerable individuals, these individuals should understand how to report that content and then allow us to moderate us.

Q. Yes, but there are different types of vulnerability and one type of vulnerability, especially when you are dealing with children, is not children who are going to say: this material is awful, I hate it, I'm going to report them. It is children who have already shown an interest in it and are being drawn into the web. So of course, there is a risk that they may not be likely to report it because they may be finding themselves enjoying the material. And the point is they shouldn't be exposed to the material in the first place. But if you are not moderating the private group, even if it is 1,000 strong, you have very limited visibility of this?

A. Yes, understood.

Q. That is a risk to child safety and it is a risk to public safety, where violence fixation is concerned, yes?

A. Yes, I would agree.

Q. "The ease with which they can re-establish groups and servers if the platform has identified illegal or prohibited content and closed the group ..."

Again, is that a weakness, do you think -- it applies to Discord and Telegram, this commentary, but is

this a weakness of Telegram, that they can easily re-establish groups if you do shut one down?

A. No, again, I would disagree with this, in particular. As I was explaining before about the moderative efforts on the platform, if we shut down a group, the moderative investigation isn't simply confined to that group, it is extended to the individuals who are within that group. So if those individuals were perpetrating some kind of harmful content within that group and subsequently, that group got closed down, the accounts of the individuals perpetrating that content would be investigated and therefore, potentially moderated and likely banned.

Q. Can you help then as to why it has become the assessment of the NCA that there is thought to be an ease with which Com groups can re-establish those sort of groups on Telegram?

A. I cannot.

Q. The third area is:

"The perceived security and limited age verification and attribution of user identity which limits the platforms' ability to prevent and detect offending."

You will remember the oral witness for this was actually Ms Rance, whose evidence I put to you yesterday, that Com groups both prey on those who are children but also the perpetrators are often children

and they are both acting on Telegram, it would seem.

A. I think that's why I went away to confirm the implementation of the HEAA, the date, 24 June 2025. Our age verification, we would argue, is efficient and we have communicated as much with Ofcom and they understand the way that our process works and are in line with their guidelines.

Q. But you understand the room for improvement in that too, if, for example, at initial sign-up, it is an app that's downloaded and that is only 13-plus?

A. I do.

Q. Are you aware that Ofcom currently views the controls on app purchase to be relatively weak, easily circumvented, either by self-declaration of age or just having any credit card?

A. I was not aware of that.

Q. Mr Comerford, from the Institute for Strategic Dialogue gave evidence to our seminars. Could we have the transcript for 15 September. Just while that's being brought up, are you familiar with the Institute for Strategic Dialogue?

A. I am.

Q. Yes, a serious organisation?

A. Yes.

Q. Responsible commentators?

A. I believe so.
Q. If we could go to pdf page 4. It is the internal page 14. If we could go and just look together at page 14, starting at line 17, so what we see there is:

"Nihilistic networks use platforms such as TikTok for aesthetic purposes, branding and cultural signalling. By establishing these distinctive aesthetics and distributing propaganda across these spaces, networks entrench a group identity and attract new recruits who may be drawn to these extreme aesthetics. After establishing initial contact, extorters often attempt to move their interactions to less public platforms, so they are conducive to secure one-to-one messaging, such ..."

Then just go to page 15:

"... as Discord and Telegram, where they engage in grooming, exploitation and extortion."

It goes on to say this:

"Telegram is the most important platform for coordinating activities and exchanging sexploitation material that emerges in ISD's research, but Discord also plays an important role for members of the network to identify potential victims, groom them and ultimately broadcast their abuse."

So, it is not just the NCA flagging Telegram as

being at, or near, the very top of the list of networks of choice for -- or platforms of choice for Com networks. Here, you have the ISD as well. What's your response to Mr Comerford's evidence, that Telegram is the most important platform for coordinating activities and exchanging sexploitation material?
A. My response would be that we would obviously appreciate the ISD to share any materials that they have, to enable us to take down examples of this kind of content.
Q. But you will know that that seminar evidence has ISD research lying behind it. So just to take a couple of examples, if we could look at ISD000037. This is "Networks of Harm: A Victim-Centric Information Resource on the 764 Sextortion Network".

Now, sextortion is not our direct focus of attention, but given that Com networks also operate in the sphere of moving into a real-world physical violence attacks, that the use of Com networks and how they operate most certainly is.

So that's the background to why we are looking at the 764 sextortion network. Now, if we look at page 6 ISD000037_0006, the bottom left paragraph:

"764 and related sextortion networks operate on a global scale, with an estimated involvement of hundreds -- if not thousands -- of individuals across

the world who have served as victims and/or abusers. Through ethnographic monitoring, ISD has observed groups on Telegram containing up to 15,000 users at once."

So there again, you see these large groups with this sort of sextortion group sitting behind it, using Telegram?
A. Again, 764 is an example of the Com groups that we have been recently focused, including 884 and many others, where we have been working diligently and our systems are constantly evolving, again, to try and capture and prevent these groups from existing on the platform.
Q. Yes, but even if it is an example of how grave the historical risk was, do you accept that this network was involved in a Telegram group that had 15,000 members?
A. Without knowing the identifier of the group, I can't confirm whether the group was on the platform or not, but I can accept that the ISD is a diligent organisation.
Q. They are unlikely to be wrong about that?
A. Correct.
Q. If we just go over to page 7 ISD000037_0007, paragraph 1.:

"764 members are active across nearly all social media apps, but the most prominent include Telegram, Discord, Roblox, X [and] Instagram ..."

Would you agree with that?
A. Again, I can't speak to other platforms, but --
Q. No, but as to Telegram's --
A. I would repeat the previous point that I made, which is that we are working incredibly diligently to try and remove such groups from the platform.
Q. So is the reality of this that you would accept that Telegram had a major problem with these sorts of groups using the platform but it is one that you have recognised and you are working hard to deal with? If that's the candid position, it would be helpful if you could state it clearly?
A. I'm not sure that major problem is the terminology I would use. I think we identified that there were groups of bad actors who utilised the platform, not just for Com groups, but we are always working to try and keep the platforms safe for our users.
Q. Well, is there any adjective that can be used, other than if a sextortion group is running a group of 15,000 people on your platform?
A. It is obviously an example of users engaging in illegal content, which we are working to remove from the platform.
Q. On mass, and it is by no way the only example. That's the reality, Witness A.

A. I think, to clarify, we scan 35 billion items of content monthly. My point is we are working very hard, across multiple different fronts, with regards to online safety and 764 is part of that focus.
Q. All right. I don't want to spend too long going over old ground but one thing that you could do, immediately, differently, is in relation to group chats that are private, you could say, in your privacy policy, that: material that is being posted will nevertheless be moderated even though it is a private group and we will run our automated software on it, to check that there is not illicit material, even though it is a private group.
A. Again, with regards to the wording of the privacy policy, I acknowledge that it could have benefited from additional clarity with regards to the scope of the terms of service --
Q. Yes, of course, but what I'm talking about -- forgive me. You could make it clear to your users, that: henceforth, we are going to run our software moderation on private groups?
A. But such software is technically incompatible with the way that private groups are set up. It would require us to change the underlying technical architecture of private groups.
Q. In the light of your candid answer, that you accept that

there is a risk to child safety and a risk to the public, will you do that; change the software so that it can run on private groups? I'm not suggesting you can do that tomorrow, next week, but why not take those steps, in light of the safety risk?
A. I'm not sure that the solution is necessarily to change the technical architecture, which, again, for some people, as I've expressed in my affidavit, is crucial for freedom of communication and anyone's right to privacy, in countries where they are repressive and authoritarian states. What I will say, as I have attempted to earnestly express throughout this dialogue, we are working incredibly hard to try and keep our platform as safe as possible for all of our users without infringing on their right to private communication.
Q. Well, look, let's just go back briefly to those paragraphs -- page 3 TEL000018_0003, bottom of the page, paragraph 13.1, and those four subsets.

So, I'm not asking you here -- so back in the statement, forgive me. Bottom of page 3. You are obviously not the only platform, WhatsApp is a better known example that has end-to-end encrypted chats. So I'm not asking about the secret chats and how they may be useful and I'm not asking either about the private

chats.

But if we go on to 13.3 TEL000018_0004, you currently run the moderation, as we have looked at -- sorry, paragraph 13.4. You currently run the moderation if the chat is public, but not if it is private. And that's one of the areas where these reports are flagging up the risk is of these hostile actors drawing people in.

Now, other than in the short-term, it may be thought not to be a very good answer to the risks that are involved in that, to say: our software isn't designed in that way?
A. Again, I'm not sure the answer is our software is not designed in that way. I think it becomes a conversation about affording users the right to be able to speak in private groups and the focus should be on using identifiers, to prevent malicious actors from using those means of communication.
Q. But, forgive me, you are not stopping them from speaking in private and nor, in this relation, would you be giving the information to any government or any oppressive regime. You would simply be running the software to ensure that the material is not illegal, or is not in violation of your terms of service?
A. Forgive me --

Q. That's not a gross innovation of privacy at all. It is what most platforms do all the time?
A. Again, forgive me, because perhaps I'm not the most technically capable of answering, and there are people who have more technical expertise who can answer in more detail. But my understanding of the private group function is that it is a private forum for people to communicate with each other. If we were to complement this AI and machine learning scanning on that side, we would have to break the privacy of that chat in order to do so.
Q. Yes. To stop it being used for illegal purposes and exploiting minors who do get onto your system, despite efforts to avoid it.
A. And my answer to that is that I'm not sure the solution to the problem is to break privacy for individuals who want to communicate in a group. I think it is to better identify those actors and act accordingly on them, to prevent them from misusing that medium.
Q. But your ability to identify them as bad actors and act accordingly is very limited if you don't have visibility of what they post, absent somebody making a complaint or it so happening that they post something that's within your hash database?
A. Again, we are returning to this idea of almost -- people

do not use private chats in a vacuum. It is part of the full suite of functionality that Telegram offers. People interact with public channels. Accounts can be flagged for the way that they behave on the platform, for the way that they interact with people on a one-to-one messaging basis.

There are a variety of different methods that we can use in order to try and identify these accounts and prevent them from misusing it. My point is simply that I don't think the solution to the problem is to break a group chat's privacy and therefore deprive many other people of using that medium safely.

Q. So that ability to have group chats that are in private, which is perhaps part of the unique selling point of Telegram -- and it is for others to judge -- may be the very reason why it is attractive to these groups. Your position as a reticence to break the privacy of those, even just to the extent of running moderating software that detects inappropriate posting?

A. Again, I'm not sure it is as simple as that, but I don't have the technical expertise to speak to it. We are making incredible efforts to try and moderate the platform accordingly, without infringing on a user's right to privacy, including that right to privacy to communicate via group chats.

Q. Thank you. Just a couple more examples, please. Also underlying the ISD's comments in the seminar, could we have on screen, please, ILT000381. This is the article:

"Dismantling digital terror: Lessons learned from the collapse of Terrorgram."

If we could go to page 2 ILT000381_0002, please:

"In the late 2010s, Terrorgram emerged as a loosely connected network of hundreds of channels and group chats on Telegram which advocated for white supremacist violence and accelerationism."

Do you agree with that?

A. Again, I can't speak to it because I'm not personally aware of it but I have read this report and can confirm that's what it says on the screen.

Q. And you don't have any reason to doubt it?

A. I don't.

Q. "At its peak in 2019 to 2020, key content creators within the network leveraged their organisational capabilities and exploited Telegram's ineffective moderation to coordinate the distribution of violent material across channels. These individuals were particularly adept at creating both propaganda and instructional materials, including slick artwork designed to incite violence, manuals for manufacturing firearms and explosives, and hit lists of potential

targets."

Now, as we will see in what follows, this undoubtedly, is looking back some time, although not so very long, but, again, do you agree with that explanation of quite how bad the content was and how it was exploiting Telegram's then ineffective moderation?

A. Again, I cannot speak to it personally, but having read this report, that is what it asserts in the report, based on the evidence it provides, yes.

Q. Thank you. If we scroll down a little bit, we have a paragraph:

"In 2022 a Terrorgram leader was arrested and another became aware that he was under investigation. This created a leadership vacuum that was filled by two longstanding Terrorgram operators in the US."

It continues:

"After a Terrorgram adherent attacked a gay bar in Slovakia in October 2022, the network failed to produce content that matched the influence of its previous works. The absence of strong leadership also allowed undisciplined influencers within the network to launch aggressive Telegram channels. These attracted a swift law enforcement response, leading to a series of arrests across the US ..."

What's being suggesting there was that it sort of

branched out as it was breaking up and some undisciplined members then launched their own aggressive Telegram channels. So I assume your answer will be the same, that you have no reason to doubt that that was happening on Telegram, but it is not within your personal knowledge?

A. Correct.

Q. Thank you. Then, if we go over to page 3 ILT000381_0003, we see the "Pressure on Telegram" section:

"Since the arrest of Telegram CEO Pavel Durov in August 2024 by French authorities, the platform appears to have taken a stricter line on content moderation and legal compliance. Illicit channels are being banned more frequently, and many Telegram users believe it is no longer a secure venue for their operations."

So no doubt, you would agree with that?

A. Again, only -- I have only been at the company since May 2025 but while I have been there, I would say that the team that I work with are excellent and we have put in a concerted effort to ensure that moderation is efficient and broad.

Q. Yes, but you understand now why, 15 minutes or so ago, I put it to you that, at least historically, Telegram had a major problem?

A. Again, it is not within my personal remit to comment. I can assure you that the colleagues that I work with now, who were at the company before, take trust and safety very seriously and are excellent.
Q. "Despite this progress, it is important to note that Terrorgram percolated relatively undisturbed on Telegram for years, allowing the network to flourish until its leaders were arrested. The platform enabled the network to disseminate violent propaganda, encourage sympathisers to conduct attacks and engage in operational planning. Moreover, Telegram's moderation is still critically deficient: ISD analysis has found that it remains the most popular platform among violent extremists in the US."
That was in a report just in March of last year. Why is Telegram, as of 2025, still the most popular platform amongst violent extremists in the US, do you think?
A. I would, again, disagree with that assertion. I would encourage any organisation that has evidence of that to please reach out to us and share that information so that we can moderate it accordingly.
Q. Have you -- forgive me, do finish. It is my fault. I was going to say, have you reviewed the analysis? There is a link there to the ISD analysis that supports

that?
A. I believe it is currently with my team.
Q. Having been published March 2025?
A. We have been made aware of it and we are currently re-reviewing it. My understanding is that since this article has come out, as I expressed already, we have had a renewed focus on groups and communicated and enhanced our NGO collaborative efforts. Our hash database has expanded significantly, our keyword list has expanded significantly, our list of harmful URLs that we are able to ban and block immediately has expanded significantly. So it is all part of the platform growing and evolving as a moderative force.
Q. I'm not going to go through too many more examples but within your evidence proposal, you were alerted to the evidence of Mr Burrows of the Molly Rose Foundation, who referred to the use of Discord and Telegram as being a site to which vulnerable individuals were taken; to the evidence of Dr Ebner, in our seminars, who, in briefest terms, was able to do studies on Telegram of 764, as well as Terrorgram, as well as neo-Nazi communities on Telegram and a white supremacist community on Telegram as well; Dr Whittaker, who referred to the problem of those who glamourise mass casualty attacks and school shooters, featuring heavily

on Telegram and Discord; to Mr Richardson of the NCA, who said that Telegram was one of the main platforms for Com networks; and from Mr Hadley, who you will be familiar with, Tech Against Terrorism, his transcript, saying -- having said that increasingly, especially on Telegram, which is an encrypted messaging app, what we are seeing is various Com network groups, as well as other forms of violent extremists online, asking for password access or a keyword, saying: we will only give you access to this group if you give us this code, or this word and so on. I think governments find that quite hard to get through.
That is a plethora of evidence from informed experts and commentators, all of them flagging Telegram as a significantly risky platform for this sort of material and these sort of groups. And they are not, there, speaking historically.
A. Tech Against Terrorism is an example, is an organisation that we communicate with regularly and we have had reports from them with regard to Com groups and 764 groups and we do our best to moderate them and as soon as we are alerted to manifestly illegal content, we take it down.
Q. Yes, but again, I'm going to endeavour not to open up the ground, but you understand that Mr Hadley of Tech

Against Terrorism in that passage, which I briefly summarised to you, is alighting on exactly the point that I have been putting to you, about how these groups are getting people in and getting them to join, by giving them passwords or links into private groups, when they can then communicate with little visibility, certainly from Government?
A. We recognise that there are regrettable instances of malicious actors who misuse such mediums.
Q. And if the design of your platform is such that it is attracting those groups -- and the evidence suggests that it is -- isn't it time to act?
A. Again, I would say that we do act on such instances. It has been a concerted focus for us for a long time and, again, I would return to the argument that vilifying the communication medium is not necessarily the -- or does not necessarily lead to the desired outcome.
Q. So, rest assured I'm not seeking to vilify the communication medium. I'm simply putting to you that there is a plethora of evidence that bad actors are choosing your platform, and Discord as well, as their favoured location for this sort of activity. So it is not vilifying Telegram, or you as a witness, but it is pointing to the dangers and suggesting that the high priority given to privacy and to allowing large groups

to communicate in private without the material being heavily moderated, is drawing them in. And that that gives rise to a legitimate -- not a vilifying question -- a legitimate question about whether now is the time -- put it this way -- not just to act, but to do a lot more?

A. If I could just give context. I didn't mean to say that you were vilifying us, as a platform, specifically, I was talking about the communication medium of private groups. Again, I can't speak to the moderation efforts of other platforms, but I will re-emphasise that we do everything within our power to try and keep the platform as safe as possible for our users, through the proactive and reactive measures that we have in place.

Q. All right. I want to go to one further aspect in relation, specifically, to gore and that's the VOX-Pol paper. Again, it is relatively recent, it is ILT000242.

We saw this with our previous witness this morning. So, VOX-Pol. Again, what do you know and understand about them, as an organisation?

A. My understanding is they are a reputable organisation.

Q. Thank you. So this is their report on gore and violent extremism. And if we could go, within this, please, to page 36 ILT000242_0036.

And have the top half of the screen. I will just

read it into the record, if I may:

"Gore on Telegram.

"This research identified thousands of videos shared on public Telegram channels that contained gore or graphic violence, or that had the visible watermark of a gore-related website. These videos were shared on 100 public channels that were also posting [extreme right-wing terrorism] content and discussing [extreme right-wing terrorism-related] issues, for example white supremacy and accelerationism. Within these channels, users were observed shitposting and goreposting ..."

And, if we just scroll down to the bottom of the page, we will see "shitposting" is defined as the:

"... posting of 'worthless or irrelevant online content intended to derail a conversation or to provoke others.'"

And:

"Goreposting is the practice of sharing extremely graphic or violent content, often without context, to entertain, shock, or desensitise viewers."

So, back up, please. So:

"Within these channels, users were observed shitposting and goreposting, embedding videos that would provoke a response from and shock other channel[s]. The findings highlighted the different reasons people

supportive of [extreme right-wing terrorist] ideology may also be interested in or actively share graphic violence ..."

So that's the link between right-wing terrorist groups and gore and graphic violence.

And then the 100 public Telegram channels being reported on here, if we can just have that table, please. So:

"Livestream attack footage.

"24 channels contained livestream footage from ideologically motivated mass murders ... Christchurch and Buffalo. These videos are often shared to signal support for a belief system and can be found across mainstream and fringe social media platforms.

"Military content.

"Five channels were dedicated to sharing military content from the Russia-Ukraine war and Israel-Hamas conflict. The high volume and frequency of content from these conflict zones generates a stream of real death and gore content. It can also be shared to demonstrate and admire the impact of weapons deployment like the use of drones."

Just pausing there. That doesn't seem to be speaking about legitimate war footage, but graphic violent injuries and the effectiveness of weapons, when

used against people:

"Racially motivated gore-sharing.

"Unsurprisingly, channels sharing ERWT ideological content also shared and celebrated videos showing violence towards black people and other ethnic minorities. Channels also shared graphic videos of violence perpetrated by ethnic minorities to promote racism and xenophobic views.

"Gaming and gore content.

"Researchers identified examples of users sharing content from and links to customised video game maps and characters depicting gore and playable recreations of live stream attacks. Some games appear created specifically to generate 'gore' gaming content, eg GoreBox, others provide modification functionality that can be exploited by users, eg Roblox."

So a recent report and 100 public Telegram channels pumping out this type of material.

A. Without identifiers for which Telegram channels they are, I'm unable to comment on them.

Q. As you have identified, this is a high-profile, reputable research organisation in the field of violence, terrorism and extremism. If we can just go to the whole page.

"Gore on Telegram". This isn't picking out other

platforms, it is specific to what they found on your platform and it is not talking about the occasional thing getting through the net, or things in privacy on private groups. It is talking, Witness A, about what is not being moderated on your public channels.

A. I understand the assertion being made and I would like to repeat the point, which is, as I have expressed before, we obviously have an evolving moderation system. We try our best to keep the platform as safe as possible for all of our users. But in instances such as this, it would be beneficial to have the links to the respective content so that our moderators can act on them.

Q. Have you asked for them?

A. I have not.

Q. Has anybody asked for them --

A. I would have to confer with the team.

SIR ADRIAN FULFORD: Can you do so, please?

A. Of course.

MR MOSS: That shows a problem because with an organisation that has 7 million -- or 6.9 million, I think you said, UK users -- I'm not going to ask you exactly what your revenue stream is, but no doubt very, very large, presumably, you, as a company, keep an eye on media coverage of Telegram and research in relation to Telegram?

A. When we are made aware of such reports, we do, yes.

Q. And so, when a leading organisation such as this posts this sort of material, surely, you should be acting on it directly, not waiting until a public Inquiry draws it to your attention and then saying: well, I can't comment from my personal knowledge, but we will get back to you. Forgive me putting it in that way.

A. No, I -- candidly, when we become aware of these reports, we always do try to reach out to them. I just cannot definitively confirm whether that has happened because it is outside of my knowledge, with this specific report.

Q. Because I am going to suggest to you Witness A, that, on its face, this report reveals something which is shocking and disgraceful, in terms of material that Telegram, even of March 2025, was permitting to be broadcast on public channels, do you agree?

A. The content described clearly resembles illegal content and again, it we were made aware of the links, we would moderate it accordingly.

Q. Just one moment.

Thank you. Can I just move on now to the question of Telegram and weapons. If we could just look at TEL000024. This is your illegal content risk assessment, Witness A, just so that you get your

bearings again. Let's just have the first page for context. So again, Telegram Messenger, "July 2026 Illegal Harms Risk Assessment Record".

If we go to page 26 TEL000024_0026, please, within this, and if we could look at paragraph 5.14, bottom of the page. You say:

"Telegram's advanced AI tools are able to flag channels related to firearms, knives and other weapons as soon as they are created -- before any content is posted. Furthermore, Telegram invests significant resources in the extensive moderation of public search results, banning relevant keywords and using AI to further remove potentially unwanted results before users can discover them. [It] also responds to official requests from UK law enforcement, including those involving cases of firearms, knives and other weapons."

What is your assessment of the efficiency of the systems on Telegram for identifying, in particular, inappropriate knife advertising and knife sales?

A. We believe our systems are efficient and we are always again improving them and trying to make them more efficient.

Q. Presumably, all of the questions that I have asked previously about private groups, if private groups are exchanging that sort of material, unless it is hashed,

or unless someone complains, you wouldn't have any visibility of it?

A. That would be correct.

Q. So, somebody on one of those group chats could simply post -- and they may use more sophisticated or nuanced language than mine -- but they could post, effectively: anyone know where I could get a zombie knife? And that wouldn't flag?

A. Well, it would be in a private group so there would be nothing for it to flag, yes.

Q. I'm just going to warn, for those who are following our live stream, that I'm going to bring up some images of knives. Thank you. That will come in a moment.

Page 70 TEL000024_0070.

It says:

"Given the number of risk factors identified in the Ofcom Guidance, Telegram acknowledges that the Ofcom Guidance would attribute a ..."

Then there is a particular:

"... risk rating in such a scenario. Therefore, in view of the performance of moderation systems and controls, Telegram was not satisfied that there is a medium likelihood of encountering Firearms, Knives, and other weapons on its service. The performance and output of the moderation systems, alongside the

evaluation of user complaints demonstrate that if Firearms, Knives, and other weapons were to be encountered on the service it would be exceedingly rare, and accordingly the probability of encountering it falls short of a medium likelihood."

Does that remain your position?

A. That does remain my position.

Q. If we look at ILT000296. This is the Government's "Independent end-to-end review of online knife sales", of which the lead author was Commander Clayman. It is dated January 2025.

If we look at page 54 ILT000296_0054, paragraph 8.4, so the bottom. That's perfect, thank you. And just to get our context, he is speaking here about the grey market in knife sales:

"... can simply be described as knives sold by individuals outside of a business setting which treads the grey line between legal and illegal sales ... Often on social media ... can be face-to-face ..."

And he explains that the review has focused on the:

"... online grey market, although it must be kept in mind that the issues with bulk knife purchases are relevant for both the online and offline grey markets."

Then says that:

"Many grey market sales are currently not illegal,

due to the fact that there is no license or registration needed to sell knives. The [Offensive Weapons Act] states that there should be a system in place for age verification on sale and for delivery, however the discovery of these sellers requires reports to be made to police by individuals active in the communities or exposed to the algorithms on social media which would enable them to see the content. A seller may operate on the grey market so that they could circumvent legislation applicable to traditional online retailers, preventing checks on age verification systems, business practices or tax. The principle of selling knives on social media goes against most policies in place for the social media platforms."

Does it go against yours?

A. It does.

Q. "Many of them do not allow for marketing outside of paid adverts or through specific marketplaces, so the content of the posts are often designed to avoid detection. To achieve this in placing posts online and to stop them being removed, direct references to sales are not made and the users disguise their identity."

Are you familiar with users not making direct references to sales and disguising their identity on Telegram, to try to sell knives, including in the UK,

using Telegram?

A. Based on the exhibits provided in the course of this Inquiry, yes.

Q. Yes, thank you. So if we can go to page 56 ILT000296_0056. If we just zoom out please and the first paragraph below the grey box, please. *(Pause)*:

"Snapchat, Instagram, and TikTok remain the primary mainstream social media platforms that reach a wider network than more niche and private platforms such as Telegram and Discord. The latter platforms generally consist of smaller private groups but can accommodate groups in excess of 1000 users. Many of these people are invited into through their association with others or directed to join via more mainstream social media posts."

So do you see there that, in this report, it is alerting to the same sort of risks as we saw for violent material, that those on more mainstream channels can get invited into more private niche platforms such as Telegram and Discord, where they utilise smaller private groups for weapons also?

A. I can confirm that's what this is stating, yes.

Q. Again, presumably, given that this is coming from the Commander of what is now the National Knife Crime Centre, you don't have a reason to doubt his assessment?

A. I do not.

Q. And page 57 ILT000296_0057, please. Could we have the box please. So you see that:

"Kaif Sayed ran a grey market sales business ... named 'Weapons R Us', selling knives and other items primarily through ... Snapchat and Telegram channels."

Just pausing there, I'm not suggesting it was only Telegram, because you can see it was Snapchat as well:

"Users were directed to the channels through posts on the local news and community social media networks, paying these channels for advertising space to attract prospective buyers. The adverts placed on these networks were not overt selling platforms but filtered and specifically worded to obscure them from wider scrutiny ..."

So you can see in figure 15:

"The term tools is used with a faint image of knives in the background, largely undetectable for most viewing the post quickly."

Then it continues:

"Sayed was ordering the knives from a large UK-based knife retailer and reselling the items at inflated cost. Examples of the adverts he was placing are shown in figure 16. In one transaction [he] ordered 30 knives from the retailer, using details belonging to another.

His sales offered collection from an area of London. Knives were marketed for approximately three times the retail price and all contact would have been made through the use of private messages."

If we just have the bottom of the page, thank you, and onto page 58 ILT000296_0058. One sees the images there from the shop. And if we just go to "Police action", please:

"Police action was taken in February 2024 when a warrant was executed at the home address and one other address. [He] was arrested. No knives or other weapons believed to be intended to be sold or present ... however during the search a parcel arrived for [him] containing eleven new knives from the knife retailer. [He] had just turned 18 and was using a vulnerable adult to order the knives and receive the deliveries, circumventing any age restriction by the retailer and the courier for any purchases before his 18th birthday."

So the severity of that incident includes the fact that he was effectively cuckooing an adult to take delivering of them and that he had made contact and indeed, paid for adverts on more mainstream platforms and then used Telegram and one other to actually make the sales.

Were you aware of this case before the Inquiry drew

it to your attention?

A. I was not aware of this case before the Inquiry drew it to my attention.

Q. Was Telegram aware of that?

A. Again, I can't speak to the kind of extent of expertise of my colleagues, but my understanding is that if this was reported by law enforcement to us, we would have been made aware and the channels would have been taken down.

Q. There will be that familiar difficulty, which I have put to you a number of times, about the risks of private groups not being visible when they are selling knives, sickening knives like those shown in these images?

A. Again, I would revert to the previous answer which is I think that these individuals are not using solely utilising private groups as a communication medium. I think, for example, in this instance, where I guess the funnel to drag buyers into this environment to buy them was taking place at scale and then coming to a smaller group. I think it is important to recognise that moderative efforts need to be proportionate across the board, without necessarily compromising an individual's right to privacy and communication within a group environment.

Q. Yes, but that is a difficult answer, if you look at the

screen and look at the types of knives involved?

A. I can acknowledge that.

Q. Especially in the context of this Inquiry?

A. Correct.

SIR ADRIAN FULFORD: Mr Moss, I'm just slightly concerned about the stenographer. Do you have an arrangement?

MR MOSS: Yes, I'm hoping that benign tolerance is the arrangement.

SIR ADRIAN FULFORD: How much longer have you got with this witness?

MR MOSS: So I have got probably 10 minutes, I think, but we could take a break.

SIR ADRIAN FULFORD: No, 10 minutes.

MR MOSS: I'm grateful. Thank you, sir.

Thank you. In this seminar, ILT000291, his seminar presentation, I'm really putting this to you not to go through familiar points but just to illustrate that this doesn't seem to be a one-off by any means. So this is his seminar presentation. If we go to page 16 ILT000291_0016, please. Again, with the warning.

So, this was a different account being used as a Telegram channel, this time, "MB Store", and:

"Welcome to our Telegram channel.

"We offer a secure and convenient bank transfer and paypal payment methods for all your purchases ...

"Tasers.

"Dusters.

"Pepper spray.

"Flickys."

And:

"Shanks".

And it is also advertising fake IDs and also pictures of the knives, some of which certainly were illegal to be sold and certainly should not be advertised without age restriction.

What's your reaction to the ability of a store just to put, on a public Telegram channel, offering for sale tasers, dusters, pepper spray, Flickys and shanks? I think we were told it was in the north of the UK and we can see it had a username linked to the UK?

A. The content in front of me is obviously in violation of Telegram's terms of service and I would again, want to confirm to the Inquiry after whether we did moderate it.

Q. Yes. There is such a plethora of images there and also, in context, troubling language. Orders in close proximity to tasers, which I am sure you are aware are unlawful other than for police use. Dusters, knuckle-dusters, similarly unlawful. Any effective moderation process should have stopped this from being published in the first place?

A. Again, I'm not sure I can agree with the assertion that our moderation practice by insinuation is not effective. I think our moderation practice is highly effective and again, it is an evolving landscape that we are trying to work on. I can concede here that as soon as we were alerted to this information, specifically this chap with the ID, it should have been taken down and I want to confirm with my colleagues that it has been.

Q. Yes. Well, it will have done now but if you can assist us with when exactly it was taken down and whether law enforcement were proactively informed by Telegram, that would be helpful.

That leads me to my final topic on law enforcement. If we can go back to your statement, please, at page 8 TEL000018_0008, paragraph 34.

You say that, as stated in your privacy policy:

"... Telegram cooperates with relevant authorities, notably the UK National Crime Agency, and various units of UK law enforcement."

What threshold does Telegram apply for when it will proactively report its users to law enforcement?

A. Again, similar to many global online safety frameworks in Article 18 of the DSA, in threat to life scenarios, we would escalate the requisite information technically available to us to UK law enforcement.

Q. Is it only threat to life, or imminent risk of serious bodily harm as well?

A. I would need to go and confirm the exact wording within our policies but it is within the framework of the law.

Q. In the situation where Telegram saw those sort of illegal knives for sale on a Telegram public channel, your moderating systems notice them, or someone complains and they are taken down. Would you then refer them to the National Knife Crime Centre, to say, "Somebody has been using our platform to attempt unlawful knife sales", or not?

A. If it was mandated by law, we would, yes.

Q. It is not, at the moment, mandated by law. Would you proactively do it?

A. Again, with no kind of legally binding request, we would not, by default.

Q. Why not, if your platform is being abused by people advertising fatal weapons which could be intended for those who are underage, abusing your platform, putting it on a public channel? Why not do the responsible thing and report them? They are abusing your channel and your terms of service.

A. Because again, upon discovery of illegal content, we delete that content and secondly, I think there is a proportionality question about the existing

infrastructure for various law enforcement outlets to receive the volume of content that we process or delete on our platform at any given time.

Q. Forgive me, that's why I'm pressing you on this sort of threshold situation, where you have got unlawful knife sales. I'm not talking about things lower down the threshold, and the Inquiry is not aware of any evidence or suggestion that the National Knife Crime Centre would be reluctant to receive this information from platforms such as yours. If the material is simply taken down, what happens to the vendor?

A. The account would be banned in that instance because it is a violation of our terms of service.

Q. Yes, I understand that, but what about the vendor who is trying to push knives to anyone who will buy them, including knives that are unlawful? Isn't there a risk that they just go elsewhere without law enforcement intervention?

A. Again, I think there are two things here. The first of which is that the law has obviously been made in consultation the relevant law enforcement authorities and we would obviously act in accordance with the law, if that law was updated. Secondly, with regards to the scope of Telegram's moderative powers, they are restricted to the service, at the end of the day. We

moderate the platform, accordingly. That person would be removed. That phone number would be banned from re-registering and they would not be able to perpetrate that kind of offence on the platform again.

Q. Does the company not feel any sense of community duty to look out for the risks to the public? I mean, if someone was trying to sell a firearm or a zombie knife, when they are unlawful, what about community safety? What about common decency?

A. Again, I can't speak to the kind of -- the company's perspective on community duty. What I can say is that if content is illegal, as it was in this case, our view is that it should be moderated and removed from the platform and that user should be banned from using the platform, so as not to misuse the communication mediums that we offer.

Q. One final question in this area, if I may. I can bring up the transcript if you like, but I will try to summarise it and quote the relevant bit. Mr Richardson from the NCA gave this example. He says that one example they had last year, they had been tracking a Com network group on Telegram, on their publicly accessible channel. Right, you will note that it was Telegram and how recent it was.

He says there was an individual in there who, for

quite some time, had been expressing violent ideation and intent to stab schoolchildren in Italy. And this individual deleted their account and other people in the group expressed concern that he was going to do something. So at that point, there is a clear signal of intent to carry out that attack.

We -- that is the NCA -- collated all the material, we wrote to various reports. It took us, I think, seven days to get that report to the relevant authorities in Italy, we had to go through, I think, the British embassy in the end to figure out how to route that to the Italian authorities.

So you have the picture. A Com network, publicly accessible channel, this individual has been expressing violent ideation and intent to stab schoolchildren in Italy, then deletes the account. Other people are expressing concern that he is going to do something, and the UK's NCA intervened.

Did Telegram do anything?

A. I am unaware of that specific incident. My understanding, having read it, is that it is still with the team. In instances where the user deletes their account, there is no information retained because we offer users full autonomy over their data retention.

Q. So even though they had been expressing, for quite some

time, violent ideation and intent to stab schoolchildren, and even though those still on the group, a public group, were expressing concern that he was going to do something, you say it is with the team. It sounds as though --

A. I'm sorry. Forgive me, but I would need to understand the exact context and the exact channel, the item of content, the messages that suggest that he was -- ideating about stabbing schoolchildren. I'm unaware of the exact contents of the group.

Q. You can't help further?

A. I cannot.

Q. If you do learn of any explanation as to why that didn't lead to action by Telegram, would you let us know?

A. I would.

MR MOSS: I'm grateful. Those are my questions. I'm just going to look to my left. I think Mr Chapman has a few questions.

SIR ADRIAN FULFORD: Yes, Mr Chapman, do come forward.

Questions by MR CHAPMAN

MR CHAPMAN: Witness A, I ask questions on behalf of the bereaved families and the associated victim groups.

Let me ask you, first of all, about hashing. You were asked yesterday -- and I think you agreed with Mr Moss -- that hashes make sure duplicates or very

close representations are not re-posted, but you said later that you use SHA256 hashes.

A. Yes.

Q. Just pause for the question. Am I right in saying that an SHA256 hash matches only an identical file, byte for byte?

A. That is correct.

Q. So it doesn't, for example, hash or pick up a cropped or re-encoded or re-filmed copy, or a banned video that has been altered in even a minor way, just one byte; is that right?

A. Yes, unless that kind of change has itself been hashed and exists within the hash database.

Q. Unless it gets re-hashed?

A. Yes.

Q. Have you heard of "perceptual hashing"?

A. I have.

Q. Could you explain what that is for the Inquiry?

A. Again, forgive me if there is an element of technical ignorance to my explanation, but there are fundamentally two types of hashing; there's cryptographic and perceptual. SHA256 is an example of cryptographic, which, as you very correctly stated, identifies exact matches and then essentially prevents them from being uploaded. Perceptual hashing is a relatively nascent

form of hashing, where it is able to approximate -- I think is the best way to describe it -- images that look relatively similar and then ban them.

My understanding is that there are some concerns, among the technical ecosystem, that these hashes generate a lot of false positives.

Q. Does Telegram use any perceptual hashing?

A. At this time, we do not.

Q. Were you aware that e-Safety had criticised Google for matching only on exact copies, in other words, using SHA256?

A. I was not aware of that specific instance, no.

Q. That would put you in the same boat as Google, I take it then, that criticism?

A. I believe so.

Q. You were asked about GIFCT. Is the use of this SHA256 hashing the reason you can't take GIFCT's hashes?

A. No, that was a comment that I made kind of in haste yesterday and I would like to correct it. And Mr Moss enabled me to go away. As I explained earlier that was a concern about competition, when we initially engaged with the GIFCT in 2021. It is an independent organisation but it was funded by Meta. Meta obviously being the organisation that runs WhatsApp which is a direct competitor to us. We made the decision, at the

time, to explore other partnerships that could yield an extensive hash database and it is something, again, that we would be keen to revisit now.
Q. What's the reason you would be revisiting it now?
A. Because it's been raised in this medium. We have -- again, it is not that we are absent of hash databases. We have multiple NGOs who partner with us. And it is not just hashes, it is also keywords and other pieces of context that help feed our AI machine-learning systems.
Q. Do I take it that you would be interested in exploring also perceptual hashing?
A. I think it is a question for, frankly, someone who is more technically capable than me, but if it was something brought into law, we would obviously abide by the law.
Q. Well, let me give you an example. Bishop Emmanuel video, for example. I think you accepted there were examples of gore in your hashing database, is that right?
A. That is correct, yes.
Q. Is that video in it?
A. I can't confirm the exact video, unfortunately.
Q. If an edited copy were made and put on Telegram, would that be blocked, for example?
A. Again, I couldn't possibly speak to that situation

because there is a scenario in which that video would be posted and our AI machine-learning systems would do the job of perceptual hash matching, identify it as a piece of harmful content and then take it down.
Q. But if you don't use perceptual hashing?
A. Again, our AI machine-learning systems aren't solely for keywords, they're also for images, logos, as I said in the affidavit and Mr Moss and I discussed. A video like that, which is edited and displays clear qualities of an item of gore, for example, which is forbidden by our terms of service, would be taken down.
Q. But it wouldn't make use of perceptual hashing and to the extent you are reliant on these SHA256 hashes, a copy wouldn't be picked up, would it?
A. Again, I think we need to be clear about the systems that operate in parallel. With regards to hashing, an altered copy wouldn't be picked up by the hash matching systems that we have. In a public community, that video being posted would be identified by our AI machine-learning systems.
Q. I see, so there are parallel systems, I understand, but the perceptual hashing, you don't have. So the obvious and easy way of picking up a copy like the Bishop Emmanuel video wouldn't be picked up that way?
A. Correct, not by perceptual hashing.

Q. One-to-one chats. I think your privacy policy says that Telegram may use automated algorithms to analyse messages in cloud chats, to stop spam and phishing --
A. Correct.
Q. -- and the like, nuisance communications, basically?
A. Correct. In cloud chats. But I would just like to clarify the premise of the question because end-to-end is not the same as cloud.
Q. All right, well, you probably have anticipated my question, which is: well, if you can scan those for spam, why can't it match those for no footage of killings, or things like that?
A. Because -- do you mean as in using hash matching technology to do so?
Q. Well, how do you scan for spam?
A. Again, hash matching is -- I would have to double-check and confirm, but my understanding is hash matching is used in the cloud messaging aspect of the service. Specifically, there is end-to-end encryption that it is not used in and that is because, as I think explained at the very beginning of this --
Q. You just can't see that?
A. Correct. There are two devices that both have keys and they are the only two that can access it. Otherwise it is not an end-to-end encrypted conversation.

Q. So you would not be scanning for spam in those kinds of conversations because the same deal applies?
A. No. Also, that is actually a more technical detail about the way that people liaise with each other in secret chats, which is you have to know the other person, contact them and then be in the communication at the same time. So spam is not something necessarily that can be done in that format, if that makes sense.
Q. In terms of signing up to Telegram, you need a telephone number?
A. Correct.
Q. Is a SIM card needed?
A. I believe in most cases, you would need a SIM card to have a telephone number, yes.
Q. Telegram has something called a "fragment marketplace"?
A. It is a third-party marketplace, it is not something Telegram operates.
Q. But that marketplace, you can buy what are known as "+888" numbers?
A. There were a very limited quality of vanity numbers that were released, I think, two years ago, off the top of my head, yes.
Q. And that would mean you could sign up without a SIM card?
A. Again, this is a very limited instance that -- just

to -- I would need to double-check, but I believe so, yes.
Q. In the UK you can buy a Pay As You Go phone with a SIM card?
A. That is also true, yes.
Q. There is no requirement in the UK, is there, to provide any proof of identity to buy a SIM card like that?
A. Again, it is outside of my remit of knowledge, but I don't believe so.
Q. Are you saying you don't know that? It is a commonly known --
A. If it is a common piece of knowledge then I guess, it is so, but I can't speak to how a company like Vodafone or EE necessarily operate their service.
Q. They are typically known as "burner phones", aren't they?
A. I believe so.
Q. What about when a user has been banned, is there anything to stop a user coming back on a new Pay As You Go SIM plan?
A. No. I think -- I guess, the cost of the SIM plan would be the deterrent for users to not get those phone numbers banned. It would be a waste of money, in short.
Q. If you close down a group, you can set up one quite quickly, can't you, if you get closed down?

A. I don't understand. Are you just saying in isolation, or in relation to the previous question?
Q. In relation to the same question, getting banned, what is the real sanction? You can get a burner phone, as I called them, very cheaply.
A. Sure.
Q. And you could set up a new group. If you closed down an entire group, you could set up another one quite quickly, couldn't you?
A. Again, I don't want to speculate, but in theory, if someone had a burner phone, that phone number was banned and then they got another phone, then yes, they could open Telegram and act as a new group. But there are, again, common identifiers, I think, among moderative efforts that prevent -- or at least allow us to try and identify such groups being constantly set up.
Q. VPNs. How does Telegram decide whether a user is in the UK or not, is that just on telephone?
A. Again, to be frank, I don't have the technical expertise to give you an exact understanding how you do that.
Q. Well, you said in your statement there is some VPN detection.
A. There is.
Q. That constitutes, at best, an educated guess, and you can make an educated guess?

A. We can.
Q. Does that mean, however, that a UK child on a VPN can reach groups and channels made unavailable in the UK?
A. Again, I'm unaware of these kind of circumventions for accessing content that can be harmful via VPNs.
Q. Well, you can make an educated guess. It might be worth doing some research, perhaps?
A. I think it would be highly speculative for me to say anything in response to that.
Q. Have you done any research of that nature?
A. As to whether --
Q. Whether VPNs are being used by minors?
A. No, I currently -- I am sure that there is research that we can lean on. If the Inquiry would like us to provide it, we could produce something. But it is currently not my understanding. Again, VPNs are a particularly sensitive topic around free speech and an individual's right to privacy.
Q. Some VPN addresses are well known, aren't they?
A. Reasonably so, yes.
Q. Does Telegram restrict any sign-up in relation to those well-known VPN --
A. Again, I cannot comment. The VPN sign-up is not necessarily something I'm acutely aware of. My understanding is that the phone number is used when

signing up.
SIR ADRIAN FULFORD: Thank you. Witness A, thank you very much. That brings your evidence to a close. Thank you for coming to give evidence and participating in this Inquiry.
MR MOSS: Sir, might we say 1.50 pm, if that's convenient?
SIR ADRIAN FULFORD: 1.50 pm, certainly. Thank you very much.
(12.57 pm)
(The short adjournment)
(1.50 pm)
SIR ADRIAN FULFORD: Yes, Mr Jamieson.
MR JAMIESON: Sir, thank you. Ms Stevens is on the link. In a moment, I will ask her to be affirmed and we will begin her evidence, but may I just set out how I plan to use the time this afternoon?
SIR ADRIAN FULFORD: Certainly.
MR JAMIESON: Ms Stevens is our only witness for this afternoon. There is a quantity of important information to get through, but we can certainly finish it. What I will do is I will take breaks every hour and a quarter for 10 minutes, just to ensure that our shorthand writer, and indeed everybody else, has an opportunity just to be refreshed. It has been a long day already. That may mean that we have two breaks and it may mean

that we finish at or around 5 o'clock, but I hope that draws your favour.

SIR ADRIAN FULFORD: Abundant good sense. Thank you very much.

MR JAMIESON: Thank you very much. Then please may the witness take the affirmation.

MS KATIE STEVENS (sworn)

Questions by MR JAMIESON

MR JAMIESON: Thank you. May we have your full name, please?

A. Yes, Katie Stevens.

Q. Ms Stevens, good afternoon for us, good, I think, early morning for you. We are very grateful that you are joining us at this time. Please may I have on the screen RBX000119. Ms Stevens, this is your statement?

A. That's correct.

Q. And if I went to page 3 RBX000119_0003, please, I would see the date, 22 October 2026 and your signature that has been redacted. Is this statement true and accurate to the best of your knowledge and belief?

A. Yes.

Q. Thank you. It is a short statement. The reason for that is we have a longer substantive statement, don't we, as to the Inquiry, on behalf of your colleague, who we are calling Witness B, is that right?

A. Yes, that's correct.

Q. And if I went to page 2 RBX000119_0002 of the statement, and to paragraph 6, you would tell us -- and we will turn it up in a minute -- that you have had a chance to look at Colleague B's statement, or Witness B's statement. You have satisfied yourself as to its accuracy and essentially, you adopt that statement as your own evidence, is that right?

A. That's correct. Yes.

Q. Thank you. Before we get to that statement, and I go through the formal process of that, can we just go back to the first paragraph of your statement on page 1 RBX000119_0001, where you introduce yourself. You work for Roblox?

A. Correct.

Q. And you are the Manager of the Safety Intelligence and Investigations team, you tell us there?

A. That's correct.

Q. That team works to identify, assess and mitigate serious safety risks on Roblox?

A. Correct.

Q. And one of those serious risks that you and your colleagues have identified and worked towards mitigating is terrorism and violent extremism?

A. Correct.

Q. Essentially, you are the head of that team, as I understand it?

A. Correct.

Q. And Witness B was somebody -- or is somebody, who works underneath you in a senior role in the Terrorism and Violent Extremism team?

A. That's right.

Q. And you tell us, at your paragraph 1, that what do you is you do research into those threats and risks, create intelligence, create trend analysis and from that, risk assessments?

A. That is correct.

Q. And that work product, research, intelligence, trend analysis, risk assessment, you use that to inform internal policies, procedures, and enforcement strategies, aimed at preventing what you call "TVE" and I will adopt that acronym?

A. Yes, that's right.

Q. Now, that all sounds, from our perspective, like very important work. But may I say, we are a public Inquiry engaged in attempting to mitigate that similar threat in the real world. And I have no doubt that your work in this space will have informed you that one of the things about TVE is it is not unique to Roblox, is it? It is cross-platform on the internet, that's how it manifests

itself, am I right?

A. Yes, correct.

Q. And when it is felt most acutely, it is felt in the real world, with attacks of egregious nature that sit behind this Inquiry but happen all round the world. And so the plea that I make to you, or the request I make to you, the question at the outset is: we are grateful for the statement that you have provided, we are grateful for the disclosure that you have provided, and I don't say this critically, but at this stage, you have not, as a matter of fact, disclosed to us any of the research, intelligence, trend analysis or risk assessments that you have created in your work in this area. As a matter of fact, you have not done that.

Will you do that, please?

A. I can provide it in writing afterwards, if you are interested.

Q. Yes, thank you. We are very interested. Because one of the things that will be the theme of our questioning is you, as the platform, have access to all of that proprietary data as to how the people that use it interact, how their interests modify over time, and how the threat picture that they may pose develops. Whereas external agencies don't have that same visibility. So we would be -- sir, I'm having the temerity to speak on

your behalf -- very interested in the provision of that information and I think that's you indicating that you are happy to do that?

A. Yes.

Q. Thank you. All right.

Then with that, let's get to the substance. Please may we have on the screen Witness B's statement, which is RBX000017. And the boxes are the redactions that have been made to protect Witness B's identity. So don't worry about that.

But if we went to page 27 RBX000017_0027, we would see that there are 95 paragraphs to this statement and if we went to page 98 -- sorry, page 28 RBX000017_0028 -- we would see that it was signed by Witness B, dated in August.

This is the statement that you have had an opportunity to satisfy yourself as to its accuracy, isn't it?

A. That's correct.

Q. And it is also true and accurate to the best of your knowledge and belief?

A. Correct.

Q. Thank you. Having gone through that process then, please may we go all the way back to page 1 RBX000017_0001 of this statement and to paragraph 2.

Witness B introduces herself at paragraph 1. I don't need to go through that again. Having taken things slightly out of turn, with asking you to provide that disclosure to us. Paragraph 2, you start to tell us about Roblox.

In a sentence or two, shortly, please would you describe what Roblox is, how it works, for those of us who have no familiarity with it?

A. Yes, so Roblox is, as stated here, a gaming experience for users and creators to create and explore games on the platform. So, individuals can create interconnected places, with specific environments, 3D graphics, scripts, et cetera. So it is really a gaming platform.

Q. Yes. Just in relation to that, a couple of follow-up questions, if I may. So, firstly, let's have an idea of the scale of Roblox. Of those games that it hosts, how many are there, roughly?

A. I believe the latest numbers I have seen in 2025 were about 7 million daily active experiences or games.

Q. So 7 million. I think "experiences" is the term that Roblox uses, which we would understand as games, but it has a wider meaning and I will come to that in a moment. But about 7 million. Those games or experiences, are they created by Roblox or are they created by its users?

A. By its users.

Q. Right. So, individual subscribers to your platform, individual members of your platform, create those games and then will play those games and will play to them amongst them, am I correct?

A. Correct.

Q. And the company, you tell us there, at paragraph -- sorry, as your colleague tells us at paragraph 2, is publicly traded. Its rough value at the moment, publicly reported to be about $35 billion, is that broadly correct?

A. Yes.

Q. Which gives us some idea as to the scale. Its annual revenue, somewhere between 5 and $6 billion, am I broadly correct?

A. Yes. The recent number, I believe, was a little under 5 billion for the year.

Q. Now, you have got those 7 million games but it is free to access, I believe, and free to sign up for Roblox. So how is the revenue generated?

A. The majority is through Robux, which is the virtual currency on the platform. Yes, so you can purchase subscriptions, you can purchase gift cards but you can also, in the experience, purchase assets, access, upgrades to your avatar, things of that nature. So the majority of is derived from Robux.

Q. And are the developers, the individual users who create the experiences, can they derive a share of that income?

A. If they are eligible. So there is the DevX experience, but they have to be eligible for that. So not everyone who creates a game is eligible for deriving funds from that.

Q. You have described it as a gaming platform and you have given us that general overview. But alongside the gaming function, is the chat function a very significant part of Roblox?

A. It is a frequently used feature, correct.

Q. And are there different ways in which individuals can communicate? Firstly, can they communicate directly, in terms of voice, on your platform? Can they speak to each other?

A. Certain eligible users can, yes.

Q. We will come onto the fact that you have restricted some of your functionality for those who verify their age, haven't you?

A. Correct.

Q. But just in general terms as to the general functionality, so people can speak directly in groups, but also privately?

A. Yes, generally speaking.

Q. And within experiences, within games, but also

separately across the platform?
A. Yes.
Q. There's something called "Party chat", isn't there?
A. Correct.
Q. And is that where people join into a conversation that can move across one experience to another?
A. Yes, correct.
Q. There is also text communication between individuals. Again, that can be public or it can be private. Am I correct?
A. That's correct, yes.
Q. Just to give us an idea of the scale of that, may we have on the screen, please, RBX000011. Now, just to explain what this document is. When we get onto it, you are going to tell me about a text filtering software that you have created called Sentinel, which you use to moderate chat on your platform, yes?
A. Yes.
Q. And one of the things that Roblox have done is made that software -- let's just crop into the first half of the scene, so we can see what we are talking about -- you have made that publicly available so that other people can deploy that same software on their platforms to make their platforms safer. And I will ask you about the thinking behind that approach.

If I just cropped in on that top bullet, underneath the diagram. *(Pause)*.
So, 100 million users every day. Something of that order?
A. Yes. Current number is about 138.
Q. 138. Then the paragraph immediately under the bullet, tells me this, that:
"... communication is at the heart of [the] activities ... every day, more than 111 million users come to Roblox, where [they send] an average of 6.1 billion chat messages [a day and have] 1.1 million hours of voice communications ..."
So we shouldn't think of the chat, voice and text as being a small adjunct to your platform. It is a key and integral feature, isn't it?
A. It is a frequently used feature, yes.
Q. And that tells us -- well, 6 billion messages a day, 1.1 million hours of voice communication a day. Please may we go back to the statement of Witness B, page 2 RBX000017_0002, paragraph 3. So, again, to give us an idea of the scale, you have 3,000 employees. Something of that order?
A. Full-time employees, yes.
Q. May I ask, how many of those -- what's the size of your team that you lead? How many of those 3,000 employees

work for you?
A. My specific team, or the safety team?
Q. So the safety team?
A. Under safety, there is about 400 full-time employees, but we also employ thousands of contractors, to support moderation efforts as well.
Q. And what's their function, in general terms, the contractors?
A. To moderate, so to do human review of specific cases, tickets, that are generated from our candidate generator and moderate those appropriately, per our policies.
Q. So, again, we will look at the detail of that when we come to it, thank you. So that 400 in the safety team, they are involved, what, in the research, in the analysis, in the development of your policies?
A. Correct. And provide subject matter support for the development of the policies and moderation when there are borderline cases.
Q. How many of that 400 work in the TVE team?
A. So that's a bit difficult to answer because there is certain features that we are cross-trained on, right? So there is a large percentage of that that have touch-points with TVE. But in terms of a specific number, it fluctuates, given the features that we have, so there is a lot of cross-training. So that a bit

difficult to pinpoint how many exactly.
Q. Give me a rough idea. How many full-time equivalent roles are concentrated on that particular threat? Are we talking tens of people, hundreds?
A. I would say hundreds.
Q. Thank you. And the final question about the nature of Roblox, before we move on, is just to understand the user demographic in terms of age of your platform. So, in 2026 you have introduced age verification, or you have beefed up your age verification, haven't you, on your platform? Which I anticipate will give you good data as to the age demographic of your platform?
A. That's correct.
Q. So how many -- of that 100 million or so, how many are under 18?
A. It is roughly about 70 per cent.
Q. 70 per cent. And some of the users of Roblox are very young, aren't they? It goes down to about 5 years old, am I right?
A. That is the age requirement at sign-up, yes, to use the platform.
Q. So how many between 5 and 16?
A. I don't know between 5 and 16 but under 13, it is about 34 per cent.
Q. Okay, I think that will probably do. So it is about

a third of your users that are under 13, and 70 per cent that are under 18?
A. Correct.
Q. Which I think probably even I can do that maths. So that's about 70 million children using your platform on a daily basis?
A. Sounds about right.
Q. Thank you. That brings me onto the next topic. May we just scroll down on this page so we have got paragraph 5. Because what you tell us there -- or what Witness B tells us you adopt -- very first substantive sentence:

"Safety is at the core of Roblox."

That's something that is said in number of places in this statement. Indeed, it is said in a number of your policies, isn't it?
A. Correct.
Q. Is that a standard that Roblox doesn't just declare but lives by?
A. Yes.
Q. Because if you have 70 million children, you need to keep them safe?
A. Correct.
Q. The next topic that I would like to look at, please, is the risks and threats -- or some of the risks and

threats that you need to keep those children and -- dare I say, vulnerable adults -- safe from and the purpose of this section is -- of my questioning, is not to evaluate the efficacy of the mitigations that you have put in place, we will come to that, but I want to understand with the Chair, with our witness, what those threats are in the first place. Do you understand?
A. Yes.
Q. Thank you. If we went down just to the bottom of paragraph 7 there. You have listed some of the threats, in fact, that your standards that your safety measures are guarded against, or aimed against. So: risk of suicide; self-injury; harmful behaviour; sexual exploitation, including grooming behaviours; real-world sensitive events, which includes mass casualty attacks that have happened in the world; terrorism and violent extremism; violent content and gore; illegal and regulated goods or activities; the inappropriate sharing of personal information or attempts to direct users off-platform.

Now, those are threats that you have identified for yourself, I think, as a platform?
A. Yes.
Q. And how was that done? How did you identify these were the threats that you needed to mitigate?

A. Through our review of the platform, we are constantly monitoring. And our policies evolved to encompass the things we are seeing to ensure we are appropriately moderating them. So through our dynamic research and review of the platform itself.
Q. And that list includes real-world sensitive events, terrorism and violent extremism, violent content and gore, which are all issues that this Inquiry is very much engaged in the investigation of. And I come back to the point I made already -- I don't apologise for doing it -- we very much do want to see the research, the risk assessments, the learning, the data that has led to your identification of these risks on your platform, please.
A. Yes.
Q. But since I don't have those now, what I'm going to do, if I may, is just show you some of the third-party or law enforcement investigations that have been conducted that touch upon the work of Roblox, to help us to identify what those threats are. I anticipate very little of what I have to say will be news to you but it is important that I get your response to it.

The first document please is DSIT000091. So this is an internet bulletin or a press release from two UK law enforcement bodies: the National Crime Agency -- can you

see it, or do you want me to zoom it in?
A. No, I can see it, thank you.
Q. When we get to the detail, I will zoom it in, but I just wanted you to see who it was. So, the National Crime Agency, which I think is one of the organisations that Roblox partners with?
A. Correct.
Q. You are familiar with those? And the National Police Chiefs' Council is the representative body for all of the territorial police forces in the UK. And this is a document that they released in response to the UK Government's proposal that under-16s would be banned from accessing social media.

That's what this document is. If we just looked at the bottom of page 1 and onto page -- in fact, let's stay there for the moment. Essentially, there's already been a social media ban in Australia, hasn't there?
A. To my knowledge, yes.
Q. In Australia, particular named platforms have been banned, whereas other platforms have not. What the NCA and the NPCC are saying here is that their position is that the internet, as it currently exists, is not safe for children under 16. And they want:

"... restrictions on under-16s' access to online platforms whose design features enable criminals to harm

children. This means not just social media, but also gaming platforms, messaging apps, devices and AI."

And what they go on to say is that that ban should not be based on app names, but it should be based on the functionality of platforms. The first functionality they are concerned about is the mass discoverability of children, where children can easily be found or suggested to a large number of unknown users, allowing the offenders to identify and target victims.

Just go over the page DSIT000091_0002:

"Unrestricted contact from unknown adults ...

"Private or encrypted messaging ..."

"Algorithmic recommendations ...

"Nude image sharing or streaming ...

"Weak age assurance ..."

When we get to the detail, I am sure you will tell me that Roblox now has in place measures that meet some of those risks. I will take that as read for the moment. But what the NCA and the NPCC were saying was those features were commonly found across a range of well known messaging, social media, gaming and increasingly AI platforms, such as Snapchat, Instagram, Discord, TikTok, Telegram, Kik, X and Roblox. So Roblox was amongst the platforms that those law enforcement agencies were naming as amongst the most risky for

children because of that functionality. Have you seen this before? We asked you to look at it --

A. Yes.

Q. You have fine. So, again, I know you will tell me when we come to it, that you have features in place that mitigate some of these risks. But, in terms of the mass availability of children, we know already that there are 70 million on your platform. We know that chat discussion is possible, absent age verification, which we will come to. So those are some of the risks that you have to mitigate on your platform. Am I correct?

A. Which risks? Specific to those outlined by the NCA?

Q. So Roblox is amongst the platforms identified by the NCA as potentially the most risky because of its functionality, is that right?

A. So the functionality that they are talking about in here, in this specific article that I reviewed, the majority doesn't apply to Roblox. So from my standpoint, the risks outlined here, with the exception of children being on the platform, which we do understand is a risk which is why we do our best to mitigate that risk, the remaining kind of risks that they pose here really are not applicable to the platform.

Q. The next report that I just want to put briefly on the

screen, but I'm not going to go through the detail of it because I anticipate it will be familiar to you, ILT000395. Sir, these are really just for your note. I don't want to go through these exhaustively.

This was a report by an organisation called Revealing Reality from April 2025. I anticipate you will have seen this and looked at it and it is important that I note this was a report in April 2025 and they did a follow-up report four months later, or a little over four months later in September 2025, didn't they?

A. To my understanding.

Q. Yes, and sir, again, for your note, that is ILT000394. I am not going to put it up at this stage. But in summary, what Revealing Reality did was created a number of different profiles, where they had input different ages, from 5 to 42.

Do you want to look at the detail of this, or are you familiar with it?

A. I'm familiar.

Q. So, in April 2025, their research showed that an account registered as a 42-year-old could add and publicly interact with accounts that were registered as children as young as five and privately chat with children as young as 13. Then an account registered as a 10-year-old was able to freely access highly

suggestive environments which seemed to be modelled on hotels with private rooms and characters dressed in sexually suggestive outfits.

Profiles for five and 10-year-olds, able to access those features in April 2025, that's what Revealing Reality found.

In fairness to you, in September 2025, they re-investigated because Roblox introduced a number of changes in response to this report, didn't it?

A. I'm not sure if it was in direct response to this report but we have improved our systems since that time.

Q. What was found at that stage was that the overtly inappropriate sexual content wasn't available to anybody under the age of 17; that the chat moderation had improved; but that it was still easy to create accounts with false ages, and it was still easy for direct communication to occur between adults and children.

But I note that even the update is more than a year ago and we are going to come to the changes you have put in place in 2026. But that unfiltered access, or potential unfiltered access from malign adults to children is one of the real risks that is Roblox has to deal with?

A. Sorry, just to clarify, when you say it is "unfiltered" access, we do, even between trusted adults and trusted

connections, we still apply the same text filtering, for some of the risks as well. So just to clarify it is not unfiltered access, by design.

Q. No, thank you. And I make clear, I'm not talking about the mitigations you have got in place, but if you didn't have any of those mitigations, you have got 70 million children and you recognise that adults who wish to groom children, if you didn't stop them, would be coming to your platform to undertake that action?

A. Potentially.

Q. Yes. So, the other document -- the final document on this heading I would ask you just to look at please, CCW000018. Sir, this is again, a document that goes back to 2024 and I acknowledge that immediately. It was created under the aegis of the Children's Commissioner for Wales in the UK. It is an online safety snapshot and it is simply that, a snapshot, but if we were to go to page 3 CCW000018_0003, please. We would see that children and young people were asked whether they felt safe and happy when they used apps, games or websites. 1,000 or so of them.

I also make clear, for fairness, that the majority of those said "yes" they felt safe and happy when they used games, apps and websites. But of those who said "sometimes", "I don't know" or "no", they were asked

a follow-up question, so that 300 or so:

"Which apps/games/websites have made you feel unsafe or unhappy?"

Of that 300, a third, near enough, approximately 100 said it was Roblox that made them feel that way. Can you see that?

A. Yes, I can see that.

Q. From the top of those bullets. And the anecdotal quotes, third bullet:

"Sometimes on apps like Roblox they have voice chat ..."

I think that probably should be "where":

"... some people say inappropriate stuff also even without it people discriminate me because of my skin colour."

Something an 11-year-old was saying. So certainly in 2024, a third of the people -- or children who responded in that way to this survey were saying that they didn't feel safe or happy on Roblox and you have got an 11-year-old referring directly to the voice chat. Is there any response that you want to give to this snapshot?

A. No, other than we are continuing to improve our safety process and our mitigation strategies to reduce these risks cited here.

Q. It is another piece of evidence that we have been looking at that shows that the chat function, voice and text on your platform, is something that has to be carefully guarded, moderated, kept safe, else it risks abuse. And that's something Roblox fully accepts?

A. Yes.

Q. It is a part of the responsibility of running the platform. If you run a platform that allows direct communication between adults, between children, whatever it might be, you have to keep that communication safe?

A. And we understand that.

Q. Yes, but not all platforms do, so I think I'm adducing that perspective from you for that reason. So the second threat that I want to talk to you about is the potential -- the potential for non-ideological or nihilistic extremism to be groomed and incubated on your platform. The potential, we will come to the countermeasures, but the risk. The chat function that we have talked about is part of that, but so too is the design and the play of the platform.

Can we look at a document. Sir, you have looked at already, but it is important to look at in this context. ILT000363. It is the Council of Europe paper.

So, we put chat to one side and we will look at some of the detail of this, Ms Stevens, but I will tell you

immediately that the date of this is November 2025, so it is about a year ago. But it is an alert, piece of learning that has been issued across Europe by the Council of the European Union. All right? That's what it is.

If we just went to the -- exactly there -- the bottom of page 1, the bold text tells us the executive summary of what this alert is about. So:

"Nihilistic extremist violence refers to the commitment of acts of violence not driven by an ideological coherent goal, but by the apology of violence itself ... [It's] rapidly expanding across ecosystems online, mainly populated by minors and young adults [adolescents] that engage in overlapping online and offline violent activities ...

"The criminal and violent acts associated with nihilistic extremist violence are diverse and fragmented, making it hard to verify that they originate from the same ecosystem, and they are driven by the same misanthropic worldview. At the centre of this universe is The Com."

That definition of "nihilistic extremist violence", is that one you are familiar with and you work to?

A. Yes, that aligns with our understanding and meaning.

Q. Is it in use in the US, "nihilistic extremist violence"

or something of that order?
A. Yes, nihilistic violent extremism.
Q. And that encompasses, amongst other things, school shootings?
A. That's -- from a definitions standpoint, that usually falls into what we call "TCC", or True Crime Community. And not every law enforcement recognises TCC as a subset of NVE. So it kind of goes back and forth, but from our standpoint, we look at all forms of violence.
Q. Thank you. We may see a little of that data reflected very shortly. May we just look at page 6 ILT000363_0006 very briefly. So we've looked at the executive summary. Page 6 will frame the threat for us:

"Nihilistic extremist violence refers to the perpetration of gruesome acts of violence for the sake of violence itself."

Mention of the Com again. If we went to page 7 ILT000363_0007, we would see the tripartite description of "The Com":

"... not driven by ideology ... does not intend to bring about social change ... misanthropic worldview ... goal of subverting and corrupting social norms ... spreading chaos ..."

Adopts, picks up "elements from different extremist milieus", "fusion of random" events, is "also imprinted

by the personal grievances and frustrations of each individual".

So when the term "nihilistic extreme violence" is used, these are the risk factors, these are the elements that are being discussed and these are, I daresay, risk factors and challenges with this form of violence that you will be familiar with, from your work?
A. Yes.
Q. May we just look then at page 8 ILT000363_0008, which is the piece that is particular to your platform:

"It is a live digital ecosystem. Regardless of the focus of the violence, a multitude of groups co-exist and intersect online. This is a permanently shifting landscape, not only adjustments naturally to law enforcement disruptions, but also spontaneously fusing or multiplying."

The amorphous nature of this threat and the groups that undertake it, again, is that something you are familiar with?
A. Yes.
Q. I think, when I was asking you about definitions a moment ago, you were talking about: well, it is important not to think too much about TVE, we have to think about True Crime Community, we have to think about nihilism. These intersect and evolve. Am I right?

A. Yes, correct.
Q. And that's the learning that you have gained from the work that you've done within your platform?
A. Yes.
Q. But then underneath:

"Popular and mainstream online platforms are used to hook victims but then move to more obscure and encrypted ones."

Again, is that something that you are familiar with? You, on your platform, have mechanisms, countermeasures that are designed to uncover or prevent dangerous communications, risky communications, grooming communications, in general terms?
A. Yes.
Q. That's conduct you try and stop?
A. Yes.
Q. But other platforms do not make the same efforts that you do, in that regard. And they are listed here by the Council of Europe: Discord, Telegram, Snapchat, and the like. But the role or relevance of your platforms are this -- the example that's given is:

"... Roblox, Minecraft are all used as a means of contact, communication and public display of the violence committed. Gaming platforms play an important role: the gamification of violence itself helps to

support the belief system of the groups and provides tangible goals to its members (for example, scoring points according to the level of violence exerted offline)."

This gamification of violence is a really important part of this threat to understand, isn't it?
A. Yes, I would imagine so.
Q. Because part of the group's lore -- if that's the right word -- aesthetics, is to look at acts of violence and to apply the language or the aesthetics of video games to them, to apply high scores to mass casualty attacks, to think about violence through that spectrum; is that something that you have encountered?
A. On the platform itself?
Q. As part of this threat, as it presents itself?
A. From additional research and external research, yes. I understand that to be one of the risks.
Q. And that can go both ways. There can be attempts to create games that reflect or repeat or pay homage to real-life mass casualty attacks, whether on your platform or elsewhere?
A. Yes.
Q. Perpetrated by this community and indeed, there have also been attempts, where live-streamed footage of atrocities has been captured or made available, members

of this community have overlaid video game-type graphics to that, haven't they? Health bars, high scores, things like that?

A. From my external research, I have seen that.

Q. So one of the risks that you have to be attuned to, as Roblox, is to make sure that your platform is not being used for those purposes?

A. Correct.

Q. If we just went down to page 9 ILT000363_0009 and the third bullet point. This threat, the nihilistic extremist violence threat, is "a universe mainly populated by minors":

"An online, gamified, clout-searching culture in which each member wants to leave an impact in the world expressed through violence."

So if that's right, if this is a community that are seeking to attain status, an adolescent community seeking to attain status through their acts of extreme violence, that is another way in which the gamification comes in, isn't it? Because, for instance, we have talked already about the Robux economy on Roblox. It makes a tremendous amount of money, doesn't it, for your company? One of the things that a user seeks to do is to have an avatar that is of greater status than others, by spending Robux to buy unusual, atypical, rare items

of clothing, or items that can be held. Is that part of the culture on Roblox?

A. In some cases, yes, but sometimes they just like the avatar aesthetically, yes.

Q. Sure. I'm certain that we are only talking about a very small subset of the tens of millions of people who use Roblox and the vast majority of that may be entirely benign. But this idea of status and the expenditure of money and efforts to achieve status, can be part of what drives that economy on Roblox?

A. Sure.

Q. Thank you. So that's the Council of Europe report. That can come down. May we please look at an ISD report, so that's ISD000029. We can do this quite swiftly.

Just to introduce what this is, the Institute for Strategic Dialogue, is that an organisation you have come across before and are familiar with?

A. Yes, we work with them.

Q. I thought so. So you will be familiar with this report. Sir, you have looked at this as well already. We don't need to go through it comprehensively, but may we look at page 3 ISD000029_0003, please.

If we crop in on the second and third bullets. The finding that chimes with what the Council of Europe are

saying:

"Nihilistic violence ecosystems are decentralised, cross-platform and highly agile."

And the third bullet:

"Communities produce a much broader range of harms than ideologically motivated extremist networks, spanning a spectrum of crimes and risks, which include targeted violence, self-harm, animal abuse, mass casualty attacks, school shootings."

The report goes on to set out a number of features of this, but please may we just look at page 13 ISD000029_0013.

What this is telling us -- so, we have a number of names of organisations here with which you will be familiar: No Lives Matter; 764; and there at the bottom, is the TCC. It sets out the importance of aesthetics to these groups.

If we just come down to the bottom of that page, it says this:

"Aesthetics, in-group language and memes are important cultural touch-points."

More organisations are set out. The imagery, the narratives and the reflection of earlier mass casualty attacks. Again, may we just go over the page ISD000029_0014.

More paragraphs about the importance of aesthetics to this community and the adoption and the glorification of the look, the approach of former mass casualty attackers. That's a particular risk that you have to be aware of on your platform, isn't it?

A. Yes.

Q. You have to make sure that avatars are not created in a way that reflect former mass casualty attackers. Is that right?

A. Correct. That's part of our detection mechanisms.

Q. And you have to make sure that video games are not created that reflect, ape, pay homage to former mass casualty, real-world attacks, is that right?

A. Yes.

Q. And are those sorts of aesthetical reproductions harder to spot, harder to mitigate than the iconography, the designs that are associated with classic terrorism? Is it easier to spot a swastika than it is an outfit that a mass casualty attacker has worn?

A. In isolation, yes, it can be more difficult. But stacking signals, we have found to be very effective in identifying that. So, yes, I would say in isolation more difficult but combined with other signals, we are able to identify them.

Q. So if we just scroll down to the bottom of this page and

over ISD000029_0014, we would see the platform usage. Discord and Telegram, X and Reddit mentioned there. But if we just went over the page to page 15 ISD000029_0015, in the second paragraph, here's where there's a particular mention of your platform. So the 764 Network, which is a part of a Com:

"... does not treat any particular platform as rigid, single purpose environment. Members of these networks constantly adjust their use of various platforms according to their specific needs ... (such as identifying victims, grooming and exploiting them) which are all steps on the way, broadcasting their abuse or disseminating propaganda. This is dynamic is often fluid. For example, although Roblox is primarily used to identify potential victims due to its young user base, the platform has also been used for grooming purposes and to engage in sexual roleplay."

Are those risks that you are aware of and work to mitigate, the use of your platform to identify potential children victims of this harm?

A. Yes.

Q. And the grooming of children into the creation of this harm?

A. Yes.

Q. Thank you. That can come down, thank you. May we just

look at the final document under this heading, another NCA document, NCA000021. The purpose of looking at this document is it has some commentary on the particular relevance of your Robux economy. So to introduce this, it is an NCA document. It is from April of this year. It is called "'COM', Pathways into Harm". Part of the methodology for the creation of this document is the NCA spoke to, sought data from, individuals who had themselves been involved in or integrated with the Com.

That's the general purpose of it. If we went to the bottom of page 27 NCA000021_0027, please, under the heading "Relational factors". So here, the report is noting the sorts of factors, the sort of risk factors for both the perpetrators and the victims of this violence and says this:

"As with perpetrators, social isolation and the lack of protective factors such as strong familial relations and the absence of trusted adults in their lives make young people more susceptible to being targeted. Victims are groomed in online spaces where vulnerable young people congregate. Gaming platforms such as Roblox, Minecraft and Fortnite were the most frequently mentioned as being spaces where victims are targeted. One interviewee ..."

Inferentially, somebody who had been involved in

the Com:

"... described these websites as 'the holy trinity' ..."

For that purpose.

Obviously, we abhor the adoption of that language but it shows the use of gaming platforms for that nefarious purpose, the identification of victims for grooming: Roblox, Minecraft and Fortnite.

But if we just picked up what it said -- which is a point that the ISD and NCA are agreeing -- but can you see the point I was talking to you about in terms of Robux:

"A less obvious driver is 'a desire to be seen' ..."

Over the page, please. To page 28 NCA000021_0028:

"... aspiring online influencers with a drive for recognition and the pursuit of a lifestyle beyond the reach of many can leave victims exposed to exploitation. The framing is heavily gendered, young girls who are chronically online see highly successful influencers as well as sub culturally respected and followed 'E-Girls' and can view either route as a lifestyle to emulate. One interviewee described:

"'... having spent [some] time in some of those Discord servers, I just think, God, these, these Com extorters are just, it's like shooting fish in

a barrel ... It's too easy for them. Servers, are, just full [of] young girls going Robux, Robux, along Robux, give me Robux, give me Robux and ... some trying to set up as content vendors, going, here's my throne page.'"

It goes on. But essentially, can you see that is the report of the relevance of your online currency being abused, I would say, as a means to recruit, groom, extort vulnerable young people?

A. Yes, we understand that as a risk.

Q. So that is a risk you have to work against. One that perhaps may not be obvious until we get into the detail of it. But there's the NCA's work and it is one you recognise.

The final area of risk that I want to talk about is one that we have touched on, but I want to deal with it directly. That is games that are created that venerates or replicates previous mass casualty attacks. May we look at, please, ILT000210.

So this is an academic article from February 2026 on the True Crime Community. May we just crop in on that bold text on the top right. It gives us the abstract.

It is another article focusing on the TCC.

It goes on to talk about the importance of symbolism, aesthetic callbacks and as we will see, video games that copy and ape previous attacks. If we go down

to page 4 ILT000210_0004, right-hand column, bottom of the page.

So it is an article that's going through the different layers of this group and how it works. Here, under "Tier 2: Fandom and Parasocial Identification", it says this:

"As in many [other] online subcultures, video games that include creative and world-building elements are used to construct digital spaces where members can interact and expand on their common interests. For the TCC, games popular with young audiences, such as Minecraft and Roblox, are used to recreate significant locations or events related to mass acts of violence. Gameplay of these recreations are frequently recorded and re-shared on other social media platforms, complicating moderation efforts."

And it goes on. It is a threat that you are aware of, this creation of those video game homages, reproductions? It is potentially a multifaceted threat, the gamification, it makes those events seem less real, it makes them seem like video games for the people who consume them.

It takes away the horror of a real-world attack if children can just play a computer game of it, it makes it seems more normal to them. Can you see that?

A. Yes, I see that from the research there.

Q. It allows -- potentially facilitates that idea of status within a mass casualty attack as well, doesn't it?

A. According to the research there.

Q. The more you kill, the more points, the more impressive, the more kudos for you. Can you see that as a threat? Is that a risk you have to mitigate on your platform?

A. The gamification of violence?

Q. Yes.

A. Yes.

Q. Thank you. Please may we go to your statement, to a recent example of this. So we look at -- sorry, Witness B's statement. So that's 000017, page 18 RBX000017_0018, paragraph 59.

So, this is where Witness B has told us about the game that re-enacted the Sandy Hook school shooting and I'm not going to go into the details of it but the Sandy Hook school shooting is a particularly notorious attack where, very tragically, a very large number of very young children were killed in a school attack.

What you tell us here is that -- well, rather than me speaking, you tell us what happened, what did you detect, what did you do?

A. Yes, so our moderation efforts and detection efforts, we look for instances of games that are recreating

real-world sensitive events, what we call RWSE. And in our detections, we were able to flag a replication of Sandy Hook and we removed that game from the platform within five minutes of the initial report.

So, we also have not only internal moderation but we have the ability for external trusted flaggers, as well as you, in-game, can report an issue. And we did find that a few of the users that did play that game -- not very many -- accessed the game from a link and not through like an organic discovery or algorithm. And at that point, we reported all parties, the creator as well as the users that played the game, to law enforcement.

Q. So I think it is fair for me to observe an example of good practice, if you have been able to find that within five minutes and take action, impressive. But we note that ultimately, people wanted to create that game on your platform in the first place. And it must have taken some time for the game to be developed before it was launched and playable. So although, once it was launched, you detected it within five minutes there must have been a lead time before that that it was made?

A. Elements of it are made. The full thing is often not until the end.

Q. Again, just noting something that you have said there, people have obviously played it very quickly, if you

have taken it down in five minutes. And your assessment was that they had come to the game via a link, rather than finding it within your platform, which suggests that there must have been some communication somewhere else to provide them with a link, to provide that coordination, to allow them to come to the game to play it in the first place. Which is more evidence, if we needed it, of the cross-platform nature of this danger, isn't it?

A. Correct.

Q. So those are the areas of threat that I wanted to highlight in this aspect of your questioning. Can I take it that none of what I have taken you to, none of what I have discussed with you is new to you?

A. No, not new to me.

Q. Those are all threats that you know, you are aware of and you are working to -- I sound like a broken record, but the way in which you have gained this understanding, your assessment of this threat, your understanding of this threat, this is all very much the information that we would ask you to disclose to this Inquiry.

A. Sure.

MR JAMIESON: Sir, I'm a little bit ahead of an hour and 15, but that is a natural break.

SIR ADRIAN FULFORD: It is a natural break. How long?

MR JAMIESON: Shall we take 10 minutes? I look to our shorthand writer.
SIR ADRIAN FULFORD: Certainly. We are going to take a 10-minute break now and then we will resume. Thank you very much.
(2.55 pm)
(A short break)
(3.05 pm)
SIR ADRIAN FULFORD: Yes, Mr Jamieson.
MR JAMIESON: Sir, thank you. Ms Stevens, thank you for the patience of going through the risks. Let's look at some of the countermeasures that Roblox has put in place to meet them.
Could we have Witness B's statement back on the screen please, page 3 RBX000017_0003, at the bottom. Paragraph 10. So, the first tier of countermeasure that Roblox have put in place are your policies and your standards?
A. Yes.
Q. And we are just going to look at some of the relevant aspects now. We have paragraph 10 there on the screen. I'm not going to read it all out, but the top document, the most important policy that you have are your terms of use. Those are your rules on your platform that you set for your users?

A. Yes.
Q. And if people don't abide by the terms of use, you can stop them using your platform?
A. Correct.
Q. Importantly, for our purposes, one of the things you say in your terms of use is that: if you want to use our platform you have to abide by our community standards.
A. Correct.
Q. And the community standards you set out -- or you begin to summarise there at (ii) -- but again, the first thing you say, or is said, in this statement is an echo of something we said already:
"The Community Standards place safety at the core of Roblox's approach. Among other things, they prohibit content or behaviour that incites, condones, supports or glorifies, or promotes any terrorist or extremist organisation or individual, or their ideology, iconography, or actions."
We will look at the community standards in a moment. But you have decided that the rules of your platform, put safety ahead of people being able to say what you want?
A. Correct.
Q. And that is a value choice that you are able to make, as the owners and operators of a platform?

A. Correct.
Q. If we just go over the page, please RBX000017_0005, we will just look at some of what you have set out about it. So, for instance, users are not allowed to create content that recreates or imitates real-world sensitive events and you have told us about one of those things that was detected and removed. You don't say: well, it is legitimate to do this as a matter of freedom of speech, or: we can see some sort of value in it. You have taken the decision that you will not host that content?
A. Correct.
Q. And you give some lists or you give a list of some of the examples of that content there. Where you don't take such a hard and fast line is here, set out in the paragraph, "weapons or violence" because, of those very many games that Roblox hosts, some of them will be aimed at children, of blocky, limited graphics sort of games, but other of those games will be realistic, combat-type games with weapons?
A. For certain users, falling into certain age categories, yes.
Q. But we should be clear that there is violence -- as with many other video games -- I'm not singling you out, but it is a feature of modern video games, that they include

representations of violence, death, killing, weapons, those sorts of matters. And we should not think that that conduct is not present on Roblox. But even then, you have some rules about the extent of that that you will host?
A. Correct.
Q. And we will look at that. May we just look at the community standards briefly. Sir, for your note, the terms of use are RBX000002. I'm not going to pull that up. But the community standards are RBX000003. Please may we just look at that.
May we just crop in on the top half of the page. So you give a description of your community and what you say, at the third of those paragraphs, is this:
"We know we are not perfect, and even with our best efforts, sometimes things slip through the cracks. If you ever see something that you might think violate these rules ... [tell us]. We're in this together ..."
We want a space that you will all be proud of. And you set that out.
One of the things that you tell people in these standards is that you -- in fact, if we just go down -- yes. It is there, it is a point that we have made before:
"Safety."

You put that ahead of freedom of expression. You accept limits to that, in the name of safety. Just something you mentioned, in relation to the Sandy Hook game, that we were discussing before we broke. I think you told us that you referred, both the creator of that game and indeed all of the people who had played that game, to local law enforcement?

A. Correct.

Q. And I will come onto ask you -- do I take it that that was not because you -- well, was that because there was an assessment that there was an imminent risk of life from those individuals, or did you apply some other standard?

A. Not because there was imminent risk that we identified, because we wanted to proactively ensure that law enforcement was made aware of potential for criminal conduct on our platform.

Q. Yes, and again, that was a choice that you could make and an action that you could take, and you did so?

A. Correct.

Q. Just here, under the heading of "Safety", the second example, in particular, you have highlighted as to what you will prohibit, terrorism or violent extremism, this is the "TVE" acronym that you and I have been using. You say:

"Roblox does not allow content or behaviour that incites, condones, supports, glorifies, or promotes any terrorist or extremist organisation or individual, their ideology, iconography, or actions, including:"

And you set it out. Again, you have felt available to include that specifically in your community standards. How long has that aspect been part of the community standards? Is it a relatively recent addition or has it been there for a long time?

A. This particular aspect has been there for a while. I don't have the exact year it was launched, but it has been there for a long time.

Q. No, fine, but it has not affected the overall profitability, marketability of your platform?

A. Not to my knowledge, no.

Q. No. If we just scroll down, we will note, in passing, page 2 RBX000003_0002. You don't allow harassment or discrimination. If we keep going. You prohibit the depiction or encouragement of suicide, self-injury or harmful behaviour. You will, on some occasions, take account of harmful off-platform speech or behaviour. If we kept going, we would see that, in fact, under the heading of "Civility", you again, prohibit the depiction or recreation of real-world sensitive events, violent content and gore. That's where you draw the line and so

I will just read this:

"Although some games on Roblox may include weapons and violence, we do not allow content that contains extreme violence or serious physical or psychological abuse, including:

"Depicting or glorifying human, animal, or fictional creature abuse and torture.

"Realistic or real-world depictions of extreme gore, graphic violence, or death."

So you will not allow games that show that content on your platform?

A. Correct, we won't allow it.

Q. "Romantic and Sexual Content", part of your safeguarding or part of your protection of children, no doubt, but not particularly relevant for our purposes, so I will move over it. But if we just come down. Over the page RBX000003_0004, we see that you go so far as, in fact, as to prevent swearing on your platform.

A. Correct.

Q. These are all value choices that you can make, as the operator of a platform, as to the type of behaviour that you will allow. And these are all choices that Roblox has made and continues in its profitable business?

A. Correct.

Q. Thank you.

So, those are -- that's the first level of countermeasure that you have deployed. You set out your standards: that sort of behaviour is not welcome on our platform and if you are -- well, what happens if you breach the community guidelines, what action will be taken?

A. Depending on the particular breach, we will ban you, restrict you, remove your accounts, or if in a situations where there is criminal conduct, or imminent risk, we will report you to law enforcement.

Q. In terms of reporting to the law enforcement, is that a capability -- is that an action that you undertake in relation to United States law enforcement, or can you do that globally?

A. We do that globally.

Q. Does that include the UK?

A. Yes.

Q. And when you are making reports to the UK, who are you partnered with? Is that to central agency, such as the NCA, or do you have relationships with territorial police forces; how does that work?

A. So typically, it is through NCA. However, we do have a law enforcement liaison in the UK and in Europe specifically, that's covering that area. So we do work with local police departments as well, to ensure that we

provide them with actionable information. So it depends on the circumstances but we do have local law enforcement contacts as well.
Q. So your liaison, that's somebody within your company, is it?
A. Yes.
Q. Your law enforcement liaison, and they are based in the UK or elsewhere in Europe?
A. In the UK.
Q. So you have somebody here and they have contacts with local law enforcement?
A. Correct.
Q. That's something that you have funded, that you have put in place?
A. Yes, we have --
Q. Sorry, you go.
A. Sorry. I was going to say we have law enforcement liaisons all over the world.
Q. And in the UK, is that a single person or a team of people?
A. That's a single person in the UK.
Q. All right. Those, then, are the policies. Let's look at the next level of countermeasure mitigation, which is your age assurance. That's the one I want to look at with some particularity. If we could go, again, back to

Witness B's statement, to page 5 RBX000017_0005.
This starts at paragraph 11 but it is paragraph 12 that I want to start with, if I may. So again, just to frame these questions, it is explicit in what we have discussed about already, that you have a lot of children across a broad age range, from 5-18. And then a third of your users, there abouts, 30 per cent, are adults?
A. Yes.
Q. So age assurance, making sure that appropriate content is going to appropriate ages is obviously important for that sort of demographic, am I correct?
A. Correct.
Q. Now you tell us, at 12, that now, at the end of 2026:
"Roblox implements a tiered age-assurance system designed to ensure users have access to features and content appropriate for their developmental stage."
You tell us first, about a neutral age gate at the point that a new user creates an account. By "neutral age gate", does that mean I simply -- if I'm a new user and I come to Roblox and I make an account, I will be invited to put in my date of birth?
A. Correct.
Q. And you make -- or Witness B makes clear in these paragraphs, it doesn't tell you the right answer. It doesn't say: if you say you are under 18, you are only

going to get access to this, if you say you are over 18 you are going to get wider access, but it just invites you to put in a date of birth?
A. That's correct.
Q. And at that stage, is there any checking, is there any assurance that I have put in the right date of birth?
A. At that point, no, but you can't -- you get access to the platform but not the features of it.
Q. So, in a minute we are going to come onto the age assurance aspects that you require before certain features of the platform are unlocked. But just, if I'm that person who has input a date of birth, can I go on to the platform and play games?
A. Not certain games, not in some circumstances, no.
Q. So which games can I play? If I have said I'm 18, what can I play?
A. Typically, it is the mild, minimal, lower-age tier games. It is very minimal what you can do on the platform.
Q. Is it everything apart from the restricted games that I can play?
A. I don't believe so. I would have to double-check and I can follow up in writing on that, but I don't believe it is anything but the restricted games. I believe it is even lower than that.

Q. But certainly there are many, many games that I can play at that stage?
A. Yes, that you can play. Correct.
Q. You could -- you are going to tell me in a minute about the assured -- or the age assurance stages, that are necessary to access other aspects of the platform. And we will come onto that, because, in simple terms, if I just do that and I put in my date of birth and nothing else, am I able to chat with other users?
A. No.
Q. If we just went down to your paragraph 14, onto page RBX000017_0006 -- thank you. So you say this:
"Whilst the self-reported age entered at sign-up affords a user access to the platform, it does not grant [right] to access every feature ..."
And in particular, user-to-user chat.
To access those features, I have to go through an age check, which is there at 15. And there are two ways that I can do that. I can either do a facial age estimation, which is where I hold up a device that looks at my face and some software estimates my age, is that right?
A. Yes, correct.
Q. Or, I can provide a Government-issued ID for users over 13 and even if I take that option, so providing

an ID, do I also need to provide a photograph or some video of my face, to prove that it matches the ID?
A. Yes, you do.
Q. Right. I'm going to ask you some questions in a minute about work-arounds or the ability -- or the extent to which those countermeasures solve the problem.
But those are countermeasures that Roblox deploys, in simple terms, to allow me access to the chat, one way or another?
A. Correct.
Q. Is any chat, of any nature, possible before I undertake those age checks?
A. Not to my knowledge. I believe, you could see -- in a game setting, I think you can see game chat. But not in terms of actual communicating, back and forth, no.
Q. So I could access an experience that has a public chat in it and I would be able to see what other people are saying, but I wouldn't be able to enter into that discussion, is that what we should understand?
A. Yes. That's what I understand, yes.
Q. So that will have some risks to it, no doubt, because I may be a very young child, I may have given a false date of birth, who knows what chat I will encounter. Do you accept that that approach has risk to it?
A. There are risks to that but we also have other measures

that we use, to ensure that that risk is minimal.
Q. Are you talking about moderation and the like?
A. Yes, moderation, but also additional audits on age as well. We don't just accept the first age check. We also monitor how they interact with the platform, to ensure that potentially they didn't lie about their age.
Q. Thank you.
A. So --
Q. I'm going to come onto that. That is an interesting aspect of Roblox's approach that I will ask you about shortly. But essentially, Roblox has made a value judgement because that age assurance, you could put that at the very start. You could prevent me any access to the platform at all until I have gone through that. That's a possibility?
A. Theoretically, yes.
Q. You have chosen to deploy those countermeasures to allow me access to some functionality, rather than to allow me access to the platform at all. Is that a decision that has been made for commercial reasons?
A. I'm not privy to why that was made. So I can't speak to that. That's a bit outside my remit.
Q. Let's go back to that -- let's just crop down the page because you do -- and it is fair that I record some aspects that you use to try and ensure people enter the

correct age in the first place. So the first is this, in simple terms, if I'm a child and I have come into the platform and I have put in that I'm 12, and then I'm disappointed about the games to which I have access, I will find it difficult to change my age and say that I'm 18, in simple terms?
A. Correct.
Q. But that doesn't deal with a problem if I create an entirely different account, with a different email address, whatever that might be, and say I'm 18 in relation to that one?
A. Our mechanisms would still make that difficult.
Q. But children are tech savvy and ingenious and will find a way around. All right. But the other aspect that you are telling me about a moment ago, if we just came down to the next page, 17 and 18, so we can have it on the screen RBX000017_0007:
"Behavioural Monitoring."
This is what you were mentioning. So you have some sort of system that seeks to determine -- sorry, I have to stop because occasionally your video-feed cuts out, but it is only momentarily. Are you losing us --
A. No, I'm able to see.
Q. Fine, thank you.
You have some sort of subsequent checking process.

Now, I don't -- here, in this public forum, I don't want to understand the precise particularity into the way in which that works, but can you give me a high-level summary as to how that works and what you do?
A. Yes, so it is based on how you interact, like I mentioned, with the platform. So there are a variety of signals, behavioural and otherwise, that we take into account. And if we identify that there's inconsistency with what you told us your age was, or what you age verified at, we will promote another age check and during that time, again, features will be restricted until you validate your age again.
Q. So, in simple terms, and at high level, after a new user has joined, there will be some, to whatever extent it is, monitoring of the way in which they interact with the platform, from which signals can be derived. And if those signals raise an inconsistency, if that is interpreted to be something that raises a safety concern because: this looks like somebody who is younger than they say they are or perhaps the other way round, then you can take some action in relation to that?
A. Yes.
Q. That's a process that you use in relation to age verification. That is also a process that could be used, for instance, to identify somebody who was

becoming increasingly engaged with extreme violence, or using a chat in a way that suggested increasing areas of concern. That's functionality that is potentially possible on your platform?

A. And exists, yes.

Q. And exists. And whilst yours is a gaming platform, ultimately -- and again, I'm asking you at high level, I don't want the detail -- but principal signals are likely to be -- I don't know -- the period of engagement, the sorts of materials that are interacted with, the sorts of individuals that are interacted with, any chat, or any output of any nature; that's going to be the data that's available to you?

A. Yes.

Q. Is my list -- am I getting somewhere near, or am I completely wrong?

A. For on-platform signals, yes. And generally speaking, that's the right track.

Q. Are you able to access off-platform signals?

A. We are.

Q. So whilst you are a gaming platform, we have talked about -- I think your founder calls you a "hybrid platform" because it is gaming but it is all of that social element as well. But that is also an approach that other platforms could take to this problem; the

monitoring of those signals, the evaluation of those signals and the taking of action where there is concern? Are you able to comment?

A. I'm not familiar with every platform's technical ability but we found that to be effective for Roblox.

Q. Thank you. Again, I'm going to come back to my well-worn theme of: that's the high level, please, in writing, follow up, tell us how this is done.

A. Yes.

Q. Is that something that you can do?

A. Yes.

Q. Thank you. Now, I have said people will always find their way around. If I just came down a little in the page, you have given some more detail about how you do age assurance. In simple terms, you engage a third party that you have determined to be the best at this?

A. Correct.

Q. And you have asked them to do this age assurance for you. If I just -- just at the very top of the page there, can I see that the final sentence in paragraph 19, is that:

"If Roblox detects that an account may have changed hands ..."

Then you will revoke the account's age check status and provide an opportunity for age re-verification.

That sounds like it is a known risk that you try to work against, the selling, the swapping, the exchange of accounts?

A. Correct.

Q. There is some news reporting from Australia I would like to show you about that. ILT000396. So if we just cropped in on the top half of the page, we would see that this is pretty recent reporting, of six months ago or so:

"Underage Roblox accounts sold online allow predators to bypass safety measures protecting young gamers.

"One alleged Australian predator user has been charged with 596 child abuse-related offences."

It is not the core threat we are dealing with here but it is an analysis or an evaluation of this problem.

If we just scroll down please. This is the reporting:

"Age-verified Roblox accounts [were] being offered for sale online ...

"Pre-made accounts have recently appeared in various online marketplace listings ... for as little as $1.50."

If we kept going down, we would see some screenshots of that. There we go. Somebody offering, for sale:

"Roblox account -- Verified birthday and 13-15 Age

Checked.

100% legit and safe account.

"No restrictions or bans.

"Voice chat activated and microphone enabled."

It is hard to see how there could be any lawful, well-intentioned purchase of an account of that nature advertised in that way, but that is part of the threat that you are having to mitigate, yes?

A. Yes, and I will just mention as well that the sale of accounts is also strictly prohibited on our terms of use as well.

Q. Of course it is and you will work to detect it, no doubt, and to take action against accounts where you can detect that this has happened. But the fact that people are selling these accounts, age-verified, under-13s, to potentially adults, shows that yes, you are taking important steps with your age verification but it is not a complete solution, is it? It doesn't take away the risk entirely?

A. It doesn't take the risk, but it minimises it.

Q. I don't think I need to look at this anymore but the nature of the threat and the extent of the threat that was being posed by the individual that's being reported on here is clear and significant.

May we just go back to Witness B's statement and to

page 7 RBX000017_0007 and to paragraph 23.

Just on this idea of age verification and its -- the extent of its impact. Page 8 RBX000017_0008, thank you.

There are some charts, there is some data, but in simple terms, the age estimation isn't perfect. It's got an accuracy of about -- it depends. If I looked there, under different age bands, the age estimation model's accuracy depends on the band, but it is close, but it could be a year or a year and a half out and as people get older, perhaps more. But if we are estimating the age of adults, the software being out by two and a half years or three and a half years may not matter, but if we are estimating the age of 12-year-olds, or adolescents, that level of accuracy might be significant. Do you accept that?

A. Yes.

Q. And so we should also bear that in mind when we are thinking about the part that age verification has to play because if we -- because essentially, the purpose of age verification within your platform is to serve appropriate content to appropriate ages. That's why you do it?

A. Correct, and which is why we also look at age bands. So we don't just do a single age. We look at appropriate features for an age band, to allow for some of this --

the 1.4 or whatever year difference that we see.

Q. Face-spoofing or the use of technology, or even something as rudimentary as make-up, to impact the accuracy of age verification is also a problem with this software?

A. I have not personally seen that, in my experience, with make-up or AI, or anything like that. But theoretically could be an issue.

Q. So, again, something that we have to consider when we are considering the efficacy of this software. But, despite those limitations, despite those shortcomings, with the point that I have made already about the point at which Roblox deploys this age verification -- it is not at the point of access, it is to access functionality -- but you are able to use this technology and you choose to do so to protect the safety of the people who use your platform?

A. Correct.

Q. The next layer of your safety measures I wanted to look at, please, is moderation. But in fact, before I do that, let's just look at a topic that we haven't dealt with yet, which is your algorithm. So if we went back to the statement, please, and we went to page 20 RBX000017_0020 and paragraph 66. Because we have just been talking about making sure that the right people

have got the right ages. All right? Because once users are on your platform, they can select games by searching for them, by following links and the like, but your platform will also promote games to them, won't they?

A. Yes.

Q. Now, we shouldn't think of this assist something like Instagram or TikTok, where there is a continuous feed of promoted content. But if I'm looking for a game to play, is there a page that I can go to that will promote games to me?

A. Yes, on the home page, it will have the recommended for you.

Q. And paragraph 67 contains familiar language:

"... recommends personalised content on its 'Home' that aims to foster deep engagement from users."

Which is a nice way of saying: keeping people on the platform playing. Which, you are a commercial entity, you are seeking to make money, the longer people play the more money you will make, in simple terms. Is that what "foster deep engagement" means?

A. Yes.

Q. Or am I being overly cynical?

A. No, that is correct.

Q. That's what it means. And in simple terms -- I don't need to get into the particularity of it, unless you

want to -- you will prompt what look like, to your algorithm, the best, the most popular, the most engaged with games?

A. Correct. I will caveat that with, again, it is specific to the age band or the tier of account that they are in. So, yes, that's also a consideration before recommending specific games.

Q. So if I came down to 69 on this page, you tell me, as you just have, that the safety control that you have is you recommend, or the algorithm seeks to recommend, only appropriate games for age appropriateness, which takes us back to what we were talking about, in terms of the effectiveness of your age assurance software. And, indeed, whether or not the person has assured their age at all. Because if I'm 10 and I have put into the platform that I'm an adult, whilst it will, as it tells me, filter out 18-plus material, other than that, the algorithm is going to promote material which is suitable for older game-players, rather than 10 year olds. Am I right?

A. Yes, theoretically, that's possible.

Q. There's no inherent, contextual safety aspect to how that algorithm works. It doesn't filter out violent games. It doesn't filter out realistic games. As long as it is rated age appropriate, it will promote the most

popular?
A. Not just the most popular but also, if you choose to say that you are not interested in certain categories of games, it is not going to prompt you with those games anymore. And it also looks at experimental games as well. What is popular in your area, but also what we think you might enjoy from an experimental perspective.
Q. But none of that -- so I can say: I don't like this, don't send me anything like this again. But if I don't do that, it is going to be games that seek to maximise my engagement, one way or another?
A. Correct.
Q. Just as an example of what that might look like -- again, it is anecdotal, but we have some reporting from the BBC from 2025 -- ILT000393, please.
This, I imagine, is an interview which will be well known to all who work at Roblox because it was with the BBC with your founder and he signed off with a pretty powerful headline about keeping children off Roblox if they are worried.
But I don't look at it for that purpose. This was an interview with your CEO which looked at the state of play on Roblox then in 2025. If we went to page 4 ILT000393_0004, can you see just in the middle of the page there, I can crop in on it, if it would help you

read it. There are some game titles that were being recommended by the platform to an 11-year-old, including:
"Late Night Boys And Girls Club [roleplay]"
Which is one of those hangout spaces that -- potentially one of those hangout spaces that the 2025 investigation was concerned about, but perhaps more relevantly, for our purposes:
"Special Forces Simulator.
"Squid game."
Which was a pretty violent -- well, it shares the same name as a pretty violent Netflix television series, doesn't it, Squid Game:
"Shoot down planes... because why not?"
So some content which, in 2025, was being promoted to 11-year-olds. Would titles with those -- I can't see what the gameplay of those titles is. I have not seen it. This is the report that we have got. But doesn't look 11-year-old appropriate, on its face. Are those sorts of games still being promoted to children who may be as young as 11?
A. From my understanding of how that algorithm works, it should not be. Each of these games go through a questionnaire and review and audit, to identify what its maturity rating is for the platform. And as you

mentioned this is from 2025, so this was pre- some of the facial age estimation, as well as our tiered approach to kids and select categories for account tiers. So in theory, our algorithm should not be sending this their way, but based on the title, that's a bit more difficult. We look at the actual content of the game.
Q. All right. Well, we will keep those in mind and we will look at moderation now and we will see how effective that is.
Please may we go back to the statement of Witness B, on page 9 RBX000017_0009. So we have looked at policies, we have looked at age assurance, now we are going to look at moderation. Just to introduce this, when we are talking about moderation, there are the different aspects of your platform that we need to consider. We have the moderation of communication between users, both text and voice; we have got the moderation of games or experiences; and we have got the moderation of avatars. And we are going to need to look at all three of those.
The section that we are looking at here deals first with the moderation of discussion between users and with written communications, as I understand it, there are two levels of moderation that you use.

The first is a filter, which is here at paragraph 25 and it says that:
"Roblox by default automatically filters chat on the platform ... Done [by] automated systems that block users from sending potentially harmful messages when certain text is detected ..."
And then examples are given. Are we to understand that this approach prevents some text from even being posted in the first place?
A. That is correct.
Q. If I want to write swear words, if I want to say: give me your Snapchat handle, it will not allow me to write that in the first place?
A. Correct.
Q. And that is an automated process? I don't want to know the details but, at scale, 6 billion messages a day, in real time, is that something that essentially has to be entirely automated?
A. Yes, the scaled approach is automated.
Q. Fine. Again, I should have repeated what I have said already, that if we are getting into areas of operational sensitivity, just say and deal with it at high level.
A. I appreciate that.
Q. That's the text filtering, and again, here, I make the

observation that ultimately, the text that is filtered out, that's for Roblox to identify the terms, the phrases, the text that it does not want to be promoted on its platform?
A. Correct.
Q. And no doubt, this is giving away no secrets, but this will be an iterative process, there will no doubt be terms and phrases and words and work-arounds, where people have -- if they can't write a swear word, in the most benign example, they will find a way of writing a swear word, by replacing letters with symbols or by misspelling it or something of that nature. And you can detect those work-arounds and prohibit those as well?
A. Correct.
Q. And whilst I'm talking to you about the context of swearing, in that circumstance, that same approach can be used for language that is relevant to the TVE threat?
A. Correct, and it is.
Q. And is used. Now, jumping ahead a little, that iterative process by which you have identified the words, the phrases, the aesthetics, the iconography, whatever it is, that is relevant to that TVE threat, no doubt, your understanding of that has increased over time?
A. That is correct.

Q. Are you willing to share that understanding, as a matter of principle, with other platforms, to allow them to mitigate the same threat, if they so choose?
A. And we actively do.
Q. I will ask you about that at the end. But the same question, willing to share it with law enforcement, public protection agencies in states, including the UK?
A. Yes, and we do.
Q. In simple terms, how do you do that?
A. Share our findings?
Q. Yes.
A. Well, not only are we part of information-sharing platforms, so like Tech Coalition, GIFCT, founding members of ROOST, and several others, that I won't name, but we also work, again, with law enforcement, quite closely, we have those liaisons all over the world and they go to conferences, go to ICACS, so Internet Crimes Against Children forums and conferences and work directly with law enforcement and share our findings on how to not only engage with us, but what we are seeing on our platform and how we are mitigating those risks.
Q. Okay. Again, it's -- I'm not going to apologise for saying the same thing -- that is something, the detail of which, the Inquiry would very much like to receive in writing, please, after your evidence?

A. Of course.
Q. I will come back to that. It is obviously a topic of some importance. We will return to it, but just rounding out this question of moderation of text chats, we have the automatic filter. May we just come down and look at paragraph 26.

Is this right, that users who are 13 or over can have a form of chat where the filter setting is turned down, it allows more language through? Is that what I should understand by "expressive chat"?
A. Yes, but it doesn't preclude like the swearing, violent terminology, criminal conduct.
Q. So that less restrictive text filter, that will still -- even if I'm 13-plus age verified, if the language that's detected is relevant to a TVE threat, will that be filtered out or allowed through?
A. No, that would be filtered.
Q. Just, there is some terminology here which we may not understand: "game chats", "direct chats" and "Party chats". "Game chat", is that text messaging within a game?
A. Yes, correct.
Q. "Direct chat", is that user-to-user?
A. That's correct.
Q. And "Party chat", is that a group messaging facility

that will follow a group of users as they move from one game to another?
A. Yes, that's correct.
Q. "Trusted friends", what does that mean, please?
A. Yes, so that is a new implementation where you have to be added as a trusted friend in order to have that less restrictive chat, or more expressive chat. So for users between 13-17, like it mentions here, you can only add somebody as a trusted friend if it shows that you likely know them off-platform in real life. So QR code scanning, contact importing. For users who are under 13, you have to have parental consent as well, so the parent attached to the account has to allow for you to chat outside your age range.
Q. Yes, that all comes with a caveat that, if I'm 13 or if I'm 12, and the age authentication software thinks I am 13 and a half, then I will fall into that 13-17 bracket and I will potentially be allowed to do it. And whilst live QC code scanning is a countermeasure, that doesn't stop me communicating with somebody I don't know off-platform and finding a workaround to that?
A. Which we do monitor for.
Q. Again, I don't want operational detail but presumably, the extent to which you can monitor activity on other platforms has its limits?

A. Sure. That's correct.
Q. So these are features that you put in the way to try and increase safety but none of them are without workarounds, or none of them are foolproof, am I right?
A. Correct, there's always risk there.
Q. Yes. So, you also have, in relation to -- just on this filtering point -- something similar, real-time monitoring for voice chat, you tell us about it there at paragraph 27:

"... voice detection tool to proactively detect policy-violating language on the platform. If the tool detects policy-violating language based on [the] Community Standards, [it] employs system-generated safety nudges and timeouts to help discourage further violative language."

So, I can still say policy-violating language, it is not quick enough to stop it being broadcast in the first place. But if it is detected, some sort of warning system will come into play?
A. Correct, warning and bans.
Q. So what does that look like? How does that -- if I -- if I'm an adult, or if I am an adolescent, speaking to another adolescent and I'm using TVE, grooming relevant language, and it is detected, what could I expect to happen?

A. There will be a pop-up, letting you know that that content is not allowed. Depending on the egregiousness of what you are saying, we might sign you out, we might ban you from continuing to speak. It sort of depends, it is progressive, depending on the severity of the content. But also, if it is to the level where it is repeats, and other behavioural signals suggest that there is TVE, we will also moderate and kick you off the platform.
Q. In a conversation like that, where perhaps one person is using the language and another person is receiving the language, a classic grooming situation, are we both getting the pop-up, do they both look the same? Or am I getting a warning for my behaviour and are they getting a warning of some sort of safety advice? What does it look like?
A. So, typically, the warning is coming to the perpetrator who spoke the violating content. And then we also offer -- again, depending on the exact situation, there might be pop-ups or offering of support for the victim or the bystander.
Q. Other platforms have suggested, in their evidence, that warnings were -- or might be counterproductive, it might not achieve the end that they were set out to achieve; what's your research, what's your understanding of the

efficacy of warnings?
A. In my review of the platform, it is effective in providing enough friction to reduce that risk. Obviously, again, kind of what we mentioned with these really organised bad actors, they will find ways to circumvent it and won't necessarily care about warnings. But for an average user, it is effective in reducing the risk to exposure on the platform.
Q. Thank you. So, on that point you have just made, let's go down to page 13 RBX000017_0013 and paragraph 38. You have this at-scale, automated filtering process, but bad actors -- to borrow that phrase -- will find a way around it. The next level of moderation that you have is chat moderation. You tell us, here at paragraphs 38 and 39, about the process that you use in the related field, the related risk of child exploitation. Again, I'm going to simplify it.

You have an AI system that scans all direct chats, looking for risky conversations. If something is flagged, paragraph 39, it comes out of the general AI system into a more specialist one, for particular scanning for that sort of language. And then is there escalation to a human moderator, in appropriate circumstances?
A. Yes, that is correct.

Q. Without going into the detail of it, have I got the general working of that appropriate?
A. Yes, you do.
Q. If we go back to -- I'm not going to call it up again, but the name of that process is "Sentinel", which is the document that we looked at, at the start, to give an idea of the scale of the communication on your platform.

You tell us that you have made the decision to make that available for open-source use. In a couple of sentences, why, and what has the uptake of that been, please? Why did you do that?
A. We believe that information sharing to combat these risks is important. And so we actively try to support the industry, with providing our learnings, our findings, to reduce the risk across the industry. My last estimate that I saw about the use of that, was that it had been downloaded over 75,000 times. I don't recall the exact number but in that range, was about 75,000 times.
Q. Did you have concerns that by making it available in that way, it would enable bad actors to find flaws, workarounds, shortcomings in that software?
A. Because of our sort of first layer of defence, I think we were comfortable saying that we have other mechanisms

to reduce the risk of bypass. So putting that information out there and not advertising our other mechanisms that we use, in order to moderate and identify these risks, I think we kind of found that to be the right balance of providing industry support, while also maintaining that -- some things quiet for ourselves, to not enable bad actors from bypassing our systems.

Q. Perhaps a broad metaphor, you have made the penicillin broadly available, but the most specialist antibiotics, the most refined solutions, you have kept away from open consideration?

A. Correct.

Q. That's child exploitation. Paragraph 40 you tell us about the approach to TVE content. We have redactions here, we will be particularly careful. But in general terms, is it the same approach: a broad, general search engine; a more specialist, AI large language model, once candidates have been identified; and then human moderation in appropriate cases?

A. Yes, it follows that general process.

Q. Yes, and it says here:

"Users flagged by the system are then cued for automatic investigation."

Is that by humans?

A. We have both automatic investigation as well as human investigation.

SIR ADRIAN FULFORD: We must soon take a break.

MR JAMIESON: Yes. Thank you, sir. May I just round out one point and then we will do exactly that. So, again, may we just look at paragraph 42 RBX000017_0014 because what you say, in those circumstances, is that you will take appropriate action if the communication violates your community standards but does not rise to the level of child exploitation or violent extremism.

What does "appropriate action" mean?

A. Again, depending on the circumstances, it could be a ban for a specific period of time, up to and including removing and deleting the account entirely.

Q. Can it include referral to law enforcement?

A. Yes. If it rises to the level of child exploitation and violent extremism, or other criminal conduct, we will refer you to law enforcement.

Q. But those are the standards that you -- in simple terms, it has to be violent extremism -- and I'm not suggesting there's anything wrong with it, I just want to understand it -- violent extremism, criminal conduct or child exploitation, those are the things that you would refer?

A. There's other content, other harms that we would also

consider referring to law enforcement, if we believed there was an imminent risk to an individual or to society in general.

Q. I tell you the reason I ask -- and I will finish here, sir, if I may -- one of the things that many witnesses have told this Inquiry about the cohort that we are concerned with, individuals living online, becoming fixated on violence, progressing along a continuum to serious extreme violent offending, is that the best information as to who they are, their motivations, their risk factors, is often available online, firstly; and secondly, the best opportunity to intervene effectively is early, before we are getting to the stage of imminent risk, better we are getting to the stage of criminality. When we are starting to see that young adolescents are becoming fixated on violence, that they are spending more time on their own, that they are consuming extreme violent content.

Is there the facility for you to refer those sorts of cases to law enforcement, if you thought it appropriate?

A. If we believe that there is concern and in consult with our legal counsel, we do in fact also refer cases of not imminent risk, where there is concern about the individual or people in their orbit with -- you know,

not rising to the level of kind of imminent risk or criminality. If we see behavioural signals that are progressing that way, we also refer those in certain circumstances. It requires a high level of judgement and behavioural kind of compilation over time, but yes, we have referred those as well.

Q. What I would ask, please, in respect of that, is anonymised if need be, but real-world examples of where Roblox has done that in writing after your evidence, please. It doesn't have to be the UK. I just want to understand where you have done that, the judgements you have made, the process you have made. If you need to anonymise who that individual is, I think that would be acceptable. I'm looking at the Chair?

A. Yes, I would have to anonymise that.

MR JAMIESON: Yes. Sir, is that a good moment for a break?

SIR ADRIAN FULFORD: It is, we will sit again at 4.20 pm.

(4.07 pm)

(A short break)

(4.20 pm)

SIR ADRIAN FULFORD: Thank you very much. Yes, Mr Jamieson.

MR JAMIESON: Thank you, sir. Thank you, Ms Stevens. Please may we have Witness B's statement, page 10 RBX000017_0010, paragraph 28 on the screen. We have talked about text moderation and the two approaches to

that. We are going to talk now about game moderation briefly.

To pick up something that you have told me in passing already here, at paragraph 28, the principal protection that you use here is you age gate or age band games into these categories?

A. That's correct.

Q. So "Roblox Kids", 5-8; "Roblox Select", 9-15; and then games for 16 or over or 18 or over. Those are the categories of games?

A. That's correct.

Q. When a user creates a game, they have to fill in a questionnaire as to the content of the game, which includes an assessment of the violence that's within it and that, amongst other signals, is used to band the game into the appropriate age bracket?

A. That's correct.

Q. I think I am entitled to observe, in passing, that 9-15 is quite a wide age band. There are plenty of things that will be suitable for a 15-year-old that are not suitable for a 9-year-old. Would you accept that?

A. I would be open to the research on that. I don't know specifically, in exact terms, what would be different but I would be open to reviewing the research on that.

Q. You do not think there is a difference between

a 9-year-old who is yet to go through puberty and a 15-year-old who is a way of the way through?

A. Sure, I understand there is a difference in maturity level, but in terms of what games or content should be available for them, I would have to look at the research to have a formed opinion about that.

Q. If we looked at paragraph 29, we could see you have given some more particularity about the stages that a creator has to go through to publish a game. The questionnaire and then, once it has been published, again, an automatic 16-or-over age rating and then you monitor how people interact with that game. Am I right?

A. Yes.

Q. That's what paragraph 29 says.

A. Correct.

Q. If I'm one of those profiles that has not validated my age, if I have punched in that I'm over 18 and I have not validated that, can I play these games at this time?

A. Can you play the games?

Q. Yes.

A. As the creator? Can you clarify?

Q. Yes. So a game has been made available only to age-checked users 16 or older, this says. So does that mean, if I have not verified my age, if I'm another user and I have joined Roblox and I have punched in date of

birth that says that I'm 18 but, in fact, I'm 12 and I have not age-verified it, can I play this game at this time?

A. I believe it depends on the game, as I mentioned before, what category it is in. If it is in a restricted category, if you haven't age verified and those -- certain features, like that, won't be available to you.

Q. Right. Because here, at paragraph 30, you say that:

"Games [that are] available to 16 [and over] and 18[-year-old] users do not need to meet the ..."

Same safety review criteria for those that are getting to be released to younger ages?

A. Sure. And I apologise, I maybe misunderstood your question, when you said about a 12-year-old, but --

Q. So I'm inviting you to think about the circumstance where I am 12 years old but I have come to Roblox and I have lied about my age and I have created a profile that says I'm 18 years old or 19 years old. I know that I can't chat directly with other users but I can access computer games, I can access experiences. My question is: which of those experiences can I access? I have a profile that says I'm 18, but it has not been age verified. What can I play?

A. So then you would be able to access the full content.

Q. The full content?

A. Yes.

Q. Including games that are rated for 18 and over?

A. Correct. If your age band is 18-plus, yes, you would be able to access 18-plus games.

Q. And those are the games that will have -- if there are violent games that is where they are to be found, 18-plus?

A. Correct. "Violence" as defined by our terms and conditions, yes.

SIR ADRIAN FULFORD: Can we just ensure that there isn't a misunderstanding here. Are you saying then that in that category, you would not have to be age verified in order to play those games with violent content?

A. No, you'll have to be age verified. So you have to have age verification for restricted games.

MR JAMIESON: Yes. Okay. There is a particular meaning for "restricted games" on your platform, isn't there?

A. Yes, sorry. Correct.

Q. I have confused myself now, sir. So the question is this: if I have a profile that I have set up and it says that I am over 18, but I have not gone through the age verification process, so I haven't submitted a selfie and I haven't submitted any ID, that's the profile I'm interested in. All right?

A. Okay.

Q. Which games can I access to play?
A. My understanding -- and I can confirm in writing after this -- of the platform is you shouldn't be able to access any games, unless you are -- sorry, those kind of highly restricted games, unless you age verify. That's my understanding. I think --
Q. But what does "highly restricted" mean? Because you have told us here that there are games that are rated as appropriate for 5-8-year-olds, as one category; 9-15 as a second category; 16 or over for a third category; 18 or over for a fourth category. Which of those can I play?
A. 18 and over. Well, you can play -- if you are a 18 and over verified account --
Q. No, I'm not verified. I have said I'm 18, but I have not verified it. What can I play?
A. To my understanding, you wouldn't be able to play the "restricted" category, what we deem as restricted, based on our questionnaire.
Q. If we just went over to paragraph 31. In fact, sorry, just up to 30 again. My apologies.
So, what "restricted" means in this context is if the developer's game includes:
"... graphic realistic-looking depictions of violence and/or death that do not violate Roblox's

Community Standards, then that game is rated Restricted which is only available to 18+ users."
A. Correct.
Q. Right? And so I think what I would value confirmation of in writing as to whether I have to have an age verified account, I have to have gone through that verified process to get access to that game?
A. Sure, and I can follow up.
Q. It sounds like all the other categories, 8 and under, 9-15, 16-plus, those are definitely all available to me if I have not verified my age?
A. I believe so, yes, but I will provide confirmation in writing.
Q. Thank you. If we -- you say, at paragraph 31, that:
"Roblox recommends that creators base ..."
Their evaluation of their game:
"... on the most mature or most extreme content that players can encounter ..."
But you say that a moderation team "may review a Questionnaire and a game's rating to ensure its validity" based upon the content. Does that mean that a moderation team will not always review the answers that creators give to games that are age-gated 18-plus?
A. In all circumstances, there might not be a human review but there is automatic review as well, to include

snippets and screenshots of the game, to ensure that it is rated appropriately.
Q. Thank you. At paragraph 32, you say that:
"All content in the game" is run through a pre-publication scan, to comply with your particular policies, in particular, child sexual abuse material, child exploitation content. In simple terms, are you making sure that there is no child sexual abuse material in this game before it is published?
A. Correct.
Q. Is the same scan run for TVE content, pre-publication?
A. There is a similar scan that is done, yes, for real-world sensitive events, extremism, terrorism, et cetera.
Q. But you say, the final sentence to this paragraph:
"To the extent that bad actors manage to bypass automated detection filters, this content can also be reported within the game, and removed as policy violative."
Which has two aspects to it. That is an acceptance, rightly, that sometimes games will get through this automatic process, that will happen? Am I right, that will happen?
A. Yes.
Q. But you are also drawing our attention to the fact that,

if it does happen, one of the mitigations you have is that players can report games and if they do, you will take action?
A. Correct.
Q. May we just look down the page, paragraph 33, over the page RBX000017_0012, sorry. So here, you are talking about the avatars that individuals create. And may we just understand this, if I access your platform, I create an avatar, as a gamified version of myself. Is that avatar common across all the different games that I play?
A. Yes, that will be consistent.
Q. Indeed, there are -- some of the experiences are meeting places in which avatars will come together and communicate in some way with one another, either directly, with voice or with text?
A. Yes.
Q. We have discussed already the importance that some of your users place upon their avatars, their appearance, the items of clothing, or the objects that they have applied to them. People will spend a lot of money on the appearance of their avatar, is that right?
A. Yes, in some cases.
Q. What you say here is, as with the games, at paragraph 34, some bad actors will attempt to circumvent

the safety mechanisms that you put onto the appearance of those avatars. We have talked about the importance of aesthetic, for the Com, the signals that people want to create in this online environment. You are making efforts to prevent that happening with the appearance of your avatars. But people will try and get round that?

A. Correct.

Q. You -- again, you are, rightly -- or we are redacting the particularity of the way you do that, but do you have a combination of human and automated systems to seek to detect avatars that violate your standards and, in particular, those that would commemorate or venerate, mass casualty attackers?

A. Yes, correct. It is a combination.

Q. That can be particularly difficult where the way in which that aesthetic is presented changes, is content-specific over time. This is as difficult challenge that you have to meet?

A. Correct.

Q. At paragraph 37 RBX000017_0013, you have mentioned, in passing, real-world sensitive events on a number of occasions. Please tell me what that means on your platform, what are we talking about?

A. Any replication or attempt to condone a situation that happened in the real world, like a natural disaster,

mass casualty attack, human rights violations, and things along that line, that created a traumatic experience in the real world. So any replication, attempt to praise them, or mock victims of that situation.

Q. You tell us, at paragraph 37, that you run sweeps on your platform to detect, or to aim to detect content that reflects real-world sensitive events. You tell us that there is a priority system. Presumably, the greater the priority, the more often the sweep is run and with greater resource. I think I do have to ask what priority Southport is accorded?

A. I'm not sure on the exact priority level it was at the time, but we have done sweeps throughout 2026 that I have been familiar with. So, in terms of the priority ranking, again, I can follow up after in writing but we have continued to do sweeps, on this particular instance.

Q. Please. May we just look at two instances of media reporting on this, to illustrate the problem. ILT000397 which, as it comes up, is an article from the Guardian of 13 February 2026.

Now, this is an article that's published under the heading of the "Tumbler Ridge school shooting", which was the mass casualty attack in Canada.

The individual that perpetrated that attack had not created a real-world event, or an existing real-world event on your platform, but they had created something that was called a "mall shooting game". If we moved over onto the second page ILT000397_0002, we would see that. If we came down, we would see that the action that you took -- so, you told the Guardian that you have:

"... removed the user account connected with this horrifying incident ... We are committed to fully supporting law enforcement in their investigation."

The game that they created, a mall experience, other reporting has got screenshots on it. I'm very deliberately not putting that on the screen. But it was a game in which you could move through a shopping centre and shoot members of the public. That was the essence of the game.

It was accessible only through Roblox Studio, a separate app used by developers to create games. As a result, the simulator recorded just seven visits.

So, just to unpack this, this was an individual that went onto perpetrate a mass casualty attack, the Tumbler Ridge shooter. They had used --

A. Yes.

Q. They had used Roblox to create a game that was a mall

shooting experience and, as a matter of fact, that had not been detected or mitigated before the attack took place.

A. Correct.

Q. Now, your real-world sweeps that you do now, will they detect games like this, that don't seek to replicate an existing real-world experience, but might foreshadow something that somebody might do?

A. Under the "real-world sensitive event" kind of category, not necessarily. But we also have other implementations and experts that are watching for signals that would indicate that there is a simulation occurring of a potential risk.

Q. So if such a signal were detected, is that going to be relevant to the question that I asked you already, about whether or not there might be some engagement with law enforcement?

A. Yes.

Q. To the extent that you can answer it, is there any particular reason why this example was not detected ahead of time?

A. In general terms, I think as we continue to iterate on our platform safety features, and understand the mechanisms that bad actors can use to circumvent our safety measures, this was an area that we were able to

learn from and implement additional and enhanced strategies to identify these ahead of time.

Q. Well, let's look at a more recent example then. ILT000392, please, which is some Reuters reporting from a month ago. Sir, for your reference, this is some reporting that relates to the series of attacks that took place in Poland -- attacks and attempted attacks -- but there is a particular -- I will note in passing that it was 20,000 police who were deployed to schools, rather than some bigger number -- that's the general story. If we go down to page 2 ILT000392_0002 and for your reference, Ms Stevens, we know -- we have seen other evidence that there were several days of incidents of concern, several days of attacks and attempted attacks in Poland, different individuals, different methodologies.

And the reporting here is saying that there's a dismissal of rumours that the attacks were linked to some online challenge or organised group. But, Mr Tusk gives the response -- and if we come down that page, please, we see there one of the incidents was a boy who had "created a model of his school in the Roblox game and simulated attacks on students". He was arrested in the currency of this operation, inferentially before he had got to his school, if that's where he was going, in

possession of a firearm, ammunition and knives.

This is obviously a very recent situation and no doubt, the Polish law enforcement process is at an early stage. But are you aware of this incident?

A. From what I have reviewed on the platform, and my colleagues have reviewed, we have not been able to confirm this specific line. We have not been able to confirm that that occurred. But we welcome partnership with law enforcement to be able to identify it, if it exists. But at this point, we have not been able to confirm that.

Q. We heard about a meeting that was convened between the Polish authorities and the big tech platforms. Did Roblox attend any such meeting?

A. I do believe Roblox was there, yes.

Q. So are you in communication with the Polish authorities about this issue?

A. I'm not personally involved in that, that is a bit outside my remit. But I do know that we did attend that meeting. And we work with law enforcement worldwide and do include Poland.

Q. Because on the face of it, again, I appreciate and I acknowledge the efforts that you make to remove sensitive references to events, or existing events on your platform -- and we are going to come on to the AR

content in a moment -- but anecdotally, these may be examples of the perpetrators of extreme violence, or the potential perpetrators of extreme violence creating run-throughs, dry runs, whatever they might be, on your platform. If that is what this is, that must be a matter of the gravest concern to you?

A. Yes and that's why we employ experts in this field and continue to increase our proactive detection of these mechanisms, to really understand what the ecosystem of these bad actors and violence is, and to make sure we can prevent it on our platform.

Q. Well, you have mentioned learning from the Tumbler Ridge event and you have told me, fairly, that you are not involved in this Polish incident. I think, please may I add this to the list of things that you will come back on, the learning that has been identified in your assessment of the Polish position, please?

A. Yes.

Q. Thank you. I will repeat, in fairness -- although I won't turn it up again -- we have already been to the aspect of the statement that shows the Sandy Hook game was detected quickly and removed from the platform. Sir, I should put that under this heading, but I do not think I need to go back to it, unless you wanted to say anything about it?

A. No.

Q. I didn't think so, but I wanted to give you the chance. Thank you then.

I do, now, then need to come to the Inquiry's and the families' serious concerns about the presence of AR-referencing content on the Roblox platform.

Just to put this on the record, please may we have the statement of the solicitor to the Inquiry, Ross Howarth on the screen. ILT000223 at page 7 ILT000223_0007. So the purpose of Mr Howarth's statement is he is putting into the record of process, the dates of what happened and I will read it for the record. So:

"As part of the same exercise ..."

Which was the investigation of content found on other platforms:

"... the Inquiry Secretariat identified that wholly inappropriate and offensive material in relation to AR was publicly available."

On the Roblox platform:

"Accordingly on 20 August 2026, I wrote to the [registered legal representative] for the Roblox Corporation."

Sir, I am actually going to ask for this statement to come down because there was a redaction that should

have been made and hasn't been made and so that bit of transcript will have to be -- well, that bit of the video will have to be monitored. I'm not sure if I need to stop, in real time, to --

SIR ADRIAN FULFORD: No, you do not.

MR JAMIESON: No, okay, well that aspect should not appear on -- I have not read the sensitive information -- but that footage should not be shown publicly. I'm not going to read the statement to you. What I will do then is read the gist, which is what the Inquiry Secretariat found when they went on the platform and performed a rudimentary search, just typing search terms into the platform, was: users on Roblox who had incorporated references to the 29 July, 2024 -- that was the date of the Southport tragedy -- into their user names and avatars. And having the ability to dress themselves as AR, and arm themselves with a knife.

So, two aspects of egregious content: people who had used the name of AR for their avatars, either their username or their screen name; or people who had dressed themselves as AR, or dressed their avatar as AR, including, expending your virtual currency, Robux in equipping those avatars with a knife.

I note, in passing, that that -- purchasing that knife to equip their avatar will have provided some --

modest, but some -- remuneration to Roblox.

So that was the content that was found.

Before I come to the company's statement in this regard, can you see how abhorrent that content is?

A. Yes.

Q. It is unacceptable that the murderer of incident children should be capable of veneration by avatars on your platform, do you accept that?

A. Yes.

Q. It is unacceptable that Roblox allowed that to happen, do you accept that?

A. I think we are aware and share that concern, which is why we strive to increase our safety measures every day and have since removed that content from the platform.

Q. I understand that the content has subsequently been removed, and I understand that efforts are made to prevent it being there in the first place, but I ask you to agree, or consider whether you agree, that it is unacceptable that is those measures failed to prevent the material being there in the first place?

A. I would agree that no one at Roblox wants that on the platform and we don't lose sight that every incident matters and that there are real-world people behind this and, which is why we are --

Q. Well, quite. I'm so sorry, you finish.

A. I was just going to say which is why my job exists, right? To prevent this from happening and re-occurring and we will look at all risks on the platform and try to understand what we can do to enhance and improve.

Q. May we have the Witness B statement on the screen please, page 18 RBX000017_0018, paragraph 60. If we just -- paragraph 60 and paragraph 61 is your description of the events. If we go over the page to paragraph 62 RBX000017_0019. You evaluated, or Roblox evaluated, by saying that:

"It is regrettable that users have misused the Roblox platform to create such offensive and distressing content."

Observing that something is regrettable is not the same as an apology, is it?

A. Depending on the circumstances, but in theory, yes, you are correct.

Q. Well, I have just given you two opportunities to say that this should not have happened and you have declined to do so.

A. I will just clarify with that. We agree, and we share the concerns of the Inquiry, that this type of content should not be on Roblox. We have parents at Roblox that were -- with our safety measures and there would not be a single person at Roblox would say that that should be

or want that to be on the platform. So, we recognise that bad actors are misused our platform, that they have violated our terms of use and we are sorry for that, which is why we are committed to safety on the platform, which is why, when we identify instances like this happening, we look at what the root cause was that allowed it to continue and continuously improve our systems. You know, no system is perfect, but we don't lose sight that every single instance matters.

Q. The preponderance of your users are children, most of your users are children. Can you see how horrific it would be if a child, member of the affected families, resident of Southport, somebody connected with this attack, came onto your platform and encountered one of those avatars, can you see how abhorrent that would be?

A. We understand.

Q. I noted in your answer just then, you said the word "sorry" and no doubt, that will be noted. Is there a reason why there is no apology in the statement?

A. I'm not sure. It could have been a verbage thing, but I want to make sure that it is clear that we are saying that we recognise the concerns and that we are sorry that the bad actors used our platform in that manner.

Q. You are sorry that the bad actors used your platform in that manner. Are you sorry for any aspect of Roblox's

performance?
A. Right, and that our safeguards did not catch that.
Q. Sir, I think I'm going to leave that topic there.
SIR ADRIAN FULFORD: I think that's enough.
MR JAMIESON: Thank you. Thank you, Ms Stevens. The final topic that I wanted to talk to you about, please, is something that we have dealt with in passing as we have gone along, but it is important. It is the idea of whole-system working and where Roblox fits in that picture.

Because, as you and I have agreed already, this TVE threat is one that has developed cross-platform and as the facts of our tragedy tell us, is felt in the real world. So it is something that everybody needs to work, in a whole system, to mitigate and I think that's something, on behalf of Roblox, that you accept?
A. Yes.
Q. If we went in the statement, please, to page 19 RBX000017_0019, paragraph 64. Here is a section dealing with data and research, which is something I have asked you about as we have been going along and I will not have to ask you about all of it now.

But you tell us, in particular, about a specialist dashboard that you have, that identifies and escalates trends on a regular basis and where you also track the

consequences that you apply to people's accounts.

What happens with the data of that dashboard? Is it something that you keep internally or is it something that you share externally?
A. My understanding, in my capacity, we use it internally to drive trends and identify areas of opportunity to apply more friction when our terms of use are violated, or where we identify instances of violence or criminal conduct on our platform.

So I have used it internally for our internal investigations.
Q. But I have made the observation that I have already, the insight, the learning that you are using to apply that friction to prevent access to inappropriate content on Roblox, in whatever way that that is, that same learning is likely to be useful to other actors in this space, be that other platforms, law enforcement, public protection, those sorts of agencies. And I'm not going to repeat the request, I have made it several times, but we do, please, want to understand that with your follow-up to this evidence.

May we just look at the document that you have exhibited for us there. The Roblox transparency report, 28 February 2026, in response to the EU's Terrorist Content Online regulation. This, as I understand it, is

a mandatory response that needs to be submitted in response to that European law, that's what this is?
A. That is my understanding.
Q. So RBX000012, please. It is the Terrorist Content report. I'm not going to read it all out, for instances of time, but you report across 12 months. The particular piece of EU regulation that it is responsive to is cited and at numbers 1, 2 and 3, you record the elements of information that you are required to publish. Essentially, this is where relevant entities come to you and require you to remove particular pieces of content as being violative of terrorist content; unlawful terrorist content.

The reporting that you give is that across this 12-month period, there was one such notification that you received and you acted upon it and you removed that content. The reason I refer to this document though, is not for that. If we go on to page 3 RBX000012_0003, you give some more detail of your approach and your capability under this setting -- under the heading of "Identification", you say that:

"Roblox employ as combination of human review and automated technology review to identify terrorist content. In addition to these industry databases of known violative content, we review content against our

own previously-removed content. In both instances, we use techniques, including [hashtags] ... to identify when items are exact replicas of or similar to previously-identified violative content."

Then this -- so that's running automated searches for hashtags, to remove things that are notified to you as being terrorist content, or similar items that you can detect in your searches. That's what you do in the automated part of the process?
A. Correct.
Q. But you go on to say this:

"We have a team of thousands of trained professionals ..."

Pausing there, is that a reference to your moderators or is that a reference to your employees, do you know?
A. In combination.
Q. In combination:

"... that review content against our Community Standards. In particular, we have staff that solely [focus] on TVE content and behaviour, and we hire people with deep expertise in this space who have come from recognised agencies and organisations such as the FBI and Military Intelligence."

Again, does that mean that you seek out people with

particular experience and expertise, including law enforcement, in the detection and mitigation of TVE content; is that what Roblox does?
A. Yes, we do.
Q. "... leads the enforcement of TVE-specific policies ... Our partner organisations help us by providing resources, training and reporting ... This expert team has also developed fundamental TVE training for every moderation agent on staff."
So one of the outputs that you have created is developed training in relation to TVE, to assist moderators to identify this content in the first place?
A. Correct.
Q. Is that training that you share externally?
A. I don't believe so.
Q. It could potentially be of use, externally, from that description, can you see that?
A. Yes, I do understand that.
Q. Is that something that Roblox would be prepared to at least consider?
A. I think we are open to working with stakeholders and to support the industry and we do have information sharing agreements, so it would be something I would consult my internal teams about, if we can share. But I think Roblox has shown that we are willing to share, where we

can.
Q. I'm not, for my purposes, suggesting otherwise but I'm drawing attention to this capability that Roblox is publicly declaring here. I think, for my purposes, I will add to the list of requests that I have burdened you with and I do appreciate the fact that you are taking these away. I think the Inquiry would like to see that training, on a confidential basis, if needs to be.
A. Of course.
Q. But I think that is part of the information that we would seek to receive. Because just using all of that capability to simply remove unlawful or dangerous content from your platform, is potentially a misuse of that -- or an under-use, I should say, of that significant capability that you have built. Can you see that?
A. Yes.
Q. Thank you. That can come down. Please may we go back to the statement at page 21 RBX000017_0021, where you are talking about one of the actions that you have taken in response to the Online Safety Act piece of UK litigation. So we have talked about the EU litigation, here's the UK litigation -- the UK legislation.
Having been required to undertake a risk assessment,

or two risk assessments, you have done. And in particular, in relation to the illegal content risk assessment, you have considered the risk of harm from all priority offences but including: terrorism; hate offences; firearms, knife and other weapons offences; and obscene content, showing torture of human and animal offences. Something that we would call "gore" I think?
A. Right.
Q. You say, at 74 -- is this an accurate characterisation -- that essentially, undertaking that assessment has been a useful exercise?
A. Yes.
Q. It has assisted you to identify and to mitigate those harms?
A. Yes, correct. It allowed us to assess our safety measures and improve it, where needed.
Q. Again, that risk assessment, I would ask you to consider disclosing it on a confidential basis, if necessary, to the Inquiry, please?
A. Okay.
Q. May we go forward on this issue of -- so that's the risk assessment. Can we look at the issue of alerting law enforcement, which you have talked about in passing, but let's just draw the threads together. Page 25 RBX000017_0025, paragraph 89. So it is under the

heading "New Criminal Offence", but you say:
"As explained above ..."
As you and I have discussed, your:
"... reporting threshold to law enforcement is not limited to content that constitutes an illegal act or crime; rather, Roblox coordinates with law enforcement to calibrate its internal reporting threshold based on the nature and volume of the content, ensuring that Roblox's reporting practices align with what is most operationally useful to law enforcement. Roblox would work such coordination with the United Kingdom's regulatory authorities as well."
So just unpacking that, if we may. You are here, making the point that ultimately, Roblox can report conduct at different thresholds. It doesn't have to be illegal, it doesn't have to be imminent risk. Other thresholds can be deployed?
A. And we have deployed those.
Q. And you have done. You are also saying that part of that calculus as to where that threshold should be, is to what is useful to law enforcement?
A. Correct.
Q. But what the tone of this paragraph suggests is that your coordination with law enforcement is more advanced, perhaps in the US, than it is in the UK. Am I reading

that right? I'm looking at the last sentence, which says you would welcome such coordination of the UK, which perhaps suggests that it isn't there yet?

A. I wouldn't say it isn't there yet. I think we definitely have that coordination in some capacity. In terms of percentages compared to the US, I'm not quite sure. But I think we have increased our ability to coordinate directly with law enforcement in the UK. So like I mentioned, we have now a law enforcement liaison, that is responsible for supporting law enforcement in the UK directly and obtaining feedback, from not just law enforcement, but policymakers, researchers, to ensure that we're reporting actionable information to law enforcement, for their review and investigation.

Q. Thank you. Well, again, I have said it already, but a description of that role, the working, the policies that govern it, please?

A. Absolutely.

Q. Paragraph 90, something that you have mentioned already, the cross-platform working that you do in these organisations, Tech Coalition, Lantern, which is set out there. What you say is that signals shared amongst these companies in these fora include email addresses, usernames, hashes and other keywords associated with users who engage in child sexual abuse content. Does

that mean that, in this forum, those partners work iteratively to identify, amongst others things, relevant keywords and discuss them amongst each other? Is that what happens?

A. Yes.

Q. That is a forum, Lantern, that deals particularly with child sexual exploitation and abuse material. That could be done, I observe, for TVE activity in the same way?

A. Yes, and we do actually participate in similar, cross-platform signal-sharing procedure, through GIFCT.

Q. Well, let's look at that. Paragraph 92, just over the page RBX000017_0026. GIFCT, as I understand the working of that forum -- and you will correct me if I'm wrong -- that is more about real-time sharing of hashes in response to real-world events. Is that not what that is; it is a more fundamental equivalent to Lantern, is it?

A. Yes, especially in recent years. It definitely shares real-world events in real time, to make sure that we are information sharing amongst the platforms. But it also provides us with lexicon and research and opportunity to discuss trends that we are seeing on each of our platforms.

Q. Do you work with the non-governmental organisation Tech

Against Terrorism? Are they somebody who are familiar to you?

A. Yes, yes.

Q. Because one of the things they have suggested to the Inquiry should exist is a circumstance in which platforms can share real-time keywords, signals, for NVE-type keywords and common language. Essentially, the evidence that you are giving is that already exists, in the form of GIFCT?

A. Correct.

Q. Okay. Well, sir, we have some other information on the workings on that platform. We can follow it up with them.

The final thing I need to acknowledge is that in the remainder of this section, down to paragraph 95, you set out the other efforts in this space and I will also note, sir, for your record, that between page 22, paragraph 81 and paragraph 88, you set out the other changes that you have made in relation to the UK legislation and more widely, during 2026.

None of that I propose to ask you about because we have covered the detail. Are there any particular aspects of Roblox's countermeasures that you want to discuss that I haven't given you the opportunity to? I think we have covered the main parts, but I did want

to give you that opportunity.

A. Thank you and I think we have covered the primary areas.

MR JAMIESON: Yes, thank you very much.

Sir, those are all of my questions. I'm just going to look to the left, to see if there are any. No, there are not. Sir, do you have any questions?

SIR ADRIAN FULFORD: Ms Stevens, thank you very much for having got up so early.

Your evidence has been very helpful, both in its written form and for the candid answers, if I may say so, that you have given to Mr Jamieson's questions today. So, we part -- you part from us with my thanks.

A. Thank you so much.

SIR ADRIAN FULFORD: We can terminate the link, please.

Thank you all very much. What time tomorrow, Mr Jamieson?

MR JAMIESON: 9.30 am, sir.

SIR ADRIAN FULFORD: 9.30 am. Thank you, I will rise.

(5.08 pm)

(The Inquiry adjourned until 9.30 am the following day)

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